

IN THE COURT OF COMMON PLEAS WESTMORELAND COUNTY PENNSYLVANIA
CIVIL RICO

DEBORAH A. BUJDOS

JUDGE TIMOTHY CREAMY

Plaintiff,

)
) Docket number 3302-2018

vs

) CIVIL RICO
)
)
)
)
)
)

LINDA WHALEN, et, al

Defendant.

PRETRIAL STATEMENT

FILED IN
PROthonotary's OFFICE
WESTMORELAND COUNTY
2019 JUL 15 PM 12:03
CHRISTINA O'BRIEN
PROthonotary
JB

Here comes the Plaintiff stating that she is very grateful to find that you have been appointed to this case that has remained in limbo since:

1. Plaintiff filed the original complaint in August 2018.
2. There has been a 9 month delay in the case, nothing was done and none of her motions were heard including her initial request for discovery to be able to prepare a more sufficient complaint and asks the court again for permission to amend her complaint that has been delayed since August 2018.
3. This delay is due to the error of appointing the judge assigned to hear this case was Judge Scherer, who is also a defendant
4. After filing 3 motions to recuse that were all ignored the case remained in limbo for the last 9 months.
5. This case involves many serious crimes including but not limited to public corruption with Attorneys, Brokers, Sheriff Jonathon Held , 2 judges, Christian Scherer, who

THE COURT OF COMMON PLEAS
WESTMORELAND COUNTY, PENNSYLVANIA

Civil Action No.
3302-2018

July 15 - 2019

Service by FAX , Electronic Mail and U.S. Mail ~~May 29, 2019~~

Deborah A. Bujdos
Plaintiff

PRO SE

v.

Judge Harry Smail
Judge Christian Scherer
Sheriff Jonathon Held

Attorney Martha Gayle

Cetera Financial Group,
Kimberly Fleck , Scott Shoup, et.al,
Defendant

Winget, Spadafora & Schwartzberg, LLP
Joel M. Wertman, Esquire
Douglas G. Fogle, Esquire

VERIFICATION

I, Deborah Ann Bujdos, the Defendant, in this case hereby verify that the facts set forth in the within DOCUMENTS are all facts are true and correct. I understand that such statements are made subject to the penalties of Pennsylvania Crimes Code 18 Pa. §4904 relating to unsworn falsification to authorities.

Date ~~MAY 29, 2019~~

July 15 - 2019

Deborah Ann Bujdos
Deborah Ann Bujdos

Deborah Ann Bujdos/ Defendant
113 Branthoover Street
Belle Vernon, PA 15012
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dabujdos@yahoo.com

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Pretrial Statement

I Certify That A True And Correct Copy OF THE ATTACHED FILED MOTIONS Was Sent To

Attorney Martha Gayle, Attorney Dan Fogel Via Fax and regular mail on May 29, 2019

by ,

Deborah Ann Bujdos
Deborah Ann Bujdos

7-15-19

Deborah Ann Bujdos

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ORDER

AND NOW this day of 2019, upon consideration of the

Plaintiff's request for discovery and to amend her original complaint .

It is ORDERED and DECREED that the said Plaintiff shall be granted discovery and time to
amend her original complaint.

5. This case involves many serious crimes including but not limited to public corruption with Attorneys, Brokers, Sheriff Jonathon Held, 2 judges, Christian Scherer, who delayed my case for 3 years by not releasing my own retirement income, that was taken from me illegally and when it was known by the DRO That I needed that to defend myself and be on a par with my husband for a fair divorce.
6. He allowed opposing counsel and others to churn fees for 3 years, as seen on the docket.
7. Both he and Judge Smail failed to report in their 703 reports why there was a delay for 5 years.
8. I recused Judge Scherer for the repeated delays he allowed repeated vexatious hearing, for dog, Car, and attempts to evict me for 3 years all while and refusing to release my own retirement annuity income, that he allowed to be taken from me by opposing counsel and my own Counsel Heidi De Bernardo - Norton on 12-18-12 to be on a par to defend my self in this divorce that involved a 20 year marriage and an estate of over 5 million dollars.
9. The 2 judges named in this case have a personal connection with Sheriff Jonathon Held in the Sheriffs Office which explains why the sheriffs office helped Judge Smail gain 17,600.00 from bogus contempt fines .
10. Judge Smail's connection to sheriff Held is this: Judge Smail was at one time the attorney who defended Held in another case, before he became a judge.
11. Sheriff Held's office helped judge Smail prevent witnesses from testifying to suborning perjury that the Judge also witnessed, but ignored on July 11, 2016.

12. The Sheriffs office helped to allow Judge Smail gain \$17,600.00 from me for fines during the deliberately delayed 9 month long contempt hearing against me.
13. The Sheriffs office interfered with my witness, (one of their deputies) testifying and covered up the fact that the judge also witnessed it and failed to address it.
14. How The Sheriffs office worked in concert with the Judge was when prepare a motion to quash my subpoena for their deputy who could have testified that she stopped my husband from coaching a witness during cross Examination on July 11, 2016.
15. The deputy was the person who walked over to my husband and stopped the suborning perjury.
16. Judge Smail quashed my subpoena for the deputy to testify and refused to allow the original person, Deborah Messer , to testify , She is the one who alerted the deputy to the act of suborning perjury .
17. The contempt hearings were another bogus way for opposing counsel to delay this divorce and the judge allowed it.
18. The contempt hearing was initiated by opposing counsel without sufficient evidence to support a contempt was over me having to return imaginary house hold items , that I did not have and this was done before we had ED. They worked in concert with other attorneys that created an enterprise to deliberately delay 2 senior citizens high asset divorce,

19. While delaying the case they were being unjustly enriched with fees paid to them for frivolous actions and were unlawfully paid by the husbands attorney Linda Whalen the leader of the enterprise .

20. Attorney Whalen paid others with my protected retirement annuity monthly income ,

21. She falsely claimed to be holding for ED. She Spent the money before ED took place.

22. The courts were aware that she unlawfully took control of , my annuity income without my consent or knowledge in December 2012.

Proof of misuse of third party funds is seen in the many motions I filed to have my money released to defend my self,

DENIED THE PARTIES INTEREST ON THE \$7,500.00 A MONTH INCOME SHE HELD FOR FIVE YEARS IN A NON INTERST BEARING ACCOUNT.

Misuse of clients funds is also seen attorney Whalen's 2012 November letter she sent to my attorney Heidi Norton , int the letter she explains that they could put the annuity joint annuity checks into other escrow accounts but she said that the interest rate wasn't very high and it wasn't worth the trouble to do that so she made a decision SHE failed to properly have the joint checks deposited into 2 separate interest bearing accounts for both parties so that they could receive their income in collect interest on well over \$100,000.00 in her account.

Both judges were aware that opposing counsel and my attorney colluded to take my income to financially suppress me and even created a false

Power of Attorney on 4-17-13 to take control of the joint monthly income checks .

23. All of the defendants worked in concert to defraud me out of 2.5 million and succeeded.

24. As seen in the 7-18-17 final order prepared by opposing counsel the total value of the 5 million dollar estate was grossly under valued.

- All evidence submitted by attorney Whalen is Incomplete.
- They Failed To List All assets and all Investments .

See Allan W. Lugg Jr., Appellee V. Sarah A. Lugg, Appellant. No. 883 Mda 2012.

Allan W. Lugg, Jr. Lugg Claims The Trial Court Erred In Enforcing The Agreement Because,

- (1) There Was A Lack Of Disclosure Of Assets On The Part Of Allan Lugg, Jr.,
- (2) The Agreement Was Signed Under Duress, And
- (3) The Agreement Is Unconscionable. After A Thorough Review Of The Submissions By The Parties, Official Record, And Relevant Law, We Affirm.†

See, Stoner v. Stoner, 819 A.2d 529 (Pa.2003); Simeone v. Simeone, 581 A.2d 162 (Pa.1990). This argument is based on considerable case law that provides full and fair economic disclosure is mandatory

The lack of full disclosure is due to Attorney Whalen's refusing to cooperate with discovery. Wife filed a counter-motion to Husband's motion requesting the Court invalidate the parties' agreement and order Husband to execute a deed re-conveying the marital residence to Husband and Wife.

EXTRINSIC FRAUD LEAD TO UNCONSCIONABLE FINAL ORDER

Defendant Believes she is with in her rights to request the court to open or vacate the final unconscionable order that was procured with Extrinsic Fraud.

- *The standard of unconscionability is used in commercial law, where its meaning includes protection against one-sidedness, oppression, or unfair ; Stiefler v. McCullough, 174 N.E. 823, 97 Ind.App. 123 (1931); Terre Haute Cooperage v. Branscome, 35 So. 2d 537, 203 Miss. 493 (1948); Carter v. Boone County Trust*

Co., 92 S.W.2d 647, 338 Mo. 629 (1936). It has been used in cases respecting divorce settlements or awards. Bell v. Bell, 371 P.2d 773, 150 Colo. 174 (1962) ("this division of property is manifestly unfair, inequitable and unconscionable").

- As the record shows this was a high asset divorce case that involves a 20 year marriage and had at least 5 million in assets to divide.
- The 7-18-17 final order ITSELF is evidence of the parties division of property was manifestly unfair, inequitable and unconscionable. Bell v. Bell, 371 P.2d 773, 150 Colo. 174 (1962) ("this division of property is manifestly unfair, inequitable and unconscionable").
- IN ORDER TO DETERMINE WHETHER THE AGREEMENT IS UNCONSCIONABLE, THE COURT MAY LOOK TO THE ECONOMIC CIRCUMSTANCES OF THE PARTIES RESULTING FROM THE FINAL ORDER THAT WAS ISSUED WITHOUT THE MANDATORY PRETRIAL STATEMENTS AND NO FULL DISCLOURE OF ASSETS and other relevant evidence such as the conditions under HOW THE ORDER WAS MADE : DEFENDANT ASKS THIS COURT TO CONSIDER :
- THE MASTER DENIED THE WIFE TO PRESENT ALL OF HER EVIDENCE ON 5-9-16 IF SHE INSISTED ON CALING HER VET TO TESTIFY TO A FALSE ALLEGATION MADE AGAINST HER . HER VET DID TESTIFY THAT THE COURT MADE A FALSE ACCUSATION OF HARMONG HER BELOVED PETS AS AREASON TO EVICT HER.
- AS A RESULT OF THE VET TESTIFYING , THE MASTER DENIED THE WIFE THE RIGHT TO PRESENT HER SUITCASE FULL OF HER EVIDENCE SHE HAD SITTING ON THE DESK ON 5-9-16

- THERE WAS NEVER AN AGREEMENT MADE.
- THE FIRST AND ONLY OFFER TO SETTLE FROM THE PLAINTIFF WAS MADE IN JANUARY 2016 A FEW DAYS AFTER JUDGE SMAIL ORDERED WIFE TO BE EVICTED.
- THERE WAS NEVER A FINAL SETTLEMENT CONFERENCE WITH BOTH PARTIES
- OR ANY ATTEMPT TO NEGOTIATE A FAIR SETTLEMENT.

William A. Bayles

(iv) Deliberate Negligence

Best safety provider should be ones own annuity broker Scott Shoup and Plaintiffs attorney, and opposing counsel who self appointed herself as a dual fiduciary over the Plaintiffs annuity income she held hostage for five years . They Were the ones who were in the best position to protect Plaintiff from harm had the responsibility to do so and deliberately failed. And forced the Plaintiff to suffer irreversible financial harm.

(v) Intentional Infliction of Emotional Distress

Defendant intentionally or recklessly engages in extreme and outrageous conduct that causes the plaintiff severe emotional distress. The elements of IIED are (1) intent or recklessness (2) extreme and outrageous conduct (3) causation (4) severe emotional distress.

Robert A. Bujda 7-15-19

Need to pay a file Mon.

5 cannot to need

THE GOAL INTENDED IN THIS RICO CASE

Was To Defraud The Wife Of 2.5 Million, Done By Delaying the case for 5 years was used by the defendants to turn the divorce court in to a criminal money making enterprise. The Court was used A Venue for attorneys To Be Unjustly Rewarded With Churned Fees And the courts Unlawful Fines Taken From The Wife During The Deliberately Delayed Five Year Divorce. .

RICO CRIMES COMMITTED LISTED BELOW INCLUDE THE FOLOWING , BUT NOT LIMITED TO OTHER RICO ACTS NOT LISTED BELOW

RICO Crimes Committed Began with Financially Suppressing Plaintiff / Dependant Spouse In High Asset Divorce.

Count I. Extrinsic Fraud

Count II. Forgery

Count III. Theft By Deception Of \$7,500.00 Private Paid Up Joint Annuity Income Checks In Pay Status

Count IV. A. Unjust Enrichment Judge Smail Collected An Excessive Fee \$17,600.00 For Revenue For The Judicial Fundament Fund

Count IV. B. Unjust Enrichment Attorneys Churning Fees And Fines For 5 Years

Count IV. C. Unjust Enrichment

Count V. Bribery

Attorney Whalen Bribing The Master Of Her Choice , She Paid Master Bononi a retainer With A 10,000.00 check written directly out to him without my consent or knowledge to pay him or to agree to having him as our master. There is no order stating that amount of \$10,000.00 is to be paid him from the Plaintiffs annuity funds that were held in in her control ,as a dual fiduciary , she improperly placed her firms non interest bearing IOLTA account for 5 years.

She failed to follow the Mandatory rules for having a master and ignored the May 13, 2015 order signed by master Henry Moore, who referred the case to a master and stated the master was to be paid the normal 252.00 a day Fee Paid To The Prothonotary For The Master At 252.00 A Day Is That is the Normal Fee To Pay Master At The End Of The case.

Master Bononi Was Paid Before The Court Ruled On Plaintiffs Motion To Continue The Masters Hearings Until She Had Her Money Released To Do Her Discovery First.

Count VI. Torturous Interference With Annuity Contracts.

Count VII. Conspiracy And Collusion .

Count VIII. Mail And Wire Fraud Used To Delay Divorce For 5 Years With Fraudulant Acts

Count IX. Interfernce With Interstate Commerce For Five Years Taking Control Of Plaintiffs Out Of State Annuity Checks

Count X. Docket Tampering

Count XII. Altering Transcripts

Count XII. Judicial Malfeasance

Contributed The Deliberate Delay Of The Parties Divorce , They Worked In Concert With The Attorney Whalen's Rico Scheme That Required The Plaintiff To Be Financially Suppressed From Having A Fair Divorce, Hence Taking Her \$3,750.00 A Month Annuity Income Left Her Indigent, After Having To Pay The Bills On The Marital Home

Count XII

A. Judicial Malfeasance Ignoring Spousal Support Fraud For 5 Years

Both Judges Ignored The Husbands Grossly Under Reported Monthly Income.

He Reported Only 7000.00 - 11,000.00 A Month Income For Five Years When The Husband Actually Had 18,000.00 20,000.00 A Month Net Income Free After Taxes (Proven By Forensic Report)

B. Both Judges Deliberately Denied Plaintiff , Dependant Spouse A Warrented Increase In Plaintiffs Spousal Support For 5 Years After The Court Unlawfully Took Her \$3,750.00 A Month Annuity Income From Her Without Her Knowledge Or Consent On 12-19-12

C. Both Judges Deliberately Denied Plaintiff , Dependant Spouse A Warrented Increase In Plaintiffs Spousal Support For 5 Years After The Court Unlawfully Took Her \$3,750.00 A Month Annuity Income From Her Without Her Knowledge Or Consent On 12-19-12

D. Both Judges Were Deliberately Violating The Plaintiffs Original 10-24-12 Support Order Stated That The Wife's Spousal Support Income Was Based On Her Continuing To Receive Her 3,750.00 A Month Income. After Loosing The Annuity Income The

Husband Support Was To Be Increased, Both Judges Repeatedly Denied The Plaintiffs Motions For An Increase.

E. Both Judges Failed To Follow The Pacses Dependant Spouses Support Guidelines Both Judges Were Aware Of The Wife's Entitlement To An Increase In Spousal Support After Wife Suffered A Loss Of \$3,750.00 A Month Income They Took From Her That Came From Her 2 Jointly Owned 500,000.00 Retirement Annuity Income For Life Payments,

F. Forgery

Was Involved With The Preperation Of The Order Dated 12-19-12 To Take The Plaintiffs Income .

The Order Falsely Stated She Agreed To Have Her Annuity Income Taken And To Be Placed In Escrow Until Ed.

G. Both Judges Ignored The Plaintiffs Prime Facie Evidence For 5 Years With Motions For An Increase Or To Release Her Annuity Income. All Is Seen In Her Filed Exhibits Of Verified Email Communications With The Court, Her Attorney And The Husbands Attorney , Proving She Was Trying To Have That Order Reversed And Never Agreed To Have Her Funds Taken

H. It is Judicial Malfeasance When The 5 Year Record Shows Plaintiffs Repeated Attempts To Release Her Much Needed Income Was Denied Or Ignored

I. It is Judicial Malfeasance By The Judge Harry Smail , ignoring the plaintiffs 8-10-17 motion to release her income to hire attorney Nicole Kairys to appeal the unconscionable 7-18-17 final order that is missing 4 million to divide.

J. It is malfeasance by both judges Failing To Place Plaintiff On A financial Par With The Husband's 20,000.00 A Month Net Income In A High Asset Divorce, After Wife Suffered A Loss And The Major Change In Her Financial Circumstances After The Court Unlawfully Ordered On 12-19-12 Her Annuity Income Was Going To Be Taken And Placed In Escrow Until Ed., Without Her Knowledge Or Consent.

COUNT II. FORGERY
COUNT 1

Forgery Was Used To Unlawfully Take The Plaintiffs Own \$3,750.00 A Month Annuity Income That Was In Pay Status For Four Years Before Divorce Began.

COUNT 2 FORGERY

was used by Attorney Whalen and Attorney Heidi Norton when they prepared , signed and executed a fake Power of attorney on 4-17-13 to take control of the wife's share of the monthly annuity income .

TORTUROUS INTERFERENCE WITH ANNUITY CONTRACT.
NEGLIGENCE

Annuity Law Was Violated By Broker Scott Shoup , He Failed To Enforce Plaintiffs Annuity Contracts To Continue Receiving Her Income During The Divorce.

Extrinsic Fraud Prevent Wife From Having Access To The Courts Without Her Income .

Both Judges And Attorneys Violated The Pa Annuity Laws As They Allowed Plaintiffs Income To Be Taken And Kept From Her Without Her Consent And Refused To Release It For 5 Years, Prevented Her From Having Access To The Courts Without Funds To Hire Experts To Defend Her.

Forgery On A 12-19-19 Court Order

Taking Plaintiffs Annuity Income Without Her Knowledge Or Consent On 12-19-12 Is Also
Was Extrinsic Fraud

Done By Collusion Of Defendants Divorce Attorney Linda Whalen, Plaintiffs Divorce
Attorney Heidi Norton , The Defendant Laurence Bujdos , Judge Christian Scherer, And Scott
Shoup The Parties Broker:

JUDGE SMAIL'S ABUSE OF CONTEMPT POWERS

COUNT I. UNLAWFUL COLLECTION OF \$17,600.00

Excessive Fine A Bogus Contempt During Plaintiffs Divorce And Before Equitable
Distribution Occurred.

Judge Smail And Sheriff Jonathon Helds Involvement In

COUNT II. : VIOLATING THE 8 TH AMENDMENT FOR CHARGING EXCESSIVE

Fees. From A Deliberately Delayed 9 Month Long Civil

Contempt In Previous Divorce. Charged Plaintiff 100.00 A Day For 9 Months In Unfounded
Contempt Fines Without Supporting Evidence Facts, Findings Or Conclusions Of Law.

COUNT III. INTERFERING WITH WITNESSES

Sheriffs Dept Assisted In Interfering With The Plaintiffs Witness , A Deputy At

7-11-16 Contempt Hearing Who Witnessed The Plaintiff/ Wife's Husband Laurence
Bujdos And His Son, Brad Bujdos Blatantly Suborning Perjury That Was Also Witnessed By

COUNT IV. JUDICIAL MALFEASANCE JUDGE SMAIL IGNORING

SUBORNING PERJURY

Judge Smail Who Ignored It And Quashed My Subpoena For The Deputy To Testify To
Stopping The Husband From Coaching His Son How To Answer Questions Under Cross.

To Establish A Claim For State-Created Danger,

A Plaintiff Must Prove That

- (i) **The Harm To The Plaintiff Was A Foreseeable: The Wife Plaintiff Was Derauded Of 2.5 Million In A Divorce . The Parties Were Married For 20 Years , The Husband At Age 70 Filed For Divorce, There Was No Marital Misconduct Against The Wife. They Had A Marital Estate Valued At 5 Million, Seen In Their Professional Estate Plan They Had Prepared Prior To The Divorce In August 2012. They Had Many Investments Including The 2004 Purchase Of 2 Five Hundred Thousand Jointly Owned Retirement Annuities For Lifetime Payments , To Each For 3,750.00 A Month That Began Paying Them That Contracted Amount Monthly In 2008. In December 2012 Opposing Counsel And Wife's Counsel Unlawfully Took The Monthly Joint Annuity Income Checks , Without Telling The Wife They Agreed To Take The Joint Annuity Income Checks From Her And Place Them In Opposing Counsels Iolita Account Until Ed Occurred. This Was One Without Her Consent Or Knowledge And Desperately Needed Her Income To Defend Herslf In A 5 Million Dollar, 5 Year Long Deliberately Delayed Divorce . This Was Opposing Counsels Strategy To Financially Suppress The Wife From Having A Fair Divorce . This Was Her Strategy To Win And Delay The Case To Churn More Fees. Both Judges From The Case Were Aware Of Huge Disparity In The Parties Income And Refused To Increase The Wife's Support To Level The Playing Field. They Held Her Annuity Income Hostage And Rfused To Release It Even To Hire An Attorney To Appeal The Final 7-18-17 Ed Orderhat Was Missing 4 Million To Divide. Both Judges Allowed Opposing Counsel To Obstruct Wife's Forensic Accountants Discovery Of2.5 Missing From The Marital Estate A Year Before The Final Order Was Issued. They Knew Opposing Counsel Had Repeatedly Refused To Provide Financial Documents And Refused To Give The Accountant A Boiler Plate Release To Review The**

Many Missing Investments . The Last Judge Was Extremely Bias And Refused To Recuse 4 Times. He Ignored The Wife's 4 Timely And Properly Prepared Motions With In The 30 Day Time Frame To Vacate The Final Order Due To Extrinsic Fraud. Just Totally Ignored Them And Ignored Her Motion To Release Her Annuity Income To Hire A Attorney To Appeal The Order. Due To That The Wife Has Lost 2.5 Million And Left In Debt. And This Loss Was The Direct Result Of Judges And Opposing Counsels Defendant's Conduct,

(ii) (li) The Defendant Acted With Conscious Disregard Of A Great Risk Of Serious Harm,

2 Judges Denied The Wife The Right To Continue Receiving Her 3,750.00 A Month Retirement Annuity Income , That Was Taken From Her Without Her Consent Or Knowledge By The Attorneys Agreeing To Hold It For Ed. Both Judges Denied Wife's Motions For An Increase In Spousal Support To Have The Parties On A Par For 5 Years . Denied Her An Increase While Knowing The Husband Was Grossly Under Reporting His Monthly Income Claiming It Was Only Seven To Eleven Thousand A Month On His Support Forms When He Was Proven To Have Been Collecting Eighteen To Twenty Thousand A Month Income After Taxes, And Confirmed By Wife's Certified Forensic Accountant's Disposable Net Income Report On The Husband .

(iii) the Defendant's action made the plaintiff more vulnerable to the harm.

FORESEEABILITY was deliberately ignored :

The Reasonable person standard also applies to foreseeability

Alternative conduct- what else could have been done to prevent Plaintiff from being

financially suppressed after her annuity income was taken? Grant her motions for an increase in support.

MORE DAMAGES CAUSED BY NOT HAVING PLAINTIFFS OWN

RETIREMENT ANNUITY INCOME

DENIED MY OWN ANNUITY INCOME TO HIRE REPLACEMENT

AFTER BEING ABANDONED BY ATTORNEYS HEIDI AND ANTHONY DE BERNARDO

My Attorney Heidi De Bernardo – Norton quit in June 2014 knowing I had no way to pay to retain a new lawyer.

She quit knowing that she did not get my annuity income released, as promised and knew I had no way to pay for another attorney to represent me I had no money available to hire a new attorney

I. After Heidi left I sent her many emails requesting her release my funds so that I could secure an attorney and she either ignored my requests or simply refused and suggested I just get an attorney

sent the opposing attorney Linda Whalen ,many emails to release my income . She was holding my annuity income hostage since December 2012, without my consent

WITNESS LIST OF ATTORNEYS I CONTACTED AND COULD NOT RETAIN WITHOUT MY ANNUITY INCOME AFTER ATTORNEY HEIDI DE BERNARDO- NORTON AND ANTHONY DE BERNARDO ABANDONED ME IN JUNE 2014

BOTH OF THEM KNEW WHEN THEY QUIT I COULD NOT RETAIN ANY REPLACEMENT ATTORNEY WITHOUT HAVING MY ANNUITY INCOME RELEASED.

LIST OF WITNESSES, LAWYERS, I WAS UNABLE TO HIRE DUE TO NO FUNDS AVAILABLE.

1. Jason Huska
2. Margaret Tremba
3. Barb Staroschuck
4. Jonathan Voelker
5. Nicole Boyle Kairys
6. Attorney John Logan
7. Attorney Margaret Joy
8. Attorney Deborah Miskovich
9. Attorney Lisa Marie Vari
10. Attorney Jack Bergstein
11. Attorney Rose Turzak
12. Attorney David D Rose

IGNORED EXTRINSIC FRAUD

DEENIED RIGHT TO BE HEARD

DENIED OWN RETIREMENT FUNDS

TO HIRE APPELATE ATTORNEY

DENIED THE RIGHT TO APPEAL FINAL ORDER MISSING 4 MILLION DOLLARS

FEE AGREEMENT FOR DEBORAH BUJDOS

TO RETAIN ATTORNEY NICOLE KARIS

AUGUST 16, 2017

JUDGE SMAIL IGNORED THE MOTION I FILED AUGUST 17, 2017 TO RELEASE \$10,000.00 FROM MY SHARE OF THE \$44,946,96. OF MY INCOME STILL BEING HELD BY ATTORNEY WHALEN'. THE MOTION INCLUDED THIS LETTER AND DUE TO MY MOTION BEING IGNORED AND ATTORNEY WHALEN IGNORING MY LETTER TO HER TO RELEASE THE FUNDS THEY DELIBERATELY PREVENTED ME FROM APPEALING THE FINAL ORDER.

IN BRIAN CAVANUGHS 8-25-17 MOTION HE TELLS JUDGE MARSILLI THAT I AM ATTEMPTING TO APPEAL BUT THEY KNOW I WILL FAIL BECAUSE I DID NOT HAVE AN ATTORNEY.

HE FAILED TO SAY THEY WERE DENYING ME MY OWN MONEY TO HIRE NICOLE KARIS. .

YOU WILL ALSO NOTICE IN THE ATTACHED COPY OF BRIANS MOTION AT THE END YOU WILL FIND THE September 29 2015 ORDER AND RECEIPT THAT MY TAXES WERE PAID UP TO DATE,
UNLIKE THE FALSE STATEMENT BRIAN CAVANAUGH MAKES ON PAGE 5 OF HIS MOTION . THE PROOF THAT I HAD THE TAXES PAID UP TO DATE

13. Attorney Darren Oglesby
14. Attorney Jack Puskar
15. Attorney Steve Toprani
16. Attorney Deborah Crips

WITNESS DETAILS

APPELATE ATTORNEY NICOLE BOYLE KAIRYS

Can testify that she gave the wife an engagement letter that stated she was willing do wifes appeal of the 7-18-17 final order that was missing 4 million , but she did not do the appeal due to the wife not having access to her own annuity income to pay her retainer.

Judge Harry Smail ignored the wifes filed and served August 10th, 2017 motion to release \$10,000 to hire an appealte attorney out of the wife's remaining \$22,000,00 annuity income that was being held hostage by attorney Whalen

ATTORNEY NICOLE BOYLE KAIRYS

She can also verify the parties 7-18-17 final order under estimated the value of the parties 26 marital acres Mineral and Gas well , bonus and future lease Income.

SEE: NICOLE'S PUBLISHED REPORT ON SHALE-OIL ERA COMPLICATES LAND VALUATION IN DIVORCE

BY NICOLE BOYLE KAIRYS IN THE ALLEGHENY COUNTY BAR ASSOCIATION JOURNAL

with the arrival of the oil and gas industry through the Marcellus Shale boom in southwestern Pennsylvania, land valuation throughout the region has become increasingly complex.

Family Law practitioners are used to dealing with the standard methods for valuing and distributing real property between divorcing spouses. However, depending on the property location and acreage, these standard methods may no longer be sufficient.

“Times have changed in Western Pennsylvania,” said Donna Kline, a certified divorce financial analyst with HBKS Wealth Advisors.

“Land that was purchased and used for hunting, fishing or farming may suddenly have a spike in value due to the discovery of natural gas pockets or crude oil.

This puts a whole new dimension on how that asset should be treated at equitable distribution.” For family law practitioners, one of the threshold questions in any case that involves the ownership of land now must be whether there is value to the subsurface oil, gas and mineral estate. According to Steven Franckhauser – director of Hill Barth & King’s Energy Division, which handles these pricing inquiries – the question of how much oil and gas rights are worth begins to draw attention when the parties deal with 15 or more acres.

Presently, Washington and Greene counties and sections of Butler and Beaver counties are getting the most interest in southwestern Pennsylvania. “With 15 or fewer acres, most people elect not to make an issue of the value of subsurface rights. But above that figure, and especially if the property has not been leased, the monies can be significant,” Franckhauser said.

If there is land to be divided as part of an estate with a subsurface interest, the value of the interest must be determined. Traditional real-estate appraisals do not include the value of the subsurface rights. Subsurface valuations and appraisals under IRS guidelines can be cost prohibitive, but Franckhauser said

firms such as his can perform a market analysis for about half the price of a full valuation. It is critical to enlist the services of an oil-and-gas appraiser who possesses relevant experience and has technical oil and gas expertise.

THE VALUE OF THESE SUBSURFACE RIGHTS CAN BE SIGNIFICANT. AS AN EXAMPLE, FRANCKHAUSER REFERRED TO AN EXTRAORDINARY RECENT BONUS PAYMENT OF MORE THAN \$7,500 PER ACRE IN A DESIRABLE SWATH OF GREENE COUNTY.

Thus, even with the recent drop in oil and natural gas prices, there still is value to these interests in both bonus and potential royalty streams. Once the value is determined, issues remain. According to Kline, there are three options when determining how to deal with the property at equitable distribution – sell the property, have one spouse buy out the other spouse or have one spouse retain the surface property but retain jointly titled subsurface rights. Selling the property outright to a third party is a popular option. When selling surface and subsurface rights, it is essential to secure a selling price for the subsurface oil and gas rights from one who can maximize the return. However, this option often is undesirable, as one spouse usually wishes to retain ownership. One party can buy the other out, but this can raise issues if there are not sufficient other assets in the estate to offset the value of both the surface and subsurface property. In addition, issues can arise if refinancing is necessary. “If the lease includes a right to put a well on the property, many lenders won’t touch it,” said Mark Segar, a mortgage broker and president of Mortgage Planning Group. Though the third option initially might seem like the ideal solution, it can be fraught with issues. If subsurface rights are to continue to be held by both parties, the property interests must be held through separate deeds, Franckhauser said.

Otherwise, the subsurface property rights may not be properly transferred or protected. In addition, possession of “executive rights” – which provide decision making authority regarding oil, gas and mineral activity on the property – is of paramount importance. For the asset to function, one must be

able to execute a lease. Absent that "executive right" being clearly possessed, producers will avoid the property.

However, there then might be issues related to the surface owner's enjoyment of his land and the value of the nonsurface-owner's interest if executive rights are not included. Add to this the acrimony that often exists between divorce litigants, and resolving these conflicts can be extremely difficult.

One solution is to establish a trust in which a third party trustee holds executive rights. Franckhauser said such arrangements can provide for the parties to continue to hold the benefits while avoiding future conflict.

Even if all of these issues can be resolved between the parties, issues can continue to arise through the separation of the surface and subsurface interests.

Nicole Boyle Kairys Continued on page 9 "If the oil and gas right do not convey upon purchase, most clients are not interested in purchasing the property or even looking at it," said Diana McKay, a real estate agent with Coldwell Banker.

Going forward, family law practitioners need to be cognizant that such interest may come into play when divorcing parties hold land that has or SHALE-OIL ERA could have value as it relates to oil, gas and mineral rights.

PLAINTIFFS REMARKS

IN THIS CASE ATTORNEY WHALEN AND JUDGE SMAIL FAILED TO BE CERTAIN THAT THE HUSBAND AND THE WIFE WERE FULLY INFORMED AND AWARE OF THE VARIOUS OPTIONS AND THE BENEFITS AND DRAWBACKS OF THOSE OPTIONS

HERE THE FINAL ORDER IMPROPERLY JUST TOOK THE WIFES RIGHTS TO FUTURE INCOME FROM THE 26 ACRES AWAY.

ATTORNEY DEBORAH CRIBS

A WITNESS TO THE DE BERNARDO ATTORNEYS ABANDONING ME AFTER GIVING US WRONG ADVICE

She can testify to why both Attorney Heidi and her father Anthony De Bernardo suddenly abandoned me and quit my cases in June 2014. Anthony was handling my intentional torte Against my husband for intentionally injuring my wrist during a drunken rage. Heidi De Bernardo was representing me and also my son Regis Steedle in our 2012 divorces.

Anthony DeBernardo recommended Debra Cribbs to my son for him to file bankruptcy during his divorce . He gave us incorrect advice in a letter , ATTACHED HERE TO AS EXHIBIT "A: MADE A PART HEREOF , regarding his instructions for my son who had to file bankruptcy , In the letter confirms he told my son to put his car in my name before filing bankruptcy .

When my son contacted the bankruptcy Attorney Debra Cribbs that Anthony recommended and she heard what Anthony's advised My son to do with his car before he files bankruptcy she said she would not take the case if we already did that it's a federal crime .

I was in shock so then I asked both Heidi Dei Bernardo and heard father why they would tell us to do something this attorney said is a federal crime. Then I told her the attorney they recommended won't

take the case because of their advice to have my son put his car in my name before filing bankruptcy

Only days later I received notices that they were both quitting.

They quit my case and left me without access to my income, that Heidi allowed the opposing attorney to take control of in 2012 without my consent. She knew I had no money to hire new attorneys to replace them.

I have attached the verified emails between me and those parties confirming the above discussion when I ask them why they would suddenly quit well we were only following their direction. I was begging Heidi to help me and she refused,

WITNESSES REGARDING UNLAWFUL CONTEMPT AND CHARGED AN EXCESSIVE FINE OF \$17,600.00

1. West Mifflin Police Officer Robert. Fedor

He can testify to THE GAMES THAT MY HUSBAND AND HIS FRIENDS WERE PLAYING ON ME DURINGTHE DIVORCE

He can testify to having called ME on February 7th 2015 because he received a complaint from my husband's friend Dan Bodner (ONE OF THE LEAD BULLIES FOR MY HUSBAND IN THE DIVORCE) saying that I had contacted him via telephone and he felt that was harassment so officer fedora advise me not to call him any further my reply was to him that how dare Dan Bodnar complain about me when the only reason I called him and only one time was to tell him to stop offering to come to my home in court to do checks on the cars, without my being there, because that's what he did the day before in a hallway court hearing, he and my husband was trying to force me to let him come to the home to check on our cars without me being there . I found that to be totally unacceptable because of his rude and harassing actions towards me since the divorce began. He lied under oath on July 11, 2017 repeatedly, that can be proven with photographs . He can't be trusted to be on the property without damaging something and blaming Me for it so they could force me to be in court again over meritless claims, I told Officer Fedor this is what they were doing during the entire divorce. It was a game of how to torture me the entire time. After telling officer Fedor my side of the story he then told me that he understood my frustration and new that I wasn't calling Dan Bodnar to harass him. He knew I only called him to tell him he is not welcome at my home and to let me alone .

SHOCKING MY CONSCIENCE OFFICER FEDOR TOLD ME THAT HE KNEW DAN WAS GOING TAKE MY TRUCK BEFORE HE DID IT. he told me that Dan Bodnar had contacted him prior to TAKING THE TRUCK and was asking officer Fedor if he could get in trouble for taking a truck out of the driveway at the marital home

Officer Fedor told me that he told Dan Bodnar not to take the truck especially since It's part of marital assets in the divorce and more so not to take it when it was the only vehicle I had available to drive without me knowing .

Dan Bodnor ignored his advise and took the truck without my knowledge or consent, I had to rent a

vehicle to drive.

Officer Fedor told me that he was writing up a report regarding this and that I could have a copy for the court.

OFFICER RICHIE TAYLOR OF THE ROSTRAVER.

Police Department

Can Confirm the husbands violations, harassment

Committed during and after the PFA and everyone ignored.

MR. AND MRS. DENNIS SHAWLEY neighbors testified at the exclusive possession of the home hearings confirming that while i was living there i was taking excellent care of the home and didn't understand why they would want to evict me during the divorce

MRS. SHIRLEY LAZAR Neighbor who lost out on 2014 gas lease due to me not having the income to pay attorney Roger Gaydos a retainer to begin preparing all the leases.

At this point in time my ex-husband refused to sign a lease with the neighbors for the mineral rights until after the divorce to deprive me of any future income .

MR. AND MRS. CRAIG DIAMOND neighbors also testified to how well kept the home was while i was living there alone and there was no need to forced me to move because the home was well cared for.

MRS DIAMOND can testify to the stalking my husband was doing the frighten us during the divorce

MR. AND MRS. ROBERT STEWARD people who helped me move Answer and saw the harassment that I was being subjected to the day i was moving by my husband and his group of bullies

MRS. BETH TERBEST Witnessed attorney Eric Bononi talking to me in February Just weeks before Judge Smail was to be evicting me from the marital home and had no place to go. I was asking him why this was happening and Beth heard him telling me that The reason I am being forced to move is because I won't agree to a settlement and I told him that he knew My forensic accountant proved in his hearing in January of 2016 there's still 2.5 missing from the marital estate and we can't make a settlement with at all investments disclosed. Beth heard him say I should just take a little money now and come back for what he has hidden later you said just go find a house with a big kitchen and come back later for what's hidden .

She can also testify to the violence my husband was displaying Towards me and her after judge Smail gave him the right to come back to the home to check one the cars

She can also testify tell her own experience with judge Smail who was uninterested and badgered her when she went before him for a PFA when her children were with her father who pulled a gun out during traffic I'm going to shoot at another driver while the kids were with him.

MRS. BONNIE HALINKA REAL ESTATE AGENT can verify that after I was evicted She tried very hard to find a place for me to rent and could not find a place For me to rent because my credit was destroyed during the divorce without my income and she couldn't find a place that would allow pets and I had for dogs that we had for years .

MY EX HUSBAND ABUSE OF PROCESS FILING A BOGUS SUIT AGAINST MY SON TO HARM ME DURING THE DIVORCE

COURT REPORTER FOR ATTORNEY JOHN LINKOSKY WHO WAS REPRESENTING MY HUSBAND IN A BOGUS SUIT AGAINST MY SON

HIS COURT REPORTER IS A WITNESS TO THE ABUSE OF PROCESS

And

ATTORNEY TIM MILLER

HE CAN CONFIRM ABUSE OF PROCESS

He was representing my son, during a deposition standing in for Heidi.

Prime Facie evidence has been submitted repeatedly proving the suit against my son was bogus and improper, ATTORNEY John Linkosky's court reporter told him in front of all of us if there was another Deposition that needed to be recorded for this same case that she's not coming if it's going to be handled the same way it was the day that we went.

Both Attorney Tim Miller and the court reporter knew the manner the deposition was done was unprofessional, harassing at the end of it was threatening. Both heard my husband threaten me by saying if I didn't like what went on there that day he said theres a lot more to come.

ATTORNEY DEBRA CRIBS

HER PRIME FACIE EVIDENCE CAN CONFIRM MY HUSBAND FILED A FALSE SUIT AGAINST MY SON WITH HER documents and emails SHE SENT to me and the court proving my son should have never been sued by my ex husband, she said my ex used my son as a scapegoat to hurt me.

ATTORNEY MICHAEL STEWART JUNIOR

He can confirm that when he was no longer representing my ex husband and was replaced by Linda Whalen that he and I had a conversation behind the thrift shop in Greens burg in the parking lot. I had been in the Thrift shop and when I came out I remained sitting there for a few minutes sorting papers that I had to file at the court . Michael was walking by and seen me and stopped to talk to me . He said he doesn't know why my ex husband is still HARRASING ME AND dragging this on. He said he really felt bad for me.

FORENSIC ACCOUNTANT HEATHER BARONOWSKI

WITNESS WHO APPEARED AT THE MAY 12, 2014 DEPOSITION OF THE HUSBAND BY HEIDI. HEIDI TOLD HEATHER THAT SHE WOULD HAVE TO WAIT FOR A RETAINER UNTIL MY INCOME WAS RELEASED

AND SAID SHE MADE A MISTAKE TO LET LINDA WHALEN TAKE MY ANNUITY INCOME . NOT HAING MY ANNUITY ICOME CAUSED ME NOT TO BE ABLE TO HIRE AND PAY HEATHER

FORENSIC ACCOUNTANT ALEX KINDLER CAN CONFIRM

SPOUSAL SUPPORT FRAUD , with his disposable monthly net income report he prepared in 2015 for 2012 – 2015 after taxes income for the husband. The report showed the husband was receiving BETWEEN 20,000.00 , TO 18,000.00 a month income after taxes .

SPOUSAL SUPPORT FRAUD EVIDENCE IS ALSO SEEN IN THE HUSBANDS VERIFIED SIGNED DRO SUPPORT FORMS .

ENTERING FALSE INFORMATION ON VERIFIED DRO SUPPORT DOCUMENTS FOR 5 YEARS

BOTH JUDGES IGNORED THE HUSBAND AND HIS ATTORNEYS ENTERING FALSE INFORMATION ON

VERIFIED DRO SUPPORT DOCUMENTS FOR 5 YEARS

THE HUSBAND SIGNED AND DATED VERIFIED SUPPORT STATEMENTS that state the husband only reported BETWEEN 7,000.00 TO 11,000.00 a month income in December 2012 - May of 2017 instead of the \$18,000.00 to 20,000.00 a month income income .

Spousal support fraud evidence is also seen In transcripts and the husbands May 12,2014 deposition with Attorney Heidi De Bernardo he admitted his monthly income was over \$18,000.00

THE WIFE WAS DELIBERATELY FINANCIALLY SUPPRESSED

RECUSED JUDGE SCHERER SIGNS ORDER DENYING WIFE INCREASE IN SPOUSAL SUPPORT

THE WIFE WAS DENIED AN INCREASE IN SUPPPORT AGAIN BY THE JUDGE SHE JUST RECUSED

ON OCTOBER 6, 2015 THE RECUSED JUDGE CHRISTIAN SCHERER SIGNED THE 10-6-15 ORDER DENING THE WIFE AN INCREASE IN SPOUSAL SUPPORT, DESPITE KNOWING AND AFTER REVIEWING THE FORENSIC PROOF OF HUSBAND GROSSLY UNDER REPORTING HIS INCOME.

BOTH JUDGE SCHERER AND JUDGE SMAIL DENIED THE WIFE , DEPENDANT SPOUSE CORRECT SPOUSAL SUPPORT FOR 5 YEARS KNOWING THE HUSBAND HAD 20,000.00 A MONTH INCOME AND THE WIFE ONLY HAD 3,500.00

REMARK: THERE IS NO EXPLANATION FOR WHY BOTH JUDGES REPEATEDLY DENIED THE WIFE AND HER COUNSELS MOTIONS DURING 2012 – 2017 FOR AN INCREASE IN SPOUSAL SUPPORT CONSIDERING THEY KNEW THE HUSBAND WAS GROSSLY UNDER REP;ORTING HIS INCOME

AND FAILED TO CONSIDER THE HUGE DISPARITY BETWEEN THE HUSBANDS 20,000.00 A MONTH INCOME AFTER TAXES AND THE WIFE'S \$3,500.00 SPOUSAL SUPPORT THAT SHE WAS LEFT WITH AFTER THEY TOOK HER 3,750.00 A MONTH ANNUITY INCOME FROM HER WITHOUT HER CONSENT. BOTH JUDGES LEFT HER WITH ONLY 3,500.00 A MONTH AND KNEW HER EXPENSES EXCEEDED HER INCOME, SHE WAS RESPONSIBLE TO PAY FOR THE MARITAL HOME'S EXPENSES AND PRE-SEPARATION CREDIT CARDS, AND MORE. SHE WAS LEFT INDIGENT WITHOUT HER ANNUITY INCOME OR AN INCREASE IN SUPPORT AFTER PAYING SOME OF THE EXPENSES DUE EVERY MONTH FOR 5 YEARS.

DENIED WIFE FULL DISCLOSURE OF ASSETS

FINANCIAL ADVISOR WITH STATE FARM, NICHOLAS L. KACZKA

CAN VERIFY BOTH JUDGES DENIED WIFE FULL DISCLOSURE OF ASSETS

He can confirm in 2015 he came to the marital home and reviewed all of the parties' investment records that needed to be reviewed, with a release to get updates on their status.

He can testify the many investments records he reviewed were not listed on the final order.

DENIED FUTURE INCOME FROM GAS WELL RIGHTS

Attorney Roger Gaydos

HE CAN CONFIRM THE WIFE LOST LEASE AND BONUS OFFER FOR GAS WELL RIGHTS IN SUMMER OF 2014 DUE TO THE WIFE NOT HAVING HER ANNUITY INCOME

In 2014 **Attorney Roger Gaydos** prepared Gas and mineral rights lease for the wife and neighbors

Without access to my income I could not pay him a retainer.

Emails in 2014 between me and Heidi and Heather Baranowski shows they knew this to be true
I needed my income released to retain Roger..

JULY 12, 2019

PLAINTIFFS AMENDED RESPONSE TO DEFENDANTS ANSWER REGARDING PLAINTIFFS
REQUEST FOR DISCOVERY AND LEAVE TO AMEND ORIGINAL COMPLAINT

PARTIAL LIST OF WITNESSES TO CALLED FOR RICO TRIAL

1. ROY REICK AIDING AND ABETTING CONCEALMENT OF MARITAL FUNDS

Husbands accountant Roy REICK who committed perjury during masters hearing denying being named the trustee of the two \$1 million trust started by the parties in 2001
He also lied about not having a investment with the company for guardian which is a \$500,000 investment that leads us to another witness Jay Clistor who created the Guardian policy

2. Jay Clistor sold Mr. Bujdos a 500,000.00 Guardian Policy not listed on the final order to divide. another hidden asset

3. Dan Bodner the close friend of the Plaintiffs husband is also a client of the parties Broker Scott Shoup. The parties hired Scott Shoup per Dan's suggestion Scott is also Dan Bodnars financial advisor

4. Judge Smails court reporter James

He can testify to me contacting him regarding the many errors that were on my transcripts and explain why they were never corrected

5. Julie from the prothonotaries office

Can testify to me being present with my friend Deborah Messer on March 17, 2017 looking for the 929 2015 tax document that was removed from the docket and she can testify that she personally re-entered it into the electronica record

6. Marcus Master. Bononi's legal aid

He can testify to master Bononi not allowing me to enter all of my evidence on the last day on May 9, 2016 and helping me carry my suitcases of information out and he can confirm that he told me not to be upset with Master. Bononi because he only does what Judge. Smail tells him to do and he agreed that Judge. Smail does not like me

7. Master Henry Moore extortion and intimidation threatening me to move from my home Women from the pfa department can testify to my going there to inform them that Master. Henry Moore just badgered and threatened me to move out of my home that day or he was sending my violent husband home that very same day if I didn't agree to move on May 6, 2015

8. Becki from the Blackburn Center confirming the abuse and confirmation of me reporting Master. Henry Moore

9. Betty Best from Scott Shoup's office she can testify to having a conversation with and Met Life employee or a John Hancock employee telling her that my husband was requesting to have checks written out and only has a name we have the actual documents from John Hancock stating those facts

10. ALEX KINDLER 1. RE: SPOUSAL SUPPORT FRAUD

the forensic accountant who discovered spousal support fraud the husband was only reporting making 7,000.00 to 11,000.00 a month on his support forms when his disposable net income for the husband showed he was making anywhere from \$18-\$20,000 a month clear during 2012 and 2015 but only reporting 7 to 11,000 a month income

2. ALEX KINDLER RE: DENIED DISCOVERY can also testify to the court and attorney Whalen refused to provide financial documents he needed to locate 2.5 million that was missing from the marital estate . He discovered this in January 2016 and was never provided the information .

3. ALEX KINDLER RE: a 580,000.00 hidden fidelity IRA He can also testify to there being more than one IRA in the marital estate . In September 2012 the beginning of the parties divorce there was only one IRA listed on the marital assets form. It was called BRINKER and it's August 2012 Invoice shows it had 590,000 balance . Suspiciously on the 7-18-17 final order it only had 82,000 left in it.

4. ALEX KINDLER RE: CAN TESTIFY THAT THE SECRET FIDELITY IRA WAS OPENED BY THE HUSBAND AND SCOTT SHOUP ONLY A FEW WEEKS after the divorce was filed The RECORDS SHOW THE husband contacted Scott Shoup and apparently moved 500,000 of the Brinker and opened up a Fidelity IRA which is not listed on the final order to distribute.

5. ALEX KINDLER RE: UNHEARD ECONOMIC CLAIMS \He can also testify to the court not resolving any of my economic claims looting taxes that were due and pre-separation credit card debt and judgments against me that were not resolved before the final order was made

11 and 12 SUBPOENA 2 Witnesses from the bank that held the mortgage on the marital home that Attorney Whalen had subpoenaed to come to a surprise evction hearing on 4-17-13

13. Call Jack LaCart as a witness who can testify to the husbands scheme to deny the wife income from the mineral rights on their 26 acres of marital properties . He knows why the husband refused to sign the wife's 2014 mineral and oil deeds because he was waiting until after the divorce and signed A lease with Jack La Carte with his adjoining property.

14. Call Deborah Messer who can testify to what she personally witnessed as she attended every hearing with me she can testify to the judges bias Ness and abuse and his over looking suborning perjury that she reported

15. Call Frank Christopher who appeared at the January 2017 hearing where Judge. He witnessed the bias action of judge Smail and was present when the judge refused to release my own annuity income for me to have emergency dental work done

16. Call John Lunt
he can testify to Judge Smai's blatant dislike for me and was also present at January 24 2017 hearing when the judge refused to release my own funds for the emergency dental work
He can also testify to the damages that I've incurred financially I still owe him over 2000.00 for moving me after being thrown out of my house during the end of the litigation without cause on March 11, 2016 , being left homeless and left having to pay him \$500 a month since March 11 of 2016 just to store my furnishings in his warehouse . I haven't been able to use because of being left with No credit not receiving the 2 1/2 million that I was entitled to and because I was left with that to pay out of the \$400,000 joint MetLife annuity while the husband received a whole \$5 million state

Witnesses questions to answer about Docket Tampering

- 17. Judge Harry Smail
- 18. Christina O'Brien and
- 19. Julie, her assistant

DOCKET TAMPERING

Judge Smail has yet to explain how the 9-29-15 tax document got removed from the docket, that showed I paid the taxes on the home before I was evicted. Suddenly this tax document disappeared in January right after the judge ordered me to be evicted, on March, 11 2016 FOR NOT PAYING MY TAXES THAT WERE IN FACT PAID.

PRIME FACIE Proof of the docket tampering was done, in March 2017 with my friend Deborah Messer and I in the presence of Christina O'Brien the prothonotary when we went to the prothonotaries office to look through my file for the stamped 9-29-15 document.

My weekly Previous print outs of the docket show the stamped 9-29-15 tax document was on there until. The document was removed after the 1-6-16 order to evict me, FOR NOT PAYING TAXES was filed.

THE 9-29-15 TAXES PAID documents should've still been listed on the electronic docket but it wasn't it was sitting in my file box.

Christina OBrien' immediately instructed her assistant Julie to put that 9-29-15 tax document back on the record.

PRIME FACIE EVIDENCE Then Christina O'brien told me in an email that she was going to investigate. She said The only people who have access to the docket is the prothonotary and the judge.

Transcripts will show I brought that up in open court to Judge. Smail and he denied removing it but, he asked me if I had printouts showing when it was on the docket and when it went missing and I told him on the record that I did have the printouts as proof that the 9-29-15 tax document was on the docket and when it went missing. To date nothing has been done about the docket tampering.

Respectfully Submitted by.

Deborah Bigdo 7-15-19

FORGERY

FAKE POA REVOKED BY

DEBORAH BUJDOS

DEBORAH BUJDOS
385 LUTZ RUN ROAD, BELLE VERNON, PA, 15012
724-522-2590 dabujdos@yahoo.com

August 17, 2015

Eric E. Bononi
Attorney at Law
20 North Pennsylvania Avenue
Greensburg, PA 15061

Re: **Larry A. Bujdos vs Deborah Ann Bujdos**
No. 1849 Of 2012D

Dear Master Bononi:

For the record, enclosed please find a time stamped copy of the Counter Affidavits Forms Under DIVORCE CODE 3301 c and d stating that I do not consent to entering a final decree of divorce until discovery and Equitable Distribution have been completed. Also please note for the record I have attached my notarized copy of my RECENT REVOCATION OF MY POWER OF ATTORNEY. I personally filed these documents today on my own behalf on August 17, 2015 Also you will find a copy of the previous counter forms filed with the prothonatary . You will also find a letter from Ms. Whalen , she sent to my previous counsel, Kristen Bojorski promising her that she would not bifurcate this case. You will also find an estimated updated asset document, showing the complexity of the marital estate of approximately eight million dollars. This case is complex and discovery has not been done.

A true and correct copy of the enclosed file was hand delivered to Attorney Linda Whalen's office today.

Most Sincerely,



Deborah Ann Bujdos

Cc: Attorney Whalen

2015 AUG 17 PM 3:47
CHRISTINA O'BRIEN
PROTHONATARY

ORIGINAL

LIMITED POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS:

That I, Deborah A. Bujdos, do hereby make, constitute and appoint Larry A. Bujdos my true and lawful Attorney-in-Fact for me, and in my name, place and stead, to sign, execute and deliver, the same as I might do if personally present, any checks issued to Larry and Deborah Bujdos by John Hancock Life Insurance Company and MetLife Investors USA Insurance Company.

My said Attorney is hereby specifically authorized to only endorse those checks on my behalf. The endorsed checks will then be provided to Linda L. Whalen, Esquire to be placed into her trustee account pending equitable distribution in the parties' divorce action filed in Westmoreland County, Pennsylvania.

WITNESS my hand and seal at Greensburg, Pennsylvania, this 18 day of April, 4-18-13, 2013.

Deborah A. Bujdos
Deborah A. Bujdos

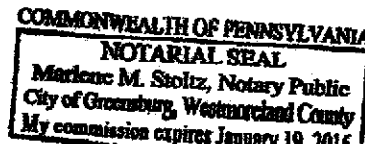
**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF WESTMORELAND**

On this 18th day of April, 2013, personally appeared before me, a Notary Public in and for the Commonwealth and County, aforesaid, Deborah A. Bujdos, who acknowledged the foregoing Power of Attorney to be her own act and deed and executed the same for the purpose therein expressed.

Mark M. Stoltz
Notary Public

My Commission Expires:

E-MAIL TO CLIENT _____
COPY TO ATTY Orig _____
COPY TO CLIENT _____
DATE 4/17/13



REVOCATION OF POWER OF ATTORNEY

I, Deborah Ann Bujdos, of 385 lutz run road, Belle Vernon, Pennsylvania 15012, hereby revoke any and all powers of attorney previously signed by me, without regard to the identity of the party or parties designated in such documents to act on my behalf.

Dated 11 August, 2015, at Belle Vernon, Pennsylvania.

Deborah Ann Bujdos
Deborah Ann Bujdos

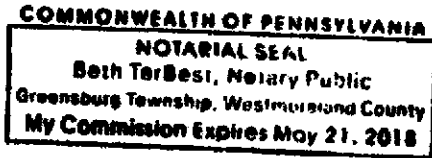
Witness Signature: Marlene Metrosky
Name: Marlene Metrosky
City: Belle Vernon
State: Pennsylvania

Witness Signature: _____
Name: _____
City: _____
State: _____

STATE OF PENNSYLVANIA, COUNTY OF WESTMORELAND COUNTY, ss:

On this 11 day of August, 2015, before me,
Beth TerBest, personally appeared Deborah Ann Bujdos, known to
me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument
and acknowledged that he/she executed the same as for the purposes therein contained.

In witness whereof I hereunto set my hand and
official seal.



Beth TerBest
Notary Public

Notary Public
Title (and Rank)

My commission expires 21, May 2018

Notary Address:

1252 Felts Church Rd
Belle Vernon, PA 15012

Forquy

EXHIBIT

Proves there was no hearing
to take annuities on 12-19-12

Order has forged signature
of Deborah A. Bejdos

see next page

12-19-12 order was for
an all counts - no modification

**HERE THE GOAL OF THE RICO ENTERPRISE WAS TO
FINANCIALLY ABUSE THE WIFE BY TAKING HER INCOME :
DELAYED THE DIVORCE**

**TO ALLOW ATTORNEYS TO CHURN FEES,
THE COURT TO GAIN \$17,600.00 FOR UNLAWFUL FINES**

**A WELL KNOWN DIRTY DIVORCE TRICK WAS DONE TO
ACCOMPLISH DEFRAUDING THE WIFE :**

FINANCIAL ABUSE OF DEPENDANT SPOUSE

**FINANCIALLY STARVE A SPOUSE FOR 5 YEARS TO FORCE
SETTLEMENT WITH LESS THAN FAVORABLE TERMS.**

**FULL DESCRIPTION OF EXTRINSIC FRAUD, FRAUD ON THE COURT
AND CRIMES COMMITTED IN THIS CASE
SENT TO ATTORNEY WHALEN**

• **THE FRAUD ON THE COURT AND EXTRINSIC FRAUD BEGAN WITH:**

- (a) The scheme to defraud me began when with the crime of fraud on the court on 12-19-12 happened, which opened the door for the continued acts of (Extrinsic Fraud)
- (b) Extrinsic Fraud began with you and my own Attorney Heidi De Bernardo 's wrongful acts of , preparing a void order and falsely telling the court I agreed to let you take my \$3,750.00 a month retirement annuity income and hold it until ED
- (c) extrinsic fraud is defined as some act (like taking someone's income without their consent or conduct providing false statements in your motions of the prevailing party which has prevented a fair submission of the controversy and has deprived the wife of a fair and unbiased divorce. and denied the opportunity for a fair trial.
the other factor proven here of extrinsic fraud is seen as defined here to include when my own attorney joined forces with you and sold me out by letting you take my income .
- (d) You created a scheme to win the divorce by financially suppressing me.
- (e) It was Extrinsic Fraud when You and my own attorney conspired and made an agreement between the two of you to take my income and put it in your firms non interest bearing account without my knowledge or consent.
- (f) By taking my income you torturously interfered with the retirement annuity income for life contracts, and breached the annuity contracts,
- (g) You failed to notify the Annuity companies that you were taking the checks and without my consent.
- (h) Your invoice shows You created a fraudulent POA for the checks on 4-17-13

- (i) I never seen THE POA until 2015 after Heidi quit. I was shocked to see it said I give my POA to my husband, ???? (that I am divorcing) ???
- (j) I immediately revoked it in August 2015 and filed it on the docket that and served you a and the judge a copy of the revocation.
- (k) More Fraud as You failed to notify me of your clients deceitful act when he illegally had Met Life remove my name from the joint annuity checks.
- (l) Then on a transcript you tell the judge another lie by saying Met Life Stopped payments due to me calling them for money.
- (m) You failed to notify my 2nd attorney Kristen Bojarski in January 2015 when your client illegally had Met Life remove my name from the checks.
- (n) I only learned in August 2015 from Brandon at Met life that my name was removed in from the only annuity left from Met life .
- (o) He told me that was illegal and put my name back on the annuity and I told him it had to be frozen and it was.
- (p) You failed to file The IRS form 56 required for fiduciary's controlling people annuities that you were appointing yourself as a dual fiduciary over these retirement annuities .
- (q) You refused to step down after I repeatedly told you I do not consent to you being my fiduciary and demanded my income be released.
- (r) FRAUD ON THE COURT HAPPENED On 12-19-12 You presented Judge Christian Scherer with a fraudulent order that you prepared and he signed that falsely stated that both parties agreed to have their retirement annuity income be held in escrow for Equitable Distribution.

- (s) Both you and Heidi knew I was never informed of this and knew I would never agree to it because I needed it to defend myself and to pay my monthly obligations that were more than the spousal support I was left with, ONCE YOU TOOK MY FUNDS.
- (t) It is Extrinsic Fraud to illegally to take the annuities that I needed to have a fair divorce.
- (u) You breached our very strict annuity contracts that included a non alienation clause and was not permitted to be assigned to anyone other than us.
- (v) You had to have both parties agree to take those funds and you never had my consent.
- (w) EVERY TIME you have stated on the record that I consented to having my income taken was fraud on the court.
- (x) More prime facia evidence I have shows a verified email between me and Heidi on 12-18-12 the night before the you committed fraud on the court . The email ends with me wishing Heidi a Merry Christmas , proving that I was not intending to see her until after Christmas.
- (y) More evidence of your fraud on the court on 12-19-12 is seen in a motion Heidi prepared dated Feb. 25, 2014 to release the funds . She was trying to undo the damage she caused by letting you take control of my own income .
- (z) In her filed motion she does incorrectly state that both parties agreed , to the funds going into escrow (when I never agreed) but she did not say on 12-19-12 we agreed she said sometime in the spring of 2013 but no longer wanted it held for ED.
- (aa) I don't know how she could say we agreed when she received hundreds of emails with me asking her why I wasn't getting my annuity every month ,
- (bb) For the first year Heid never answered why I wasn't getting the checks .

- (cc) Then once I found out all of my emails to her saying she has to get that reversed I never agreed to letting you take my income
- (dd) My emails to Heidi all say she needed to get my income back and have that order reversed. I told her I was loosing my credit and in financial trouble without my annuities.
- (ee) Heidi did made it a point to get it on the record that the husband had an income of over \$18,000.00 a month net. And that I was only getting \$3582.00 a month and that I was in desperate need of my income . Even with that income I was never on a par with the husband to defend myself.
- (ff) Her motion stated that I was in desperate need of my annuity income and wanted it released.
- (gg) Naturally Judge Scherer denied her motion as he was a part of the fraud upon the court , when he signed the 12-19-12 void order taking my money .
- (hh) Heidi made it clear in her motion that the annuity money was INCOME and not supposed to be held for ED.

The 12-19-12 fraud on the court was the first step in defrauding me by taking my income and caused the divorce to be delayed for 5 years and prevented me from appealing the final order.

- (ii) I have hundreds of VERIFIED emails and letters from me to you and Heidi and the court requesting my funds be released FOR 5 years trying to get my own money released to hire attorneys and experts to do discovery.

- (jj) Which now finally brings me to respond to your first argument that I did not appeal. the unconscionable final order . your fraud on the court and extrinsic fraud prevented me from appealing
- (kk) You refused to release 10,000.00 out of the \$44,000.00 of annuity funds you were still holding hostage .
- (ll) You denied me my own retirement annuity income (you gained with fraud on the court on 12-19-12) You prevented me from hiring Attorney Nicole Karys who agreed to do my appeal for 10,000.00 .
- (mm) More Extrinsic Fraud is found when Judge Smail failed to do his duty when he ignored my motion (that included Nicoles Engagement letter) to release the funds in order for me to appeal and present my case.
- (nn) More proof of the FRAUD ON THE COURT is seen as you law partner , Attorney Brian Cavanaugh represented my husband for the matter of the home being up for sheriffs Sale
- (oo) He presented an 8-25-17 motion to delay the sale with Judge Marselli (that I was never notified of the sheriff sale)
- (pp) In that motion he FALSELY tells the judge the reason the taxes were not paid was because I didn't pay them.
- (qq) You know that is a lie because Master Bononi paid the current homes taxes on 9-29-15 for me. Six months later I was evicted without any legal reason .
- (rr) Any unpaid taxes up to August 25, 2017 , was the husbands fault . Brian lied to the court.

- (ss) Then he goes on to tell Marselli how there was a final order made on 7-18-17 and that he knows the wife is trying to appeal, but HE KNOWS SHE WILL FAIL, because she does not have an attorney, and also says that there is \$44,000.00 in your firms account,
- (tt) He also says in the motion "that the \$44,000.00 ANNUITY INCOME money will be released after THE WIFE FAILS TO FILE AN APPEAL " "BECAUSE SHE IS PROSE AND IF SHE DOES THE APPEAL HERSELF THEY ARE SURE IT WON'T BE CORRECT FOR AN APPEAL ."
- (uu) Your Co-Counsel Brian Cavanaugh CONFIRMED the extrinsic fraud IN HIS AUGUST 25, 2017 MOTION TO PREVENT THE SHERIFF SALE OF THE HOME. While he was working in concert with you, he revealed the fraud by telling Judge Marselli he knew I was trying to appeal but would fail without an attorney. I could not hire the appellate attorney while your holding my retirement income. All of you knew I was denied the right to appeal by illegally keeping my income.
- (vv) Both of your conduct includes the use of fraud on the court, lying to the court.
- (ww) IT IS EXTRINSIC FRAUD, TO PREVENT ME FROM APPEALING THE FINAL ORDER WHILE YOUR STILL ILLEGALLY HOLDING MY RETIREMENT ANNUITY INCOME OF \$ 22,000.00.
- (xx) Your guilty of misuse of third party funds, conversion of my annuity income, paying a master \$10,000.00 out of my retirement income without my consent, then giving him \$22,000.00 more from the final order.
- (yy) You have violate all fiduciaries rules and failed to inform the IRS with the form 56 when you named yourself a fiduciary over our two private jointly owned \$ 500,000.00 retirement annuities income for life. (WHILE YOU NAMED YOUR SELF MY

FIDUCIARY DESPITE MY MANY NOTICES TO YOU THAT I DO NOT AGREE TO
HAVE YOU IN CONTROL OF MY INCOME . IT WAS A CONFLICT OF INTEREST)

(zz) AND It is unconscionable that you refused to release my funds to appeal during the
same month Brian presented his fraud on the court motion to Judge Marselli on August
25, 2017 telling him he knew I would fail at appealing.

(aaa) He said he knew I was trying to appeal , knowing that I filed a motion in August
right before he presented his motion.

(bbb) He knew I asked you to release my money so I could hire Nicole Karys who agreed
to do my appeal for \$10,000.00) . and knew everyone refused to give me my income to
hire Nicole.

(ccc) He knew I was not going to get my own money to hire her and you and he just waited
for the time to appeal to pass.

(ddd) (It is Extrinsic Fraud to have your money stolen from you to prevent you from
presenting your case with an attorney for filing an appeal.

(eee) It is extrinsic fraud when You falsely led me to believe for 5 years with that 12-19-
12 void order gave you the authority to keep me from getting my monthly income.

(fff) ISSUED FINAL ORDER TO AVOID DOCUMENT PRODUCTION

you drafted the final 7-18-17 order (that was pending since 11-21-16) the day after
getting a second demand on 7-17-17 for financial documents my forensic accountant,
Alex Kindler who needed them for the August 28, 2017 De Novo hearing regarding the

\$300,000.00 I am still owed for back support payments due to your client grossly under reporting his income, committing spousal support fraud.

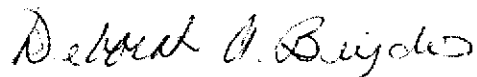
(ggg) DELIBERATELY DENIED WIFE CORRECT APL

You violated the 10-24-12 support order that awarded me \$7332.00 a month . The order stated he husbands 3,582.00 support was based on me continuing to receive my \$3750.00 from my annuity income . The judge was suppose to make the husband pay more in support to make up for loosing \$3, 750.00 a month income so that I was receiving the \$7,332.00 income to be on a par with the husband.

(hhh) You know very well I had no idea my funds were being taken from me for months, That has affected the entire deliberately delayed 5 year long divorce by deliberately financially suppressing me .

(hhh)

Respectfully,



Deborah A. Bujdos

VIOLATED PA ANNUITY LAW

LEGAL ARGUMENT TO VACATE OR OPEN FINAL ORDER:

DUE TO EXTRINSIC FRAUD

THAT BEGAN WITH UNLAWFULLY TAKING WIFE'S RETIREMENT ANNUITY INCOME TO FINANCIALLY SUPPRESS HER FROM A FAIR DIVORCE WHILE OPPOSING COUNSEL ILLEGALLY HELD HER RETIREMENT ANNUITY INCOME HOSTAGE FOR FIVE YEARS DELIBERATELY VIOLATING AND IGNORING THE ACT OF MAY 3, 1917, P.L. 112, § 1, AS AMENDED, 40 P.S. § 515.

THA READS: ANY ANNUITY OR PENSION, WHETHER BY WAY OF A GRATUITY OR OTHERWISE, GRANTED OR PAID BY ANY PRIVATE CORPORATION OR EMPLOYER OR OUT OF A TRUST FUND ESTABLISHED BY ANY PRIVATE CORPORATION OR EMPLOYER TO A RETIRED EMPLOYEE, BEING A CITIZEN OF THIS COMMONWEALTH, UNDER AN AGREEMENT, PLAN OR TRUST INDENTURE WHICH PROVIDES THAT THE SAME SHALL NOT BE ASSIGNABLE OR SUBJECT TO EXECUTION OR ATTACHMENT:

ALL SHALL BE EXEMPT AND FREE AND CLEAR FROM THE CLAIMS OF ALL HIS OR HER CREDITORS, AND FROM ALL

LEGAL AND JUDICIAL PROCESSES OF EXECUTION,
ATTACHMENT, OR OTHERWISE, WHATSOEVER.

Act of May 3, 1917, P.L. 112, § 1, as amended, 40 P.S. § 515.

pursuant to 42 Pa.C.S.A. § 8124(b) any pension and profit sharing plans are exempt from attachment pursuant to 42 Pa.C.S.A. § 8124(b). In germane part, this section reads:

(b) Retirement funds and accounts (vii) **Any pension or annuity**, whether by way of a gratuity or otherwise, granted or paid by any private corporation or employer to a retired employee under a plan or contract which provides that the pension or **annuity shall not be assignable**.

(viii) Any retirement or annuity fund of any self-employed person (to the extent of payments thereto made while solvent, but not exceeding the amount actually excluded or deducted as retirement funding for

Federal *417 income tax purpose) and the appreciation thereon, the income therefrom and the benefits or annuity payable thereunder.

Pursuant to Section 8124(b),[6] this Court (per Judge HESTER) opined:

Clearly, these types of statutes were specifically drawn to protect the beneficiary's family:

Commonwealth ex rel. Magrini v. Magrini, 263 Pa.Super. 366, 370-71, 398
A.2d 179, 181 (1979).

AND Pursuant to the provisions of Section 302(c) of the Labor

Both judges and attorneys violated the PA annuity laws as they allowed plaintiffs income to be taken from her without her consent and refused to release it for 5 years, prevented her from having access to the courts without funds to hire experts to defend her.

Taking Plaintiffs Annuity income without her knowledge or consent on 12-19-12 was extrinsic fraud, done by collusion of defendants divorce Attorney Linda Whalen, Plaintiffs divorce attorney Heidi Norton, The defendant Laurence Bujdos, Judge Christian Scherer, and Scott Shoup the parties broker:

Forgery

Theft by deception.

Torturous interference with annuity contract.

FULL DISCLOSURE WAS NEVER MADE.

Defendant Believes she is with in her rights to request the court to open or vacate the final unconscionable order The Final Order Was Issued On 7-18-17 Without Full Disclosure Making It Invalid

Attorney Whalen Obstructed the wife's Discovery Of 2.3 Million from the marital estate. This was revealed by the wife's forensic accountant, Alex Kindler who testified under oath and said the 2.3 million was missing or unaccounted for.

- Attorney Whalen Refused To Provide Documents Requested For 5 Years.

She refused to sign a boiler plate release after the forensic accountant revealed the

- missing 2.3 million.
- **NONE OF THE FACTORS THE COURT IS REQUIRED TO CONSIDER IN MAKING AN ED ORDER WERE ONSIDERED .**

- The Husbands Interrogatories and evidence presented at masters hearings Were Vague other than her clients description of cars and farm equipment and to disparage the wife and her children with false statements .

Exhibit 1

FORGERY

FAKE POA REVOKED BY

DEBORAH BUJDOS

DEBORAH BUJDOS
585 LUTZ RUN ROAD, BELLE VERNON, PA, 15018
784-588-8590 dabujdos@yahoo.com

August 17, 2015

Eric E. Bononi
Attorney at Law
20 North Pennsylvania Avenue
Greensburg, PA 15061

Re: Larry A. Bujdos vs Deborah Ann Bujdos
No. 1849 Of 2012D

Dear Master Bononi:

For the record, enclosed please find a time stamped copy of the Counter Affidavits Forms Under DIVORCE CODE 3301 c and d stating that I do not consent to entering a final decree of divorce until discovery and Equitable Distribution have been completed. Also please note for the record I have attached my notarized copy of my RECENT REVOCATION OF MY POWER OF ATTORNEY. I personally filed these documents today on my own behalf on August 17, 2015 Also you will find a copy of the previous counter forms filed with the prothonatary. You will also find a letter from Ms. Whalen, she sent to my previous counsel, Kristen Bojorski promising her that she would not bifurcate this case. You will also find an estimated updated asset document, showing the complexity of the marital estate of approximately eight million dollars. This case is complex and discovery has not been done.

A true and correct copy of the enclosed file was hand delivered to Attorney Linda Whalen's office today.

Most Sincerely,

Deborah Ann Bujdos
Deborah Ann Bujdos

Cc: Attorney Whalen

2015 AUG 17 PM 3:47
CHRISTINA O'BRIEN
PROTHONOTARY

6C

ORIGINAL

LIMITED POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS:

That I, Deborah A. Bujdos, do hereby make, constitute and appoint Larry A. Bujdos my true and lawful Attorney-in-Fact for me, and in my name, place and stead, to sign, execute and deliver, the same as I might do if personally present, any checks issued to Larry and Deborah Bujdos by John Hancock Life Insurance Company and MetLife Investors USA Insurance Company.

My said Attorney is hereby specifically authorized to only endorse those checks on my behalf. The endorsed checks will then be provided to Linda L. Whalen, Esquire to be placed into her trustee account pending equitable distribution in the parties' divorce action filed in Westmoreland County, Pennsylvania.

WITNESS my hand and seal at Greensburg, Pennsylvania, this 18 day of April, 4-18-13, 2013.

Deborah A. Bujdos
Deborah A. Bujdos

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF WESTMORELAND**

On this 18th day of April, 2013, personally appeared before me, a Notary Public in and for the Commonwealth and County, aforesaid, Deborah A. Bujdos, who acknowledged the foregoing Power of Attorney to be her own act and deed and executed the same for the purpose therein expressed.

Marlene M. Stoltz
Notary Public

My Commission Expires:

E-MAIL TO CLIENT _____
COPY TO ATTY Orig ✓
COPY TO CLIENT _____
DATE 4/17/13

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Marlene M. Stoltz, Notary Public
City of Greensburg, Westmoreland County
My commission expires January 10, 2016

REVOCATION OF POWER OF ATTORNEY

I, Deborah Ann Bujdos, of 385 lutz run road, Belle Vernon, Pennsylvania 15012, hereby revoke any and all powers of attorney previously signed by me, without regard to the identity of the party or parties designated in such documents to act on my behalf.

Dated 11 August, 2015, at Belle Vernon, Pennsylvania.

Deborah Ann Bujdos
Deborah Ann Bujdos

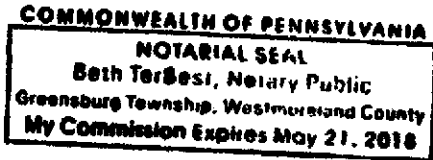
Witness Signature: Marlene Metrosky
Name: Marlene Metrosky
City: Belle Vernon
State: Pennsylvania

Witness Signature: _____
Name: _____
City: _____
State: _____

STATE OF PENNSYLVANIA, COUNTY OF WESTMORELAND COUNTY, ss:

On this 11 day of August, 2015, before me,
Beth TerBest, personally appeared Deborah Ann Bujdos, known to
me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument
and acknowledged that he/she executed the same as for the purposes therein contained.

In witness whereof I hereunto set my hand and
official seal.



Beth TerBest
Notary Public

Notary Public
Title (and Rank)

My commission expires 21, May 2018

Notary Address:

1252 Felts Church Rd
Belle Vernon, PA 15012

Exhibit 1-2
Forsey

In the Court of Common Pleas of WESTMORELAND County, Pennsylvania
DOMESTIC RELATIONS SECTION

DEBORAH A. BUJDOS
Plaintiff

vs.
LAURENCE A. BUJDOS
Defendant

Order Number: 01775 DR 2012
PACSES Case Number: 721113557
Docket Number: 01775 DR 2012
Clerk State ID Number:

ORDER OF COURT - UNALLOCATED

Final Interim Modified

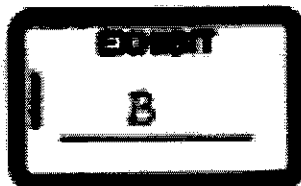
AND NOW, 19TH DAY OF DECEMBER, 2012, based upon the Court's determination that the Payee's monthly net income is \$1,083.00 and the Payor's monthly net income is \$7,523.00, it is hereby ordered that the Payor pay to the Pennsylvania State Collection and Disbursement Unit FOUR THOUSAND EIGHTY-FIVE Dollars (\$4,085.00) a month payable MONTHLY as follows: first payment due JANUARY 1, 2013. The effective date of the order is 10/01/12.

Arrears set at \$6,346.00 as of DECEMBER 19, 2012 are due in full IMMEDIATELY. All terms of this Order are subject to collection and/or enforcement by contempt proceedings, credit bureau reporting, tax refund offset certification, passport denial certification, driver's/professional/recreational license revocation, interception of lottery winnings, and the freeze and seize of financial assets. These enforcement/collection mechanisms will not be initiated as long as obligor does not owe overdue support. Failure to make each payment on time and in full will cause all arrears to become subject to immediate collection by all the means listed above.

For the Support of:

Name
DEBORAH ANN BUJDOS

Term Date
08/22/22



Other Conditions:

THE PLAINTIFF WAS PRESENT AND REPRESENTED BY ATTORNEY HEIDI DEBERNARDO-NORTON. THE DEFENDANT WAS PRESENT AND REPRESENTED BY ATTORNEY LINDA L. WHALEN. THIS ORDER TAKES INTO CONSIDERATION THE PARTIES' HEALTH INSURANCE COSTS. AN UPWARD MORTGAGE DEVIATION (MST) IS INCLUDED IN THIS ORDER.

THE JOHN HANCOCK AND METLIFE ANNUITY ACCOUNTS/PAYMENTS ARE RESERVED FOR EQUITABLE DISTRIBUTION. BOTH PARTIES AGREE TO SHARE EQUALLY ALL ANNUITY PAYMENTS RECEIVED FROM SEPTEMBER 4, 2012 TO THIS DATE. THEREAFTER, BOTH PARTIES AGREE TO PLACE ALL FUTURE ANNUITY PAYMENTS IN AN ESCROW ACCOUNT UNTIL FURTHER ORDER OF COURT.

Defendant shall pay the following fees:

<u>Fee Total</u>	<u>Fee Description</u>	<u>Payment Frequency</u>	
\$0.00	for JUDICIAL COMPUTER FEE	Payable at \$0.00	per ONE TIME
\$	for	Payable at \$	per
\$	for	Payable at \$	per
\$	for	Payable at \$	per
\$	for	Payable at \$	per

IMPORTANT LEGAL NOTICE

PARTIES MUST WITHIN SEVEN DAYS INFORM THE DOMESTIC RELATIONS SECTION AND THE OTHER PARTIES, IN WRITING, OF ANY MATERIAL CHANGE IN CIRCUMSTANCES RELEVANT TO THE LEVEL OF SUPPORT OR THE ADMINISTRATION OF THE SUPPORT ORDER, INCLUDING, BUT NOT LIMITED TO, LOSS OR CHANGE OF INCOME OR EMPLOYMENT AND CHANGE OF PERSONAL ADDRESS OR CHANGE OF ADDRESS OF ANY CHILD RECEIVING SUPPORT. A PARTY WHO WILLFULLY FAILS TO REPORT A MATERIAL CHANGE IN CIRCUMSTANCES MAY BE ADJUDGED IN CONTEMPT OF COURT, AND MAY BE FINED OR IMPRISONED.

PENNSYLVANIA LAW PROVIDES THAT ALL SUPPORT ORDERS SHALL BE REVIEWED AT LEAST ONCE EVERY THREE (3) YEARS IF SUCH REVIEW IS REQUESTED BY ONE OF THE PARTIES. IF YOU WISH TO REQUEST A REVIEW AND ADJUSTMENT OF YOUR ORDER, YOU MUST DO THE FOLLOWING: CALL YOUR ATTORNEY. AN UNREPRESENTED PERSON WHO WANTS TO MODIFY (ADJUST) A SUPPORT ORDER SHOULD CONTACT THE DOMESTIC RELATIONS SECTION.

ALL CHARGING ORDERS FOR SPOUSAL SUPPORT AND ALIMONY PENDENTE LITE, INCLUDING UNALLOCATED ORDERS FOR CHILD AND SPOUSAL SUPPORT OR CHILD SUPPORT AND ALIMONY PENDENTE LITE, SHALL TERMINATE UPON DEATH OF THE PAYEE.

A MANDATORY INCOME ATTACHMENT WILL ISSUE UNLESS THE DEFENDANT IS NOT IN ARREARS IN PAYMENT IN AN AMOUNT EQUAL TO OR GREATER THAN ONE MONTH'S SUPPORT OBLIGATION AND (1) THE COURT FINDS THAT THERE IS GOOD CAUSE NOT TO REQUIRE IMMEDIATE INCOME WITHHOLDING; OR (2) A WRITTEN AGREEMENT IS REACHED BETWEEN THE PARTIES WHICH PROVIDES FOR AN ALTERNATE ARRANGEMENT.

UNPAID ARREARAGE BALANCES MAY BE REPORTED TO CREDIT AGENCIES. ON AND AFTER THE DATE IT IS DUE, EACH UNPAID SUPPORT PAYMENT SHALL CONSTITUTE, BY OPERATION OF LAW, A JUDGMENT AGAINST YOU, AS WELL AS A LIEN AGAINST REAL PROPERTY.

IT IS FURTHER ORDERED that upon payor's failure to comply with this order, payor may be arrested and brought before the Court for a Contempt hearing; payor's wages, salary, commissions, and/or income may be attached in accordance with law; this Order will be increased without further hearing by 15% a month until all arrearages are paid in full. Payor is responsible for court costs and fees.

Copies delivered to parties: 12-21-12 VK
Date

707 gds

Consented:
Richard A. Bajer
Plaintiff

Heidi D. Mc...
Plaintiff's Attorney

Larry Bujlos
Defendant

Jude...
Defendant's Attorney

BY THE COURT
[Signature]
Judge

19TH DAY OF DECEMBER, 2012
Date

Exhibit
L-3

Family Division FD 94-09310
Deborah A. Bujdos Defendant
Laurence A. Bujdos Plaintiff

Revised Alimony
Funds
as of 7-6-15

Exhibit Back
Support

Mr. Bujdos will pay the Pende Lite Alimony arrears immediately of \$7,000.00 and pay no later than the 1st of each month in the future.

Release 1/2 of the Iolita funds to me (\$\$\$\$\$) as living and legal expense and that a full accounting of the fund be completed immediately.

So Ordered on this day 6 July, 2015

Divorce Master Attorney Eric Bononi

Prepared by

Deborah Bujdos

Exhibit K to

Army Meas De Matti

after Judge Smail left

Case unresolved

EXHIBIT ~~K~~-1

1-6 PAGES

Denial Back Support

**NOTICE TO THE COURT ADMINISTRATOR AMY MEARS DEMATT AND
COUNTY CONTROLLER RE: SHERIFF / ASSISTING WITH JUDGE
SMAIL CHARGING PLAINTIFF \$17,600.00 UNLAWFUL EXCESSIVE
FINE FOR BOGUS CONTEMPT
ALSO QUESTION ABOUT ATTORNEY WHALEN BRIBING A MASTER
WITH 10,000.00 FROM PROTECTED RETIREMENT ANNUITY FUNDS
WITHOUT CONSENT**

EXHIBITS FOR PROVING FORGERY ON A 12-19-12
ORDER TO TAKE ANNUITIES

THERE WAS NO 12-19-12

HEARING TO TAKE MY ANNUITY INCOME

EXHIBIT "1"

ATTACHED 12-19-12 ORDER FOR RESCHEDULING
AN ALL COUNTS HEARING UNTIL FEB 2013 HENCE,
THERE WAS NO 12-19-12 HEARING TO TAKE MY
ANNUITY INCOME

EXHIBIT "2"

VERIFIED 12-18-12 EMAIL BETWEEN ME AND ATTORNEY
HEIDI DE BERNARDO – NORTON
LAST SENTENCE ENDS WITH ME WISHING HER MERRY
CHRISTMAS ON 12-18-12 THE DAY BEFORE THE
SUPPOSED HEARING TO TAKE THE ANNUITIES

EXHIBIT "3"

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY,
PENNSYLVANIA
CIVIL DIVISION - LAW

LAWRENCE A. BUJDOS,)
Plaintiff,)
v.) NO.: 1849 OF 2012-D
DEBORAH ANN BUJDOS,)
Defendant.)

ORDER OF COURT

AND NOW, to wit: this 19th day of December, at the request of the parties' counsel, IT IS HEREBY ORDERED AND DECREED that an All Counts Conference is scheduled for Thursday, February 7, 2013 at 9:00 o'clock am. The parties and their counsel are directed to attend. Inventories shall be filed and exchanged at least twenty (20) days prior to this conference. Marital Asset and Liability forms and a proposal for settlement shall be exchanged and provided to the Master at least ten (10) days prior to the conference.

BY THE COURT:


Chris Scherer, Judge

ATTEST:



PREPARED BY:


Mary E. Mears, Esquire
All Counts Master

cc: L. Whalen, Esq., for Plaintiff
H. Norton, Esq., for Defendant

2012 DEC 21 PM 2:19
WESTMORELAND COUNTY
CLERK OF COURT

Deborah A. Bujdos

Annuity contract was breached by broker, whalen, Heidi and scherer

BROKER CONFIRMS ANNUITY CHECKS MUST FOLLOW CONTRACT

Email below Shows that the broker knew of a divorce

deborah bujdos brown <dbujdos@yahoo.com>

Technorton@dandpc.com

Ce:Mit@dandpc.com

Nov 28, 2012 at 1:13 AM

Our financial Rep. Scott Shoup, that handles the investments and the two checks that come in monthly for us advised me last month that both checks have to be signed by both and must be deposited in a joint checking account. I think our regular joint checking account at PNC is still open and I think it would be a good place for us to have the checks deposited so that we can take our own 50% of each check from after they get deposited. In order to keep the account open we only need to keep a small amount in there but we can take the half of each check out. Can we do that without having to go back to court if I agree to sign the checks and if he does too? That would really great if I could use that money monthly until we get to the end of this.

SEC complaint

Exhibit N

Duivonx Rocket

1849-2012

see no mod. hearing on

12-19-12

Jan/09/2014	MOT/PET SPECIAL RELIEFMOT/PET SPECIAL RELIEF	View
Jan/09/2014	ORDER SPECIAL MASTER'S HEARING	ORDER SPECIAL MASTER'S HEARING FEB 24 2014 AT 1:15 PM View
Oct/30/2013	NOTICE NOTICE OF SERVICE OF INTETOGATORIES	View
Oct/16/2013	MOT/PET SANCTIONS	MOT/PET SANCTIONS AND TO COMPEL ANSWERS/ORDER OCT 16 2013 View
Sep/23/2013	ALL COUNTS CONFERENCE MASTER'S RECOMMENDATION AND ORDER	ALL COUNTS CONFERENCE MASTER'S RECOMMENDATION AND ORDER View
Sep/16/2013	NOTICE DEPOSITION	NOTICE DEPOSITION OF LARRY BUJDOS View
Aug/16/2013	ORDER ORDER DATED 8-14-13/HEARINGSCHEDULED 9-18-13 @1:00 PM	View
Jul/31/2013	NOTICE OF SERVICE	NOTICE OF SERVICE/ANSWERS HAND DELIVERED ON 7-30-13 View
Jul/18/2013	MOT/PET SANCTIONS	MOT FOR SANCTIONS & TO COMPEL/ORDER HRG CONT 9-18-13 @ 1 PM View
Jul/16/2013	NOTICE OF SERVICE	NOTICE OF SERVICE/INTEROGATORIES HAND DELIVERED 7-12-13 View
Jun/06/2013	NOTICE OF SERVICE	NOTICE OF SERVICE OF INTEROGATORIES View
Jun/04/2013	MOT/PET SPECIAL RELIEFMOT/PET SPECIAL RELIEF IN EQUITABLE DISTRIBUTION MATTER	View
May/31/2013	ORDER ORDER SCHEDULING HRG ON 7-17-13 @1:00 PM BEFORE MASTER	View
May/15/2013	ORDER ALL COUNTS CONFERENCE/MSA	ORDER ALL COUNTS CONFERENCE ON AUG 14 2013 @ 9:00 AM View
May/09/2013	ORDER CONTINUING HEARING	ORDER CONTINUING HEARING TO MAY 13 2013 AT 1:00 PM View
Apr/18/2013	ORDER HEARING CONTINUED	ORDER HEARING CONTINUED TO MAY 3 2013 AT 10:30 AM View
Mar/12/2013	MOT/PET SPECIAL RELIEFPET FOR SPECIAL RELIEF MODIFICATION/CERT OF SERVICE	View
Feb/08/2013	ORDER ORDER/ALL COUNTS CONF SCHEDULED MAY 13 2013 @ 1:00 PM	View
Jan/03/2013	INCOME AND EXPENSE STATEMENT INVENTORY AND APPRAISEMENT	INCOME AND EXPENSE STATEMENT INVENTORY AND APPRAISEMENT View

Dec/21/2012	ORDER ALL COUNTS CONFERENCE/MSA	ORDER ALL COUNTS CONFERENCE SCHEDULED 2-7-13 AT 9:00	View
Dec/17/2012	MOTION/PETITION	MOTION FOR SPECIAL RELIEF/ORDER DATED 12-12-12	View
Nov/27/2012	PRAECIPE TO WITHDRAW	PRAECIPE TO WITHDRAW & ENTER APPEARANCE LINDA WHALEN	View
Sep/18/2012	AFFIDAVIT OF SERVICE OF COMPLAINT IN DIVORCE	AFFIDAVIT OF SERVICE OF COMPLAINT IN DIVORCE 9-17-12	View
Aug/31/2012	*COUNT INJUNCTIVE RELIEF	COUNT INJUNCTIVE RELIEF	
Aug/31/2012	*COUNT EQUITABLE DISTRIBUTION	COUNT EQUITABLE DISTRIBUTION	
Aug/31/2012	*COMPLAINT DIVORCE	COMPLAINT DIVORCE	

DIVORCE DOCKET

Case Information

Case# Caption Reference File Judgment Amt Filed Date Case Type/Subtype Status Judge
12DO01849 LARRY A BUJDOS VS DEBORAH ANN BUJDOS 0.00 Aug/31/2012 DIVORCE MGT CL HARRY F SMALL

Parties

Party Type	Name	Address
DEFENDANT ATTY	HEIDI DEBERNARDO NORTON	11 NORTH MAIN ST, GREENSBURG, PA, 15601
DEFENDANT ATTY	KRISTEN ANDERS BOJARSKI	5824 LIBRARY ROAD, BETHEL PARK, PA, 15102
DEFENDANT ATTY	TRAVIS J DUNN	6 CLAIRTON BLVD, PITTSBURGH, PA, 15236
DEFENDANT	DEBORAH ANN BUJDOS	113 BRANTHOVER ST, BELLE VERNON, PA, 15012
DEFENDANT PRO SE	DEBORAH ANN BUJDOS	
INTERESTED PTY	GEORGINA STEEDLE LORENZI	
INTERESTED PTY	ERIC E BONONI	20 N PENNSYLVANIA AVENUE, GREENSBURG, PA, 15601
PLAINTIFF	LARRY A BUJDOS	385 LUTZ RUN ROAD, BELLE VERNON, PA, 15012
PLAINTIFF ATTY	LINDA L WHALEN	229 SOUTH MAPLE AVENUE, GREENSBURG, PA, 15601
INTERESTED PTY	WESTMORELAND COUNTY SHERIFFS OFFICE	
PLAINTIFF ATTY	IRENE LUBIN	232 W OTTERMAN STREET, GREENSBURG, PA, 15601

Events

Jul/31/2017	RESPONSE	RESPONSE TO 7-18-17 SETTLEMENT	View
Jul/31/2017	MISCELLANEOUS	MISC/STATEMENT TO COURT BY DEFENDANT	View
Jul/31/2017	MISCELLANEOUS	MISC/PLAINTIFFS SECOND REQUEST FOR PRODUCTION OF DOCUMENTS	View
Jul/31/2017	COUNTER AFFIDAVIT	COUNTER AFFIDAVIT UNDER 3301 (d) OF THE DIVORCE CODE	View
Jul/31/2017	RESPONSE	RESPONSE TO 7-8-17 ORDER TO RETURN DOCUMENT	View
Jul/21/2017	ORDER	ORDER DATED JULY 21 2017 AS SET FORTH	View
Jul/19/2017	*PRAECIPE TRANSMITT RECORD	PRAECIPE TRANSMITT RECORD	View
Jul/19/2017	AFFIDAVIT NON MILITARY SERVICE	AFFIDAVIT NON MILITARY SERVICE	View
Jul/19/2017	OPINION AND ORDER	OPINION AND ORDER DATED JULY 18 2017	View
Mar/13/2017	NOTICE JUDICIAL NOTICE FOR DEFENDANTS DELAY APPEAL	View	
Feb/08/2017	NOTICE NOTICE OF INTENTION TO FILE EMERGENCY PETITION FOR REVIEW &	View	
Jan/30/2017	ORDER DENYINGORDER DENYING PET FOR SPECIAL RELIEF/DATED JAN 30 2017	View	
Jan/24/2017	MOT/PET SPECIAL RELIEFPETITION FOR SPECIAL RELIEF	View	
Jan/24/2017	MOT/PET SPECIAL RELIEFEMERGENCY PETITION FOR SPECIAL RELIEF	View	
Jan/24/2017	MOT/PET SPECIAL RELIEFPETITION FOR SPECIAL RELIEF	View	
Jan/24/2017	NOTICE NOTICE OF PRESENTATION	View	
Jan/03/2017	ORDER ORDER DATED DEC 30 2016 AS SET FORTH	View	
Dec/15/2016	ORDER ORDER 12-14-16 DEFENDANT FOUND IN CONTEMPT AS SET FORTH	View	
Nov/23/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON NOV 21 2016	View
Nov/23/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON NOV 9 2016	View
Nov/18/2016	AMENDED AMENDED EMERGENCY MOTION TO RECUSE OR DISQUALIFY	View	

Action Date	Action Description	Action Name	View Document
Mar/29/2019	NOTICE APPEAL UPON THE RECEIPT OF THE DOCKETED MARCH 8 2019 ORDER		View
Mar/21/2019	TRANSCRIPT OF PROCEEDINGS	MOTIONS COURT DIGITALLY RECORD MARCH 8 2019	View
Mar/21/2019	TRANSCRIPT OF PROCEEDINGS	DIGITALLY RECORDED FEBRUARY 1 2019	View
Mar/21/2019	TRANSCRIPT OF PROCEEDINGS	HEARD ON DECEMBER 21 2018 JUDGE SILVIS MOTIONS COURT	View
Mar/21/2019	MEMORANDUM UNDERSTANDING FROM THE 3-18-19 MOTION FOR RECONSIDERATION		View
Mar/18/2019	ORDER DATED MARCH 8, 2019/ ORDER DENIED/ P.A.R.C.P. NO. 236(A)(2) AND (B)		View
Mar/06/2019	NOTICE OF PRESENTATION/CERTIFICATION OF SERVICE		View
Feb/14/2019	MEMORANDUM OF UNDERSTANDING FROM THE FEBRUARY 1 2019 HEARING		View
Feb/14/2019	MEMORANDUM OF UNDERSTANDING OF THE FEBRUARY 1 2019 HEARING		View
Feb/14/2019	MOT/PET RECONSIDERATION	MOT/PET RECONSIDERATION	View
Feb/04/2019	ORDER FEBRUARY 4, 2019 AS SET FORTH/N236		View
Feb/01/2019	NOTICE OF SERVICE	OF SUBPOENA	View
Jan/28/2019	AMENDED	RESPONSE TO ORDER	View
Jan/24/2019	AMENDED MOTION	FINAL AMENDED MOTION TO CONTINUE	View
Jan/24/2019	MEMORANDUM OF UNDERSTANDING		View
Jan/24/2019	NOTICE PRESENTATION OF MOTION OR PETITION	NOTICE PRESENTATION OF MOTION OR PETITION	View
Jan/24/2019	AMENDED MOTION	TO CONTINUE HEARING	View
Jan/24/2019	RESPONSE	OBJECTIONS TO PLAINTIFF'S BRIEF OPPOSING DEFENDANT'S MOTION	View
Jan/24/2019	MOT/PET CONTINUANCE	MOT/PET CONTINUANCE	View

Nov/14/2016	MOTION/PETITION	EMERGENCY MOTION TO RECUSE OR DISQUALIFY J SMALL	View
Nov/14/2016	CERTIFICATE OF SERVICE	CERTIFICATE OF SERVICE/BRIEF IN SUPPORT US MAIL 11-14-16	View
Nov/14/2016	BRIEF IN SUPPORT OF	BRIEF IN SUPPORT OF EXCEPTIONS	View
Nov/09/2016	*MOT/PET	PETITION FOR DISMISSAL OF CONTEMPT HEARING	View
Nov/03/2016	MOT/PET QUASH SUBPOENA	MOTION TO QUASH SUBPOENA/ORDER 11-3-16 SUBPOENA IS QUASHED	View
Nov/01/2016	CERTIFICATE OF SERVICE	CERTIFICATE OF SERVICE/BRIEF/MAIL/NOV 1 2016	View
Nov/01/2016	BRIEF IN SUPPORT OF	BRIEF IN SUPPORT OF EXCEPTIONS FILED TO MASTERS REPORT	View
Sep/15/2016	ORDER	ORDER OF COURT ACCEPTING MASTER REPORT DATED 8-30-16 IS	View
Sep/07/2016	MOT/PET CONTINUANCE	MOTION TO CONTINUE/ORDER SECOND DAY OF HEARING RESCHEDULED	View
Sep/06/2016	ORDER	ORDER DATED AUG 30 2016 AS SET FORTH	View
Aug/23/2016	NOTICE	NOTICE OF ARGUMENT DATE/ARGUMENT ON NOV 21 2016 @ 9 AM	View
Aug/16/2016	PRO SE APPEARANCE	ENTERED BY PRO SE APPEARANCE ENTERED BY DEBORAH BUJIDOS	View
Aug/16/2016	EXCEPTIONS MASTER'S	REPORT EXCEPTIONS TO MASTERS REPORT/RECOMMENDATIONS FILED 8-16-16	View
Aug/16/2016	AFFIDAVIT	AFFIDAVIT OF GEORGINA STEEDLE LORENZI	View
Aug/15/2016	CERTIFICATE OF SERVICE	CERTIFICATE OF SERVICE/EXCEPTIONS/MAIL/AUG 15 2016	View
Aug/15/2016	EXCEPTIONS MASTER'S	REPORT EXCEPTIONS FILED TO MASTERS REPORT	View
Aug/03/2016	CERTIFICATE OF SERVICE	CERTIFICATE OF SERVICE/AMENDED NOTICE OF FILING OF MASTERS	View
Aug/03/2016	ORDER	ORDER DATED AUGUST 3 2016 AS TO MOTION TO RECUSE/DENIED	View
Aug/02/2016	NOTICE	AMENDED NOTICE OF FILING OF MASTERS REPORT ON JULY 27 2016	View
Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON MAY 4 2016	View
Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON MAY 9 2016	View

Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON APRIL 6 2016	View
Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON DEC 17 2015	View
Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON JAN 18 2016	View
Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON JAN 25 2016	View
Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON AUG 10 2015	View
Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON NOV 16 2015	View
Jul/27/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON SEPT 9 2015	View
Jul/27/2016	VERIFICATION	VERIFICATION	View
Jul/27/2016	MASTERS REPORT	MASTERS REPORT AND NOTICE OF FILING OF MASTERS REPORT	View
Jul/11/2016	ORDER	ORDER HEARING SET FOR SEPTEMBER 22 2016 @ 10 AM	View
Jul/11/2016	ORDER	ORDER DATED JULY 11 2016 AS SET FORTH	View
Jul/01/2016	ORDER	ORDER OF COURT TO CLAIFF/DATED JULY 1 2016 AS SET FORTH	View
Jun/30/2016	MOTION/PETITION	MOTION FOR RECUSAL OF SPECIAL DIVORCE MASTER ERIC BONONNI	View
Jun/30/2016	MOTION/PETITION	MOTION FOR RECUSAL OF J HARRY F SMALL/NOTICE OF PRESENTATION	View
Jun/29/2016	OPINION AND ORDER	OPINION AND ORDER JUNE 28 2016 AS SET FORTH	View
Jun/29/2016	ORDER	ORDER GRANTING MOTION FOR RECONSIDERATION/DATED JUNE 29 2016	View
Jun/24/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON JUNE 22 2016	View
Jun/24/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON JUNE 16 2016	View
Jun/24/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON JUNE 7 2016	View
Jun/24/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON MAY 6 2016	View
Jun/24/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON APRIL 19 2016	View

Jun/24/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON MARCH 4 2016	View
Jun/24/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON FEBRUARY 5 2016	View
Jun/24/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON SEPTEMBER 9 2015	View
Jun/22/2016	MOT/PET CONTEMPT	PETITION FOR CONTEMPT OF ORDER 5-18-16/ORDER HEARING7-11-16	View
Jun/21/2016	MOT/PET RECONSIDERATION	MOT FOR RECONSIDERATION & VACATE MAY 18, 2016 ORDER	View
Jun/21/2016	MOTION/PETITION	MOTION FOR RECUSAL OF JUDGE AND CHANGE OF VENUE	View
Jun/20/2016	MOT/PET RECONSIDERATION	MOT FOR RECONSIDERATION & VACATE MAY 18 2016 ORDER	View
Jun/20/2016	AMENDED	AMENDED MOTION FOR RECUSAL OF J SMALL & CHANGE OF VENUE	View
Jun/16/2016	NOTICE	NOTICE OF SETTLEMENT CONFERENCE/7-6-16 @ 10:30 AM	View
Jun/16/2016	PRAECIPE WITHDRAW APPEARANCE	PRAECIPE WITHDRAW APPEARANCE OF ATTY TRAVIS J DUNN	View
Jun/10/2016	ORDER DENYING	ORDER DENYING ORDER JUNE 10 2016 DENYING MOTION FOR RECUSAL/N236	View
Jun/07/2016	MOT/PET WITHDRAW APPEARANCE AS COUNSEL	PET WITHDRAW ATTY TRAVIS J DUNN/ORDER GRANTED	View
May/19/2016	MOT/PET SPECIAL RELIEF	PETITION FOR SPECIAL RELIEF	View
May/18/2016	ORDER	ORDER MAY 18 2016 DEFENDANT TO RETURN MARITAL RESIDENCE	View
May/06/2016	MOT/PET SPECIAL RELIEF	PETITION FOR SPECIAL RELIEF/ORDER DATED MAY 6 2016 DENYING	View
Apr/07/2016	NOTICE	NOTICE OF MASTERS HEARING/5-4-16 @ 9:30 AM & 5-9-16 @ 9:30 A	View
Mar/09/2016	OPINION AND ORDER	OPINION AND ORDER DATED MAR 9 2016 EMERGENCY PETITION DENIED	View
Mar/07/2016	NOTICE	NOTICE OF MASTERS HEARING/SCHEDULED FOR 4-6-16 @ 9:30 AM	View
Mar/04/2016	MOT/PET WITHDRAW APPEARANCE AS COUNSEL	PETITION WITHDRAW ATTY DUNN/ORDER MAR 4 2016 DENIED WITH	View
Feb/23/2016	ORDER	ORDER FEB 23 2016 MOTION FOR RECONSIDERATION GRANTED IN	View
Feb/12/2016	MOT/PET SPECIAL RELIEF	PETITION FOR SPECIAL RELIEF	View

Feb/12/2016	MOT/PET RECONSIDERATION	MOT FOR RECONSIDERATION OF COURT ORDER AND OPINION	View
Feb/05/2016	MOT/PET SPECIAL RELIEFPETITION FOR SPECIAL RELIEF/ORDER FEB 5 2016 GRANTING AS SET	View	
Jan/21/2016	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON DECEMBER 3 2015	View
Jan/20/2016	*ORDER ENTER JUDGMENT	AMENDED ORDER DATED JAN 18 2016 AWARDDING PLAINTIFF EXCLUSIVE	View
Jan/06/2016	OPINION AND ORDER	OPINION AND ORDER JAN 6 2016 ENJOINING AS SET FORTH	View
Dec/31/2015	CERT PREREQUISITE TO SERVICE OF SUBPOENA PUR TO RULE 4009.22	CERT PREREQUISITE TO SERVICE OF SUBPOENA PURSUANT TO RULE 40	
	View		
Dec/09/2015	NOTICE MASTER'S HEARING	NOTICE MASTER'S HEARING 12-17-15 @ 9 AM & JAN 18 2016 @ 9:30	View
Nov/30/2015	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD OCT 5 2015	View
Nov/17/2015	NOTICE MASTER'S HEARING	NOTICE MASTERS HEARING/DEC 7 2015 @ 9 AM DEC 17 2015 @ 9 AM	View
Oct/23/2015	NOTICE NOTICE OF MASTERS HEARING NOV 16 2015 @ 9 AM	View	
Oct/21/2015	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS/HEARD ON SEPTEMBER 23 2015	View
Oct/21/2015	MOTION/PETITION	EMERGENCY MOTION TO RELEASE FUNDS& CONTINUE HRGS/ORDER	View
Sep/29/2015	MOT/PET SPECIAL RELIEFMOT/PET SPECIAL RELIEF/ORDER DATED 9/29/15 AS SET FORTH	View	
Sep/23/2015	TRANSCRIPT OF PROCEEDINGS	TRANSCRIPT OF PROCEEDINGS HEARD ON AUGUST 20 2015	View
Sep/22/2015	ORDER ORDER PARTIES ATTEND MOTIONS COURT 9-29-15 @ 8:45 AM	View	
Sep/16/2015	NOTICE MASTER'S HEARING	NOTICE MASTER'S HEARING SCHEDULED OCTOBER 21 2015 @ 9 AM	View
Aug/26/2015	ORDER ORDER FOR FURTHER PROCEEDINGS TO BE HELD W/ J SMALL 8-25-15	View	
Aug/17/2015	AFFIDAVIT UNDER SECTION 3301(D) AND NOTICE	COUNTER AFFIDAVIT UNDER SECTION 3301(D) AND NOTICE	View
Aug/17/2015	MISCELLANEOUS	MISCELLANEOUS/REVOCATION OF POWER OF ATTORNEY	View
Aug/13/2015	ORDER FOR RECUSAL	ORDER FOR RECUSAL HRG AUGUST 20 2015 @ 8:45 AM	View

Aug/11/2015	NOTICE MASTER'S HEARING	NOTICE OF MASTER'S HEARING SEPT 9 2015 @ 9 AM	View
Aug/10/2015	AFFIDAVIT OF CONSENT & WAIVER OF PLAINTIFF	AFFIDAVIT OF CONSENT & WAIVER OF PLAINTIFF	View
Aug/05/2015	PRO SE APPEARANCE ENTERED BY	PRO SE APPEARANCE ENTERED BY DEBORAH ANN BUDOS	View
Aug/05/2015	MOT/PET SPECIAL RELIEFMOTION FOR SPECIAL RELIEF/ORDER	AUGUST 5 2015 AS SET FORTH	View
Aug/05/2015	NOTICE NOTICE OF PRESENTATION/MOTION FOR RECUSAL OF JUDGE SCHERER		View
Aug/05/2015	NOTICE NOTICE OF PRESENTATION/MOTION FOR RECUSAL OF JUDGE SCHERER		View
Aug/05/2015	NOTICE NOTICE OF PRESENTATION/MOTION FOR RECUSAL OF JUDGE SCHERER		View
Jul/09/2015	ORDER EXCLUSIVE POSSESSION	ORDER EXCLUSIVE POSSESSION HRG AUGUST 21 2015 @ 10 AM	View
Jul/08/2015	NOTICE MASTER'S HEARING	NOTICE MASTER'S HEARING AUG 10 2015 AT 9:00 AM	View
Jun/19/2015	ORDER SPECIAL MASTER'S HEARING	ORDER SPECIAL MASTER'S HEARING AUGUST 7 2015 @ 10:30 AM	View
Jun/19/2015	MOTION/PETTITION	MOTION TO REASSIGN & RESCHEDULE EXCLUSIVE POSS HRG	View
Jun/17/2015	*MOT/PET APPOINT DIVORCE MASTER	MOT APPOINT DIVORCE MASTER/ORDER APPOINTING ERIC BONONI	View
May/13/2015	ALL COUNTS CONFERENCE MASTER'S RECOMMENDATION AND ORDER	ACC MASTER'S RECOMMENDATION/ORDER ACCEPTED MAY 6 2015	View
Apr/01/2015	ORDER ORDER MARCH 31 2015 AS SET FORTH/EXCLUSIVE POSSESSION		View CANCELED
Feb/25/2015	MOT/PET SPECIAL RELIEFPET SPECIAL RELIEF/MODIFY SUPPORT/ORDER	HRG 3-30-15 @ 2:30	View
Feb/24/2015	MOT/PET WITHDRAW APPEARANCE AS COUNSEL	MOT WITHDRAW APRE OF ATTY BOLARSKI/ORDER GRANTING	View
Feb/05/2015	ORDER CONTINUING HEARING	ORDER CONTINUING HEARING TO MARCH 30 2015 @ 2:30 PM	View
Dec/18/2014	MOT/PET SPECIAL RELIEFPET SPECIAL RELIEF/ORDER	HRG EQUITABLE FEB 4 2015 @ 9 AM	View
Dec/18/2014	AFFIDAVIT CONSENT - DEFENDANT'S	AFFIDAVIT CONSENT - DEFENDANT'S	View
Nov/04/2014	ORDER CONTINUING HEARING	ORDER CONTINUING ALL COUNTS CONF FOR FEBRUARY 4 2015 AT 9 AM	View
Oct/09/2014	CERTIFICATE OF SERVICE CERTIFICATE OF SERVICE/COUNTER	AFFIDAVIT 3301 (D)	View

Oct/09/2014	CERTIFICATE OF SERVICE CERTIFICATE OF SERVICE/PET RAISING CLAIMS US MAIL 10-8-14	View
Oct/07/2014	APPEARANCE ENTERED BY APPEARANCE ENTERED BY ATTY KRISTEN ANDERS BOLJARSKI	View
Oct/07/2014	*COUNT COUNSEL FEES COSTS AND EXPENSES COUNT COUNSEL FEES COSTS AND EXPENSES	
Oct/07/2014	*COUNT ALIMONY PENDENTE LITE COUNT ALIMONY PENDENTE LITE	
Oct/07/2014	*COUNT ALIMONY COUNT ALIMONY	
Oct/07/2014	MOT/PET RAISING CLAIMS MOT/PET RAISING CLAIMS	View
Oct/01/2014	COUNTER-AFFIDAVIT UNDER SECTION 3301(D) COUNTER-AFFIDAVIT UNDER SECTION 3301(D)	View
Sep/24/2014	ORDER ORDER DATED SEPT 23 2014 DISMISSING DEFT PET FOR CONTEMPT	View
Sep/19/2014	NOTICE INTENT TO REQUEST ENTRY OF DIVORCE DECREE NOTICE INTENT TO REQUEST ENTRY OF DIVORCE DECREE	View
Sep/19/2014	CERTIFICATE OF SERVICE CERTIFICATE OF SERVICE/AFFIDAVIT 3301 (d) US MAIL 9-18-14	View
Sep/18/2014	AFFIDAVIT UNDER SECTION 3301(D) AND NOTICE AFFIDAVIT UNDER SECTION 3301(D) AND NOTICE	View
Sep/03/2014	MOT/PET CONTINUANCE MOT/PET CONTINUANCE/ORD HRG CONT TO 11-5-14 AT 1:15	View
Jul/16/2014	ORDER HEARING RESCHEDULED TO ORDER HRG RESCHEDULED TO SEPTEMBER 23 2014 @ 1:15	View
Jul/03/2014	ORDER HEARING RESCHEDULED TO ORDER HEARING RESCHEDULED TO AUG 7 2014 AT 10:00 AM	View
Jul/03/2014	ORDER HEARING RESCHEDULED TO ORDER HEARING RESCHEDULED TO 9-3-14 AT 1:15 PM	View
Jun/26/2014	MOT/PET WITHDRAW APPEARANCE AS COUNSEL MOT WITHDRAW ATTY DEBERNARDO NORTON/ORDER GRANTED 6-26-14	View
Jun/03/2014	ORDER HEARING RESCHEDULED TO ORDER HEARING RESCHEDULED TO JULY 1 2014 AT 11:00 AM	View
Apr/17/2014	NOTICE DEPOSITION NOTICE DEPOSITION	View
Feb/26/2014	ORDER CONSENT ORDER 2-24-14/ALL COUNTS CONF JULY 8 2014 @ 9 AM	View
Feb/25/2014	ORDER ORDER DATED FEBRUARY 25 2014 AS SET FORTH	View
Feb/25/2014	MOT/PET SPECIAL RELIEF/PET/EMERGENCY SPECIAL RELIEF IN EQUITABLE DISTRIBUTION	View

EXHIBIT "2"

VERIFIED 12-18-12 EMAIL BETWEEN ME AND ATTORNEY
HEIDI DE BERNARDO – NORTON
LAST SENTENCE ENDS WITH ME WISHING HER MERRY
CHRISTMAS ON 12-18-12 THE DAY BEFORE THE
SUPPOSED HEARING TO TAKE THE ANNUITIES

Previously Entered on Decket

EXHIBIT "3"

VERIFIED EMAIL TO HEIDI NOVEMBER 2012 TELLING
HER WHERE TO PUT THE ANNUITY CHECKS IN OUR JOINT
CHECKING.

sent on Previous Pocket

EXHIBIT "5"

**FORENSIC REPORT , SHOWS HUSBAND WAS GROSSLY
UNDER REPORTING HIS MONTHLY NET INCOME**

Laurence A. Bujdos

**Disposable Income Calculation
For the years ending December 31**

	2012	2012	2013	2013	2014	2014
	taxable	Cashflow	taxable	Cashflow	taxable	Cashflow
INCOME						
Interest	118	118	20	20	-	-
Dividends	838	838	-	-	-	-
(1) Capital Gains	42,000	42,000	55,000	55,000	49,500	49,500
IRA Distributions	24,868	94,700	42,000	90,000	42,000	65,000
(2) Pensions & Annuities	70,283	117,137	71,580	109,656	81,754	126,353
(3) Schedule E - Rental	21,916	25,784	22,298	29,219	22,923	29,815
(4) Social Security						
TOTAL INCOME	\$ 159,795	\$ 280,578	\$ 190,888	\$ 280,894	\$ 196,877	\$ 287,468
TAXES						
Federal Income Tax		(MFS-1)		(MFS-1)		(MFS-1)
Social Security/Medicare Tax		37,903		50,821		52,467
State Taxes - PA		2,188		2,198		2,510
Local Wage and Municipal Services Taxes		-		-		-
TOTAL TAXES		40,089		53,019		54,977
TOTAL DISPOSABLE INCOME FROM AVAILABLE FUNDS		240,489		227,875		212,491
MONTHLY NET DISPOSABLE INCOME		\$ 20,041		\$ 18,989		\$ 17,708

(1) Capital gain transactions assumed to be considered in equitable distribution
(2) Pension cash flow includes both taxable and non-taxable distributions
(3) Rental Cash flow based earnings plus depreciation and amortization expense add back
(4) Social Security cash flow based on actual amount received
Filing Status calculated assuming married filing separately

EXHIBIT TIMOTHY CAWASKY IGNORED THE HUSBANDS TRUE INCOME

I DRAFTED AN ESTIMATED CORRECTED AMOUNT FOR MONTHLY SUPPORT BASED ON THE 18,000.00 NET INCOME FROM HUSBAND IN 2012 MINUS MY ANNUITY INCOME OF 2,980.00 ,(THAT IS BEFORE MY HUSBANDS ATTORNEY TOOK MY INCOME BY TRICKERY AND ASSIGNED ME A MINIMUM WAGE CAPACITY.)

TIMES 40% THAT CAME TO BE THE HUSBANDS SUPPORT OBLIGATION TO BE 6,008.00 NOT THE 3,582 .00 HE PAID BASED ON HIS CLAIMING TO ONLY MAKE 7,000.00 IN DECEMBER 2012 THEN OCTOBER 24, 2012 HE CLAIMED 11,000.00 A MONTH ON HIS FORMS FOR SUPPORT. TO PAY ON 18,000.00 A MONTH MINUS MY INCOME EQUALED 6,008.00 TO BE PAID FROM HUSBAND MONTHLY AND I WOULD CONTINUE TO RECEIVE MY INCOME OF 2,980.00 TOTALING 8988.00 MONTHLY APL IS THE CORRECT AMOUNT I SHOULD HAVE BEEN RECEIVING IN 2012 , 2013 2014, 2015, 2016 ,2017 . INSTEAD OF THE 3,582.00 I HAVE BEEN RECEIVING SINCE 2012. I BELIEVE I SHOULD HAVE BEEN AND STILL BE RECEIVING THE 8988..00 A MONTH IN SUPPORT .

AT THE END OF MY DISCUSSION THEY TOLD ME THAT THEY WILL LET THE SUPERVISOR LISTEN TO OUR TELEPHONE CONVERSATION .

1910.16-1 Amount of support guidelines and 23 pa cs 4322 Pa General Assembly title 23 chapter 37 alimony and support judge smail aware of behavior and breaking the law by bononi and whalen and simply turned his check

Exhibit
Demuel
Correct APL
N-2

11 usc 523 (a)(2)(A) false pretense, representation actual fraud and financial crimes committed by bononi and whalen

CALCULATING SUPPORT BY PA GUIDELINES BELOW:

HUSBANDS MO NET INCOME 2012

WIFES MO. NET INCOME 2012 FROM HER

RETIREMENT ANNUITIES

18,000.00 NET

2,978.00 NET

2978.00 MINUS WIFE'S INCOME

15,022.00 HUSBANDS INCOME AFTER DEDUCTING wifes income 15,022.00

Times the 15,022.00 by 40% support due from husband 6,008.00

Wife continues to receive her income RETIREMENT ANNUITY of 2,978.00

1. total monthly income due to wife By the PA Apl laws = 8,986.00

2. minus the total income wife received since 2012 monthly 3,582.00

3. monthly support amount wife is owed using correct income 5,404.80

4. modified order from 10-24-12 for APL the increase 8,986.00

5. PA Law for APL support based on correct income paid to wife to be on an

6. equal financial par with husband for a fair divorce the increase 8,986.00

ARREARS: from 2012 - May 2017 HUSBANDS MO. NET INCOME 18,000.00

equal financial par with husband for a fair divorce the increase 8,986.00

total income wife received since 2012 monthly 3,582.00

unreported mo. income wife was deprived of since 2012 5,404.80

ARREARS: for 3 months Oct., Nov. Dec. 2012 @ 5,404.80 16,214.40

Arrears for 2013, 2014, 2015,2016 48 months @ 5,404.80 259,430.40

Arrears for 2017 Jan.- May , 5 months @5,404.80 27,024.00

ARREARS BACK SUPPORT FOR UNREPORTED INCOME 302,668.80

HUSBANDS TOTAL INCOME FOR 56 MONTHS @ 18,000.00 1,008,000.00

2012 IRA UNREPORTED TO DRO INCOME = 49,000.00

HUSBANDS TOTAL INCOME SINCE 2012 1,057,000.00

WIFES TOTAL INCOME FOR 56 MONTHS @ 3,582.00 202,592.00

COMPARE PARTIES INCOME SINCE 854,408.00

HUSBAND'S DIFF. INCOME . TO WIFES SINCE 2012 854,408.00

DIFFERENCE IN HUSBANDS INCOME NOT REPORTED TO DRO \$854,408.00

MINUS WIFES BACK SUPPORT HUSBAND OWES - 302,668.80

AFTER HUSBAND PAYS WIFE BACK SUPPORT HUSBAND HAS \$551,739.20

MORE INCOME THAN WIFE SINCE OCTOBER 2012 TO MAY 2017

BACK SUPPORT HUSBAND OWES WIFE TO DATE IS \$ 302,668.80

Deborah A. Beigler

4

**WIFE DENIED HER FUNDS
FOR EMERGENCY ORAL
SURGERY JANUARY 24, 2017**

Copy

Medgaus Dental Care

2550 Mosside Blvd, Suite 317
Monroeville, PA 15146
412-373-0310

Patient's Name Deborah Bernard Date 1/18/17

Tooth #	Description of Treatment	Fee	Insurance Estimate	Patient Responsibility
	Lower Hyb XD	\$17,100		\$37,100
	Upper Hybridge	\$20,000		
	\$3400 if not a XD Candidate		\$20,100	

Total _____

Comments/Notes

Insurance estimates are estimates only.
It is your responsibility to know the specifics of your insurance plan.

Estimates are valid for 30 days

Patient Signature Deborah Bernard Date 1-18-17

**RESPONSE LETTER TO ATTORNEY LINDA
WHALEN FILING A MOTION
FOR CONTEMPT**

**TO RETURN THINGS TO THE MARITAL
HOME THAT WERE NEVER TAKEN**

DEBORAH A. BUJDOS
113 Branthoover Street
Belle Vernon, PA 15012
724-322-2590
dabujdos2@gmail.com

4/25/16 2:40:29 PM

Re: In response to the April 19, 2016 hearing .

Dear Attorney Whalen,

In response to the April, 19, 2016 hearing you requested to be heard. The requests for items to be returned were another example of the fraudulent statements you have made to the court. In case you do not recollect what I asked the judge to look at was some evidence I wanted to show Judge Small solid proof that Mr. Bujdos is not credible and has committed perjury many times on transcripts and on his deposition. I can prove and that Mr. Bujdos lied and provided false evidence to the court in order to gain exclusive possession of the home. Fortunately for you the judge did not let me present that evidence which resulted in you making more false statements to the court about the things supposedly missing.

I do intend to peruse an action of fraud upon the court and motion to vacate the exclusive possession of the home hearing and to motion the court to allow me to have full discovery before any more masters hearings are heard and more money is wasted in legal fees when the discovery should have been complete since it is such a complex case before we were in front of a divorce master. The order for the exclusive possession of the home and the appointment for Eric Bononi the divorce master came from the recused judge. That judge should have never heard them as you gained them fraudulently by your Ex Parte Communications with Judge Scherer in June 2016. Your motions to Judge Scherer were both filled with lies; you committed fraud on the court. You do know that I have solid proof that your motions were done with unclean hands and filled with false information. I will present the evidence.

The ex parte motions and orders for the exclusive possession of the home and the appointment for Eric Bononi the divorce master came from the recused judge. That is in itself fraud on the court. Judge Scherer should have never heard them. Judge Small should have never continued to hear anything from the recused judge.

As your aware you gained the signed orders fraudulently by your Ex Parte Communications with Judge Scherer in June 2016. Your motions to Judge Scherer were both filled with lies; you committed fraud on the court. You do know that I have solid proof that your motions were done with unclean hands and filled with false information. I will present the evidence in future motions.

Both proceedings were continued even though I brought the matter to the judge and the masters attention prior to them beginning the proceedings I informed them of the motions you presented were done Ex Parte and granted by the judge that was later recused. Judge Scherer was not permitted to pass the Exclusive Possession of the home hearing or anything else to the new judge.

1A

The Pennsylvania Code, "Chapter 7. Assignment of Judges."

<https://www.pacode.com/secure/data/201/chapter7/chap7toc.html>

Rule 701. Assignment of judges to courts. (A) Conditions Applicable for the may be made through the Regional Unit, but IN NO CASE SHALL A RECUSING JUDGE SELECT HIS OR HER ... HE SHALL NOT MAKE ANY PERMANENT RE-ASSIGNMENT OF A JUDGE FROM ONE ... SUCH PETITION SHALL STATE THE REASONS THE ASSIGNMENT OR RE-ASSIGNMENT IS ...

Judge Smail continued to hear Plaintiffs divorce case and proceeded with the ill gotten hearing for Exclusive Possession, gained in an Ex Parte motion filed by attorney Whalen in June 2015. Judge Smail lost subject matter jurisdiction over hearing the divorce and Exclusive Possession of the home hearing. He lost subject matter jurisdiction by accepting the issues passed down to him from the recused judge both a violation of Rule 701. Assignment of judges to courts, in spite of Plaintiff filing an immediate recusal of him based on his violation the retaliation for Judge Scherer very well documented in the record and witnesses have and will testify to provided supporting evidence. (1) The report shall be prepared on a form supplied by the Administrative Office of Pennsylvania Courts or generated by the computer system of the judge's court in the same format as the form supplied by the Administrative Office.

(2) The report shall be signed by the judge.

(3) For each matter which remains undecided ninety days or more, the report shall state:

- (a) the type, caption, and number of the case;
- (b) the nature of the matter;
- (c) the date of submission to the judge;
- (d) the specific reason(s) for the delay; and
- (e) the specific steps taken to remedy the delay.

Judge Smail illegally refused to recuse 4 times during his time on the bench during the divorce. He was determined to remain of the case until he totally destroyed the Plaintiff

The first words that came to my mind after reading your motion for the items to be returned and your testimony in court again. The phrase that came to mind is The Dragonetti Act. You were once again presenting the court with false information. Your motion is filled with incorrect facts, false assumptions, and demands to return some items that either were not Mr. Bujdos's property to begin with or never existed or were taken before I moved. Mr. Bujdos's previous history during this case has evidence that he has perjured himself many times under oath. Therefore, these false accusations are not surprising. For months before my moving Mr. Bujdos and his friends were constantly coming to the garages as I showed you the picture at the last masters hearing. Larry and his friends were always leaving with something. They came without any notice and were removing things. It is quite possible many of the things he claims I have were already removed by himself and his friends.

Please be advised that I do intend to inform the court with proof of perjury committed many times by Mr. Bujdos in transcripts, the deposition, and on his inventory that he submitted. I will also show the court the many violations you have committed and point out each untrue fact you have stated in all of your motions during this litigation.

Let me remind you that his purpose to be there was to care for the cars. During his visits not one car was ever started, washed or cared for. He allowed them to depreciate by not caring for them when he was permitted to do so since February 2013. I never prevented his friends from coming to care for the cars. I will prove this in court and have them subpoenaed to testify I never tried to deter them from coming and caring for the cars. Mr. Bujdos has been coming to the garages himself now for months since Henry Moore gave him permission to return to the residence on May 6th, 2015. You recall that was the day you were suppose to release my 12,000.000 to pay my taxes and then refused to give it to me. Then you filed ex Parte motions to retaliate against me for refusing an offer to move from the home. This motion is a prime example of your Rambo behavior and dirty tactics you have used during this entire litigation.

Regarding the missing items:

The items I have are the 1970 style light was removed when we remodeled being so dated. I do not even know what they looked like or where they are. I have the weed whacker in the car, although I left 3 behind. The swing is sitting behind the garage, it is a big Amish swing that is weathered, as Larry never properly maintained it, and it is still sitting under the brown garages awning. It was there for years and when I left.

For the record Larry has lived in a condo that was fully furnished including a large screen TV since 2013 that he brought back to the marital residence. Larry was left a fully furnished kitchen, fully furnished master bedroom, 3 reclining white leather couches bought on my charge in 2012, a large Sony TV that I paid for in the sunroom. He was left a large granite kitchen table with 8 swivel leather chairs and 5 matching leather stools for the 2 large islands with the granite tops. He was left the front porch white wicker furniture, (a love seat and chair with a matching table.) The pool furniture taken I paid for on my charges and was 3 chaise lounges. I use them in my sons yard. There was a large white table with an umbrella and chairs in the pool area. Mr. Bujdos has been seen with those in his red truck when he was seen at Randal's restaurant. The workbenches were purchased by my son and owned by son since 2008. A coo clock was a birthday gift to me from my son and his then wife. My pots and pans: Larry has never cooked and I brought the pots and pans into the marriage when I moved into the home. Any tools mentioned are either still there or he removed them. I never saw any of them and do not know what they are. This request is another form of harassment.

Even though plaintiff offered to pay my rent on the eviction, I never received any money when I was forced and threatened to move from my home for no legal reason. You and the court knew that I had no money or credit to find a new place to live and did the eviction anyway. I DID NOT HAVE ACCESS TO ANY OF MY RETIREMENT INCOME AS YOU HOLD HOLDIT HOSTAGE. , I have been financially damaged again by having to move in the first place by you attorney Whalen' and your fraud on the court to have the Exclusive Possession hearing be held.

Your insulting comments about the size of my son's 780 square foot house as she stated with her investigation of Google. Only confirms that the Plaintiff and his son and friends continue to stalk me. You state my things are in a warehouse that also proves this eviction of me from my home was wrong when I had no money, no credit that you cause d me to loose when you took my retirement income and never made your client pay his share of the marital card debt. Mr. Bujdos had a comfortable home in a condo for the last 3 years, He had permission t have people care for his cars and chose to let the cars go uncared for himself, he has 18, 000.00 of monthly income and full access to his 500,000.00 IRA that he admitted under oath to taking more from that as he cant live on 18,000.00 a month.

You have repeatedly lied in every motion to the court about me not paying my bills when you know the only time I missed paying them was when your client was keeping my mail that you actually sent to my attorney after he held it from me. I have that letter you sent Heidi stating you was returning my mail. I have provided my credit reports to prove I had perfect credit until you took my retirement money, placing me in financial suppression during this litigation to give your client the power to destroy me financially.

2. Our marital funds have never been frozen. Larry enjoys receiving \$18000 a month while I receive alimony pendent lite of \$3,582.00 which he pays to me out of the marital pot and enjoys access to his IRA's etc.

I have attempted to obtain discovery since 2012; however, you prevented me from doing so by controlling my monthly retirement money. You had no incentive to close or provide the required COMPLETE discovery as you have illegally been collecting and placing in your escrow every month claiming to use for equitable distribution. In fact, the marital annuities by law cannot transfer owners, however, you have taken the liberty to pay Master Bononi \$10,000 direct to Master Bononi for a master hearing that was gained Ex Parte with false information in your motion to have the appointment for a master. IOLTA rules have been broken particular the fact that a sub account must be set up in a trust fund to pay a master. I do not know what kind of tax liabilities you have caused me by doing this. Your comment in the motion for April 19, 2016 you state that we have been to 6 masters' hearings and imply that it is my fault for that. PA law should have not in front of a master until both of us had our discovery done us. These hearings have been done with us only getting the discovery done now. You refused to release financial information we need to complete discovery. You should be sanctioned and Your client in contempt as you well know the documents we need to review should have been listed on his inventory and we should not have to request him to sign a release as these are all critical to the true value of the marital estate.

3. At the first DRO hearing/order it was calculated that I receive 4,400.00 spousal supports from Larry as along as I continued to receive my share of the MetLife/John Hancock marital retirement income from the annuities in both names. We were receiving these since 2008 as our monthly retirement income. Already in pay status that should not have been taken from me or held for Equitable Distribution by PA law. Doing otherwise is considered double dipping. Your constant derogatory comments at each hearing regarding my not working are a violation of your model rules of conduct; you do that to influence the judge to favor Larry. What you do not state is that both Larry and I chose to take an early retirement and set those funds aside to use. I do not have to work when I have made previous arrangements to retire early using funds that are marital.

On 3/17/13 during a meeting with Attorney Norton you attorney Whalen deceitfully "slipped" in a modification motion stating the marital annuities were to be placed into a trust account. That "modification" was dated 12/19/12 and the only recorded Order of Court dated 12/19/12 is an order for an ACC hearing. The DRO Prothonatary statement does not even show a hearing held, nor a De Nova filed timely. In fact, you filed your appearance as attorney on 11/26/12, although your invoice shows you prepared a de novo appeal on 11/12/12. Attorney Norton's invoice shows a special relief hearing for dogs and cars issues. This "modification" is questionable of ever happening however the so-called hearing caused a reduction of my alimony pendent lite.

4. At one of the master hearings, you presented you invoice as Exhibit "50" Yes, one of many exhibits. I assume by presenting as an Exhibit, you are requesting attorney fees paid to you out of MY funds, which I have no access to.

5. I have repeatedly requested you, attorney Whalen to present me with your original POA that you drafted and charged Mr. Bujdos for and have many times said it gives you authority to hold my share of the marital annuities. You have refused to provide it to me.

Exhibit "50" attorney Whalen's invoice states:

4/14/13 Draft Special POA regarding the checks	\$150.
Letter & enclosure to Attorney Norton	\$90.
4/22/13 Attend to letter & signed POA from Attorney Norton	\$56.25

The POA that attorney Whalen drafted clearly violates Pa I would never sign my rights over to opposing litigant and give attorney Whalen authority to "hold" my marital annuities and deprive myself of the style I was accustomed to living for 18 years in the marriage according to Pa Divorce Code. In fact the POA IS VOID as the proper language is not cited as required in Pa Law and there are no witnesses on this piece of hand written paper as required.

6. The invoice is riddled with fees charged for "handling" "issuing checks" along with subpoenas you served without notifying Attorney Norton or me for the surprise deceitful April 2013 eviction hearing. The subpoenas were served to people from the bank where my mortgage is held. You also prepared one for a TOM WOODSON to testify against me. Your deceitful actions in setting up that eviction hearing failed to prove that I was not paying mortgage/and other marital home-related expenses. I proved that my payments were, made and on time. The entire hearing was meritless.

7. It is these types of meritless motions you presented repeatedly that caused me to have increased legal fees and that allowed you time to delay my discovery.

You have ignored your model rules of conduct and many rules of the court and it's procedures without being held responsible for you act of unclean hands in this litigation.

All while you have churned fees and made the court look at me as a gold-digger.

Finally, a review of my prothonatary filed documents along with comparing her invoice show that many motions were filed without notice to me, ex parte conduct such as the 5/5/15 conversation with Henry Moore, for \$48. , One day before the 5/6/15 ACC hearing there are charges for interviewing Roy Reick, who is our accountant, particularly 12/16/12 Review fax from Roy Reick \$80 and 12/20/12 Interviewing Roy Reick \$80. It appears a conflict of interest and this is the time that the "modification" for my alimony pendent lite to be placed in an escrow account for equitable distribution. There is no order from the DRO stating you, attorney Whalen are assigned as escrow officer.

8. I filed a motion for Judge Scherer to recuse from my case, stating the many violations I endured since 2012 to 8/2015. One of the violations included him hearing and granting your ex parte retaliatory exclusive possession of the home motion and appointing a master motion.

Was Your motions were retaliatory due to my refusing your a surprise offer made to me on May 6th, 2015 to move from my home before I was permitted to do my discovery. That was your strategy to again delay my discovery by getting exclusive possession of the home and appointing a divorce master before my discovery was done. That was done with unclean hands. Shortly after that, a hearing was held and Judge Scherer recused. You continued to pursue the motions you presented to Judge Scherer ExParte

9. Everything that began after that the Ex Parte Communication should have been stopped. You should have had to prepare new motions for the new judge and Judge Sherers orders from your Ex Parte meeting should have been dismissed. His orders should have not carried over these ex parte proceedings from the recusing Judge. There has been extrinsic Fraud committed during the entire case .

Deborah Bujdos

Deborah Ann Bujdos

The Pennsylvania Code, "Chapter 7. Assignment of Judges,"

<https://www.pacode.com/secure/data/201/chapter7/chap7toc.html>

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Judge Smail continued to hear Plaintiffs divorce case and proceeded with the ill gotten hearing for Exclusive Possession, gained in an Ex Parte motion filed by attorney Whalen in June 2015. Judge Smail list subject matter jurisdiction over hearing the divorce and Exclusive Possession of the home hearing. He lost subject matter jurisdiction by accepting the issues passed down to him from the recused judge both a violation of **Rule 701. Assignment of judges to courts**, in spite of Plaintiff filing an immediate recusal of him based on his violation the retaliation for Judge Scherer very well documented in the record and witnesses have and will testify to provided supporting evidence. (1) The report shall be prepared on a form supplied by the Administrative Office of Pennsylvania Courts or generated by the computer system of the judge's court in the same format as the form supplied by the Administrative Office.

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Judge Smail illegally refused to recuse 4 times during his time on the bench during the divorce. He was determine d to remain of the case until he totally destroyed the Plaintiff

**IN THE COURT OF COMMON PLEAS OF
WESTMORELAND COUNTY, PENNSYLVANIA
CIVIL ACTION - DIVORCE**

**LARRY A. BUJDOS,
PLAINTIFF**

vs.

**DEBORAH ANN BUJDOS,
DEFENDANT**

No. 1849 of 2012-D

PRAECIPE TO TRANSMIT RECORD

TO THE PROTHONOTARY:

Transmit the record, together with the following information, to the court for entry of a Divorce Decree:

1. Grounds for Divorce: Irretrievable breakdown under §3301(c) of the Divorce Code.
2. Date and manner of service of original Complaint:


Personal service on September 17, 2012 by Robert C. Freeman, Constable. An Affidavit of Service signed by Robert C. Freeman, Constable is dated September 17, 2012 and filed with the Prothonotary on September 18, 2012.

3. Date of execution of the Affidavit of Consent required by §3301(c) of the Divorce Code:

by Plaintiff: August 10, 2015 by Defendant: November 21, 2014

4. Related claims pending: None
5. Date and manner of service of the notice of intention to file Praecipe to Transmit Record, a copy of which is attached. N/A

DATE: 7/19/17


Linda L. Whalen, Esquire
Attorney for Plaintiff

OPEN FOR BIAS



COPY

This court erred by not allowing the case to be reopened for the proven fraud used in the case and the well established proof that Judge Smail was Bias. And had a duty to recuse, before issuing an unconscionable final order that he knew was missing \$2.3 million and full disclosure of assets by the husband was never enforced. .

Judges are human and we are all influenced by past experiences. These past experiences, however, must never deprive a person of their rights under the law. It is one of our most basic rights under the law!

The extrajudicial source doctrine, however, provides for a rare exception, allowing a judge's in court statement to weigh on his impartiality when the judge's statements exhibit such a high degree of favoritism that fair judgment would be impossible.²⁸ In *United States v. Antar*, a judge stated in court that his goal from the start of the case was to give back to the public.²⁹ Despite the extrajudicial source doctrine's presumption that only out-of-court statements or actions by a judge are applicable under § 455(a), the Third Circuit in *Antar* ruled that the trial judge's proclamation that his goal was to give back to the public provided a stark example of the antagonism to a party that justified an exception under *Litky*.³⁰ Despite occurring in court, the Third Circuit found the judge's statements to exhibit such a high degree of favoritism to justify disqualification.³¹

The final order should be vacated In this case due to judge Smail who was clearly bias from the first day he did not recuse or disqualify himself four other times during the litigation,

despite the defendant's timely filed motions to recuse with affidavits, and her production of evidence including court transcripts and orders showing the judge's false statements he made on orders and defamatory statements in transcript's against the wife, also witnessed by others, established that his bias, prejudice, and unfairness, with such a high degree of favoritism to justify disqualification and necessitated his recusal.

His refusal to recuse, ended in the defendant being denied her own money to appeal his order and ended with the wife defrauded of 2.5 million in marital assets. He denied the defendant/ wife's constitutional right to a fair and impartial hearing, by refusing to recuse.

Judicial recusal is an extremely important concept and should not be overlooked. Failure to address it before or during trial could result in a waiver of the issue on appeal. It is important therefore that your attorney explores this issue and immediately makes a motion if it is appropriate. Even if a judge refuses to recuse himself, a higher court can still reverse an unfavorable decision and/or grant the party a new trial followed.

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Despite the extrajudicial source doctrine's presumption that only out-of-court statements or actions by a judge are applicable under § 455(a), the Third Circuit in *Antar* ruled that

the trial judge's proclamation that his goal was to give back to the public provided a stark example of the antagonism to a party that justified an exception under *Liteky*.³⁰ Despite occurring in court, the Third Circuit found the judge's statements to exhibit such a high degree of favoritism to justify disqualification.

See: I. Liteky v. United States and Limited Exceptions to the Extrajudicial Source Doctrine in Extreme Circumstances

The extrajudicial source doctrine requires that for an impartiality analysis, a judge's in court statements will not be considered except in rare circumstances.²⁴ In *Liteky v. United States*, the Supreme Court refused to

18. *See id.* at 914 (distinguishing the informed reasonable person who understands the presumption that judges hear a case they are assigned to from a passing observer who may be shocked by threats against a judge).

19. *See In re United States*, 666 F.2d 690, 695 (1st Cir. 1980) (finding rumors, innuendos, and erroneous information published as fact insufficient to support a finding of factual bias).

20. *See Holland*, 519 F.3d at 916-17 (ruling that, based on the presumption that judges hear assigned cases, the defendant's threats did not warrant a § 455 disqualification).

21. *See Liljeberg v. Health Servs. Acquisition Corp.*, 486 U.S. 847, 860 (1988) (establishing, after a 1976 amendment to the statute, that the § 455 disqualification applies where the objective appearance of bias, and not actual bias, is shown).

22. *See Liteky v. United States*, 510 U.S. 540, 555 (1994) (applying the extrajudicial doctrine for disqualification, meaning that the source of bias or impartiality must be out-of-court or extrajudicial).

23. *See United States v. Grinnell Corp.*, 384 U.S. 563, 583 (1966) (holding that a judge's "terse" exclusion of what he felt to be irrelevant evidence was insufficient to warrant disqualification, due to the extrajudicial source doctrine).

24. *See Liteky*, 510 U.S. at 551 (explaining that the extrajudicial source doctrine

26. *See id.* at 542-43 (examining whether displays of impatience with the defense during trial was sufficient to justify an exception to the extrajudicial source doctrine).

27. See *id.* at 555 (crafting a limited exception to the extrajudicial source doctrine where an in-court statement can be considered when the evidence of an extreme animosity to a party makes the judge unable to render fair judgment).

28. See *id.* at 551 (finding that despite the existence of the exception, the general presumption favors the exclusion of in court statements by a judge for a § 455 analysis).

29. See *United States v. Antar*, 53 F.3d 568, 576 (3d Cir. 1995) (finding an exception to the extrajudicial source doctrine where the judge made it clear to the parties that his goal in the case was different than what it should have been).

31. See *id.* at 584 (recognizing the limited nature of an extrajudicial source doctrine exception while remanding the case to a different trial judge)

This court erred by not allowing the case to be reopened for the proven fraud used in the case and the well established prof that Judge Smail was Bias. And had a duty to recuse, before issuing an unconscionable final order that he knew was missing \$2.3 million and full disclosure of assets by the husband was never enforced. .

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Deborah A. Reijo

2-13-19

ORIGINAL

EXHIBIT "B"

NEW JUDICIAL ASSIGNMENT

AND CURRENT DOCKET

[New Search](#)[Search Result ✕](#)[Case Detail ✕](#)

Case Information

Case#	Caption	Reference File	Judgment Amt	Filed Date	Case Type/Subtype	Status	Judge
18CI03302	DEBORAH A BUJDOS VS. LINDA LONG WHALEN			Jul/24/2018	MISC OTHER	ACTIVE	Timothy Creany

Parties

Party Type	Name	Address
DEFENDANT ATTY	MARTHA GALE	1515 MARKET STREET SUITE 1414, PHILADELPHIA, PA, 19102, USA
DEFENDANT	LINDA LONG WHALEN	
DEFENDANT	MICHAEL STEWART Sr.	
DEFENDANT	BRIAN P CAVANUGH	
DEFENDANT	STEWART MCCARDLE SORICE WHALEN FARRELL FINOLI & CAVANAUGH L	
DEFENDANT	HEIDI DE BERNARDO-NORTON /AKA	
DEFENDANT	HEIDI NORTON	
DEFENDANT	ANTHONY DE BERNARDO	
DEFENDANT	TRAVIS DUNN	
DEFENDANT	BOOTAY BEVINGTON & NICHOLS LLC	
DEFENDANT	LEE DEMOSKY	
DEFENDANT	JONATHON HELD	

DEFENDANT CHRISTIAN SCHERER
 DEFENDANT HARRY SMAIL
 DEFENDANT HENRY MOORE
 DEFENDANT ERIC E BONONI
 DEFENDANT CHRISTINA OBRIEN
 DEFENDANT TERRENCE OHALLORAN
 PLAINTIFF DEBORAH A BUJDOS
 DEFENDANT MELISSA ROBERTS
 DEFENDANT TIM CAWOSKI
 DEFENDANT ROY REICK
 DEFENDANT LAURENCE BUJDOS
 DEFENDANT SCOTT EUGENE SHOUP
 DEFENDANT KIMBERLY FLECK
 DEFENDANT LEANN RENEE
 DEFENDANT PFG /CETERA
 DEFENDANT RUMMEL
 DEFENDANT CETERA FINANCIAL GROUP
 DEFENDANT METROPOLITAN LIFE INSURANCE
 COMPANY
 DEFENDANT WILLIAM S DEMCHAK
 DEFENDANT PNC BANK
 PLAINTIFF DEBORAH A BUJDOS
 PRO SE

Events

Action Date	Action Description	Action Name	View Document
Jun/10/2019	***** NOT VERIFIED *****	***** NOT VERIFIED *****	
Jun/10/2019	ANSWER	ANSWER TO PLFFS MOTION FOR PRE COMPLAINT DISCOVERY AND PERMISSION TO AMEND COMPLAINT AND REQUEST FOR PROTECTIVE ORDER AND STAY OF	View

		DISCOVERY PENDING DETERMINATION OF PRELIMINARY OBJECTIONS TO PLFFS COMPLAINT FILED ON BEHALF OF	
May/31/2019	ORDER STATUS CONFERENCE	SCHEDULING ORDER MAY 29, 2019 THAT A STATUS CONFERENCE IS SCHEDULED FOR JULY 15, 2019	View
May/28/2019	REQUEST	REQUEST FOR PRE COMPLAINT DISCOVERY AND PERMISSION TO AMEND HER COMPLAINT	View
May/28/2019	RESPONSE - PLAINTIFF'S	TO DEFTS PRELIMINARY OBJECTIONS	View
Apr/15/2019	JUDICIAL REASSIGNMENT FORM FROM	SCHERER TO JUDGE CREANY	View
Apr/15/2019	BRIEF IN SUPPORT OF PRELIMINARY OBJECTIONS	BRIEF IN SUPPORT OF PRELIMINARY OBJECTIONS TO THE COMPLAINT	View
Mar/28/2019	AGREEMENT	PURSUANT TO RULE 237.2 TO EXTEND TIME TO PRESENT HER OBJECTIONS TO THE DEFTS PRELIMINARY OBJECTIONS AND THE NOTICE TO PLEAD IN TWENTY DAYS	View
Mar/21/2019	MOTION/PETITION	THIRD PETITION FOR DISQUALIFICATION AND RECUSAL OF THE HONORABLE JUDGE HARRY SMAIL AND THE HONORABLE CHRISTIAN SCHERER AND THIS CASE AND ALL FUTURE CASES INVOLVING DEBORAH A BUJDOS	View
Mar/21/2019	MOTION/PETITION	AMENDED 2ND PETITION DISQUALIFICATION AND RECUSAL OF THE HONORABLE JUDGE HARRY SMAIL AND THE HONORABLE CHRISTIAN SCHERER AND JUDGE AG MARSILLI THIS CASE AND ALL FUTURE CASES INVOLVING DEBORAH A BUJDOS	View
Mar/21/2019	MOTION/PETITION	2ND PETITION DISQUALIFICATION AND RECUSAL OF THE HONORABLE JUDGE HARRY SMAIL AND THE HONORABLE CHRISTIAN SCHERER AND JUDGE AG MARSILLI THIS CASE AND ALL FUTURE CASES INVOLVING DEBORAH A BUJDOS	View
Mar/21/2019	NOTICE	OF PRO SE RIGHTS	View
Mar/21/2019	RESPONSE -	PLFFS SECOND RESPONSE OBJECTIONS	View

EXHIBIT "H"

**HOW SHERIFF WAS A PART OF THE
ENTERPRISE IN HELPING JUDGE SMAIL**

COLLECT 17,600.00 IN UNLAWFUL FINES

BY NOT LETTING HIS DEPUTY

TESTIFY TO WITNESSING SUBORNOING

PERJURY

**THE COURT OF COMMON PLEAS
WESTMORELAND COUNTY, PENNSYLVANIA**

Civil Action No.

3302-2018

Service by FAX , Electronic Mail and U.S. Mail June 26, 2019

**Deborah A. Bujdos
Plaintiff**

PRO SE

v.

**Judge Harry Smail
Judge Christian Scherer
Sheriff Jonathon Held**

Attorney Martha Gayle

**Cerera Financial Group.
Kimberly Fleck , Scott Shoup. et.al.
Defendant**

**Winget. Spadafora & Schwartzberg. LLP
Joel M. Wertman, Esquire
Douglas G. Fogle, Esquire**

**I Certify That A True And Correct Copy OF THE ATTACHED FILED MOTIONS Was Sent To
Attorney Martha Gayle, Attorney Dan Fogel and the Honorable Judge Creany Via Fax
and regular mail on May 29, 2019**

by ,

Deborah Ann Bujdos

Deborah Ann Bujdos

3-21-19

Exhibit Q no remedy from Texas Court

THIS IS MY AMENDED MEMEORANDUM OF UNDERSTANDING , WITH EXHIBITS . THIS COURT AGREES THAT BY DENYING MY MOTION ON MARCH 8, 2019 TO OPEN THE FINAL ORDER :

THEY HAVE DENIED ME MY DUE PROCESS RIGHTS WHEN THE COURT AGAIN ON 3-8-19 FAILED TO OPEN OR VACATE THE UNCONSCIONABLE 7-18-17 FINAL ORDER.

THEY HAVE NOT ADDRESSED THE NEW EVIDENCE: I PROVIDED REGARDING THE HUSBANDS DELIBERATE SCHEME TO ONLY SIGN THE LEASES UNTIL AFTER THE DIVORCE ,

THE HUSBAND HAS JUST RECENTLY PURCHASED 3 TRI AXLE DUMP TRUCKS , NORMAL COST FOR ONE IS 250,000.00 ON THE SIDE OF THE TRUCKS THE NAME OF THE NEW BUSINESS IS BUJDOS ONE LLC. WITH THE PLAINTIFF THE HUSBANDS CELL NUMBER ON IT.

I BELIEVE HE IS USING THE 2.5 MILLION HE HAS HIDDEN FROM THE COURT TO DIVIDE IN THE DIVORCE TO OPEN THIS NEW BUSINESS, AND HAS PAID OFF HIS SONS 200,000.00 MORTGAGE.

Q note to open 400,000.00 Trucking Bus. BUJDOS ONE LLC

BY THIS COURT QUASHING MY SUBPOENA ON 3-8-19 THAT I HADD OPPSOING ATTORNEY SERVED WITH FOR DOCUMENTS TO LOCATE THE 2.5 MILLION THAT HAS BEEN MISSING FROM THE FINAL ORDER , YOU HAVE ASSISTED HIM IN HIDING WHAT HE HAS DONE WITH THE MY SHARE OF THE MARITAL ESTATE.

YOU HAVE ALLOWED HIM TO DENY

THE COURT HAS FILED TO COMPELL THE HUSBAND TO PROVIDE THE NEW GAS WELL LEASES FOR THE 26 ACRES THAT HE SIGNED ON OCTOBER 8, 2018 AS A SINGLE MAN THIS COURT FAILED TO COMPEL OPPOSING COUNSEL TO PROVIDE CURRENT DOCUMENTS TO PROVE FULL DISCLOSURE OF THE MARITAL ESTATE AND THE THE VALUE OF THE HUSBANDS ASSSETS NOT LISTED ON THE FINAL ORDER

FAILED TO REVIEW THE PAST AND NEW EVIDNCE FOR OPENING THE FINAL ORDER .

THE COURT IS DENYING MY MOTION TO OPEN OR VACATE KNOWING

2 IRA'S ARE MISSING THE CORRECT AMOUT ON THE FINAL ORDER AMOUNTING TO ONE MILLION DOLARS FOR THE 2 IRA;S

SEE ATTACHED CETERA REPORT SHOWS THE NAMES OF ALL ACCOUNTS WITH THEM AND YOU WILL SEE THA 590,000.00 FIDELITY IRA IS MISSING FROM THE INALE ORDER, THEREFORE IT WAS NOT LITIGATED AND REMAIN UNRESOLVED.
SEE ATTACHED BRINKER STATEMNET SHOWING ITS BALANCE AS OF THE BEGINNING OF THE DIVORCE IN 2012 AS OVER %\$583,000.00 , HOWEVER THE FINAL ORDER ONLY ACCOUNTS FOR 87,000.00 TO DIVIDE.

1. UNLAWFULLY DENIED MY RIGHTS TO GAS WELL BONUS AND MONTHLY ROYALTY PAYMENTS.

Marcellus Mineral Buyer | Sell Oil and Gas Rights

[Adwww.cavallominerals.com/](http://www.cavallominerals.com/)

Oil and Gas Buyer in **PA**, OH, and WV we have paid upwards of \$10,000.00 per acre. User-Friendly Tools. Hands-On Approach. Highlights: User-Friendly Tools Available, Providing Customer Service.

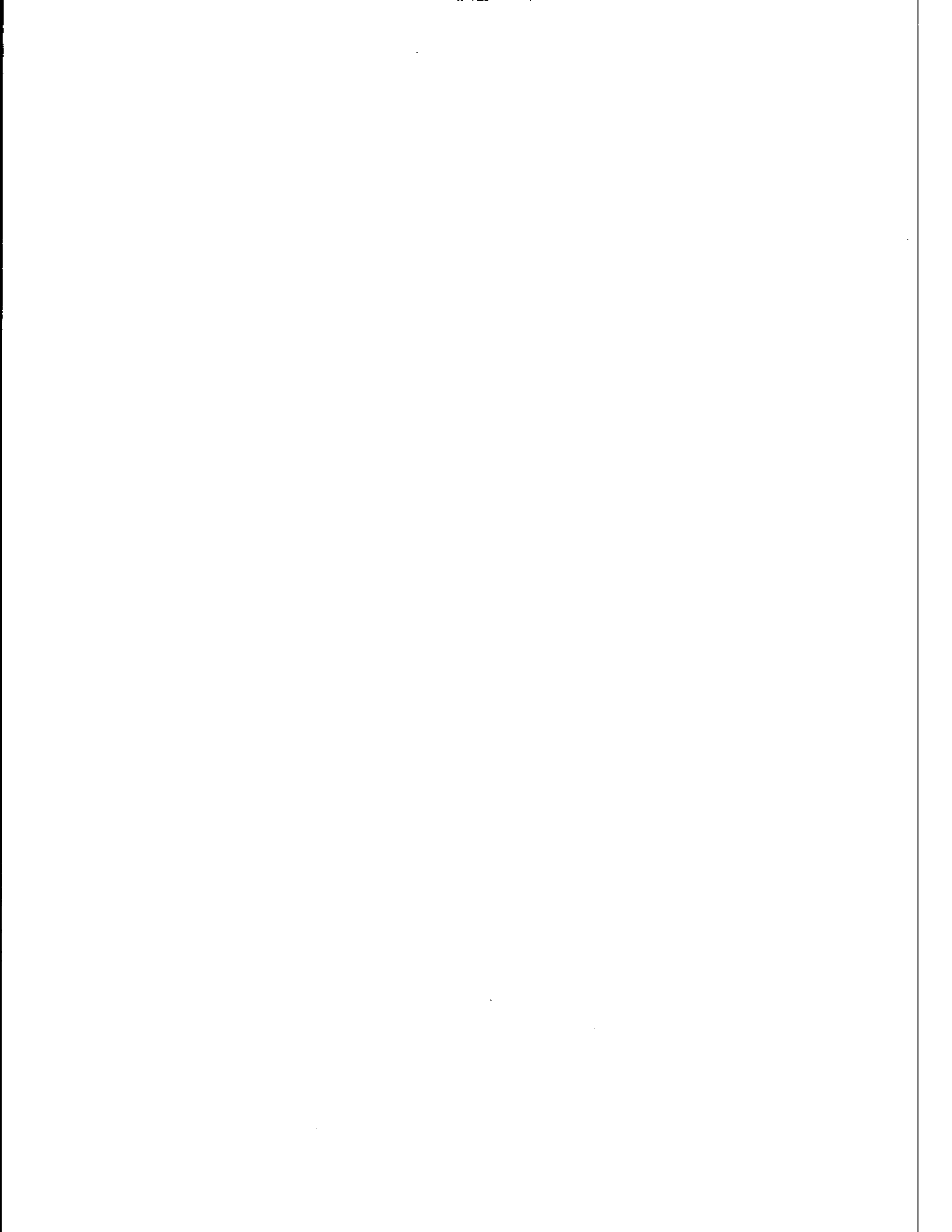
- o Contact Us
- o About Us
- o Process Information

THE COURT HAS REFUSED TO HAVE THE HUSBAND PRODUCE DOCUMENTS THAT SHOW HE HAS RECEIVED A GAS WELL BONUS FOR APPROX.

91,000.00 AFTER DELIBERATELY WAITED TO SIGN AFTER THE DIVORCE

2. AS SEEN IN THE FINAL ORDER THE COURT FAILED TO CONSIDER BOTH PARTIES POSSIBLE FUTURE INCOME

This court even failed to address any possible future income for me as this court ignored my new evidence I presented , The husbands new Chevron mineral rights lease.



IN THE COURT OF COMMON PLEAS WESTMORELAND COUNTY PENNSYLVANIA
CIVIL ACTION-DIVORCE

LARRY A. BUJDOS

Attorney Linda Whalen

Plaintiff,

)
) Docket number 1849D2012
)

vs

DEBORAH ANN BUJDOS

Defendant.

)
)
)
)
)
)

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ON THE SIDE OF THE TRUCKS THE NAME OF THE NEW BUSINESS IS BUJDOS ONE LLC. WITH THE PLAINTIFF THE HUSBANDS CELL NUMBER ON IT.

I BELIEVE HE IS USING THE 2.5 MILLION HE HAS HIDDEN FROM THE COURT TO DIVIDE IN THE DIVORCE TO OPEN THIS NEW BUSINESS, AND HAS PAID OFF HIS SONS 200,000.00 MORTGAGE.

BY THIS COURT QUASHING MY SUBPOENA ON 3-8-19 THAT I HADD OPPSOING ATTORNEY SERVED WITH FOR DOCUMENTS TO LOCATE THE 2.5 MILLION THAT HAS BEEN MISSING FROM THE FINAL ORDER , YOU HAVE ASSISTED HIM IN HIDING WHAT HE HAS DONE WITH THE MY SHARE OF THE MARITAL ESTATE.

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Marcellus Mineral Buyer | Sell Oil and Gas Rights

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Oil and Gas Buyer in **PA**, OH, and WV we have paid upwards of \$10,000.00 per acre. User-Friendly Tools. Hands-On Approach. Highlights: User-Friendly Tools Available, Providing Customer Service.

- o Contact Us
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2. AS SEEN IN THE FINAL ORDER THE COURT FAILED TO CONSIDER BOTH PARTIES POSSIBLE FUTURE INCOME

This court even failed to address any possible future income for me as this court ignored my new evidence I presented, The husbands new Chevron mineral rights lease.

1. Both the previous and this court turned a blind eye to the proof of his scheme to deprive me out of mineral rights income. That he now receiving from the mineral rights lease, he deliberately delayed signing until they forced me to sign the 26 acres of marital property over to him on 11-22-17 and done while I was under financial distress, penniless since August 2017 when they stopped my support. I was forced to sign the deeds and as seen on the transcript I was denied the right to have counsel present on 11-22-17.
2. DENIED THE RIGHT TO HAVE COUNSEL PRESENT WHEN FORCED TO SIGN MARITAL 26 ACRES OF LAND OVER, BEFORE HEARING MY MOTIONS TO VACATE.

Deborah A. Sizelo

Respectfully Submitted by

Deborah A. Bujdos

Deborah Bujdos

Plaintiff

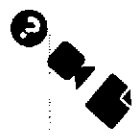
July 12, 2019

Deborah A. Bujdos 7-15-19

EXHIBIT "A"

NEW JUDICIAL ASSIGNMENT

AND CURRENT DOCKET



New Search

Search Result ✕

Case Detail ✕

Case Information

Case#	Caption	Reference File	Judgment Amt	Filed Date	Case Type/Subtype	Status	Judge
18CI03302	DEBORAH A BUJDOS VS. LINDA LONG WHALEN			Jul/24/2018	MISC OTHER	ACTIVE	Timothy Creany

Parties

Party Type	Name	Address
DEFENDANT ATTY	MARTHA GALE	1515 MARKET STREET SUITE 1414, PHILADELPHIA, PA, 19102, USA
DEFENDANT	LINDA LONG WHALEN	
DEFENDANT	MICHAEL STEWART Sr.	
DEFENDANT	BRIAN P CAVANUGH	
DEFENDANT	STEWART MCCARDLE SORICE WHALEN FARRELL FINOLI & CAVANAUGH L	
DEFENDANT	HEIDI DE BERNARDO-NORTON /AKA	
DEFENDANT	HEIDI NORTON	
DEFENDANT	ANTHONY DE BERNARDO	
DEFENDANT	TRAVIS DUNN	
DEFENDANT	BOOTAY BEVINGTON & NICHOLS LLC	
DEFENDANT	LEE DEMOSKY	
DEFENDANT	JONATHON HELD	

DEFENDANT CHRISTIAN SCHERER
 DEFENDANT HARRY SMAIL
 DEFENDANT HENRY MOORE
 DEFENDANT ERIC E BONONI
 DEFENDANT CHRISTINA OBRIEN
 DEFENDANT TERRENCE OHALLORAN
 PLAINTIFF DEBORAH A BUJDOS
 DEFENDANT MELISSA ROBERTS
 DEFENDANT TIM CAWOSKI
 DEFENDANT ROY REICK
 DEFENDANT LAURENCE BUJDOS
 DEFENDANT SCOTT EUGENE SHOUP
 DEFENDANT KIMBERLY FLECK
 DEFENDANT LEANN RENEE
 DEFENDANT PFG /CETERA
 DEFENDANT RUMMEL
 DEFENDANT CETERA FINANCIAL GROUP
 DEFENDANT METROPOLITAN LIFE INSURANCE
 COMPANY
 DEFENDANT WILLIAM S DEMCHAK
 DEFENDANT PNC BANK
 PLAINTIFF DEBORAH A BUJDOS
 PRO SE

Events

Action Date	Action Description	Action Name	View Document
Jun/10/2019	***** NOT VERIFIED *****	***** NOT VERIFIED *****	
Jun/10/2019	ANSWER	ANSWER TO PLFFS MOTION FOR PRE COMPLAINT DISCOVERY AND PERMISSION TO AMEND COMPLAINT AND REQUEST FOR PROTECTIVE ORDER AND STAY OF	View

		DISCOVERY PENDING DETERMINATION OF PRELIMINARY OBJECTIONS TO PLFFS COMPLAINT FILED ON BEHALF OF	
May/31/2019	ORDER STATUS CONFERENCE	SCHEDULING ORDER MAY 29, 2019 THAT A STATUS CONFERENCE IS SCHEDULED FOR JULY 15, 2019	View
May/28/2019	REQUEST	REQUEST FOR PRE COMPLAINT DISCOVERY AND PERMISSION TO AMEND HER COMPLAINT	View
May/28/2019	RESPONSE - PLAINTIFF'S	TO DEFTS PRELIMINARY OBJECTIONS	View
Apr/15/2019	JUDICIAL REASSIGNMENT FORM FROM	SCHERER TO JUDGE CREANY	View
Apr/15/2019	BRIEF IN SUPPORT OF PRELIMINARY OBJECTIONS	BRIEF IN SUPPORT OF PRELIMINARY OBJECTIONS TO THE COMPLAINT	View
Mar/28/2019	AGREEMENT	PURSUANT TO RULE 237.2 TO EXTEND TIME TO PRESENT HER OBJECTIONS TO THE DEFTS PRELIMINARY OBJECTIONS AND THE NOTICE TO PLEAD IN TWENTY DAYS	View
Mar/21/2019	MOTION/PETITION	THIRD PETITION FOR DISQUALIFICATION AND RECUSAL OF THE HONORABLE JUDGE HARRY SMAIL AND THE HONORABLE CHRISTIAN SCHERER AND THIS CASE AND ALL FUTURE CASES INVOLVING DEBORAH A BUJDOS	View
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Mar/21/2019	NOTICE	OF PRO SE RIGHTS	View
Mar/21/2019	RESPONSE -	PLFFS SECOND RESPONSE OBJECTIONS	View

**THE COURT OF COMMON PLEAS
WESTMORELAND COUNTY, PENNSYLVANIA**

Civil Action No.

3302-2018

Service by FAX , Electronic Mail and U.S. Mail June 26, 2019

Deborah A. Bujdos
Plaintiff

PRO SE

v.

Judge Harry Smail
Judge Christian Scherer
Sheriff Jonathon Held

Attorney Martha Gayle

Cetera Financial Group,
Kimberly Fleck , Scott Shoup, et.al.
Defendant

Winget, Spadafora & Schwartzberg, LLP
Joel M. Wertman, Esquire
Douglas G. Fogle, Esquire

**I Certify That A True And Correct Copy OF THE ATTACHED FILED MOTIONS Was Sent To
Attorney Martha Gayle, Attorney Dan Fogel and the Honorable Judge Creany Via Fax
and regular mail on May 29, 2019**

by,

Deborah Ann Bujdos

Deborah Ann Bujdos

RICO EXHIBIT JACK LA CARTE'S TESTIMONY

INVOLVEMENT IN THE SCHEME TO DEPRIVE THE WIFE OF THE MINERAL RIGHTS

This is a very important verified email I sent to my second attorney I am telling her to ask Jack Lacarte these questions about his lease. There is information from Marcellus.org on how much gas was being produced in our community for 2014.

----- Forwarded Message -----

From: Deborah Bujdos Brown <dabujdos@yahoo.com>

To: "kristin@shahlawgroup.com" <kristin@shahlawgroup.com>

Sent: Tuesday, November 11, 2014 5:02 PM

Subject: Fw: MarcellusGas.Org => Your Well Watch Weekly Update

Kristin, this is regarding another form of income. Poss. 20,000.00 a month is the going rate for leases royalties in our bracket. The well they are working on in the Google map I send you is called the Sickie unit. It is in Washington Twp, Fayette County that borders meets our prop, located in Rostraver Westmoreland County.

Sickie is where Jack Lacarte our property co owner lives and has 2 leases for property around the home with Chevron. Both leases have a paragraph stating that Jack can at anytime add acreage he has any rights to. Well that would be over 20 acres he owns with us. He is not claiming it yet, not until our divorce is final. I am sure he and Larry planned it this way. Here is the plan they want to do with this properties. Jack Lacarte has 2 leases for 15 acres that we know of. He is a savvy business man and I am sure he knows that he can bring Larry and our 80 acres into that same lease as the two he has for 15 acres that he signed May 2013 with Chevron. That would make total acreage 95. The more acreage you have the more you get in both initial money for the lease per acre and the royalties are higher if the acreage is large. The norm amount gas companies are offering for smaller leases is 2500.00 per acre to lease and 18% interest in royalties. I have been informed from a gas well lawyer that if you have say over 80 acres you can get paid up to 4 to 5 thousand per acre to lease it and well over 18% in royalties. More like in the 20's % and that is why I added all of my neighbors to my lease. With their properties together we have over 100 acres and some of them that only have 4 or 5 acres will get 4000 to 5000 per acre in stead of the 2500.00 they would normally get. They will collect whatever % on royalties I get but theirs is calculated on the

amount of acres they have. We have a very good friend who has a lease for 70 acres and is receiving of 20,000.00 per month in royalties . So you see why Larry would have rather had this divorce final before he signed a lease. He was hoping I knew nothing about the value of the gas and oil rights. He would have preferred not to have to include me in the rights to any of that money. Larry has been dealing with various gas well people over the past 5 or 6 years . I only became aware of this while looking through our papers after he was removed from the home. He has already had seismic testing done on the property and it is ready to be leased. All he needed was to be divorced from me and make all claims to the mineral and gas rights. Thats not how it went I contacted a gas and oil lawyer a Roger Gaydos who guided through the process of getting lease and including my neighbors . I have had all the neighbors sign already. I just need to pay for him to do the lease and that is 4000.00. I was hoping to get my money released so I could move forward with this. Everyday that passes is dissipating an asset if we do not have it leased.

Now what i know for sure the picture of a google earth map shows you where in location they have begun to work on the Sickle Well drilling site. It also shows you Lacartes home and ours on the map. Chevron is going to drill horizontally from that site up to 4 miles. It is very close to the Lacartes. So if Larry joined Jack's lease

Sickle would be the one they would use to get to our minerals. The Marcellus gas is very lucrative but the next level down is Utica and will provide lease holders with double or triple the amount paid in royalties. Utica is what Larry and Jack are really thinking about I am sure. Where we are located so close to Washington twp. and that well is more valuable than I eve thought considering there is only one well in Washington TWP and that is it.

Jack Lacarte has a long business history with Larry. He rented Larry the first building he ran Fib Chem out of in Charleroi until Larry built the new one in 1993. 2006 is when he ,Larry and the spouses bought the Evans Farm together. 2008 Larry and I bought and subdivided some of the Evans Farm property from Jack. It is across the street from our house known as now 400 Lutz , 402, 404, 406. 2 of those lots are vacant and can be sold right now if we could get Larry to sign a sales agreement. You can see how the property is coated near our homes much better on the property appraisal in our file. It was done in 2013.

Now knowing that Jack is waiting for the divorce to be final so he can include all of the acreage he has an interest in leads me to believe that Larry and he have had an agreement to join their acres together but only after the divorce. So I am also thinking if Jack was willing to wait instead of just getting our properties separated by deeds and in a final step then that

means he is losing money, waiting for Larry until he can claim more than the 15 acres he has listed on the current lease. So we may have to question Jack in our discovery for actual values of assets we have. Here are a few questions I thought you might want to ask him.

Our Questions for Jack Lacarte

1. Why didn't he or Larry divide the Evans farm property as I believed it was suppose to happen. Lacartes wanted the property near their home as so did we. Why is it still deeded with the 4 of us owning it?
2. Is Jack waiting for my divorce to final before he can add the acreage from the Evans farm property we own together now known as the Lacarte/Bujdos properties for his gas oil lease?
3. Is Jack going to have Larry just join in on his lease?
4. Who made this decision and when?
5. How much did Chevron offer to pay Jack per acre to lease the prop? and how much have they offered to pay in royalties?
6. How much has already been paid to Jack by Chevron for leasing to them.
7. Has there been any production from the well and is Jack collecting royalty money yet is that?
8. Why is Jack not claiming the Evans property that is directly connected to his land .
9. How much in acreage of the Evans property that connects to Jacks home that he was actually first interested in at the time of buying the Evans farm with Larry in 2006? ?
10. Have you and Larry Bujdos joined in as partners in any other business / venture?

GAS VALUES AS OF NOV. 2014

----- Forwarded Message -----

From: "WellWatch@MarcellusGas.Org" <WellWatch@MarcellusGas.Org>

To: dabujdos@yahoo.com

Sent: Monday,

NOVEMBER 10, 2014 5:32 AM

SUBJECT: MARCELLUSGAS.ORG => YOUR WELL WATCH WEEKLY UPDATE

Below is your **Well Watch** weekly update information.

To change your township choices, [click here](#)

MarcellusGas.Org - Information Related to Pennsylvania Deep Gas Well Activity

Rostraver Township (Westmoreland County)

No activity was reported in the last week for this township

Well Statistics To Date For Rostraver Township:

11 - Approved Well Permits

5 - Active Wells

5 - Wells With Reported Production Values

\$ 21,996,615.90 - Total Gas Produced (6,566,154 Mcf@ \$3.35)

EXHIBIT "B"

**HOW SHERIFF WAS A PART OF THE
ENTERPRISE IN HELPING JUDGE SMAIL**

COLLECT 17,600.00 IN UNLAWFUL FINES

BY NOT LETTING HIS DEPUTY

TESTIFY TO WITNESSING SUBORNOING

PERJURY

WESTMORELAND COUNTY PENNSYLVANIA COURT OF COMMON PLEAS

CIVIL ACTION-DIVORCE

LARRY BUJDOS

#18492012 D

V.

DEBORAH ANN BUJDOS

WESTMORELAND COUNTY
2016 NOV -9 PM 3:33
CHRISTINA O'BRIEN
PROTHONOTARY

PETITION FOR DISMISSAL OF CONTEMPT HEARING

AND NOW, comes the Defendant, Deborah Ann Bujdos, Pro Se

Your Movant is the Plaintiff, Larry A. Bujdos. She is representing herself.

The Respondent is the Plaintiff Laurence Bujdos. He is represented by Linda L. Whalen, Esquire.

On July 11.2016 the plaintiff Laurence Bujdos suborned Perjury as he coached his son Brad Bujdos a witness for him while under cross examination. This was witnessed by Judge Smail, Deborah Messer, and Deputy Griffin who approached the plaintiff to stop him from continuing making nodding motions to his son while he was answering questions under cross examination. The questions that were being asked were relative to the complaint for contempt, claiming ownership of 3 craftsmen work benches that Plaintiff was falsely claiming belonged to him. He was demanding these be returned to him when they are in fact they were always owned by Regis Steedle.

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

LARRY A. BUJDOS

CIVIL DIVISION

PLAINTIFF

VS.

1849OF2012D

DEBORAH ANN BUJDOS

DEFENDANT

NOTICE OF PRESENTATION

TO: Attorney Linda Whalen
229 South Maple Avenue
Greensburg, PA 15601


Attorney Lee R. Demosky
40 N. Pennsylvania Avenue
Suite 410
Greensburg, PA 15601

Kindly take notice that the within Counter Motion to strike the motion to quash will be presented to the Honorable Harry Smail of the Court of Common Pleas of Westmoreland County, Pennsylvania on the _____ of _____ 2016, at _____ a.m. in Courtroom #8 of the Westmoreland County Courthouse, Greensburg, PA 15601, or as soon thereafter as the Court pleases.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Counter Motion has been delivered by First Class Mail to the above-named persons at the mentioned addresses on the date herein below.

Date: 11-2-16


Deborah Ann Bujdos
Pro Se Plaintiff

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

LARRY A. BUJDOS

CIVIL DIVISION

PLAINTIFF

VS.

1849OF2012D

DEBORAH ANN BUJDOS

DEFENDANT

type of pleading

**COUNTER MOTION TO STRIKE MOTION TO QUASH SUBPOENA FOR KASI GRIFFEN
OR DISMISS CONTEMPT HEARING DUE TO THE TAINTED TESTIMONY OF BRAD
AND LAURENCE BUJDOS BU SUBORNING PERJURY ON July 11,2016**

AND NOW, COMES DEBORAH ANN BUJDOS, DEFENDANT IN THE ABOVE CASE.

On October 31, to my surprise I received a notice of a motion to quash the subpoena for Deputy Kasi Griffin.

I am sure the court is aware that Deputy Griffin was subpoenaed to testify as a witness to her having to interrupt and stop the plaintiff from procuring suborning perjury while his son Brad Bujdos was being cross examined by me on July 11, 2016 while in Judge Sail's Court.

On July 11,2016 Deputy Griffin was alerted by Deborah Messer who was also sitting in the court. Ms. Messer was the first one who noticed that the plaintiff was vigorously and quite obviously nodding and shaking his head to his son while being questioned by me.

Deborah Messer alerted Deputy Griffin so she could stop the plaintiff from coaching his son on how to answer questions. Her testimony is very critical because the plaintiff's actions were not mentioned by the judge in open court so that it was on the transcript. Judge Smail told me that day after a break when I approached the bench that he seen what the plaintiff was doing and said he would note it. After I received the transcript I found that the judge does not have it noted on the record.

This contempt hearing is nothing more than harassment from my soon to be ex-husband. This divorce has dragged on for 4 years with meritless hearings. This is my husband's form of entertainment for himself and his friends / bullies who all attended court that day. They were

enjoying it and laughing at times. The hearing was more like being in an episode of a Jerry Springer show.

What Mr. Bujdos was doing is a crime and should be addressed on the record. If this is not stopped and corrected by the judge these hearings will last forever. That is why I feel that having The deputy that actually stopped it could help prevent it from happening again by testifying and getting on the record.

It may seem like a waste of time for the deputy to testify but I beg to differ, her testifying will help prevent any more of the vexatious and meritless hearings that the husband, plaintiff has been using for entertainment for 4 years now. The docket of our case shows 4 years of meritless hearings.

If the plaintiff does not get reprimanded for this kind of behavior the case will never end and that is truly a waste of the tax payer's money and a waste of the courts time.

I understand she will be on duty in the same court room that my hearing is with Judge Smail. I hope she understands that my request to have testify will only be matter of one question that will only take but a minute or two.

So I ask the court to either dismiss the entire contempt hearing, due to the tainted testimony and suborning perjury or strike the motion to quash the subpoena and compel Deputy Griffin to testify to enforce the law and to prevent further actions by the plaintiff that are an obstruction of justice. Alternatively, Judge Smail will perhaps address the suborning perjury and obstructing justice, with the plaintiff's actions illegal actions of the plaintiff and his son on the record if he wishes to continue this hearing.

This entire contempt hearing is nothing more a way to continue harassing me.

Respectfully Submitted by,



Deborah Ann Bujdos

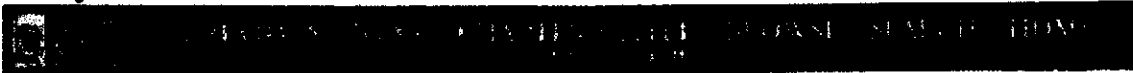
1764. Perjury Indictment Case 18 USC 1622

- 1. On or about the 11th day of July, 2016, in Westmoreland County, Pennsylvania, the Plaintiff, Laurence Bujdos, did willfully suborn and procure one Brad Bujdos to commit perjury by testifying falsely under oath to a material matter in a case entitled Bujdos v. Bujdos, No.1849 of 2012 D, in the United States District Court for the Westmoreland County, Pennsylvania.**
- 2. It was material to the said case described in paragraph one to determine whether 3 craftsmans workbenches were owned by Laurence Bujdos or Regis Steedle**
- 3. The Plaintiff, Laurence Bujdos on the 11h day of July, 2016, willfully suborned and procured Brad Bujdos**
- 4. to testify falsely in the proceedings described in paragraph one the 3 craftsman workbenches question were owned by Laurence Bujdos**
- 5. instead of the real owner Regis Steedle ;**
- 6. and on the 11th day of July, 2016, Brad Bujdos falsely testified under oath in the proceedings that Laurence Bujdos owned 3 craftsman work benches instead of the real owner Regis Steedle.**
- 7. The testimony of Brad Bujdos as aforesaid was false and perjurious as both Brad Bujdos and the Plaintiff, Laurence Bujdos well knew.**

All in violation of Title 18, U.S.C. § 1622.

In American law and in Scots law the subornation of perjury is the crime of persuading a person to commit perjury — the swearing of a false oath to tell the truth in a legal proceeding, be it spoken or written. The term *subornation of perjury* further describes the circumstance wherein an attorney at law causes a client to lie under oath, or allows another party to

The
Pennsylvania



Rule 234.3. Notice to Attend. Notice to Produce.

- (a) A party may compel the attendance of another party or an officer or managing agent thereof for trial or hearing by serving upon that party a notice to attend substantially in the form prescribed by Rule 234.7. The notice shall be served reasonably in advance of the date upon which attendance is required. The notice may also require the party to produce documents or things.
- (b) If the attendance of another party is not required, a party may compel the production of documents or things by the other party by serving upon that party a notice to produce substantially in the form prescribed by Rule 234.8.
- (c) A notice to attend and a notice to produce shall be served in the manner provided by Rule 440 for service of legal papers other than original process.

Official Note

The notice to attend and the notice to produce may be issued only to parties and may be served within or outside the Commonwealth.

Source

The provisions of this Rule 234.3 adopted December 14, 1989, effective January 1, 1990, 20 Pa.B. 7.

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**JUDGE SMAIL'S MALFEASANCE CONTINUES IN HIS ABUSE OF CONTEMPT
THAT INCLUDED IGNORING WITNESSING SUBORNING PERJURY DURING A
CIVIL CONTEMPT HEARING .**

JUDGE SMAIL DID NOT FOLLOW THE "TWO WITNESS" RULE,(IN PLAINTIFFS
CONTEMPT CASE) DERIVED FROM COMMON LAW, GOVERNS THE PROOF
REQUIRED FOR A PERJURY CONVICTION UNDER SECTION 1621. *WEILER V. UNITED
STATES*, 323 U.S. 606, 609 (1945).

HERE THE PLAINTIFF DID MEET HER BURDEN UNDER THE SO-CALLED "TWO-
WITNESS" RULE

**JUDGE SMAIL AND THE SHERIFFS DEPARTMENT INTERFERED WITH
PLAINTIFFS 2 WITNESSES
FROM TESTIFYING TO SEEING THE SUBORNING PERJURY.**

He refused to let them testify and continued the hearings for 5 more months charging
Plaintiff 100.00 dollars a day fines, amounting to \$17,600.00 after Judge Smail admitted
he witnessed the Defendant and his son suborned perjury.

1750. Comparison Of Perjury Statutes -- 18 USC 1621 And 1623

The "two witness" rule, derived from common law, governs the proof required for a perjury
conviction under Section 1621. *Weiler v. United States*, 323 U.S. 606, 609 (1945). The rule
means that a perjury conviction may not rest solely on the uncorroborated testimony of one
witness. *United States v. Hammer*, 271 U.S. 620, 626 (1926). The two witness rule, however,

does not require two witnesses to every perjurious statement. The falsity of the perjurious statement may be established either by the testimony of two independent witnesses or by one witness and independent corroborating evidence that is inconsistent with the innocence of the accused. *Weiler*, 323 U.S. at 610. Also, the second witness need not fully corroborate the first, but must substantiate the other's testimony concerning the defendant's perjurious statement. *United States v. Chaplin*, 25 F.3d 1373, 1381-82 (7th Cir. 1994). The two witness rule does not apply if the perjurious statement concerns the defendant's state of mind (usually lack of memory), which can be established by circumstantial evidence. *Id.* at 1378. The two witness rule also does not apply to sentence enhancements for obstruction of justice, even if based on the defendant's perjury at trial. *United States v. Onumonu*, 999 F.2d 43, 46 (2d Cir. 1993).

Here the Plaintiff did meet her burden under the so-called "two-witness" rule.

It is well established that "to authorize a conviction for perjury the falsity of the statement alleged to have been made by the defendant must be established either by the testimony of two independent witnesses, or by one witness and independent corroborating evidence which is inconsistent with the innocence of the accused." *McWhorter v. United States*, 193 F.2d 982, 983 (5th Cir. 1952). As the Supreme Court stated in *Weiler v. United States*, 323 U.S. 606, 609, 65 S. Ct. 548, 550, 89 L. Ed. 495 (1945), "(I)mplicit in (the) evolution and continued vitality (of the two-witness requirement) has been the fear that innocent witnesses might be unduly harassed or convicted in perjury prosecutions if a less stringent rule were adopted."

In *Offutt v. United States*, 239 acting under its supervisory powers over the lower federal courts, the Court set aside a criminal contempt conviction imposed on a lawyer after a trial marked by highly personal recriminations between the trial judge and the lawyer

. In a situation in which the record revealed that the contumacious conduct was the product of both lack of self-restraint on the part of the contemnor and a reaction to the excessive zeal and personal animosity of the trial judge, the majority felt that any contempt trial must be held before another judge.

This holding, that when a judge becomes personally embroiled in the controversy with an accused he must defer trial of his contempt citation to another judge

HERE JUDGE SMAIL WAS ASKED TO RECUSE 4 TIMES AND

REFUSED EVEN WITH THE EVIDENCE THAT PROVED HIS BLATANT BIAS

, He became personally embroiled in the controversy with an accused he should have deferred trial of his contempt citation to another judge

which was founded on the Court's supervisory powers, was constitutionalized in *Mayberry v. Pennsylvania*,240 in which a defendant acting as his own counsel engaged in quite personal abuse of the trial judge.

The Court appeared to leave open the option of the trial judge to act immediately and summarily to quell contempt by citing and convicting an offender, thus empowering the judge to keep the trial going,241 but if he should wait until the conclusion of the trial he must defer to another judge.

**IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY,
PENNSYLVANIA**

LARRY A. BUJDOS,

Plaintiff,

vs.

DEBORAH ANN BUJDOS,

Defendant.

CIVIL DIVISION

No. 12DO01849

MOTION TO QUASH SUBPOENA

**Filed on Behalf of Westmoreland County
Sheriff's Office**

Counsel of Record for this Party:

**LEE R. DEMOSKY, ESQUIRE
(Solicitor for the Westmoreland County
Sheriff's Office)
Pa. I.D. #75541**

**MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.
40 North Pennsylvania Ave., Suite 410
Greensburg, PA 15601**

**Telephone No.: (724) 836-4840
Fax No.: (724) 836-0532**

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

LARRY A. BUJDOS,

Plaintiff,

vs.

DEBORAH ANN BUJDOS,

Defendant.

CIVIL DIVISION

No. 12DO01849

MOTION TO QUASH SUBPOENA

AND NOW, comes the Westmoreland County Sheriff's Office, by and through its Solicitor, Lee R. Demosky, Esquire, and Meyer, Darragh, Buckler, Bebenek & Eck, P.L.L.C., and presents the following Motion to Quash Subpoena:

1. The undersigned is Solicitor for the Westmoreland County Sheriff's Office, and Kasi Griffin is a Deputy in said office.
2. On October 20, 2016, the Westmoreland County Sheriff's Office received a Subpoena To Attend And Testify issued by the Westmoreland County Court of Common Pleas Prothonotary directing Deputy Griffin to appear before this Court to testify at a hearing involving the above-referenced litigants. A true and correct copy of said Subpoena is hereto attached as Exhibit "A".
3. Deputy Griffin is specifically assigned to the Honorable Harry F. Smail, Jr.'s Courtroom security detail, and by the Deputy being assigned to this special detail, the Deputy is subject to the rules and regulations dictating the decorum and conduct of all other members of the judiciary.

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

LARRY A. BUJDOS,
Plaintiff,

vs.

DEBORAH ANN BUJDOS,
Defendant.

CIVIL DIVISION

No. 12DO01849

1849-2012

NOTICE OF PRESENTATION

TO: Linda Whalen, Esquire
Stewart, McCardle, Sorice,
Whalen, Farrell, Finoli &
Cavanaugh, LLC
229 South Maple Avenue
Greensburg, PA 15601

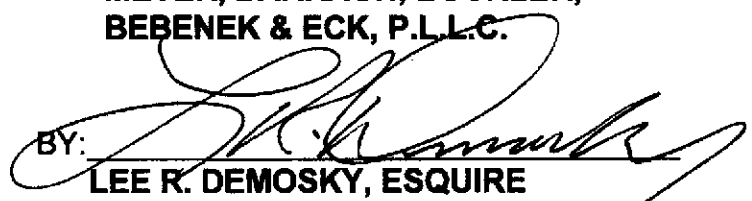
Deborah Ann Bujdos
113 Branathoover Street
Belle Vernon, PA 15012

FILED
RECEIVED
WESTMORELAND COUNTY
2016 NOV -3 AM 9:32
CHRISTINA O'BRIEN
PROTHONOTARY

TAKE NOTICE that the within Motion to Quash Subpoena will be presented before the Honorable Harry F. Smail, of the Court of Common Pleas of Westmoreland County, Pennsylvania, on Thursday, November 3, 2016, at 8:45 a.m., or as soon thereafter as the Court pleases.

MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.

Date: 10/25/16

BY: 
LEE R. DEMOSKY, ESQUIRE

Solicitor for Westmoreland County
Sheriff's Office

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY,
PENNSYLVANIA

LARRY A. BUJDOS,

Plaintiff,

vs.

DEBORAH ANN BUJDOS,

Defendant.

CIVIL DIVISION

No. 12DO01849

MOTION TO QUASH SUBPOENA

Filed on Behalf of Westmoreland County
Sheriff's Office

Counsel of Record for this Party:

LEE R. DEMOSKY, ESQUIRE
(Solicitor for the Westmoreland County
Sheriff's Office)
Pa. I.D. #75541

**MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.**
40 North Pennsylvania Ave., Suite 410
Greensburg, PA 15601

Telephone No.: (724) 836-4840
Fax No.: (724) 836-0532

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

LARRY A. BUJDOS,

Plaintiff,

vs.

DEBORAH ANN BUJDOS,

Defendant.

CIVIL DIVISION

No. 12DO01849

MOTION TO QUASH SUBPOENA

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3. Deputy Griffin is specifically assigned to the Honorable Harry F. Smail, Jr.'s Courtroom security detail, and by the Deputy being assigned to this special detail, the Deputy is subject to the rules and regulations dictating the decorum and conduct of all other members of the judiciary.

4. Members of the Courtroom staff are required to maintain the highest level of confidentiality in regard to cases involving juveniles.

5. Deputy Griffin, the Westmoreland County Sheriff's Office and the Westmoreland County Court of Common Pleas will be substantially prejudiced, burdened and oppressed by being required to appear in accordance with the Subpoena To Attend And Testify. Furthermore, the Deputy's appearance will be a substantial waste of the taxpayer's money, as the Deputy will be taken away from her security duties necessitating an additional Deputy to be assigned to this security detail.

WHEREFORE, pursuant to Pennsylvania Rule of Civil Procedure Rule 234.4, the Westmoreland County Sheriff's Office respectfully requests that this Court issue an Order to protect Deputy Griffin and quash the Subpoena To Attend And Testify.

**MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.**

By 

LEE R. DEMOSKY, ESQUIRE

Solicitor for Westmoreland County
Sheriff's Office

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF WESTMORELAND

No. 12DO01849

LARRY A BUJDOS

Plaintiff(s)

vs.

DEBORAH ANN BUJDOS

Defendant(s)

SUBPOENA TO ATTEND AND TESTIFY

TO: Rosi Gri-Fin

1. You are ordered by the court to come to Judge Smith's
Court of Common Pleas Greentown
at Westmoreland County, Pennsylvania, on November 9 at
9:00 o'clock A.M., to testify on behalf of Deborah Ann Bujdos
the parent regarding July 11, 2016 hearing in the
above case, and to remain until excused.

2. And bring with you the following: _____

If you fail to attend or to produce the documents or things required by this
subpoena, you may be subject to sanctions authorized by Rule 234.5 of the Pennsylvania
Rules of Civil Procedure, including but not limited to costs, attorney fees and
imprisonment.

REQUESTED BY A PARTY/ATTORNEY IN COMPLIANCE WITH Pa. R.C.P. No. 234.2(a).

NAME: _____

ADDRESS: _____

TELEPHONE: _____

SUPREME COURT ID#: _____

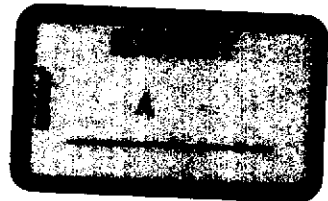
Date: _____

SEAL OF THE COURT

BY THE COURT:

Christina O'Brien
CHRISTINA O'BRIEN, PROTHONOTARY

OFFICIAL NOTE: This form of subpoena shall be used whenever a subpoena is issuable, including hearings in connection
with depositions and before arbitrators, masters, commissioners, etc. in compliance with PA. R.C.P. No. 234.1. If a subpoena
for production of documents, records or things is desired, complete paragraph 2.



RETURN OF SERVICE:

On the 20th day of November 2014
I, Regis Steedle served (name of person served)

KAYSI GREEN with the
foregoing subpoena by: (Describe method of service)

hand delivered to: X
Westmoreland County Court House
Greensburg PA

I verify that the statements in this return of service are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. & 4904 relating to unsworn falsification to authorities.

DATE: 10-20-14

Regis Steedle
(signature)

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

LARRY A. BUJDOS,

Plaintiff,

vs.

DEBORAH ANN BUJDOS,

Defendant.

CIVIL DIVISION

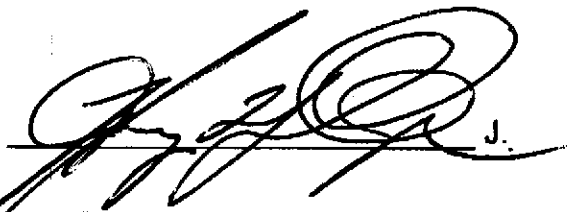
No. 12DO01849

FINAL ORDER OF COURT - PROTECTIVE ORDER

AND NOW, this 3rd day of November 2016, it is hereby ORDERED, ADJUDGED and DECREED that the Subpoena To Attend And Testify dated October 20, 2016, commanding Deputy Kasi Griffin to appear before this Court on November 9, 2016 is hereby quashed.

BY THE COURT:

ATTEST:
CHRISTINA O'BRIEN
PROTYPOTARY


Harry F. Smail, Jr.
Judge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MOTION TO QUASH SUBPOENA** has been served upon the following parties by first class mail, postage prepaid, this the 25th day of October, 2016

Linda Whalen, Esquire
Stewart, McArdle, Sorice, Whalen,
Farrell, Finoli & Cavanaugh, LLC
229 South Maple Avenue
Greensburg, PA 15601
(Counsel for Plaintiff, Larry A. Bujdos)

Deborah Ann Bujdos
113 Branathoover Street
Belle Vernon, PA 15012
(Pro Se)

**MEYER, DARRAGH, BUCKLER
BEBENEK & ECK, P.L.L.C.**

By: 

LEE R. DEMOSKY, ESQUIRE

Solicitor for Westmoreland County
Sheriff's Office

Exhibit C

WITNESS STATEMENT

IGNORED

1/16/16

Deborah F Messer
361 Jinks Trail
Ligonier, Pa 15658

Judge Smail
Westmoreland County Courthouse
2 North Main St
Greensburg, Pa 15601

Re: Deborah Bujdos case #1849

Dear Judge Smail:

On 10/9/15, I wrote a witness statement (sent certified mail and notarized to you) documenting what I observed as a witness in your courtroom in regards to the above case. I had erred on the date stating it was 10/5/15, when in fact it was 9/9/15.

At this hearing, Ms. Bujdos requested that the exclusive possession hearing be dismissed and the master hearing slated for 9/9/15 be continued.

At this hearing, Mr. Bononi, Mr. Bujdos and Attorney Whalen also appeared. At the close of this hearing, Mr. Bononi instructed Ms. Bujdos to appear at his office. I also accompanied her to his office for the hearing, however, Mr. Bononi asked attorney Whalen if she objected to me being there and she did. I was told to leave at that point.

I also attended the 10/5/15 hearing. After you asked Mr. Bujdos how his visit went to the marital home to visit the cars, you asked if there were any witnesses. Ms. Bujdos stated yes and we were asked to leave the courtroom until you called us in to testify. This hearing continued for an hour or longer and we never called back into the courtroom as witnesses.

I enter this letter to correct record. Please file accordingly.

Altered transcripts

Sincerely,

Deborah F Messer

Deborah F Messer

*Contempt
of Court.
2*

**RESPONSE LETTER TO ATTORNEY LINDA
WHALEN FILING A MOTION
FOR CONTEMPT**

**TO RETURN THINGS TO THE MARITAL
HOME THAT WERE NEVER TAKEN**

The first words that came to my mind after reading your motion for the items to be returned and your testimony in court again. The phrase that came to mind is The Dragonetti Act. You were once again presenting the court with false information. Your motion is filled with incorrect facts, false assumptions, and demands to return some items that either were not Mr. Bujdos's property to begin with or never existed or were taken before I moved. Mr. Bujdos's previous history during this case has evidence that he has perjured himself many times under oath. Therefore, these false accusations are not surprising. For months before my moving Mr. Bujdos and his friends were constantly coming to the garages as I showed you the picture at the last masters hearing. Larry and his friends were always leaving with something. The came without any notice and were removing things. It is quite possible many of the things he claims I have were already removed by himself and his friends.

Please be advised that I do intend to inform the court with proof of perjury committed many times by Mr. Bujdos in transcripts, the deposition, and on his inventory that he submitted. I will also show the court the many violations you have committed and point out each untrue fact you have stated in all of your motions during this litigation.

Let me remind you that his purpose to be there was to care for the cars. During his visits not one car was ever started, washed or cared for. He allowed them to depreciate by not caring for them when he was permitted to do so since February 2013. I never prevented his friends from coming to care for the cars. I will prove this in court and have them subpoenaed to testify I never tried to deter them from coming and caring for the cars. Mr. Bujdos has been coming to the garages himself now for months since Henry Moore gave him permission to return to the residence on May 6th, 2015. You recall that was the day you were suppose to release my 12,000.000 to pay my taxes and then refused to give it to me. Then you filed ex Parte motions to retaliate against me for refusing an offer to move from the home. This motion is a prime example of your Rambo behavior and dirty tactics you have used during this entire litigation.

Regarding the missing items:

The items I have are the 1970 style light was removed when we remodeled being so dated. I do not even know what they looked like or where they are. I have the weed whacker in the car, although I left 3 behind. The swing is sitting behind the garage, it is a big Amish swing that is weathered, as Larry never properly maintained it, and it is still sitting under the brown garages awning. It was there for years and when I left.

DEBORAH A. BUJDOS
113 Branthoover Street
Belle Vernon, PA 15012
724-322-2590
dabujdos2@gmail.com

4/25/16 2:40:29 PM

Re: In response to the April 19,2016 hearing .

Dear Attorney Whalen,

In response to the April, 19,2016 hearing you requested to be heard. The requests for items to be returned were another example of the fraudulent statements you have made to the court. In case you do not recollect what I asked the judge to look at was some evidence I wanted to show Judge Smail solid proof that Mr. Bujdos is not credible and has committed perjury many times on transcripts and on his deposition. I can prove and that Mr. Bujdos lied and provided false evidence to the court in order to gain exclusive possession of the home. Fortunately for you the judge did not let me present that evidence which resulted in you making more false statements to the court about the things supposedly missing.

I do intend to peruse an action of fraud upon the court and motion to vacate the exclusive possession of the home hearing and to motion the court to allow me to have full discovery before any more masters hearings are heard and more money is wasted in legal fees when the discovery should have been complete since it is such a complex case before we were in front of a divorce master. The order for the exclusive possession of the home and the appointment for Eric Bononi the divorce master came from the recused judge. That judge should have never heard them as you gained them fraudulently by your Ex Parte Communications with Judge Scherer in June 2016. Your motions to Judge Scherer were both filled with lies; you committed fraud on the court. You do know that I have solid proof that your motions were done with unclean hands and filled with false information. I will present the evidence.

The ex parte motions and orders for the exclusive possession of the home and the appointment for Eric Bononi the divorce master came from the recused judge. That is in itself fraud on the court. Judge Scherer should have never heard them. Judge Smail should have never continued to hear anything from the recused judge.

As your aware you gained the signed orders fraudulently by your Ex Parte Communications with Judge Scherer in June 2016. Your motions to Judge Scherer were both filled with lies; you committed fraud on the court. You do know that I have solid proof that your motions were done with unclean hands and filled with false information. I will present the evidence in future motions.

Both proceedings were continued even though I brought the matter to the judge and the masters attention prior to them beginning the proceedings I informed them of the motions you presented were done Ex Parte and granted by the judge that was later recused. Judge Scherer was not permitted to pass the Exclusive Possession of the home hearing or anything else to the new judge.

The Pennsylvania Code, "Chapter 7. Assignment of Judges."

<https://www.pacode.com/secure/data/201/chapter7/chap7toc.html>

Rule 701. Assignment of judges to courts. (A) Conditions Applicable for the may be made through the Regional Unit, but IN NO CASE SHALL A RECUSING JUDGE SELECT HIS OR HER ... HE SHALL NOT MAKE ANY PERMANENT RE-ASSIGNMENT OF A JUDGE FROM ONE ... SUCH PETITION SHALL STATE THE REASONS THE ASSIGNMENT OR RE-ASSIGNMENT IS ...

Judge Smail continued to hear Plaintiffs divorce case and proceeded with the ill gotten hearing for Exclusive Possession, gained in an Ex Parte motion filed by attorney Whalen in June 2015. Judge Smail lost subject matter jurisdiction over hearing the divorce and Exclusive Possession of the home hearing. He lost subject matter jurisdiction by accepting the issues passed down to him from the recused judge both a violation of Rule 701. Assignment of judges to courts, in spite of Plaintiff filing an immediate recusal of him based on his violation the retaliation for Judge Scherer very well documented in the record and witnesses have and will testify to provided supporting evidence. (1) The report shall be prepared on a form supplied by the Administrative Office of Pennsylvania Courts or generated by the computer system of the judge's court in the same format as the form supplied by the Administrative Office.

- (2) The report shall be signed by the judge.
- (3) For each matter which remains undecided ninety days or more, the report shall state:
 - (a) the type, caption, and number of the case;
 - (b) the nature of the matter;
 - (c) the date of submission to the judge;
 - (d) the specific reason(s) for the delay; and
 - (e) the specific steps taken to remedy the delay.

Judge Smail illegally refused to recuse 4 times during his time on the bench during the divorce. He was determined to remain of the case until he totally destroyed the Plaintiff

For the record Larry has lived in a condo that was fully furnished including a large screen TV since 2013 that he brought back to the marital residence. Larry was left a fully furnished kitchen, fully furnished master bedroom, 3 reclining white leather couches bought on my charge in 2012, a large Sony TV that I paid for in the sunroom. He was left a large granite kitchen table with 8 swivel leather chairs and 5 matching leather stools for the 2 large islands with the granite tops. He was left the front porch white wicker furniture, (a love seat and chair with a matching table.) The pool furniture taken I paid for on my charges and was 3 chaise lounges. I use them in my sons yard. There was a large white table with an umbrella and chairs in the pool area. Mr. Bujdos has been seen with those in his red truck when he was seen at Randal's restaurant. The workbenches were purchased by my son and owned by son since 2008. A coo clock was a birthday gift to me from my son and his then wife. My pots and pans: Larry has never cooked and I brought the pots and pans into the marriage when I moved into the home. Any tools mentioned are either still there or he removed them. I never saw any of them and do not know what they are. This request is another form of harassment.

Even though plaintiff offered to pay my rent on the eviction, I never received any money when I was forced and threatened to move from my home for no legal reason. You and the court knew that I had no money or credit to find a new place to live and did the eviction anyway. I DID NOT HAVE ACCESS TO ANY OF MY RETIREMENT INCOME AS YOU HOLD HOLDIT HOSTAGE. I have been financially damaged again by having to move in the first place by you attorney Whalen' and your fraud on the court to have the Exclusive Possession hearing be held.

Your insulting comments about the size of my son's 780 square foot house as she stated with her investigation of Google. Only confirms that the Plaintiff and his son and friends continue to stalk me. You state my things are in a warehouse that also proves this eviction of me from my home was wrong when I had no money, no credit that you cause d me to loose when you took my retirement income and never made your client pay his share of the marital card debt. Mr. Bujdos had a comfortable home in a condo for the last 3 years, He had permission t have people care for his cars and chose to let the cars go uncared for himself, he has 18,000.00 of monthly income and full access to his 500,000.00 IRA that he admitted under oath to taking more from that as he cant live on 18,000.00 a month.

You have repeatedly lied in every motion to the court about me not paying my bills when you know the only time I missed paying them was when your client was keeping my mail that you actually sent to my attorney after he held it from me. I have that letter you sent Heidi stating you was returning my mail. I have provided my credit reports to prove I had perfect credit until you took my retirement money, placing me in financial suppression during this litigation to give your client the power to destroy me financially.

2. Our marital funds have never been frozen. Larry enjoys receiving \$18000 a month while I receive alimony pendent lite of \$3,582.00 which he pays to me out of the marital pot and enjoys access to his IRA's etc.

I have attempted to obtain discovery since 2012; however, you prevented me from doing so by controlling my monthly retirement money. You had no incentive to close or provide the required COMPLETE discovery as you have illegally been collecting and placing in your escrow every month claiming to use for equitable distribution. In fact, the marital annuities by law cannot transfer owners, however, you have taken the liberty to pay Master Bononi \$10,000 direct to Master Bononi for a master hearing that was gained Ex Parte with false information in your motion to have the appointment for a master. IOLTA rules have been broken particular the fact that a sub account must be set up in a trust fund to pay a master. I do not know what kind of tax liabilities you have caused me by doing this. Your comment in the motion for April 19, 2016 you state that we have been to 6 masters' hearings and imply that it is my fault for that. PA law should have not in front of a master until both of us had our discovery done us. These hearings have been done with us only getting the discovery done now. You refused to release financial information we need to complete discovery. You should be sanctioned and Your client in contempt as you well know the documents we need to review should have been listed on his inventory and we should not have to request him to sign a release as these are all critical to the true value of the marital estate.

3. At the first DRO hearing/order it was calculated that I receive 4,400.00 spousal supports from Larry as long as I continued to receive my share of the MetLife/John Hancock marital retirement income from the annuities in both names. We were receiving these since 2008 as our monthly retirement income. Already in pay status that should not have been taken from me or held for Equitable Distribution by PA law. Doing otherwise is considered double dipping. Your constant derogatory comments at each hearing regarding my not working are a violation of your model rules of conduct; you do that to influence the judge to favor Larry. What you do not state is that both Larry and I chose to take an early retirement and set those funds aside to use. I do not have to work when I have made previous arrangements to retire early using funds that are marital.

On 3/17/13 during a meeting with Attorney Norton you attorney Whalen deceitfully "slipped" in a modification motion stating the marital annuities were to be placed into a trust account. That "modification" was dated 12/19/12 and the only recorded Order of Court dated 12/19/12 is an order for an ACC hearing. The DRO Prothonatary statement does not even show a hearing held, nor a De Nova filed timely. In fact, you filed your appearance as attorney on 11/26/12, although your invoice shows you prepared a de novo appeal on 11/12/12. Attorney Norton's invoice shows a special relief hearing for dogs and cars issues. This "modification" is questionable of ever happening however the so-called hearing caused a reduction of my alimony pendent lite.

4. At one of the master hearings, you presented you invoice as Exhibit "50" Yes, one of many exhibits. I assume by presenting as an Exhibit, you are requesting attorney fees paid to you out of MY funds, which I have no access to.

5. I have repeatedly requested you, attorney Whalen to present me with your original POA that you drafted and charged Mr. Bujdos for and have many times said it gives you authority to hold my share of the marital annuities. You have refused to provide it to me.

Exhibit "50" attorney Whalen's invoice states:

4/14/13 Draft Special POA regarding the checks	\$150.
Letter & enclosure to Attorney Norton	\$90.
4/22/13 Attend to letter & signed POA from Attorney Norton	\$56.25

The POA that attorney Whalen drafted clearly violates Pa I would never sign my rights over to opposing litigant and give attorney Whalen authority to "hold" my marital annuities and deprive myself of the style I was accustomed to living for 18 years in the marriage according to Pa Divorce Code. In fact the POA IS VOID as the proper language is not cited as required in Pa Law and there are no witnesses on this piece of hand written paper as required.

6. The invoice is riddled with fees charged for "handling" "issuing checks" along with subpoenas you served without notifying Attorney Norton or me for the surprise deceitful April 2013 eviction hearing. The subpoenas were served to people from the bank where my mortgage is held. You also prepared one for a TOM WOODSON to testify against me. Your deceitful actions in setting up that eviction hearing failed to prove that I was not paying mortgage/and other marital home-related expenses. I proved that my payments were, made and on time. The entire hearing was meritless.

7. It is these types of meritless motions you presented repeatedly that caused me to have increased legal fees and that allowed you time to delay my discovery.

You have ignored your model rules of conduct and many rules of the court and it's procedures without being held responsible for you act of unclean hands in this litigation.

All while you have churned fees and made the court look at me as a gold-digger.

Finally, a review of my prothonatary filed documents along with comparing her invoice show that many motions were filed without notice to me, ex parte conduct such as the 5/5/15 conversation with Henry Moore, for \$48. , One day before the 5/6/15 ACC hearing there are charges for interviewing Roy Reick, who is our accountant, particularly 12/16/12 Review fax from Roy Reick \$80 and 12/20/12 Interviewing Roy Reick \$80. It appears a conflict of interest and this is the time that the "modification" for my alimony pendent lite to be placed in an escrow account for equitable distribution. There is no order from the DRO stating you, attorney Whalen are assigned as escrow officer.

8. I filed a motion for Judge Scherer to recuse from my case, stating the many violations I endured since 2012 to 8/2015. One of the violations included him hearing and granting your ex parte retaliatory exclusive possession of the home motion and appointing a master motion.

Was Your motions were retaliatory due to my refusing your a surprise offer made to me on May 6th, 2015 to move from my home before I was permitted to do my discovery. That was your strategy to again delay my discovery by getting exclusive possession of the home and appointing a divorce master before my discovery was done. That was done with unclean hands. Shortly after that, a hearing was held and Judge Scherer recused. You continued to pursue the motions you presented to Judge Scherer ExParte

9. Everything that began after that the Ex Parte Communication should have been stopped. You should have had to prepare new motions for the new judge and Judge Sherers orders from your Ex Parte meeting should have been dismissed. His orders should have not carried over these ex parte proceedings from the recusing Judge. There has been extrinsic Fraud committed during the entire case .

Deborah Bujdos

Deborah Ann Bujdos

EXHIBIT E

~~35~~ PAGES 1-35

**NOTICE TO THE COURT ADMINISTRATOR AMY MEARS DEMATT AND
COUNTY CONTROLLER RE: SHERIFF / ASSISTING WITH JUDGE
SMAIL CHARGING PLAINTIFF \$17,600.00 UNLAWFUL EXCESSIVE
FINE FOR BOGUS CONTEMPT
ALSO QUESTION ABOUT ATTORNEY WHALEN BRIBING A MASTER
WITH 10,000.00 FROM PROTECTED RETIREMENT ANNUITY FUNDS
WITHOUT CONSENT**

May, 5 ,2018

Notice regarding the \$17,600.00 fine

SUMMARY OF ABUSE OF CONTEMPT FACTS

**Sent to Court Administrator, Amy Mears Dematt and
County Controller Jeff Balzer Requesting Reimbursement Of
\$17,600.00 For Unfounded Contempt Fined Unlawfully Taken By Judge
Smail**

WESTMORELAND COUNTY COURT OF COMMON PLEAS

CIVIL DIVISION/ DIVORCE

BUJDOS V. BUJDOS

LAURENCE BUJDOS

ATTORNEY LINDA WHALEN

PLAINTIFF

V.

DEBORAH A. BUJDOS

PRO SE

DEFENDANT

CASE # 1849DO2012

NOTICE to COURT ADMINISTRATOR

MATTER BEFORE THE COURT

**Where And What Is The County Doing With 17,600.00 Judge Harry
Smail Unlawfully Took From Me, A Senior Citizen, And A Victim Of
Domestic Violence, For Erroneous Fines For A Contempt That Was
Never Supported With Facts To Find Me In Contempt During A Divorce**

By Judge Harry Smail.

**December 2017 He Sent Me A Notice Claiming He Gave The Money To
The Countys Judicial Fund Then Sent Me Another Notice Dated April
27, 2018 And Said It Went To The Westmoreland County Fundamental**

Fund?

STATEMENT OF FACTS

1. July 11, 2017 Judge Harry Smail Unlawfully Took \$87,000.00 From Me, 61 Year Old Woman For Bogus Contempt Fines And Fees During Our Divorce.
2. December 2017 Later He Sends Me Notice That 17,600.00 Contempt Fine Was Being Released To The Judicial Fund ???????
3. I proved that I did not violate any order to be found in contempt and should be refunded the \$87,000.00
4. Judge Smail unlawfully took from me seen in the 7-18-17 order that was prepared with a conflict of interest as it was prepared by opposing counsel , and missing 4 million to divide.
5. I was denied the right to appeal the unconscionable final order , I was denied access to my own retirement annuity funds, held hostage by opposing counsel , to hire an attorney, to appeal the unconscionable order, it was issued suspiciously issued the day after she was put on notice to produce financial documents she had managed to avoid providing for 5 years.
6. **Now I find it reasonable for me to be asking where exactly was the 17,600.00 judge Smail had since the July 18, 2018 order was issued.**
7. **What is the county doing with my \$17,600.00 that was taken from me for bogus 100.00 a day contempt fines , ordered without evidence to support anything was missing.**
8. **The order holding me in contempt is invalid considering the judge Previously stated in his first contempt order dated 6-29-17 the husband did not have sufficient evidence to support the further contempt hearings,**
9. **Judge Smail ignored the husbands suborning perjury during Contempt hearing on 7-11-16**
10. **and interfered with my having witnesses to the suborning perjury**

11. He had the sheriffs department motion to quash my subpoena to have the deputy testify who stopped the husband from continuing to tell his son how to answer questions under cross.
12. I am demanding the contempt fees and fines of \$87,000.00 be paid back to me.
13. I am Requesting the court reverse the 7-18-17 order that awards an excessive fee \$32,000.00 paid to Master Eric Bononi without my consent
14. I believe I should be reimbursed for the excessive fee for master Eric Bononi of 32,000.00 that Attorney Whalen , deducts from my marital assets in the unconscionable final order dated 7-18-17
15. There is no court order stating any specific amount to pay the master.
16. Opposing Counsel Whalen agreed to pay the master of her choice Eric Bononi, this amount.
17. I was never asked if I agreed to pay for a master, there is no statement or agreement that I approved of him being our master or to pay him anything.
18. This was done without my consent \$32,000.00 was taken out of the marital estate.
19. \$32, 000.00 was paid To a master that was picked by opposing counsel prematurely before my discovery had begun and gained with an ex parte motion .
20. Shockingly in the end Judge Smail rejected the masters report that he was paid \$32,000.00 in fees for. This too is a violation of the excessive fines and fees clause .
21. Should the court refuse to vacate or reverse the fraudulent 7-19-17 order I feel it is the courts or county's duty to reimburse me for \$17,600.00 and the 70,000.00 for contempt restitution
22. The final order was procured with extrinsic fraud and defrauded me out of a grand total of 2.5 million .

- 23. The final order was made without full disclosure of all assets.**
- 24. Judge Smail was aware of 2.5 million missing from the marital estate on May 6, 2016, when the judge refused to compel husband to sign a boiler plate release to locate the missing 2.5 million in assets that are not included in the final settlement.**

Deborah Bujdos
113 Branthoover Street,
Belle Vernon, PA 15012
724-322-2590
Dabujdos@yahoo.com

May 13, 2018

Amy Mears Dematt
Westmoreland County Court Administrator

Dear Amy,

This letter is regarding the county receiving \$17,600.00 from me that judge Smail removed from my marital estate. He is violating The 8th Amendment Excessive Fines Clause and the 14th amendment and repeatedly denied me my due process rights. The right to be heard, the right to have counsel while allowing attorney Whalen to continue holding my own retirement funds without my consent. He deprived me of my access to my own money without sufficient evidence and assisted Attorney Linda Whalen in a deliberately delaying this case for five years while she churned fees and defrauded me of 2.5 million lost in marital assets, confirmed by my forensic accountant.

Judge Smail's recently sent me a notice on April 27, 2018 notifying me only now where the he put the money paid for excessive fines for a bogus contempt of \$17,600.00. (violating the 8th amendment).

The total amount he charged me for contempt was \$87,000.00, seen on a fraudulent July 18, , 2017 final order

Judge Smail illegally took this money by falsely holding me in contempt for not returning imaginary items my husband said were missing after I was evicted wrongfully and left me a domestic violence victim at the age of 60 homeless on March 11, 2016 to present date .

- **The 7-18-17 fraudulent order must be vacated and the entire case must be reopened to provide me with a fair divorce. It should be reviewed by the supreme court.**
- **During the past 5 years of being forced to remain in a deliberately delayed divorce to legally abuse me and have attorneys churning fees I have submitted the voluminous documents to the court, The president Judge, and Court administration for help with no assistance provided with help as I was constantly victimized by Attorney Linda Whalen and the 2 judges and a master on my case . I filed complaints with the Disciplinary Board, The judicial conduct board , The district Attorney, The attorney generals investigators working on the Sheriff Held case, and to the GOA , the county controller, the and regarding the judges and Attorney Whalens and Attorney Henry moore and attorney Eric Bononi's mis use of the law and their position constantly denying me the right to my own retirement annuity funds to be on a par with the husband for a fair divorce. The docket Transcripts, motions and orders prove I was denied my civil and constitutional rights , the right for equal protection, the right be heard and my right to due process . I have provided witness statements supporting my reports of being threatened by Master henry Moore on May 6, 2015 with sending my abusive husband home if I did not agree to move from my home in 30 days before my discovery was done when the husband was**

removed via PFA after physically injuring me in 2012 . Judge Smail repeatedly threatened with jail for various things seen in the transcripts and finally on November 22, 2017 I was forced to sign 4 quit claim deeds to our marital property before he heard my 4 filed motions to vacate the order with proof of fraud on the order giving my husband all the marital property . I was threatened with jail if I did not move or sign away my own property . I was coerced by Henry Moore , judge Smail , to forfeit my rights to my own property .

- As a result of the unlawful final order dated July 18, 2017 the majority of my economic claims that were preserved and left unresolved on the 7-18-17 order in this divorce, I have been served by the IRS with a collection notice for unpaid paid taxes that should have been handled in the final order.
- I am asking the IRS criminal division to examine all of my documents and filing an innocent spouse form due to the all the criminal acts that have taken place during this divorce. I am filing the innocent spouse form for the unpaid taxes and showing them all the money that has been taken from me with out reason or consent . The fraudulent final order speaks for itself as it left me with unpaid taxes. Taxes that are not my responsibility when I can prove I have been denied my own retirement income, unlawfully, without my consent for 5 years, done deliberately to place me in an grossly

unequal financial ability to defend my case. Attorney Whalen and the 2 judges are aware I have been denied my own share of the 2 five hundred thousand dollars, pre paid jointly owned retirement annuities, in pay status since 2008, 4 years before the divorce I was receiving my retirement income, They held the funds in a non interest bearing account violating IOLTA laws for 5 years, while my credit was destroyed, I was being destroyed financially, due to not having my own income

that was held hostage by attorney Whalen and with the courts assistance , done without my consent or by notifying the retirement annuity companies of a divorce before just taking my income.

She and the judges are and my husband are guilty of Torturous interference with our very strict Annuity contracts for 5 years I was denied my 3,750.00 my contract guaranteed I would have been paid .

Extrinsic Fraud : Proof that Attorney Whalen was so determined to keep me from getting my own annuity income to financially suppress me from having a fair divorce is seen on

- Exhibit 2 the 8-25-17 motion**
- and on her invoice dated 4-17-13 it shows she charged my husband for preparing a fake instrument**
- a fake POA to use for her to be able to deposit my share of the income checks without my consent.**

DAMAGES

1. I HAVE LOST 2.5 MILLION IN OUR DIVORCE
2. I HAVE BEEN MADE HOMELESS FORCED TO LIVE IN A BASEMENT
3. INCURRED MORE DEBT FOR BEING FORCED TO MOVE AND MADE
TO PAY 500.00 A MONTH FOR OVER 2 YEARS TO KEEP MY THINGS
IN STORAGE TO DATE. BEFORE A FAIR SETTLEMENT WAS MADE
4. I HAVE UNRESOLVED ECONOMIC CLAIMS, DEBTS THAT AMOUNT
TO OVER 150,000.00

5. I HAVE LOST ALL OF MY PROPERTY

6. I HAVE LOST ANY FUTURE INCOME ALIMONY,

7. I HAVE BEEN DENIED THE HALF OF A BONUS OF \$98,000.00 OR
MORE FOR A LEASE AS THEY ARE IN NEGOTIATIONS RIGHT NOW
TO SIGN NEW LEASES THAT MAY HAVE DOUBLED IN VALUE AS
THE GAS COMPANIES ARE DRILLING FOR UTICA, THAT IS
VALUED AT TWICE THE VALUE OF THE MARCELLUS SHALE
LEASES SIGNED IN 2013. FOR OUR MINERAL RIGHTS

7. I CANNOT AFFORD HEALTH INSURANCE

8. MY HEALTH HAS SUFFERED

9. I CANNOT AFFORD YET TO HAVE THE DENTAL SURGERY THAT
WAS NEEDED IN JANUARY 2017 AND NOT DONE DUE TO JUDGE
SMALL DENYING MY PETITION TO RELEASE MY FUNDS FOR THE
SURGERY IN JANUARY 2017.

THE SURGERY WAS ESTIMATED AS COSTING \$37,000.00 AND STILL
HAS NOT BEEN DONE.

10.

THE FINAL ORDER PREPARED BY WHALEN WAS DONE WHILE I
WAS REFUSED MY OWN RETIREMENT INCOME TO THE APPELLATE
ATTORNEY WHO GAVE ME AN ENGAGEMENT LETTER SHOWING THE
AMOUNT I NEEDED RELEDD TO HIRE HER.

THE UNCONSCIONABLE ORDER GAVE THE HUSBAND THE 5
MILLION DOLLAR ESTATE

AND LEFT ME WITH A 400,000.00 ANNUITY THAT WAS HALF MINE
TO BEGIN WITH, THAT WILL BE REDUCED TO LESS HALF DUE TO
NOT RESOLVING THE PRESERVED ECONOMIC ISSUES. AFTER MY
JUDGEMENTS, TAXES AND BILLS ARE PAID.

I REMAIN HOMELESS, STILL HAVING TO PAY \$500.00 A MONTH
OVER \$5,000.00 A YEAR SINCE MARCH 11, 2016, FOR
WAREHOUSE STORAGE OF MY HOME FURNISHINGS, AND MY
PERSONAL THINGS INCLUDING MY CLOTHES,

THE AWARD WILL NEVER COVER FINDING A NEW HOME

I WOULD BE FORCED TO PAY ASH FOR A HOME SINCE MY CREDIT WAS RUINED , DUETO THEM TAKING MY INCOME , I COULD NOT PAY FOR MANY OF THE UNRESOLVED CREDIT CARD ISSUES, I WILL NEVER BE ABLE TO PURCHASE OR RENT A HOME DUE TO HAVING LOST MY CREDIT AND BEING DEFRAUDED OF 2.5 MILLION IN THE FINAL ORDER. I WILL THEN STILL BE HOMELESS. ALL AFTER A 20 YEAR MARRIAGE

Not only was it unlawful since August 2017. of this case asked the Internal Revenue Service to review the entire case as I was left with unpaid taxes when I never received the correct APL. And my own income was taken from me without my knowledge or consent and held hostage for 5 years.

•

- **The 7-18-17 unconscionable equitable distribution order made by opposing counsel was issued after being pending since November 2016 and suspiciously issued the day after attorney Whalen was demanded for the 3rd time to produce financial documents, for my forensic accountant to locate a missing 2.3 million.**
- **SEE 11-22-17 TRANSCRIPT TO CONFIRM November 2016 and suspiciously issued the day after attorney Whalen was demanded for**

**the 3rd time to produce financial documents, for my forensic
accountant**

- **JUDGE SMAIL REFUSED TO ANSWER WHY HE NEVER
HEARD MY MOTIONS OR HAD THE REQUESTED
DOCUMENTS PROVIDED TO THE FORENSIC
ACCOUNTANT.**

- **IT CONFIRMS ATTN WHALEN refused to produce these
documents for 5 years, helping my husband hide 2.5 million in
marital assets**

- **The final order defrauds me of 2.5 million**

- **Judge Smail has ignored my timely and correctly filed motion to
vacate the fraudulent order.**

- **Then forces me to sign over my property with the threat of jail on
November 22,2017.**

- **Before hearing my motions filed in August and September for
vacating the order that was procured with extrinsic fraud.**

- **My economic claims were ignored in the order leaving me with
excessive debts that were to be resolved in the final order.**

- **I was denied \$300,000.00 in back support, found by my forensic
accountant's disposable income report. That proved the husband
was grossly under reporting his income.**

- **They turned a blind eye to the husband admission in a 9-9-15 masters hearing transcript where he says he took 49,000.00 from the Brinker ira and the court failed to hear my motions filed in August and September to prevent further dissipation of the Brinker ira during the litigation.**
- **The final order dated 7-18-17 shows the husband dissipated 500,000.00 from the joint Brinker account and only left \$82,00000 to divide.**
- **The final order does not include many other assets we have proven to exist that amount to 2.5 million.**
 - **I have still been left homeless and have been forced to go on government health care. I cannot afford medical or dental insurance.**
- **JUDGE SMAIL ABUSED HIS POWERS OF CONTEMPT THAT COST ME \$87,000.00**

This is unconscionable to have been victimized not only by my husband but by the court who takes 87,000.00 of my money and gives 70,000.00 to the ex with no evidence to support that.

Then to take 17,600.00 for 100.00 dollars a day fines for not returning things i proved were either imaginary or were still at the home.

Now i find it reasonable for me to be asking what exactly are you doing with the \$17,600.00 that was taken from me without evidence to support anything was missing.

I am demanding this be paid back to me.

**The only response from judge Smail regarding my \$17,600.00 fine . He
sent me these notices listed below**

**5 MONTHS LATER HE SENT ME A NOTICE IN DECEMBER 2017
THAT MY FINES WERE PAID**

**and the contempt was closed, and stated in that notice the fines were going
into the Westmoreland county, pa judicial fund.**

**10 MONTHS LATER I GET THIS LATEST NOTICE, DATED APRIL 27,
2018 ,**

**from judge Smail stating the \$17,600.00 fines have been released and
placed in the Westmoreland fundamental I fund.**

**He violates the 8th amendment for charging \$87,000.00 excessive fees for
\$100.00 a day for not returning items to the husband that were never taken**

**Then charges me \$70,000.00 for restitution to the husband for
the imaginary. Items**

**It was UNCONSCIONABLE FOR JUDGE SMAIL to continue this and
charge these fines when**

**He had no evidence to support the husbands claims and this is noted on
the 7-11-17 transcript.**

The husband admits on the stand and under oath on July 11, 2017 that he did not even have these supposed missing items listed on his asset and inventory lists., he calls the missing things I am accused of taking just garage sale items.

These contempt fees came from the ill gotten exclusive possession of the home hearings , done with unclean hands.

The contempt hearing against me was bogus. This stemmed from an unlawful exclusive possession of the home hearing that was gained illegally, by opposing counsel in June 2015. And the recused judge. She filed a false motion to have the exclusive possession hearing ex parte, and had it approved that same day when she knew i could not afford an attorney, due to her illegally taking my retirement income in 2013 and holding it hostage. so I was only receiving half of the states correct amount for APL, I was awarded in October 2012 that included on the order that I was to continue to receive my \$3,750.00 a month p income from our jointly owned annuities that were paying me that for 4 years before the divorce. By her doing this and the court allowing her to continue is the reason I have been defrauded of 2.5 million in marital assets. She took the income to financially suppress me from being able to have attorneys and to have experts do my discovery , but most importantly they did it so I could not pay me taxes on the home

and then spent 4 years trying to evict me by taking my income , proof of that plan is seen in the masters 9-9-15 transcript my husband is opposed to having the master get 15,000.00 released for me to pay my taxes and pay my attorney and hire a forensic accountant to finally after 3 years begin my discovery. PRIME FACIA EVIDENCE BEHIND THE REASON FOR TAKING MY INCOME IS SEEN IN THAT 9-9-15 TRANSCRIPT.

WHEREAS The husband STATES emphatically THAT “ HE WILL NOT AGREE TO ANY MONEY BEING RELEASED TO ME IF I AM GOING TO USE IT TO PAY MY TAXES”. ON THE HOME.

SUSPICIOUSLY HE USED MY TAXES BEING PAID LATE AS A WAY TO GET ME EVICTED WITH THE HELP OF JUDGE SMAIL EVEN AFTER I HAD MY TAXES PAID.

Taking my income from me made me loose my credit, and unable to have a fair divorce.

REPORTED EXTRINSIC FRAUD BY TORTUROUS INTERFERENCE WITH ANNUITY CONTRACTS PREVENTED ME FROM HAVING ACCESS TO THE COURT TO BE HEARD.

ANYONE WHO ASSISTED WITH TAKING MY JOINTLY OWNED ANNUITY INCOME IS GUILTY OF TORTUROUS INTERFERENCE WITH OUR VERY STRICT ANNUITY CONTRACTS BY TAKING MY INCOME WITHOUT MY KNOWLEDGE OR CONSENT AND WITHOUT NOTIFYING THE ANNUITY COMPANIES OF A DIVORCE

**INTERFERED WITH ME GETTING MY 3,750.00 A MONTH INCOME
FOR LIFE ANNUITY CONTRACT.**

**OPPOSING COUNSEL ATTORNEY WHALEN IS GUILTY OF
BREACHING A FIDUCIARY DUTIES**

**After she appointed herself as escrow agent to hold my annuity income
improperly in her firms non interest bearing IOLTA ACCOUNT from
12-19-12 to 11-22-17**

. SHE FAILED TO FILE THE REQUIRED IRS

**Form 56 Notice Concerning Fiduciary Relationship OVER OUR
RETIREMENT ANNUITY INCOME**
(Rev. November 2017) Department of the Treasury Internal Revenue Service

**SHE FAILED TO REPORT FORM 56 TO THE IRS THAT SHE SELF
APPOINTED HERSELF AS DUAL FIDUCIARY , WITHOUT MY
CONSENT AND HER REPEATED REFUSAL TO STEP DOWN AND
RELEASE MY FUNDS EVEN WHEN INFORMED HER REPEATEDLY
THAT I DO NOT WANT HER AS MY FIDUCIARY.**

WHALEN CREATED A FAKE POA

**She continued holding the funds even after I revoked the POA in August
2015 when I filed with the prothonotary (seen on the docket) that I
served her and the court with my revocation of her POA, that she
prepared and charged her client for on April 17, 2013 to gain full control of
my retirement income that interfered with my annuity contract.**

**She was also well aware as seen in a letter she sent to my attorney that
states she knew the annuity checks were at one point coming to her with
just the husbands name on the checks. She was aware her client illegally
removed my name from our jointly owned 500,000.00 metlife annuity
without my consent. She knew and my husband illegally removed my
name from the joint annuities in February 2015 . This was proven by her
depositing the annuity checks that were suddenly only in the husbands
name. She failed to inform me that my name was removed as she was
supposedly acting our dual fiduciary**

**The brokers notes support the date my name was removed and my claims
of misuse of the law.**

**She is guilty of torturous interference with the two paid in full 500,000.00
jointly owned retirement annuities that had contracts for lifetime
payments of 7,500.00 a month . These were in pay status in 2008 for
four years before the divorce began.**

**Theft of my income by deception to harm me and prevent me from having a
fair divorce.**

She has succeeded in defrauding me of 2.5 million.

**Attorney Whalen failed to challenged my notarized, affidavit of truth
regarding the fraud on the final settlement that I filed and sent to her and
judge Smail certified mail after I received unconscionable 7-18-17
fraudulent final equitable distribution order.**

**ATTORNEY WHALEN AND JUDGE SMAIL BOTH RECEIVED THE
AFFIDAVITS OF TRUTH AND FAILED TO RESPOND. BY LAW BY
NEITHER OF THEM CHALLENGING MY AFFIDAVIT OF TRUTH , IT
MAKES MY AFFIDAVIT TRUE.**

**JUDGE SMAIL's GUILTY OF ABUSE OF CONTEMPT POWERS
AND INTERFERING WITH WITNESSES TO SUBORNING**

PERJURY ON 7-11-17

**VIOLATING 8TH AMENDMENT CHARGING ME WITH AN
EXCESSIVE FINE OF \$17,600.00**

The contempt hearing should have been canceled on July 11, 2017 when judge Smail WITNESSED THE PERJURY AND ignored it, AND told me when I approached the bench about the suborning perjury, he said he “ seen it, noted it, and remedied it” The truth is he did nothing after witnessed, my husband and his son suborning perjury under my cross examination and he saw his deputy Kasi Griffin had to stop my husband from doing that.

Judge Smail failed to address the crime and then refused to let my witnesses to the crime testify to the suborning perjury, at the next hearing.

He had assistance by Sherriff Helds office in preventing the deputy/ my witness from testifying. The Sheriff office issued a motion to quash my subpoena for the deputy to testify.

He continued to show his blatant dislike and bias for me, when on July 18,, 2017 he signed a final Equitable Distribution order prepared by opposing counsel that was missing 4 million to divide and that charged me with the \$17, 600.00 excessive contempt fees and fines from a \$100.00 a day fine then let the contempt hearing drag on from March 2016 - November 2016 .

9 months ????????

He charged me with those fines on July 18, , 2017 and only notifying me now what he did with it. The fraudulent July 18, 2017 order took the 17, 600.00 from my share of the marital estate .

I notified the Amy Mears Dematt the court administrator in December 2017 after learning Judge Smail was no longer in family court . I wanted to know who was going to resolve the mess that was left behind in divorce, like all the unresolved economic claims .

She told me that judge Silvis took over all of Smail's cases. (December 2017 judge Smail was removed family court) and my new judge should be judge Silvis.

JUDGE SMAIL IGNORED MY NOTICE TO HIM THAT THE COURT LOST SUBJECT MATTER JURISDICTION

JUDGE SCHERER AND SMAIL Smail lost subject matter jurisdiction in June 2015 when the opposing attorney lied on her retaliatory motion for the exclusive possession of the home hearing and did it ex parte. Then the Judge Scherer granted her motion and was recused a month later. He passed the ill-gotten eviction hearing on to judge Smail.

VIOLATING JUDICIAL CANNON Judge Smail was appointed to my case from the recused judge Chris Scherer, they are friends and both affiliated with the sheriff's department in the past .

I was uncomfortable knowing the recused judge picked the new judge and asked Judge Smail to recuse 4 times each time he refused.

Both judges ignored these case laws for exclusive possession of the home.

Exclusive possession of the home factors and case laws that include the procedure to follow if there is domestic violence. .

- **Exclusive use and occupancy of the marital residence may be awarded during pendency of a divorce action upon a showing that a spouse's presence has caused domestic strife**
- **And/or that the spouse has voluntarily established an alternative residence.**
- **See, domestic relations law §234; annexstein v. Annexstein, 202 a.d.2d 1062 (4th dept. 1994).**
- **The standard for granting exclusive possession is a flexible one and may include any circumstance warranting judicial intervention.**
 - **See, grogg v. Grogg, 152 a.d.2d 802 (3rd dept. 1989)**
- **(the presence of marital strife can be a recognized standard for an award of exclusive possession). In i.q. V. A.q., 228 a.d.2d 301 (1st dept. 1996),**
 - **Judge Smail erred when he ignored this**
- **By not considering I had a PFA due to my husbands extreme violence that caused me an injury in August 2012 ,**

- Similarly, in *Juliano v. Juliano*, 30 a.d.3d 737 (3rd dept. 2006), testimony clearly demonstrated the existence of marital strife between the parties requiring an award of exclusive possession to insure the personal safety of the parties.
- Judge Smail also erred by ignoring that the wife only had 3,500.00 a month support and he knew the husband had 20,000.00 clear a month income and had been living in a separate home for 2 years prior to evicting me.
- Given the disparate financial circumstances of the parties, the award of exclusive possession to defendant was deemed to be proper. *Id.* In *miner v. Mitzner*, 228 a.d.2d 483 (2nd dept. 1996), the supreme court was found to have properly awarded the defendant temporary exclusive possession of the marital residence, given the domestic strife caused by the plaintiff's presence in the home and the fact that he had voluntarily established an alternative residence. *Id.* *See, also, block v. Block*, 245 a.d.2d 153 (1st dept. 1997) (in light of husband's admission that due to marital strife, he voluntarily vacated the marital residence shortly after signing a one-year sub-lease for an apartment, and the unrebutted expert evidence concerning the impact of the domestic strife on the wife prior to the husband's departure and the potential harm to the wife and children if the husband returned, the motion court erred in not granting the wife's

cross-motion for exclusive occupancy of the marital residence and in granting the husband's motion for complete access thereto).

•

Judge Smail was made aware by my attorney Travis Dunn that he was subjecting me and my grand children to being threatened by my husband and stalking and harassment by him when judge Smail allowed the husband after 3 years of being gone to return to marital home supposedly to check on the cars we had. This was done from September 2015- march 2016 . There were never any car checks done the time was spent frightening all of us continuously until to my eviction on march 11, 2016.

Judge Smail allowing the ill-gotten exclusive possession of the home hearings that began in June 2015 lasted 7 months. The evidence proves the exclusive possession of the home hearings were for nothing more than harassment.

Judge Smail had no reason to continue them after my taxes were paid . He chose to waste the courts and my time by continuing them , instead of finishing discovery and getting this divorce final.

The records prove they spent 4 years of having exclusive possession of the home hearings trying to evict me, when had been victimized both physically and emotionally by my husband, for years and had no funds or a place to go

At the last exclusive possession hearing i had 5 witnesses and the children and i could have brought 5 more neighbors that were going to be witnesses to his continued violent behavior. He is an out of control bully. He was drinking out of control and was terrorizing everyone in The neighborhood and any of my friends and even a poor should who just sold me a dryer and delivered it. The husband was charged with harassment for no reason with that guy.

After enduring the years of violence judge Smail chose to evict me, knowing i would be homeless.

This case law below proves i should not have been forced to move until this divorce is over.

Judge Smail ignored these case laws and factors they are suppose to consider.

If the presence of one party has caused significant domestic strife in the marital residence (clearly seen by the pfa that had him removed in 2012 and seen in the police reports and my medical reports after he injured me in a drunken rage.)

And that party has sufficient means to secure an alternate residence,

Clearly seen by the court who was aware of the husband having 20,000.00 a month to live on.

Judge Smail evidently did not feel those factors mattered because usually

In other courts the other party may be granted exclusive use and occupancy of the marital residence. During a divorce

Exclusive possession is one of the most important tools available to a divorce lawyer to improve client's position,

The records show there is no legal explanation for judge Smail , wrongfully evicting me and left me homeless in 2016 when the divorce began in 2012 and was deliberately delayed by opposing counsel having 4 previous attempts to evict me that failed. . He assisted attorney Linda Whalen in her 4-year scheme to evict me to use that as her tool to try to force me to settle and be homeless before i could do discovery of the 5-million-dollar estate.

- Exclusive possession is one of the most important tools available to a divorce lawyer to improve client's position, and to force the other party to establish a separate household.**

- **Grant of exclusive possession is likely to have significant consequences with respect to custody, visitation, temporary maintenance and other issues.**
- **Since the grant of exclusive possession under domestic relations law §234 is within the court's discretion, it is difficult to have it overturned on appeal.**
- **This exclusive possession of the home hearing delayed the case by 2 more years and resulted in charging me 87,000.00 in fees and fines that were not supported by any evidence ,**
- **(seen in judge Smai's own order dated 6-29-16) that order says the husband did not have sufficient evidence to proceed.**
- **Judge Smail without a new motion or explanation re opened the contempt about a week after his 6-29=16 order that stated nothing further would be heard, that husband did not have sufficient evidence to continue.**
- **Again there is no legal reason for re opening a bogus contempt except**

- To please my husband and his counsel who he made very evident that he favored them .
- The opposing counsel may have gained his loyalty because she was one of only a few lawyers who contributed to judge Smai's campaign in 2015.

DISCOVERY VIOLATIONS IGNORED BY 2 JUDGES

- Attorney Whalen found a way to avoid producing financial documents she has refused to produce for 5 years, by having the The 7-18-17 unconscionable equitable distribution order signed and issued the day after made the production of documents was sent to her for the third time. The timing of the final order is highly suspect considering the final order was pending for 9 months since November 2016 and suspiciously issued the day after attorney Whalen was demanded for the 3rd time to produce financial documents , for my forensic accountant to locate a missing 2.3 million.

Opposing attorney Linda Whalen suspiciously refused to produce these documents for 5 years,

OPPOSING COUNSEL AIDING AND ABETING HIDING

ASSETS

Attorney Whalen helped my husband hide the missing 2.5 million in marital assets.

ECONOMIC CLAIMS IGNORED ON FINAL ORDER

- **My economic claims were ignored in the order leaving me with excessive debts that were to be resolved in the final order.**

COURT REFUSED TO COLLECT BACK SUPPORT

IGNORED SPOUSAL SUPPORT FRAUD

- **I was denied \$300,000.00 in back support, found by my forensic accountant's disposable income report. That proved the husband was grossly under reporting his income.**

The docket shows proof

- *The final order defrauds me of 2.5 million*

- **JUDGES NOT HEARING MOTIONS REGARDING FRAUD ON
ORDER**

- **JUDGE SMAIL IGNORED**

- *Judge Smail has ignored my timely and correctly filed motion to vacate
that 7-18-17 fraudulent order.*

*More unconscionable judge Smail then grants attorney Whalen's motion o
compel me in November 2017 to comply with the 7-18-17 unconscionable
order before he hears my proof of fraud.*

COERCED TO SIGN OVER PROPERTY

BEFORE HEARING MOTION TO VACATE FRAUD ORDER

- **Then forces me to sign quit claim deeds over to my husband with the
threat of jail on November 22,2017**
 - **Before giving me the right to be heard.**

**He deliberately ignored and never responded to my motions filed in
august and September for vacating the order that was procured with
extrinsic fraud.**

**• DOCKET PROVES 2 JUDGES NOT HEARING MOTIONS
WIFES 2 MOTIONS TO PREVENT DISSIPATION OF 580,000.00
BRINKER IRA .**

**RESULTED IN HUSBAND DRAINING 500,000.00 FROM BRINKER
DURING DIVORCE LEAVING ONLY 82,000.00 TO DIVIDE**

- They turned a blind eye to the husband admission of dissipation in
a 9-9-15 masters hearing transcript where he says he took 49,000.00
from the Brinker iRA and the court faille to hear my motions filed
in august and September to prevent further dissipation of the
Brinker ira during the litigation.**

- The final order dated 7-18-17 shows the husband dissipated
500,000.00 from the joint Brinker account and only left \$82,00000 to
divide.**

CONCLUSION

JUDGE SMAIL

4deliberately ignored and never responded to my 4 motions

I filed in August and September 2017 TO vacate the 7-18-

17 The final order defrauds me of 2.5 million

Judge Smail has made it a pattern of ignoring my timely and correctly filed motions including the motions to vacate that 7-18-17 order that gives my property away and I can prove was procured with Extrinsic fraud

- *fraudulent order.*

More unconscionable judge Smail then grants opposing attorney Whalen's motion to compel me in November 2017 to comply with the 7-18-17 unconscionable order before he hears my proof of fraud.

COERCES ME WITH THE THREAT OF JAIL

- **Then forces me to sign quit claim deeds over to my husband with the threat of jail on November 22,2017**
 - **Before giving me the right to be heard.**
- **The final order does not include many assets we have proven to exist that amount to 2.5 million.**
 - **I have still been left homeless and have been forced to go on government health care. I cannot afford medical or dental insurance.**

This is unconscionable to have been victimized not only by my husband but by the court who takes 87,000.00 of my money and gives 70,000.00 to the ex with no evidence to support that.

Then to take 17,600.00 for 100.00 dollars a day fines for not returning things I proved were either imaginary or were still at the home.

Xsbert A. Buj do 5-5-18

DEFENDANTS JUNE 10, 2019
REQUEST TO DENY
PLAINTIFF DISCOVERY

Exhibit M

**IN THE COURT OF COMMON PLEAS WESTMORELAND COUNTY PENNSYLVANIA
CIVIL RICO**

DEBORAH A. BUJDOS

JUDGE TIMOTHY CREANY

Plaintiff,

vs

)
) Docket number 3302-2018

) CIVIL RICO
)
)
)
)
)

LINDA WHALEN, et, al

Defendant.

AMENDED MOTION TO DO PRE- COMPLAINT DISCOVERY AND LEAVE TO AMEND THE ORIGINAL COMPLAINT

Here comes the Plaintiff stating that she is very grateful to find that you have been appointed to this case that has remained in limbo since:

1. Plaintiff filed the original complaint in August 2018.
2. There has been a 9 month delay in the case, nothing was done and none of her motions were heard including her initial request for discovery to be able to prepare a more sufficient complaint and asks the court again for permission to amend her complaint that has been delayed since August 2018.
3. This delay is due to the error of appointing the judge assigned to hear this case was Judge Scherer, who is also a defendant
4. After filing 3 motions to recuse that were all ignored the case remained in limbo for the last 9 months.

5. This case involves many serious crimes including but not limited to public corruption with Attorneys, Brokers, Sheriff Jonathon Held , 2 judges, Christian Scherer, who delayed my case for 3 years by not releasing my own retirement income , that was taken from me illegally and when it was known by the DRO That I needed that to defend myself and be on a par with my husband for a fair divorce.
6. He allowed opposing counsel and others to churn fees for 3 years, as seen on the docket.
7. Both he and Judge Smail failed to report in their 703 reports why there was a delay for 5 years.
8. I recused Judge Scherer for the repeated delays he allowed repeated vexatious hearing, for dog , Car, and attempts to evict me for 3 years all while and refusing to release my own retirement annuity income, that he allowed to be taken from me by opposing counsel and my own Counsel Heidi De Bernardo - Norton on 12-18-12 to be on a par to defend my self in this divorce that involved a 20 year marriage and an estate of over 5 million dollars.
9. The 2 judges named in this case have a personal connection with Sheriff Jonathon Held in the Sheriffs Office which explains why the sheriffs office helped Judge Smail gain 17,600.00 from bogus contempt fines .
10. Judge Smail's connection to sheriff Held is this: Judge Smail was at one time the attorney who defended Held in another case , before he became a judge.
11. Sheriff Held's office helped judge Smail prevent witnesses from testifying to suborning perjury that the Judge also witnessed , but ignored on July 11, 2016.

12. The Sheriffs office helped to allow Judge Smail gain \$17,600.00 from me for fines during the deliberately delayed 9 month long contempt hearing against me.
13. The Sheriffs office interfered with my witness, (one of their deputies) testifying and covered up the fact that the judge also witnessed it and failed to address it.
14. How The Sheriffs office worked in concert with the Judge was when prepare a motion to quash my subpoena for their deputy who could have testified that she stopped my husband from coaching a witness during cross Examination on July 11, 2016.
15. The deputy was the person who walked over to my husband and stopped the suborning perjury.
16. Judge Smail quashed my subpoena for the deputy to testify and refused to allow the original person, Deborah Messer , to testify , She is the one who alerted the deputy to the act of suborning perjury .
17. The contempt hearings were another bogus way for opposing counsel to delay this divorce and the judge allowed it.
18. The contempt hearing was initiated by opposing counsel without sufficient evidence to support a contempt was over me having to return imaginary house hold items , that I did not have and this was done before we had ED. They worked in concert with other attorneys that created an enterprise to deliberately delay 2 senior citizens high asset divorce,

19. While delaying the case they were being unjustly enriched with fees paid to them for frivolous actions and were unlawfully paid by the husbands attorney Linda Whalen the leader of the enterprise .

20. Attorney Whalen paid others with my protected retirement annuity monthly income ,

21. She falsely claimed to be holding for ED. She Spent the money before ED took place.

22. The courts were aware that she unlawfully took control of , my annuity income without my consent or knowledge in December 2012.

Proof of misuse of third party funds is seen in the many motions I filed to have my money released to defend my self

Both judges were aware that opposing counsel and my attorney colluded to take my income to financially suppress me and even created a false

Power of Attorney on 4-17-13 to take control of the joint monthly income checks .

23. All of the defendants worked in concert to defraud me out of 2.5 million and succeeded.

24. As seen in the 7-18-17 final order prepared by opposing counsel the total value of the 5 million dollar estate was grossly under valued.

THE WIFE'S AWARD ENDED UP AS 400,000.00 WITH NO ECONOMIC CLAIMS

RESOLVED LEAVING HER STILL WITH OVER 100,000.00 IN BILLS. TAX ISSUES UNRESOLVED, FINAL ORDER LEFT HER WITH NO INCOME PERIOD. HOMELESS, AT THE AGE OF 62 WITH NO CREDIT, DUE TO LACK OF HAVING HER OWN INCOME TO PAY BILLS AND THE HUSBAND WAS AWARDED THE ENTIRE 5 MILLION DOLLAR ESTATE INCLUDING THE CONTINUED MONTHLY INCOME HE WAS RECEIVING DURING DIVORCE OF OVER 20,000.00 AFTER TAXES.

25. ALLOWED OBSTRUCTION OF DISCOVERY By Both Judges Who Were Aware That

Opposing Counsel Linda Whalen Was Refusing To Produce Financial Documents For 5 Years And Knew The Wife's Forensic Accountant Testified To There Being 2.3 Million Missing From The Marital Estate In January 2016.

26. SUSPICIOUS TIMING OF FINAL ORDER THAT WAS PENDING SINCE 11-21-16

SUDDENLY APPEARS WITH NO WARNING OR FINAL HEARING IT APPEARS ON 7-18-17 THIS IS SUSPICIOUS AS IT CAME the day after opposing counsel was informed for the third time in 2 months that she had to produce financial documents for my forensic accountant's review before our next 8-28-17 De Novo hearing, regarding the husband owing the wife over \$300,000.00 owed to back support. From the proof that we had showing the husband was grossly under reporting his monthly income .

27. EXHIBIT PROOF OF UNDER REPORTING INCOME FROM DOMESTIC RELATIONS. FORENSIC ACCOUNTANT ALEX KINDLER PREPARED A DISPOSABLE NET INCOME REPORT FOR THE HUSBAND THAT SHOWED HE MADE 20,000.00 A MONTH AFTER TAXES INCOME AND THE DECEMBER 2012 ORDER FOR SUPPORT SHOWS HE ONLY REPORTED 7,000.00 A MONTH INCOME . PROOF OF UNDER REPORTED INCOME KNOWN BY BOTH JUDGES AND BOTH ATTORNEYS ALL FAILED TO REPORT IT OR ADDRESS IT.

EXHIBIT FORENSIC ACCOUNTANT ALEX KINDLER'S DISPOSABLE MONTHLY NET INCOME REPORT ON THE HUSBAND ACTUAL MONTHLY AFTER TAXES INCOME ..

PROOF OF FINACIALLY SUPPRESSING WIFE FOR 5 YEARS

DUE TO THE DEFENDANTS ILLEGAL ACTIONS THE WIFE WAS ONLY RECEIVING 3,582.00 A MONTH INCOME DURING DIVORCE AND RESPONSIBLE FOR THE MARITAL HOME'S BILLS,

THE HUSBAND WAS RECEIVING 20,000.00 A MONTH INCOME

TAKING WIFE'S INCOME PREVENTED HER FROM BEING ON A PAR WITH THE HUSBAND THE WIFE WAS LEFT WITH ONLY \$3,582.00 A MONTH INCOME INSTEAD OF THE \$ 8,000.00 THE FIRST SUPPORT ORDER ON 10-24-12 STATED SHE WAS TO CONTINUE RECEIVING HER ANNUITY INCOME .

28.

MORE PROOF OF HUSBANDS HIDING 300,000.00 IN INCOME OVER 5 YEARS DURING DELIBERATELY DELAYED DIVORCE .

29. A MASTERS TRANSCRIPT AND HIS DEPOSITION SHOWS HE ADMITS HE MADE 18,000.00 A MONTH AND COULD NOT LIVE ON THAT SO HE DISSIPATED FUNDS FROM THE BRINKER IRA, HE DISSIPATED 500,000.00 FROM THAT DURING DIVORCE .
30. All defendants were misusing my annuity income that was taken from me illegally to financially suppress me during a high asset divorce.
31. Many defendants were paid by the opposing attorney Linda Whalen with money that came from my protected annuity monthly \$3,750.00 income and unlawfully held from me for 5 years and finally caused the ultimate damage when she refused to release any of my income to pay for an appellate attorney to appeal the final order that's missing 2.5 million.
32. Judge Smail continued to cooperate with the enterprise by ignoring my 3 timely and properly filed motions to vacate due to fraud within the required 30 days.
33. The documents filed yesterday were for a request to have leave for amending my complaint pending the August 2017 request for discovery, that was left unanswered by the past RUICO Judge Scherer.
34. In order to prepare a sufficient complaint I must have the court grant me discovery . The docket shows that I have been denied discovery since 2016 from opposing counsel and documents needed from Cetera with up to date transactions during and correspondence between the annuity companies, the broker, cetera

employees, and Scott Shoup, the financial advisors reports and correspondence during 2014-2017.

RESPECTFULLY SUBMITTED BY,

Deborah Ann Bujdos

DEBORAH ANN BUJDOS

PLAINTIFF

Deborah Ann Bujdos

K-2

Deborah Bujdos
113 Branthoover Street,
Belle Vernon, PA 15012
724-322-2590
Dabujdos@yahoo.com

May 13, 2018

Amy Mears Dematt
Westmoreland County Court Administrator

Dear Amy,

This letter is regarding the county receiving \$17,600.00 from me that judge Smail removed from my marital estate. He is violating The 8th Amendment Excessive Fines Claus and the 14th amendment and repeatedly denied me my due process rights. The right to be heard, the right to have counsel while allowing attorney Whalen to continue holding my own retirement funds without my consent. He deprived me of my to my own money without sufficient evidence and assisted Attorney Linda Whalen in a deliberately delaying this case for five years while she churned fees and defrauded me of 2.5 million lost in marital assets, confirmed by my forensic accountant.

Judge sail's recently sent me a notice on April 27, 2018 notifying me only now where the he put the money paid for excessive fines for a bogus contempt of \$17,600.00. (violating the 8th amendment).

The total amount he charged me for contempt was \$87,000.00, seen on a fraudulent July 18, , 2017 final order

#

NOTICE

WHERE AND WHAT IS THE COUNTY DOING WITH 17,600.00 JUDGE HARRY SMAIL UNLAWFULLY TOOK FROM ME, A SENIOR CITIZEN, AND A VICTIM OF DOMESTIC VIOLENCE, FOR ERRONEOUS FINES FOR A CONTEMPT THAT WAS NEVER SUPPORTED WITH FACTS TO FIND ME IN CONTEMPT DURING A DIVORCE BY JUDGE HARRY SMAIL. DECEMBER 2017 HE SENT ME A NOTICE CLAIMING HE GAVE THE MONEY TO THE COUNTYS JUDICIAL FUND THEN SENT ME ANOTHER NOTICE DATED APRIL 27, 2018 AND SAID IT WENT TO THE WESTMORELAND COUNTY FUNDAMENTAL FUND?

MATTER BEFORE THE COURT

SUMMARY OF ABUSE OF CONTEMPT FACTS

JULY 11, 2017 A PA STATE DIVORCE JUDGE HARRY SMAIL UNLAWFULLY TOOK \$87,000.00 FROM ME, 61 YEAR OLD WOMAN FOR BOGUS CONTEMPT FINES AND FEES IN OUR DIVORCE

DECEMBER 2017 LATER ENDS NOTICE THAT 17,6000 OF THE FINE WAS BEING RELEASED TO THE JUDICIAL FUND ????????

I proved that I did not violate any order to be found in contempt and should be refunded the \$87,000.00 Judge Smail unlawfully took from me in the 7-18-17 order that was prepared with a conflict of interest as it was prepared by opposing counsel , when I was denied my own funds to hire an attorney, suspiciously the order was issued the day after she was put on notice to produce financial documents she had managed to avoid providing for 5 years.

Now I find it reasonable for me to be asking where exactly was the 17,600.00 judge Smail had since the July 18, 2018 order was issued.

What is the county doing with my \$17,600.00 that was taken from me for bogus 100.00 a day contempt fines , ordered without evidence to support anything was missing.

The order holding me in contempt is invalid considering the judge

Previously stated in his order dated 6-29-17 the husband did not have sufficient evidence to support the contempt,

Judge Smail ignored the husbands suborning perjury and interfered with my having witnesses to the suborning perjury He had the sheriffs department motion to quash my subpoena to have the deputy who stopped the husband from continuing to tell his son how to answer questions under cross.

I am demanding the contempt fees and fines of \$87,000.00 be paid back to me.

Requesting the court reverse the 7-18-17 order that awards an excessive fee \$32,000.00 paid to Master Eric Bononi without my consent

I believe I should be reimbursed for the excessive fee for master Eric Bononi of 32,000.00 that Attorney Whalen , DEDUCTS FROM MY MARITAL ASSETS IN THE UNCONSCIONABLE FINAL ORDER DATED 7-18 -17

There is no court order stating an amount to pay the master. SHE agreed to pay to master Eric Bononi, this amount. I was never asked if I agreed to pay for a master, there is no statement or agreement that I approved of him being our master or to pay him anything.

This was done without my consent AND I LOST \$32,000.00

To a master that was picked by opposing counsel prematurely with an ex parte motion . in the end Judge Smail rejected his report that he is being paid \$32,000.00 in fees for. This too is a violation of the excessive fines and fees clause .

Should the court refuse to vacate or reverse the fraudulent 7-18-17 order I feel it is the courts or county's duty to reimburse me for a grand total of 2.5 million that was omitted from the final order when the judge refused to compel husband to sign a boiler plate release to locate the missing 2.5 million in assets that are not included in the final settlement.

Delwood A. Buehler 5-13-18

Exhibit J

Judicial District Operations and Programs Department
Administrative Office of the Pennsylvania Courts
1515 Market Street, Suite 1414
Philadelphia, PA 19102
To the administration office of the Pennsylvania courts;
March 28, 2019

RE: Deborah Bujdos v Judge Christian Scherer, et. al
RICO civil suit #3302-2018 filed 7-24-18

Dear Head Administrator;

My name is Deborah Bujdos The reason I am contacting you is because

1. I have filed a RICO Civil suit in Westmoreland County Court of Common Pleas and shockingly they have assigned a Judge Christian Scherer to be the sitting judge in the RICO action I filed .
2. He is named as a defendant in that suit and I have requested he recuse from hearing this case . He was the same judge on my 2012 Deliberately delayed 5 yearlong divorce. I recused him from that in August 2015 and finally recused from that case and now to have him as the judge to hear this RICO seems unconscionable.
3. He has not responded to any of the filings I have provided and yet he continues to be listed as the sitting judge. By his failure to respond on this very important pleading will harm me if he refuses to recuse and or respond to my motions.
4. No rules apply to these 2 judges . While he was the judge on my divorce #1849-2012 he delayed it for 3 years and failed to fill in any of the six 703 reports to describe why I was still in court. To have him as a sitting judge on my RICO would prevent me from having a fair trial.
5. I have responded to his RICO attorneys preliminary objections twice and motion to have him recuse 3 times, all were ignored.
6. I have had another of the defendants send me their preliminary objections and needed to ask for an extension of time to respond ,
7. I filed Application for Extension of Time to File Reply Brief as of this date, due to this case remaining in limbo as this judge refuses to recuse.
8. MY pleadings are being simply ignored because of my past history with this judge and because I am a Pro Se litigant and not by choice . I am forced to be pro se, after both judges assisted in me being unable to defend my self when they continued to allow my retirement income taken from me .
9. The actions of 2 bias judges lead to me to loosing 2.5 million in the divorce.
10. IT IS A FACT THAT No rules apply to these judges .
11. After Judge Christian Scherer recused he was able to continue to negatively affect my case .
12. When he violated the cannon and rule that no recused judge can assign his replacement, ever.

13. He assigned me the judge of his choice Harry Smail, who immediately appeared to me and others to be bias and retaliated against me for me recusing Judge Scherer.
14. Judge Smail is also a defendant on the RICO. He assisted opposing counsel in allowing my husband to hide 2.5 million in the divorce and deliberately delayed the case for 2 more years.
15. Proven again NO RULES APPLY TO THESE 2 JUDGES , He too failed to fill in his FOUR 703 reports to describe why I was still there.
16. Judge Smail allowed opposing counsel to continue a bogus contempt matter for 9 months while charging me a fine of \$100.00 a day that totaled \$17,600.00 he put in the judicial fund.
17. He abused his discretion and his power of contempt by unlawfully charging me 17,600.00 for a fine for a contempt for not returning house hold items , I did not have and before we had equitable distribution to discuss who was keeping what.
18. This contempt was done after he unlawfully evicted me in March 2016, leaving me homeless and during the 4th year of litigation and during the masters hearings, and left me home less when I was a domestic abuse victim of my husband .
19. He issued a 1-6-16 opinion/order that contained extremely rude, disparaging and proven false statements about me, and made the decision with no fact findings or conclusions of law or evidence to support such harsh decisions, that caused me great harm at the age of 60.
20. During the 2 year litigation with him as judge he was so blatantly bias , that was seen by me others too, I was felt the need to file 4 motions to recuse Judge Smail and each time he refused.
21. I have filed many complaints about both judges including private criminal complaints against them and the others who were assisting in the crimes that included theft by deception, conversion of annuity funds, bribery, and more.
22. It is a crime to have allowed anyone to take my \$3,750.00 a month government protected annuity income from me without my knowledge or consent to deliberately financially abuse me by opposing counsel to hold it hostage, for 5 years to financially suppress me from defending myself and prevented me from appealing the final order. That resulted in me loosing 2.5 million.
23. Judge Smail was aware opposing counsel, Attorney Linda Whalen paid the master of her choice a grossly excessive fee in total of 32,000.00 , that I never consented to
24. They allowed her to continue delaying the case for 5 years with by hearing a her false and vexatious motions for hearings for dog visits, car visits,
25. and most unconscionable they heard her 4 years of hearings trying to evict me because I did not have my annuity income to pay the taxes on the home .
26. They ignored the fact that the Opposing attorney created a fake POA to have total control of my annuity checks,
27. They were aware opposing counsel converted the with held retirement annuity funds when She appointed a master of her choice and immediately paid him 10,000.00 with a check from the account she had my annuity income in,
28. They were informed she by passed the rules for paying a master when she paid him an excessive amount as a retainer of !0,000.00 before the hearings began , that

amount was well beyond the rules that state a master would get 248.00 a day and get paid at the end.

29. She appointed the master without my consent and in violation of the rules that state we should not have been in front of a master until both parties discovery was done.
30. They knew opposing counsel was obstructing discovery for 5 years and allowed it.
31. Mine was delayed for years due to not having access to my own annuity income.
32. During the 5 years many other crimes were committed and all listed in my complaints.
33. During the divorce and I sent reports to the JCB about both¹ judges and nothing ever came of it.
34. Judge Smail caused the most damage to me and should have been forced to step down after I sent the evidence and transcripts proving he was more than bias.
35. He was determined to stay on my divorce case until he destroyed me
36. Due to the non action of the JCB addressing his many violations he did accomplish destroying me .
37. Judge Smail completed his destruction by allowing opposing counsel to prepare a final order that failed to resolve my economic claims and was missing 2.3 million, when I was pro se .
38. The missing 2.3 million from the marital estate was verified by my forensic accountant in 2016 a year before the final order was issued.
39. Judge Smail deliberately ignored my timely and properly filed motions to vacate the final order due to fraud . The motions were filed Long before the 30 days passed to modify a divorce order
40. More evidence of Judge Smail's bias is seen as he ignored my 3 immediately filed motions to vacate due to fraud
41. I was deliberately denied the right to file an appeal as he ignored my timely filed motion to release my \$22,000.00 retirement annuity
42. He ignored my Aug. 9, 2017 motion to release my income to pay an appellate attorney Nicole Kary's 10,000.00 who agreed to do my appeal.
43. I was left with no possible way to pay her or to do an appeal with no funds.
44. So Judge Smail and attorney Linda Whalen waited until the time to appeal ran and immediately took my only income that was spousal support and then compelled me to sign 4 quit claim deeds for our 26 acres of property, when I was opposed to this when he refused to hear my previous motions to prove the fraud to vacate the final order.
45. On 11-22-17 I was denied the right to have a fair hearing and denied 2.5 million in marital assets. And done before hearing my motions to vacate, or allowing me to have my own money released to be able to appeal
46. and he refused to continue the 11-22-17 motion to compel me to sign over my property until I could have an attorney present as seen on the record.
47. As you can see I have objected furiously during the entire litigation because my rights have been denied to have a fair trial and receive my own annuity income or receive the correct amount of APL to defend myself
- 48.

49. After 5 years, of being forced to remain in the legal arena Judge Smail signed a fraudulent order, on 7-18-17 with none of my preserved economic claims were resolved, I was left homeless, no future income and the husband was awarded the entire 5 million \$ marital estate.
50. I was denied the right to appeal,
51. In December 2018 I filed a motion to open the final order with a new judge Silvis to hear a motion to reopen the divorce due to many unresolved issues and not surprisingly it was denied.
52. I am letting the administration office know what is happening because I am not the only person being subjected to this type of misconduct, case fixing and retaliation from these judges and this must be stopped.
53. The people of this county are losing their life's savings by these judges charging people with unlawful fines without evidence, to support it and allowing their favored attorneys to churn fees for five or more years for a simple divorce like mine.
54. I am appalled to know that these two judges follow no rules, evidenced again in their lack of filing their 703 reports, both just feel it is ok not to fill in the 703 reports in my case when I have seen their other cases 703 reports that are filled in.
55. They have no lawful explanation as to why my case remained in court for 5 years.
56. This is the reason I have contacted The Pennsylvania administrations office.
57. We the people of this county deserve to have honest and fair judges who follow the well written laws that are meant to protect us.
58. I filed this RICO Due to the many crimes committed in this court house (that is more like a click many of people who cover for each other) when they have cases that involves wealthy people the cases get deliberately delayed and the litigants, like in my case we are both senior citizens.
59. I end up losing 2.5 million in marital assets
60. Both parties loose hundred's of thousands of their hard earned money for unjust enrichment of attorneys churning fees and judges fining people without cause.
61. I am confident that I will succeed in My RICO with the vast amount of prime facia evidence and witnesses I have. This can only happen if I am appointed a fair and unbiased judge, that is not Judge Scherer and to this date he has still ignored my motions to recuse.

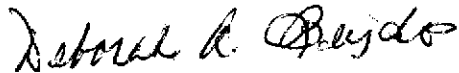
For your own reference I have sent you the rule of 703, listed below, that I went by, while reviewing the many pending issues that still has not been addressed before the July 18, 2017 fraudulent final divorce order was issued.

Both of these named judges are a danger to innocent people who are in their court for a simple divorce, their actions are best described as legal abuse.

Pennsylvania's current state constitution specifies that state supreme court judges can be considered for impeachment for acts of misbehavior. I believe these judges misconduct and arrogant attitude, so drunken with power they feel it is their right

to not follow the rules or the laws. Their misconduct has risen to the level of impeachment.

If your department does not have the responsibility to address these issues, Please advise me who to contact for the correct department in the judicial assignments so I may ask them to address this issue of Judge Christian Scherer refusing to respond and recuse from this RICO case I filed on July 24, 2018 where he too is a defendant and recused from my divorce case in 2015.



Thank you for your time sincerely,

Deborah A. Bujdos
113 BRANTHOOVER STREET
BELLE VERNON, PA 15012
724-322-2590

Cc:
JCB
Attorney Martha Gayle
Attorney General Josh Shapiro
Secretary of revenue
PA Insurance Commission

SUPERVISION AND ASSIGNMENT OF JUDGES

Rule 703. Reports of judges.

(A) Policy Statement.

It is the policy of the unified judicial system that any matter at any stage of a proceeding be brought to a fair conclusion as promptly as possible, consistent with the character of the matter and the resources of the system. The requirements of this rule further specify and implement this policy in keeping with the Court's constitutionally mandated responsibility to oversee the prompt and proper disposition of the business of the Pennsylvania courts.

(B) General Rule.

(1) Every judge shall keep a record of each matter that has been submitted to the judge for decision and which remains undecided.

EXHIBIT SPOUSAL SUPPORT FRAUD IGNORED

2-28-17 REPORT TO THE DRO RE: \$300,000.00 OWED IN BACK SUPPORT

JUDGE SMAIL FAILED TO COLLECT \$300,000.00 OWED IN BACK SUPPORT IN FINAL ORDER
OWED TO DEBORAH A BUJDOS

Terrance O'Halloran, DRO
Westmoreland County Courthouse
2 N. Main St
Greensburg, Pa 15610

2-28-17

Laurence A. Bujdos

Disposable Income Calculation
For the years ending December 31

EXHIBIT A

	2012	2012	2013	2013	2014	2014
	Taxable	Cashflow	Taxable	Cashflow	Taxable	Cashflow
INCOME						
Interest	118	118	20	20	-	-
Dividends	839	839	-	-	-	-
(1) Capital Gains	-	-	-	-	-	-
IRA Distributions	42,000	42,000	55,000	55,000	49,500	49,500
(2) Pensions & Annuities	24,889	94,700	42,000	90,000	42,000	66,000
(3) Schedule E - Rental	70,253	117,137	71,580	109,655	81,754	125,353
(4) Social Security	21,919	25,784	22,286	26,219	22,623	26,615
TOTAL INCOME	\$ 159,795	\$ 280,578	\$ 190,886	\$ 280,894	\$ 195,877	\$ 267,486

TAXES	(MFS-1)	(MFS-1)	(MFS-1)
Federal Income Tax	37,903	50,821	52,487
Social Security/Medicare Tax	-	-	-
State Taxes - PA	2,186	2,186	2,510
Local Wage and Municipal Services Taxes	-	-	-
TOTAL TAXES	40,089	53,019	54,977

TOTAL DISPOSABLE INCOME FROM AVAILABLE FUNDS	240,489	227,875	212,491
MONTHLY NET DISPOSABLE INCOME	<u>\$ 20,041</u>	<u>\$ 18,980</u>	<u>\$ 17,708</u>

Wife ma. income 3,500.00

- (1) Capital gain transactions assumed to be considered in equitable distribution
- (2) Pension cash flow includes both taxable and non-taxable distributions
- (3) Rental cash flow based earnings plus depreciation and amortization expense add back
- (4) Social Security cash flow based on actual amount received

Filing Status calculated assuming married filing separately

**In the Court of Common Pleas of WESTMORELAND County, Pennsylvania
DOMESTIC RELATIONS SECTION**

DEBORAH A. BUJDOS

Plaintiff

vs.

LAURENCE A. BUJDOS

Defendant

) Order Number: 01775 DR 2012

) PACSES Case Number: 721113557

) Docket Number: 01775 DR 2012

) Other State ID Number:

ORDER OF COURT - ALLOCATED

Final Interim Modified

AND NOW, 24TH DAY OF OCTOBER, 2012, based upon the Court's determination that the Payee's monthly net income is \$2,978.11 and the Payor's monthly net income is \$11,390.65, it is hereby ordered that the Payor pay to the Pennsylvania State Collection and Disbursement Unit Four Thousand Four Hundred Dollars (\$4,400.00) a month payable monthly as follows: first payment due within 30 days. The effective date of the order is 10/01/12.

Arrears set at \$3,920.50 as of OCTOBER 24, 2012 are due in full IMMEDIATELY. All terms of this Order are subject to collection and/or enforcement by contempt proceedings, credit bureau reporting, tax refund offset certification, passport denial certification, driver's/professional/recreational license revocation, interception of lottery winnings, and the freeze and seize of financial assets. These enforcement/collection mechanisms will not be initiated as long as obligor does not owe overdue support. Failure to make each payment on time and in full will cause all arrears to become subject to immediate collection by all the means listed above.

For the Support of:

Name

DEBORAH ANN BUJDOS

Birth Date

06/22/56



The defendant owes a total of \$4,400.00 per month payable monthly; \$3,897.00 for current support and \$503.00 for arrears. The defendant must also pay fees/costs as indicated below.

This order is allocated and monies are to be applied as follows:

Frequency Codes:		1 =One Time	M =Monthly
<u>Payment Amount/ Frequency</u>		<u>Debt Type Description</u>	<u>Beneficiary</u>
\$ 3,897.00	/ M	SPOUSAL SPT/SO	DEBORAH ANN BUJDOS
\$	/		
\$	/		
\$	/		
\$	/		
\$	/		
\$	/		
\$	/		
\$	/		
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\$	/		
\$	/		

Said money to be turned over by the Pa SCDU for distribution and disbursement in accordance with Rule 1910.17(d).

Payments must be made by check or money order. All checks and money orders must be made payable to Pa SCDU and mailed to:

Pa SCDU
P.O. Box 69110
Harrisburg, Pa 17106-9110

Payments must include the defendant's PACSES Member Number or Social Security Number in order to be processed. Do not send cash by mail.

The monthly support obligation includes cash medical support in the amount of \$250 annually for unreimbursed medical expenses incurred for each child and/or spouse as ordered herein. Unreimbursed medical expenses of the obligee or children that exceed \$250 annually shall be allocated between the parties. The party seeking allocation of unreimbursed medical expenses must provide documentation of expenses to the other party no later than March 31st of the year following the calendar year in which the final medical bill to be allocated was received. The unreimbursed medical expenses are to be paid as follows: 80.00% by defendant and 20.00% by plaintiff.

Plaintiff is ordered to provide medical insurance coverage.

Within thirty (30) days after the entry of this order, the Plaintiff Defendant shall submit to the other party and to the Domestic Relations Section written proof that medical insurance coverage has been obtained or that application for coverage has been made. Proof of coverage shall consist, at a minimum, of : 1) the name of the health care coverage provider(s); 2) any applicable identification numbers; 3) any cards evidencing coverage; 4) the address to which claims should be made; 5) a description of any restrictions on usage, such as prior approval for hospital admissions, and the manner of obtaining approval; 6) a copy of the benefit booklet or coverage contract; 7) a description of all deductibles and co-payments; and 8) five copies of any claim forms.

Other Conditions:

This order takes into consideration the parties costs for medical insurance. The plaintiff's income is based on her continuing to receiving directly \$2000.00 per month from the John Hancock account and \$1750.00 per month from the Met Life account. This order includes a plaintiff mortgage deviation. The defendant shall remit his own payments to PA SCDU.

Defendant shall pay the following fees:

<u>Fee Total</u>	<u>Fee Description</u>	<u>Payment Frequency</u>	
\$ 23.50	for JUDICIAL COMPUTER FEE	Payable at \$3.00	per MONTH
\$	for	Payable at \$	per
\$	for	Payable at \$	per
\$	for	Payable at \$	per
\$	for	Payable at \$	per

IMPORTANT LEGAL NOTICE

PARTIES MUST WITHIN SEVEN DAYS INFORM THE DOMESTIC RELATIONS SECTION AND THE OTHER PARTIES, IN WRITING, OF ANY MATERIAL CHANGE IN CIRCUMSTANCES RELEVANT TO THE LEVEL OF SUPPORT OR THE ADMINISTRATION OF THE SUPPORT ORDER, INCLUDING, BUT NOT LIMITED TO, LOSS OR CHANGE OF INCOME OR EMPLOYMENT AND CHANGE OF PERSONAL ADDRESS OR CHANGE OF ADDRESS OF ANY CHILD RECEIVING SUPPORT. A PARTY WHO WILLFULLY FAILS TO REPORT A MATERIAL CHANGE IN CIRCUMSTANCES MAY BE ADJUDGED IN CONTEMPT OF COURT, AND MAY BE FINED OR IMPRISONED.

PENNSYLVANIA LAW PROVIDES THAT ALL SUPPORT ORDERS SHALL BE REVIEWED AT LEAST ONCE EVERY THREE (3) YEARS IF SUCH REVIEW IS REQUESTED BY ONE OF THE PARTIES. IF YOU WISH TO REQUEST A REVIEW AND ADJUSTMENT OF YOUR ORDER, YOU MUST DO THE FOLLOWING: CALL YOUR ATTORNEY. AN UNREPRESENTED PERSON WHO WANTS TO MODIFY (ADJUST) A SUPPORT ORDER SHOULD CONTACT THE DOMESTIC RELATIONS SECTION.

ALL CHARGING ORDERS FOR SPOUSAL SUPPORT AND ALIMONY PENDENTE LITE, INCLUDING UNALLOCATED ORDERS FOR CHILD AND SPOUSAL SUPPORT OR CHILD SUPPORT AND ALIMONY PENDENTE LITE, SHALL TERMINATE UPON DEATH OF THE PAYEE.

A MANDATORY INCOME ATTACHMENT WILL ISSUE UNLESS THE DEFENDANT IS NOT IN ARREARS IN PAYMENT IN AN AMOUNT EQUAL TO OR GREATER THAN ONE MONTH'S SUPPORT OBLIGATION AND (1) THE COURT FINDS THAT THERE IS GOOD CAUSE NOT TO REQUIRE IMMEDIATE INCOME WITHHOLDING; OR (2) A WRITTEN AGREEMENT IS REACHED BETWEEN THE PARTIES WHICH PROVIDES FOR AN ALTERNATE ARRANGEMENT.

UNPAID ARREARAGE BALANCES MAY BE REPORTED TO CREDIT AGENCIES. ON AND AFTER THE DATE IT IS DUE, EACH UNPAID SUPPORT PAYMENT SHALL CONSTITUTE, BY OPERATION OF LAW, A JUDGMENT AGAINST YOU, AS WELL AS A LIEN AGAINST REAL PROPERTY.

IT IS FURTHER ORDERED that, upon payor's failure to comply with this order, payor may be arrested and brought before the Court for a Contempt hearing; payor's wages, salary, commissions, and/or income may be attached in accordance with law; this Order will be increased without further hearing by 15% a month until all arrearages are paid in full. Payor is responsible for court costs and fees.

Copies delivered to parties 10/24/12.
Date

Consented:

Plaintiff

Plaintiff's Attorney

Defendant

Defendant's Attorney

CERTIFIED FROM THE RECORD
This 20 Day of October
24TH DAY OF OCTOBER, 2012

Terence O'Halloran Esq.
Director, Domestic Relations
Service Type M

BY THE COURT:
Chris Schenck 10/25/12

Judge

In the Court of Common Pleas of WESTMORELAND County, Pennsylvania
DOMESTIC RELATIONS SECTION

PACSES Case Number: 721113557
Docket Number: 01775 DR 2012
Other State ID Number:

Please note: All correspondence must include the
PACSES Case Number.

OCTOBER 22, 2012

SUMMARY OF TRIER OF FACT

Plaintiff Information

DEBORAH A. BUJDOS

Address:

Employer:

Attorney:

HEIDI DEBERNARDO-NORTON

Defendant Information

LAURENCE A. BUJDOS

Address:

Employer:

Attorney:

WHALEN LINDA L

Complaint for Support 10/01/12 Petition for Modification Filed _____ Other

Reason for Conference:
spousal support

Dependent(s)

Current Order: \$ 0.00 / per month _____

Plaintiff Information

Defendant Information

Current Income:

\$2978.00 per month net

\$11390.00 per month net

Tax Return:

married filing separate

married filing separate

Medical Coverage:

\$639.00 per month

\$170.00 per month

Child Care/Tuition:

Additional Obligations:

mortgage \$1825.00 includes taxes and insurance.

Other Information:

Both parties and attorneys were present.

The plaintiff's income is based on her receiving \$3750.00 per month from the John Hancock and Met Life payments.

The defendant's income is based on the remainder of the John Hancock and Met Life payments as well as his Social Security retirement, his IRA payment and the proceeds from his rental property.

The defendant will need to remit his own payment for this spousal support to PA SDU. Temporary payment coupons have been provided with the defendant's copy of this order.

Other Information (continued):

Facts Agreed Upon:

Facts in Dispute and Contentions with Respect to Facts in Dispute:

Guideline Amount: \$3,897.00 / month

DRS Recommended Amount: \$3,897.00 / month

DRS Recommended Order Effective Date: 10/01/12

Parties to be Covered by Recommended Order Amount:

Deborah A. Bujdos

Guideline Deviation: YES or NO

Reason for Deviation:

Submitted by: CHRISTINA A GROSSMAN

Date Prepared: OCTOBER 22, 2012

In the Court of Common Pleas of WESTMORELAND County, Pennsylvania

DOMESTIC RELATIONS SECTION

SUITE 302, 2 NORTH MAIN STREET, GREENSBURG, PA. 15601-2414

Phone: (724) 830-3200

Fax: (724) 830-3256

Plaintiff Name: DEBORAH A. BUJDOS
Defendant Name: LAURENCE A. BUJDOS
Docket Number: 01775 DR 2012
PACSES Case Number: 721113557
Other State ID Number:

Please note: All correspondence must include the PACSES Case Number.

Spousal Support Guideline Calculation with Dependent Children

1. Obligor's Monthly Net Income	\$	
2. Less All Other Support	\$	
3. Less Obligee's Monthly Net Income	\$	
4. Difference	\$	
5. Less Child Obligation for Current Action	\$	
6. Income Available for Spousal Support	\$	
7. Multiply by 30%		30%
8. Amount of Basic Spousal Support	\$	
9. Adjustment for Mortgage	\$	
10. Total Monthly Spousal Support	\$	

Spousal Support Guideline Calculation without Dependent Children

1. Obligor's Monthly Net Income	\$	11,390.65
2. Less All Other Support	\$	0.00
3. Less Obligee's Monthly Net Income	\$	2,978.11
4. Difference	\$	8,412.54
5. Multiply by 40%		40%
6. Amount of Basic Spousal Support	\$	3,365.02
7. Adjustment for Other Expenses	\$	531.99
8. Total Monthly Spousal Support	\$	3,897.01

Summary

Date: OCTOBER 22, 2012

Monthly obligation amount selected: \$3,897.01

Payment frequency: MONTHLY

Obligation amount: **\$3,897.01**

Deviation reason: 1.
2.
3.
4.
5.

VERIFICATION

I VERIFY THE STATEMENTS MADE IN THE FOREGOING PLEADING ARE TRUE AND CORRECT. I UNDERSTAND THAT FALSE STATEMENTS HERE ARE MADE SUBJECT TO PENALTIES OF PA C.S. SECTION 4904, RELATING TO UNSWORN FALSIFICATION TO AUTHORITIES.


Larry A. Bujdos

Contempt
Exhibit 1

**ABUSE OF CONTEMPT TO DELAY THE CASE AND BE
UNJUSTLY REWARDED WITH 17,600.00**

CHARGING EXCESSIVE CONTEMPT FINE FOR REVENUE

TO THE JUDICIAL FUND

DELAYING CASE FOR 2 MORE YEARS

MALFEASANCE

IGNORING SUBORNING PERJURY

INTERFERING WITH WITNESSES

**WHILE WORKING IN CONCERT WITH THE ENTERPRISE JUDGE SMAIL
CAUSED THE CASE TO BE DELAYED AGAIN FOR A BOGUS 9 MONTH
CONTEMPT HEARING WITHOUT SUFFICIENT EVIDENCE. AND GAINED
17,600.00 REVENUE FOR THE JUDICIAL FUND FROM COLLECTING AN
UNLAWFUL DEBT . AN EXCESSIVE FINE OF 17,600,00 FROM PLAINTIFF.**

**JUDGE SMAIL'S MALFEASANCE CONTINUES IN HIS ABUSE OF CONTEMPT
THAT INCLUDED IGNORING WITNESSING SUBORNING PERJURY DURING A
CIVIL CONTEMPT HEARING .**

JUDGE SMAIL DID NOT FOLLOW THE "TWO WITNESS" RULE,(IN PLAINTIFFS
CONTEMPT CASE) DERIVED FROM COMMON LAW, GOVERNS THE PROOF
REQUIRED FOR A PERJURY CONVICTION UNDER SECTION 1621. *WEILER V. UNITED
STATES*, 323 U.S. 606, 609 (1945).

HERE THE PLAINTIFF DID MEET HER BURDEN UNDER THE SO-CALLED "TWO-
WITNESS" RULE

**JUDGE SMAIL AND THE SHERIFFS DEPARTMENT INTERFERED WITH
PLAINTIFFS 2 WITNESSES**

FROM TESTIFYING TO SEEING THE SUBORNING PERJURY.

He refused to let them testify and continued the hearings for 5 more months charging
Plaintiff 100.00 dollars a day fines, amounting to \$17,600.00 after Judge Smail admitted
he witnessed the Defendant and his son suborned perjury.

1750. Comparison Of Perjury Statutes -- 18 USC 1621 And 1623

The "two witness" rule, derived from common law, governs the proof required for a perjury conviction under Section 1621. *Weiler v. United States*, 323 U.S. 606, 609 (1945). The rule means that a perjury conviction may not rest solely on the uncorroborated testimony of one witness. *United States v. Hammer*, 271 U.S. 620, 626 (1926). The two witness rule, however, does not require two witnesses to every perjurious statement. The falsity of the perjurious statement may be established either by the testimony of two independent witnesses or by one witness and independent corroborating evidence that is inconsistent with the innocence of the accused. *Weiler*, 323 U.S. at 610. Also, the second witness need not fully corroborate the first, but must substantiate the other's testimony concerning the defendant's perjurious statement. *United States v. Chaplin*, 25 F.3d 1373, 1381-82 (7th Cir. 1994). The two witness rule does not apply if the perjurious statement concerns the defendant's state of mind (usually lack of memory), which can be established by circumstantial evidence. *Id.* at 1378. The two witness rule also does not apply to sentence enhancements for obstruction of justice, even if based on the defendant's perjury at trial. *United States v. Onumonu*, 999 F.2d 43, 46 (2d Cir. 1993).

Here the Plaintiff did meet her burden under the so-called "two-witness" rule.

It is well established that "to authorize a conviction for perjury the falsity of the statement alleged to have been made by the defendant must be established either by the testimony of two independent witnesses, or by one witness and independent corroborating evidence which is inconsistent with the innocence of the accused." *McWhorter v. United States*, 193 F.2d 982, 983 (5th Cir. 1952). As the Supreme Court stated in *Weiler v. United States*, 323 U.S. 606, 609, 65 S. Ct. 548, 550, 89 L. Ed. 495 (1945), "(I)mplicit in (the) evolution and continued vitality (of the

two-witness requirement) has been the fear that innocent witnesses might be unduly harassed or convicted in perjury prosecutions if a less stringent rule were adopted."

In *Offutt v. United States*,²³⁹ acting under its supervisory powers over the lower federal courts, the Court set aside a criminal contempt conviction imposed on a lawyer after a trial marked by highly personal recriminations between the trial judge and the lawyer

. In a situation in which the record revealed that the contumacious conduct was the product of both lack of self-restraint on the part of the contemnor and a reaction to the excessive zeal and personal animosity of the trial judge, the majority felt that any contempt trial must be held before another judge.

This holding, that when a judge becomes personally embroiled in the controversy with an accused he must defer trial of his contempt citation to another judge

HERE JUDGE SMAIL WAS ASKED TO RECUSE 4 TIMES AND

REFUSED EVEN WITH THE EVIDENCE THAT PROVED HIS BLATANT BIAS

, He became personally embroiled in the controversy with an accused he should have deferred trial of his contempt citation to another judge

which was founded on the Court's supervisory powers, was constitutionalized in *Mayberry v. Pennsylvania*,²⁴⁰ in which a defendant acting as his own counsel engaged in quite personal abuse of the trial judge.

The Court appeared to leave open the option of the trial judge to act immediately and summarily to quell contempt by citing and convicting an offender, thus empowering the judge to keep the

trial going 241 but if he should wait until the conclusion of the trial he must defer to another judge.

EXHIBIT
K 3

EXHIBIT TIMOTHY CAWASKY IGNORED THE HUSBANDS TRUE INCOME

Demanded
Correct APL

I DRAFTED AN ESTIMATED CORRECTED AMOUNT FOR MONTHLY SUPPORT BASED ON THE 18,000.00 NET INCOME FROM HUSBAND IN 2012 MINUS MY ANNUITY INCOME OF 2,980.00 ,(THAT IS BEFORE MY HUSBANDS ATTORNEY TOOK MY INCOME BY TRICKERY AND ASSIGNED ME A MINIMUM WAGE CAPACITY.)

TIMES 40% THAT CAME TO BE THE HUSBANDS SUPPORT OBLIGATION TO BE 6,008.00 NOT THE 3,582 .00 HE PAID BASED ON HIS CLAIMING TO ONLY MAKE 7,000.00 IN DECEMBER 2012 THEN OCTOBER 24, 2012 HE CLAIMED 11,000.00 A MONTH ON HIS FORMS FOR SUPPORT. TO PAY ON 18,000.00 A MONTH MINUS MY INCOME EQUALED 6,008.00 TO BE PAID FROM HUSBAND MONTHLY AND I WOULD CONTINUE TO RECEIVE MY INCOME OF 2,980.00 TOTALING 8988.00 MONTHLY APL IS THE CORRECT AMOUNT I SHOULD HAVE BEEN RECEIVING IN 2012 , 2013 2014, 2015, 2016 ,2017 . INSTEAD OF THE 3,582.00 I HAVE BEEN RECEIVING SINCE 2012. I BELIEVE I SHOULD HAVE BEEN AND STILL BE RECEIVING THE 8988..00 A MONTH IN SUPPORT .

AT THE END OF MY DISCUSSION THEY TOLD ME THAT THEY WILL LET THE SUPERVISOR LISTEN TO OUR TELEPHONE CONVERSATION .

1910.16-1 Amount of support guidelines and 23 pa cs 4322 Pa General Assembly title 23 chapter 37 alimony and support judge smail aware of behavior and breaking the law by bononi and whalen and simply turned his check

19. THAT STATE MOST IMPORTANTLY, APL IS BASED ON THE NEED OF ONE PARTY TO HAVE EQUAL FINANCIAL RESOURCES TO PURSUE A DIVORCE PROCEEDING WHEN, IN THEORY, THE OTHER PARTY HAS MAJOR ASSETS WHICH ARE THE FINANCIAL SINEWS OF DOMESTIC WARFARE.

APL focuses on the ability of the individual who receives the APL during the course of the litigation to defend her/himself, and the issue here, is relevant to this high asset divorce because the wife provided evidence to prove she was not receiving an amount that would permit her to defend herself, after her own income was taken from her that proves her support was inadequate the amount she was first awarded of 7,700.00 a month which was reasonable for the purpose,

This issue too is irrelevant regarding the economic resources available or the husbands ability to pay the wife and increase based on the husbands true net income. His true income was 20,000.00 a month clear after taxes income. He was only reporting an income of 7,000.00 instead of 20,000.00 and the wife's was only left with 3,500.00 spousal support after they took her annuity income from her.

Schenk v. Schenk, 880 A.2d 633, 644-645 (Pa.Super.2005) (citations and quotations omitted).

Here the trial court committed an abuse of discretion, reversible errors of law, and a misapplication of law in repeatedly denying the wife the correct APL and or by not releasing her own income to provide adequate income to defend herself in this most contentious high asset divorce.

. APL is an order for temporary support granted to a spouse during the pendency of a divorce or annulment proceeding.



No Consent

bujdos divorce consent form

Deborah Bujdos <dabujdos2@gmail.com>
To: Carole Adams <carole@shahlawgroup.com>

Sat, Nov 22, 2014 at 11:15 PM

I am not trying to be difficult but I have had 2 years of Whalen and games her threats. She lucked out by having Heidi there for 2 years but that is over. I have to go with my own instincts I do not consent to the divorce until the ED is over.

I hope you understand why I feel this way.
[Quoted text hidden]

defect no Consent

VERIFIED EMAIL TO MY ATTORNEY KRISTEN BOJARSKY

PROOF THE TRANSMIT OF RECORD IS DEFECTIVE

I NEVER GAVE CONSENT TO DIVORCE BEFORE ALL MATTERS WERE RESOLVED

20. **APL is designed to help the dependent spouse maintain the standard of living enjoyed while living with the independent spouse.**

Also, and perhaps more importantly, APL is based on the need of one party to have equal financial resources to pursue a divorce proceeding when, in theory, the other party has major assets which are the financial sinews of domestic warfare

Schenk v. Schenk, 880 A.2d 633, 644-645 (Pa.Super.2005) (citations and quotations omitted).

Busse v. Busse, 921 A. 2d 1248 - Pa: Superior Court 2007

22. THE TRIAL COURT COMMITTED AN ABUSE OF DISCRETION, REVERSIBLE ERRORS OF LAW, AND A MISAPPLICATION OF LAW IN REPEATEDLY DENYING THE WIFE THE CORRECT APL , OR RELEASING HER OWN INCOME AND FAILED TO CONSIDER

(a) "An award of alimony pendente lite may be modified or vacated by a change in circumstances .

The wife met the required burden to prove she had a drastic change in circumstances while repeatedly seeking an increase of support .

The wife showed the court competent evidence of her change of circumstances that justified a modification."

The wife presented the competent evidence by presenting the fraudulent 12-19-12 court order that took her \$3,750.00 a month retirement annuity income .

Proving that the 12-19-12 order left her with only half of the guideline APL of \$7,700.00 a month she was originally awarded on 10-24-12 that was competent evidence supporting her drastic change of circumstances that justified an increase.

"In ruling on a claim for alimony pendente lite, the court should consider the following factors:

(b) The ability of the other party to pay; this was ignored

©the separate estate and income of the petitioning party;

(d) and the character, situation, and surroundings of the parties."

Litmans v. Litmans, 449 Pa.Super. 209, 673 A.2d 382, 389 (1996).

**11 usc 523 (a)(2)(A) false pretense, representation actual fraud and financial crimes committed by
bononi and whalen**

CALCULATING SUPPORT BY PA GUIDELINES BELOW:

HUSBANDS MO NET INCOME 2012	WIFES MO. NET INCOME 2012 FROM HER
	RETIREMENT ANNUITIES
18,000.00 NET	2,978.00 NET

2978.00 MINUS WIFE'S INCOME

15,022.00 HUSBANDS INCOME AFTER DEDUCTING wifes income 15,022.00

Times the 15,022.00 by 40% support due from husband 6,008.00

Wife continues to receive her income RETIREMENT ANNUITY of 2,978.00

1. total monthly income due to wife By the PA Apl laws = 8,986.00

2.minus the total income wife received since 2012 monthly 3,582.00

3. monthly support amount wife is owed using correct income 5,404.80

4. modified order from 10-24-12 for APL the increase 8,986.00

5. PA Law for APL support based on correct income paid to wife to be on an

6. equal financial par with husband for a fair divorce the increase 8,986.00

ARREARS: from 2012 - May 2017 HUSBANDS MO. NET INCOME 18,000.00

equal financial par with husband for a fair divorce the increase 8,986.00

total income wife received since 2012 monthly 3,582.00

unreported mo. income wife was deprived of since 2012 5,404.80

ARREARS: for 3 months Oct., Nov. Dec. 2012 @ 5,404.80 16,214.40

Arrears for 2013, 2014, 2015, 2016 48 months @ 5,404.80 259,430.40

Arrears for 2017 Jan.- May , 5 months @5,404.80 27,024.00

ARREARS BACK SUPPORT FOR UNREPORTED INCOME 302,668.80

HUSBANDS TOTAL INCOME FOR 56 MONTHS @ 18,000.00 1,008,000.00

2012 IRA UNREPORTED TO DRO INCOME = 49,000.00

HUSBANDS TOTAL INCOME SINCE 2012 1,057,000.00

WIFES TOTAL INCOME FOR 56 MONTHS @ 3,582.00 202,592.00

COMPARE PARTIES INCOME SINCE 854,408.00

HUSBAND'S DIFF. INCOME . TO WIFES SINCE 2012 854,408.00

DIFFERENCE IN HUSBANDS INCOME NOT REPORTED TO DRO \$854,408.00

MINUS WIFES BACK SUPPORT HUSBAND OWES - 302,668.80

AFTER HUSBAND PAYS WIFE BACK SUPPORT HUSBAND HAS \$551,739.20

MORE INCOME THAN WIFE SINCE OCTOBER 2012 TO MAY 2017

BACK SUPPORT HUSBAND OWES WIFE TO DATE IS \$ 302,668.80

Exhibit R

THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA
CIVIL DIVISION

LARRY A. BUJDOS
Plaintiff

Attorney Linda Wjalen

No. 1849 D2012

v.

DEBORAH ANN BUJDOS,

TYPE OF PLEADING:

Defendant

MEMORANDUM OF UNDERSTANDING OF THE FEBRUARY 1, 2019 HEARING

**I
AND I AM REQUESTING THE REQUIRED TRANSCRIPT
OF THE 2-1-19 HEARING**

And now comes the defendant with her Memorandum Of February 1, 2019 Hearing that was to discuss opening or vacating my final order.

During the hearing you wanted to address 3 issues

1. you asked me if I presented my previously filed motions to vacate to make sure they were not moot.

I have attached proof verified emails and documents that prove my motions to vacate Were Presented Properly And Deliberately Ignored Denying Me The Right To Be Heard

During the entire 5 years of my case I served the judge and all parties and then filed it with the prothonotary , then I had to wait to get an email or letter from the judge, or his secretary scheduling my motion to be heard, as you will see in the attached emails.

After I filed my motions to vacate the judge failed to respond or give a date to have my motions heard. They were ignored.

Evidence of this is also seen in the 11-22-17 transcript where I tell the judge I do not understand how he could force me to sign anything before he heard my August 4 motions To vacate due to fraud.

EVIDENCE OF THE PROCEDURE I HAD TO FOLLOW TO PRESENT A MOTION EVERY TIME I FILED A MOTION SINCE 2012 IS SEEN BELOW:

- SEE; THE MANY VERIFIED EMAILS FROM JUDGE MAILS OFFICE SENDING EMAILS TO DEFENDANT TO SET DATES FOR HER MOTIONS TO BE HEARD.
- SEE: LETTERS I SENT TO THE COURT AND AMY DEMATT REQUESTING WHY A DATE HAS NOT BEEN PROVIDED TO HEAR THE MOTIONS TO VACATE
- SEE MY LETTER TO THE JUDGES LAW CLERK IN NOVEMBER BEFORE THEY WERE COMPELLING ME TO SIGN MY PROPRTIE OVER ON 11-22-17 I WAS ASKING THE LAW CLERK TO LET ME HAVE MY MOTIONS TO VACATE BE HEARD BEFORE GRANTING ATTORNEY WHALENS MOTION TO COMPEL

SECOND ISSUE YOUR ODER LISTED TO DISCUSS DESCRIPTION OF THE OF EXTRINSIC FRAUD USED IN THIS CASE:

1. By the expression 'extrinsic or collateral fraud' is meant some act or conduct of the prevailing party which has prevented a fair submission of the controversy. Among these are the keeping of the defeated party away from court by false promise or compromise, or fraudulently keeping him in ignorance of the action..
2. HERE WE HAVE THE TWO ATTORNEYS WORKING IN CONCERT AND TAKING WIFE'S INCOME WITHOUT HER CONSENT OR KNOWLEDGE TO

PREVENT HER FROM HAVING THE FUNDS FOR A FAIR DIVORCE. WIFE'S INCOME WAS TAKEN WITHOUT HER CONSENT.

3. THE ABOVE STATEMENT MATCHES THE FOLLOWING DESCRIPTION OF EXTRINSIC FRAUD THAT WAS ALSO USED IN MY CASE :
4. THE LEGAL DEFINITION OF EXTRINSIC FRAUD SEEN BELOW: :
5. WHERE AN ATTORNEY WITHOUT AUTHORITY (ON 12-19-12) ATTORNEY HEIDI DE BERNARDO) PRETENDS TO REPRESENT A PARTY (ME) AND CORRUPTLY CONNIVES AT HER DEFEAT
6. THE ACT COMMITTED ON 12-19-12 DESCRIBES THIS DEFINITION OR EXTRINSIC FRAUD
7. "WHERE AN ATTORNEY HAS BEEN REGULARLY **EMPLOYED BY ME** AND CORRUPTLY SELLS OUT HIS CLIENT'S INTEREST." SELLING MY INTEREST IN MY OWN ANNUITY INCOME TO THE OPPOSING COUNSELS CONTROL,
8. WHO USED THAT POWER TO PREVENT ME FROM HAVING THE FUNDS TO
9. **DEFEND MYSELF AND BRING A TIMELY END TO THE LITIGATION BEFORE MY CREDIT WAS RUINED AND I WAS FORCED TO BE HOMELESS.**
10. THE TAKING OF MY INCOME IN FACT DID PREVENT ME FROM EVEN FILING AN APPEAL TO THE FINAL ORDER.

THE FRAUD DESCRIBED IN THIS CASE IS EXTRINSIC.

THE FRAUD USED IN MY CASE DELAYED THE LITIGATION FOR 5 YEARS.

ANOTHER DESCRIPTION OF EXTRINSIC FRAUD USED IN MY CASE

THE LACK OF FULL DISCLOSURE ROSE TO THE LEVEL OF EXTRINSIC FRAUD.

The Final Order Was Issued With Fraud By Hiding 2.3 Million In Assets . The Final Order Was Issued Without The 2.3 Million Unaccounted For And Without Explaining Where The 500,000.00 Missing From The Brinker Ira Was, That Was Only Left With 82,000.00 To Divide On The Final Order . The Order Was Also Missing The Husbands 591,000.00 National Fidelity Ira He Opened In October 2012, A Month After Filing For Divorce . The Order Failed To List The 1.4 Million Dollar Commercial Building That Had \$800,000.00 Paid During The Marriage On The \$930,000.00 Mortgage And Now Only Has A Balance Of 110,000.00 . The Final Order Failed To List The 1.4 Million

Dollar Commercial Building . The Order Failed To List The 1.4 Million Dollar Commercial Building That Had \$800,000.00 Paid During The Marriage On The \$930,000.00 Mortgage And Now Only Has A Balance Of 110,000.00 . The Final Order Failed To List The 1.4 Million Dollar Commercial Building .

PROOF OF PERJURY THAT WORKED WITH THE EXTRINSIC FRAUD: Last Week I Presented You And Attorney Whalen With The Clear And Convincing Evidence Of Her Clients Perjury During His Deposition And Hiding Assets Revealed By Attorney Heidi De Bernardo's 5-12-14 Deposition . Attorney De Bernardo Points Out Her Client In The Deposition His Interrogatories Were In Complete , And That He Lied About His Ability To Take Extra Funds From The Annuities , He Admitted He Failed To List Ira's And Insurance Policies . This Was Done To Deliberately Hide Assets

ANOTHER DESCRIPTION OF EXTRINSIC FRAUD

IT IS EXTRINSIC FRAUD WHEN THE MASTER FAILED TO DEMAND FULL DISCLOSURE AFTER LEARNING THERE WAS 2.3 MILLION MISSING FROM ESTATE.

HE WAIVED THE MANDATORY PRE TRIAL STATEMENT AND FAILED TO ALLOW DEFENDANT TO ENTER ALL OF HER EVIDENCE ON MAY 9, 2016

THAT TOO IS FRAUD.

RULE W1920.33 JOINDER OF RELATED CLAIMS. DISTRIBUTION OF PROPERTY. ENFORCEMENT.

(a) Each party in all cases in which a master has been appointed **SHALL FILE A PRE-TRIAL STATEMENT**, pursuant to Pa.R.C.P. 1920.33(b). The original pretrial statement shall be filed with the prothonotary within 20 days of receipt of the order appointing the master. Each party shall serve copies of the pretrial statement on the master and opposing counsel, or on the unrepresented adverse party, by first class mail on the same day as filing.

(b) The exhibit list as set forth in [item 6 above] Pa.R.C.P. 1920.33(b)(4) shall be served in duplicate:

(c) Each party shall have 10 days from the date of receipt of the exhibit list to complete the exhibit list and to return the list to the other party.

(d) Failure to comply with this rule may be enforced by sanctions, with attorney's fees costs and expenses to be determined by the master or court.

Rescinded May 7, 2004; New Rule W1920.33 adopted May 7, 2004, effective June 1, 2004.

ATTORNEY WHELANS REPEATED PERJURY CONTRIBUTED TO THE EXTRINSIC FRAUD

Where the alleged perjury relates to some fraudulent act of the prevailing party the other has been deprived of an opportunity for a fair trial. **TAKING WIFE'S INCOME AND HIDING ASSETS AND INCOME.** *Bleakley v. Barclay*, 75 Kansas 462 [89 P. 906 (1907)].

Fenstermaker v. Fenstermaker, 348 Pa.Super. 237, 243, 502 A.2d 185, 188 (1985) quoting *McEvoy v. Quaker City Cab Co.*, 267 Pa. 527, 536, 110 A. 366, 368 (1920).

Thus, the Divorce Code makes clear that beyond 30 days, a decree cannot be vacated absent fraud which is collateral to the proceedings.

Naturally, when assessing whether the movant has proven the existence of extrinsic fraud, this Court focuses on the actions taken by the prevailing party.

Unlawfully taking wife's income , grossly under reporting his income , lying at deposition and interrogatories to hide assets

For example, in *Fenstermaker*, counsel for the parties attempted to resolve the marital property issues prior to the entry of the divorce decree. While the parties were in the process of negotiating a property settlement, appellee filed and was granted a divorce pursuant to § 201(d). Relying on appellee's intention to finalize their property settlement, appellant did not appeal the decree. **The trial court found that the representations made by counsel amounted to extrinsic fraud.** This court affirmed the trial court's finding of extrinsic fraud stating, "[i]n light of the continued representations to appellee evidencing his `intention' to finalize their property settlement, the court did not err in

***590 finding extrinsic fraud upon which a petition to vacate the decree could be granted.**

CONSISTANT WITH THE DEFENDANT WHO DID NOT HAVE THE OPPORTUNITY TO LITIGATE HER ECONOMIC CLAIMS." Appellee did not have the opportunity to litigate these economic claims." Fenstermaker, 348 Pa.Super. at 248, 502 A.2d at 190.

In *Foley v. Foley*, 392 Pa.Super. 9, 572 A.2d 6 (1990), an unrepresented wife entered into a property settlement agreement which purported to settle all of the economic claims arising from the marriage. In accordance with this agreement, she received \$1,500 and her husband received \$200,000. Approximately fifteen months after the entry of the final divorce decree, wife filed a motion to vacate the decree alleging that she was intimidated into entering into the property settlement. The trial court granted the wife's motion because, "the actions of THE JUDGES ORDERS TO TAKE WIFE'S INCOME did intimidate the defendant for 5 years the extent that she was constantly fearful of being able to afford the undertaking any effort to defend herself or secure the economic justice to which she was entitled, and concluded that because she was thereby denied an opportunity for a fair trial, and denied the right to appeal her final order [the wife] has established the existence of extrinsic fraud." *Id.*, 392 Pa.Superior Ct. at 14-15, 572 A.2d at 9

**DENYING THE DEPENDANT SPOUSE ATTORNEY FEES OR THE
RELEASE OF HER OWN INCOME IS FRAUD USED TO PREVENT
HER FROM APPEALING THE FINAL ORDER**

defendant is Relying on

: Busse v. Busse, 921 A. 2d 1248 - Pa: Superior Court 2007

¶ 34 Upon review, we first note that the court awarded counsel fees to wife, not based upon the statutory provisions husband cited, but rather upon section 3702, Alimony Pendente lite, counsel fees, and expenses, of the Divorce Code, 23 Pa.C.S.A. §§ 3101 *et seq.* See Record, No. 130 at 58.

The following principles apply to our review of such awards:

The purpose of an award of counsel fees is to promote fair administration of justice by enabling the dependent spouse to maintain or defend the divorce action without being placed at a financial disadvantage; the parties must be "on par" with one another.

Counsel fees are awarded based on the facts of each case after a review of all the relevant factors.

These factors include the payor's ability to pay, the requesting party's financial resources, the value of the services rendered, and the property received in equitable distribution.

Teodorski v. Teodorski, 857 A.2d 194, 201 (Pa.Super.2004), quoting Anzalone, supraat 785-786. "Counsel fees are awarded only upon a showing of need." Teodorski at 201, quoting Harasym v. Harasym, 418 Pa.Super. 486, 614 A.2d 742, 747 (1992). "In most cases, each party's financial considerations will ultimately dictate whether an award of counsel fees is appropriate." Plitka v. Plitka, 714 A.2d 1067, 1070 (Pa.Super.1998). Also pertinent to our review is that, "in determining whether the court has abused its discretion, we do not usurp the court's duty as fact finder." Teodorski at 201, quoting Verdile v. Verdile, 370 Pa.Super. 475, 536 A.2d 1364, 1369 (1988).

**THE COURT ABUSED IT DISCRETION BY NOT AWARDING THE WIFE ATTORNEY FEES.
AND FAILING TO CONSIDER THE RELEVANT FACTORS**

¶ 35 Under the facts of this case, we cannot find that the court abused its discretion and thus, given our standard of review, we must affirm the award of counsel fees. The court's Opinion makes clear that it made the award only after considering the relevant factors.

It found husband 1259*1259 was able to pay the award.

It further considered the disparate financial resources of each party, particularly considering the vast differences in the parties' earning capacity, the value of the legal services rendered, which were substantial given the protracted litigation, and the equitable distribution award.

THE court noted that husband's actions resulted in the protracted litigation and thus justice dictated that he pay a substantial portion of wife's legal fees rather than wife paying from her share of the distribution of marital property. Record, No. 130 at 58-60. In doing so, the court ensured that wife was not placed at a financial disadvantage due to husband's conduct.

✓ **THE COURT FAILED TO PROMOTE FAIR ADMINISTRATION OF JUSTICE BY ENABLING THE DEPENDENT SPOUSE TO MAINTAIN OR DEFEND THE DIVORCE ACTION WITHOUT BEING PLACED AT A FINANCIAL DISADVANTAGE.**)

See *Teodorski* at 201 (stating that "[t]he purpose of an award of counsel fees is to promote fair administration of justice by enabling the dependent spouse to maintain or defend the divorce action without being placed at a financial disadvantage."). It also can be said that, given the circumstances, the award effectuated economic justice as between these parties. See *Schubert v. Schubert*, 398 Pa.Super. 284, 580 A.2d 1351, 1356 (1990) (stating that "the purpose of an award of counsel fees is to insure that a financially dependant spouse will be able to maintain or defend against an action for divorce as well as to effectuate economic justice between the parties."). Thus, we must affirm.

**FINAL ORDER FAILED TO CONSIDER ANY OF THE FACTORS FOR FASHIONING
EQUITABLE DIVISION OF MARITAL PROPERTY PURSUANT TO SECTION 3502**

(a) General rule,

when fashioning equitable distribution awards, the trial court must consider: the length of the marriage; any prior marriages; age, health, skills, and employability of the parties; sources of income and needs of the parties; contributions of one party to the increased earning power of the other

party; opportunity of each party for future acquisitions of assets or income; contribution or dissipation of each party to the acquisition, depreciation or appreciation of marital property, value of each party's separate property, standard of living established during the marriage; economic circumstances of each party. 23 Pa.C.S.A. § 3502(a)(1)-(11).

Mercatell v. Mercatell, 854 A.2d 609, 611 (Pa.Super.2004).

RESULT OF THE UNCONSCIONABLE ORDER PROCURED BY FRAUD

- 1. The Final Order Failed To Address The Wife's Interest In The 1.4 Million Dollar Commercial Building She Has Earned Due To The \$800,000.00 Of Mortgage Payments Made During The Marriage And Because The Husband Used A Joint Retirement Annuity To Pay The Pida Mortgages On The Commercial Building He Used The Wife's Retirement Annuity ,Without Her Consent And Completely Drained It Before The Divorce Was Final John Hancock Records And The Husbands Check Book Records Show He Drained The Wife's Share Of Her 500,000.00 Jointly Owned John Hancock Annuity That Promised To Pay Her \$2,000.00 A Month For Life.**

The Final Order Leaves The Wife With Zero Income, No Property , No Home, No Credit, No Health Insurance, At The Age Of 62,

The Final Order Leaves The Husband Continuing To Have 20,000.00 A Month Net Income . The Marital Home And 26 Acres, Valued at Over A Million Dollars With A New Mineral Lease That Provided Him With A Large Bonus Of ????

And Monthly Royalty Income From That And He Was Awarded The Commercial Properties Valued At Over A Million , The Contents Of The Home

**, The Four Garages, 29, Automobiles, And The National Fidelity 500,000.00
Ira. The 500,000.00 From The Brinker Ira The, Two One Million Dollar Trusts,
The Guardian 500,000.00 Policy ,, The Lincoln Policy Acct # Ending In 333. Or
The Location Of The \$ 250,000.00 Pershing Account He Noted in His Records He
Moved To A High Interest Plan, And The Other Investments We Were Not Able
To Review With A Boiler Plate Release,**

**THIRD ISSUE THE 2-1-19 ORDER WANTED TO ADDRESS: ATTORNEY
WHALEN RECEIVING THE SAME PAPERS THE COURT HAS.**

**THE REPORT BELOW SHOWS SHE DID INFACT GET THE SAME
DOCUMENTS THE COURT DID.**

**THIS REPORT ALSO SHOWS PROOF THAT SHE LIED IN COURT ON 2-1-19
BY ONLY SHOWING A FEW PAPERS AND CLAIMING THAT WAS ALL SHE
RECEIVED SINCE DECEMBER.**

HP LaserJet MFP M130fw

Fax Activity Log

04/24/2019 11:54

Date	Time	Type	Identification	Duration	Pages	Result
11/9/2019	00:21:05	Send	7248534650	11:27	61	OK
11/9/2019	00:41:18	Send		0:00	0	Stop
11/9/2019	00:40:35	Send	7248534650	6:31	20	OK
11/9/2019	00:50:00	Send	7248534650	9:40	33	OK
11/9/2019	01:29:32	Send	7248534650	9:56	30	Stop
11/9/2019	01:41:05	Send	7248534650	10:16	35	OK
11/9/2019	02:53:20	Send	7248534650	4:13	12	OK
11/9/2019	03:23:08	Send	7248534650	6:10	17	OK
11/9/2019	03:36:25	Send	7248534650	8:57	19	OK
11/9/2019	04:16:44	Send	7248534650	2:14	7	OK
11/9/2019	04:26:04	Send	7248534650	2:20	7	OK
11/11/2019	00:06:50	Send	7248534650	4:12	17	OK
11/11/2019	00:12:43	Send	7248534650	8:05	31	OK
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11/11/2019	10:13:43	Send	7248534650	2:27	14	OK
11/11/2019	10:26:31	Send	7248534650	3:07	10	OK
11/17/2019	10:07:14	Send	7248534650	14:23	44	OK
11/17/2019	10:53:07	Send	7248534650	12:03	46	OK
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11/18/2019	22:36:49	Send	7248534650	7:17	28	OK
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11/23/2019	00:36:37	Send	7248534650	2:13	8	OK
11/23/2019	03:30:02	Send	7248534650	0:47	10	OK
11/24/2019	00:17:00	Send	7248534650	1:10	33	OK
11/24/2019	00:27:40	Send	7248534650	5:24	40	OK
11/26/2019	00:56:16	Send	7248534650	27:40	46	OK
11/26/2019	01:26:41	Send	7248534650	10:53	27	OK
11/28/2019	07:31:36	Send	7248534650	5:16	0	Stop
11/28/2019	07:53:33	Send	7248534650	11:44	44	OK
11/28/2019	09:35:42	Send	7248534650	14:33	42	OK
11/28/2019	11:07:39	Send	7248534650	7:23	26	OK
11/28/2019	13:45:15	Send	7248534650	24:26	28	OK
11/28/2019	14:04:19	Send	7248534650	10:34	39	OK
11/28/2019	14:56:33	Send	7248534650	31:51	39	OK
11/28/2019	15:38:42	Send	7248534650	26:13	36	OK

ECONOMIC CIRCUMSTANCES OF THE HUSBAND RESULTING FROM THE FINAUNCONSCIONABLE FRAUDULENT ORDER

- HERE THE FINAL ORDER PLACES AN INCORRECT VALUE ON THE MARITAL ESTATE OF A LITTLE OVER A MILLION DOLLARS, WHILE KNOWING THE FORENSIC ACCOUNTANT REVEALED THERE WAS 2.3 MILLION MISSING FROM THE ESTATE .
- HERE THE FINAL ORDER PLACES AN INCORRECT VALUE OF APPROX. 600,000.00 AS THE WIFE'S SHARE OF THE MARITAL ESTATE,
- THEN REDUCES THAT TO \$400,000.00 BY DEDUCTING \$200,000.00 FROM HER SHARE WITHOUT SUPPORTING EVIDENCE TO MAKE DEDUCTIONS FROM THE WIFE'S SHARE OF THE MARITAL ESTATE.
- THE ORDER WAS BASED ON ONLY THE ORAL TESTIMONY OF ATTORNEY WHALEN WITHOUT FACTS, FINDS OR CONCLUSION OF LAW TO DO SO.
- **THE ECONOMIC CIRCUMSTANCES OF THE HUSBAND RESULTING FROM THE FINAL UNCONSCIONABLE FRAUDULENT ORDER :**
- HERE THE HUSBAND WAS AWARDED THE 5 MILLION DOLLAR ESTATE, WITHOUT PROVIDING EVIDENCE OF WHERE THE MISSING 2.3 MILLION WAS.
- THE HUSBAND RECEIVED ALL REAL ESTATE VALUED OVER 2.5 MILLION
- THE HUSBAND RECEIVED THE 25 MARITAL AUTOS , ANTIQUES, AND COLLECTIBLES
- THE WIFE'S FUTURE INCOME IS ZERO AT THE AGE OF 62 AND NOT ELIGIBLE FOR SOCIAL SECURITY .

- HUSBAND PRE DIVORCE PLANNING HE REDUCED THE VALUE OF THE MARITAL HOME BY DELIVERATELY ENCUMBERANG WITH A 112,000.00 MORTGAGE ,ON THE JOINTLY OWNED HOME , ONLY ONE MONTH AFTER RECEIVING 7 MILLION FOR THE SALE OF THE FAMILY BUSINESS FIB-CHEM
- THE COURT FAILED TO CONSIDER THE HUSBANDS CONTINUED \$20,000.00 AND FUTURE INCOME , OF \$20,000.00 A MONTH FROM RENTAL INCOME, INVESTMENTS, SOCIAL SECURITY AND NOW THE GAS AND MINERAL RIGHTS , ROYALITES HE DELIBERATELY ONLY SIGNED AGTER THEY FORCED WIFE TO SIGN QUIT CLAIM DEEDS. SEE WIFE'S PREVIOUS MINERAL RIGHTS LEASES OFFERS IN 2014 TH HUSBAND REFUSED TO SIGN.
- A NEW LEASE FOR THE INCOME FROM THE 1.4 MILLION DOLLAR RENTAL BUILDING WAS PROCURED IN September 2018 THAT MAY INCLUDE AN INCREASE OF INCOME FROM THE \$13,000.00 THAT WAS PREVIOUSLY NOTED . WE WILL BE ASKING FOR A CCOPY OF THE NEW LEASE.
- THE COURT FAILED TO INCLUDE THE COMMERCIAL BUILDING FROM THE FINAL ORDER., WHEN THE WIFE HAS 19 YEARS OF EQUITY INTEREST IN IT AND THE AMOUNT OWED TO HER FROM THE HUSBAND LIQUIDATING A JOINT 500,000.00 JOHN HANCOCK ANNUITY FOR LIFE TO PAY OFF PIDA MORTGAGES AND PAYMENTS TO GRUBBS N ELLIS FOR PRECURING 3 COMERCIAL LEASES..
- COURT FAILED TO CONSIDER THE FACT (THAT HE ENGAGED IN FINACIAL MISCONDUCT AND BREACH OF FIDUCIARY DUTY TO WIFE) BY SECRETLY DRAINING THE PARTIES JOINT JOHN HANCOCK \$500,000.00 ANNUITY FOR LIFE RETIREMENT

ACCOUNT AND SIGNED WIFE'S NAME ON THE CHECKS HE REQUESTED FROM THE COMPANY VIA TELEPHONIC FOR LARGE WITHDRAWS TO PAY THE RENTAL BUILDINGS DEBTS, DURING THE MARRIAGE.

- **COURT FAILED TO CONSIDER THE HUSBANDS PROVEN PERJURY ON THE 5-12-14 DEPOSITION WITH ATTORNEY HEIDI DE BERNARDO WHERE SHE ASKS HIM WHY HIS INTERROGATORY IS INCOME PLERTE AS HE FAILED TO CHECK OFF ANY RETIREMENT ACCTS/ AND VARIOUS INSURANCE POLICIES, SHE HAD COPIES OF THE MISSING**
- **ACCOUNTS AND POLICIES IN HER POSSESSION THAT HE DENIED OWNING.**
- **FAILED TO CONSIDER IN THAT SAME DEPOSITION THAT HE OPENLY ADMITTED HE LIED ON A PARKVALE LOAN APP IN 2010 BY SAYING THE HIS ASSETS WERE HIGHER THAN THEY REALLY WERE.**
- **FAILED TO SEE THE HUSBANDS VALUE OF THE CARS ON THE PARKVALE APP LISTED THE CARS AT 300,000.**
- **COURT FAILED TO INCLUDE IN FINAL ORDER THE HUSBAND WAS AWARDED THE 1.4 MILLION DOLLAR COMMERCIAL BUILDING THAT PAYS OVER 13,000.00 A MONTH RENT.**
- **COURT FAILED TO CONSIDER THE WIFE EQUITY INTEREST FOR THE \$800,000.00 IN MORTGAGE PAYMENTS ON THE COMMERCIAL BUILDING AND PAID DURING THE MARRIAGE ON THE ORIGINAL \$930,000.00 SEE: MORTGAGE DOCS**
- **COURT FAILED TO CONSIDER THAT COMMERCIAL BUILDING ONLY HAS A \$110,000.00 REMAINING AMOUNT OWED FOR THE MORTGAGE.**

- COURT FAILED TO CONSIDER THE HUSBAND WAS AWARDED THE MARITAL HOME AND THE 26 JOINTLY OWNED ACRES THAT ARE VALUED AT OVER ONE MILLION
- HUSBANDS POSSIBLE FUTURE INCOME FROM THE 26 ACRES WAS NOT CONSIDERED IN THE FINAL ORDER : THE ACRES CAN BE DIVIDED AND CAN BE SOLD IN INDIVIDUAL LOTS FOR AT LEAST 30,000.00 A LOT AS SEEN IN LOCA COMPARRISON REAL ESTATE ADDS. ONE ACRE CONTAINS 3 LOTS
- FAILED TO CONSIDER HUSBANDS FUTURE INCOME AS THE HUSBAND ONLY SIGNED A MINERAL, GAS LEASE DELIBERATELY AFTER THE DIVORCE AND IN OCTOBER 2018 HE OBTAINED A LARGE BONUS FOR LEASING THE PROPERTY TO CHEVRON FOR 5 YEARS FOR ???? AMOUNT
- THE BONUS CAN BE FOR \$30,000.00 UP TO \$98,000.00 IF ALL ACRES WERE INCLUDED IN THE LEASE.
- HE WILL GAIN MONTHLY INCOME FROM THE GAS ROYALTIES.
- HE WILL CONTINUE TO GET \$2,800.00 A MONTH FROM THE HIDDEN NATIONAL FIDELITY IRA ACCOUNT ENDING IN 33, HE OPENED A WEEK AFTER FILING FOR DIVORCE WITH \$592,000.00 ON OCTOBER 9, 2012.
- THAT NATIONAL FIDELITY IRA \$591,000.00 IS NOT LISTED ON THE FINAL ORDER TO DIVIDE
- THE OTHER INVESTMENTS AND TRUSTS ATTACHED , ARE ABSENT FROM THE FINAL ORDER

- COURT MADE A FINAL ORDER WITHOUT THE MANDATORY REQUIREMENTS FOR A PRETRIAL STATEMENT, CERTIFICATE OF TRIAL READINESS, FAILED TO CONSIDER ANY OF THE MANDATORY FACTORS, FOR A FAIR DIVISION OF ASSETS,
- THE ORDER ON ITS FACE SHOWS MANY FATAL DEFECTS INCLUDING THE ABSENCE OF STATING THAT BOTH PARTIES AGREE THAT FULL DISCLOSURE WAS MADE.
- THE ABSENCE OF THAT STATEMENT IS DUE TO THE JUDGE HAVING FULL KNOWLEDGE IT WAS ISSUED BEFORE HE DEMANDED FULL DISCLOSURE AND WAS AWARE OF THE FORENSIC ACCOUNTANTS TESTIMONY IN THE MASTERS HEARING THAT THERE WAS 2.3 MILLION UNACCOUNTED FOR IN THE MARITAL ESTATE.
- THE HUSBAND IS 75 AND HAD MEDICARE SO HE HAS NO NEED FOR MEDICAL INSURANCE,
- FAILED TO CONSIDER WIFE IS LEFT WITH NO HEALTH , DENTAL, OR LIFE INSURANCE WHEN THE WIFE IS 62 AND NOT ELIGIBLE FOR SOCIAL SECURITY INCOME .
- COURT FAILED TO CONSIDER THE COST OF INSURANCE FOR THE WIFE AS AN INDIVIDUAL UNTIL THE AGE OF 65 IS 900.00 A MONTH THAT'S WITHOUT DENTAL OR EYE INSURANCE WITH HIGHMARK.

**ECONOMIC CIRCUMSTANCES OF THE WIFE RESULTING FROM FINAL ORDER
AFTER A SHE WAS FORCED TO REMAIN IN A 5 YEAR DELIBERATELY
DELAYED DIVORCE .**

**THE FINAL ORDER FAILED TO CONSIDER THE MANDATORY FACTORS FOR A
FAIR DIVISION OF MARITAL ASSETS**

THE WIFE HAS ZERO PROPERTY OF ANY KIND

NO FUTURE WAY OF MAKING INCOME

HOMELESS SINCE WRONGFUL EVICTION ON 3-11-16

NO CREDIT

DEBTS OVER 100,000.00 THAT WERE TO BE RESOLVED IN HER WELL PRESERVED ECONOMIC
CLAIMS THAT WERE IGNORED

**ATTORNEY WHALEN FALSELY STATES ON HER TRANSMIT OF RECORD THAT THERE WERE
NO ECONOMIC CLAIMS PENDING.**

THE TRANSMIT OF RECORD FALSELY STATES SHE HAD WIFE'S CONSENT WHEN THE WIFE HAS
FILED 3 COUNTER AFFIDAVITS SAYING SHE DID NOT AGREE TO A DIVORCE UNTIL ALL
ECONOMIC CLAIMS AND ALIMONEY ISSUES WERE RESOLVED.

THE FINAL ORDER FAILS TO ADDRESS THE \$300,000.00 IN BACK SUPPORT OWED TO THE WIFE.

THE COURT FAILED TO CONSIDER THE 12-1912 EXTRINSIC FRAUD AND VOID ORDER USED TO
FINANCIALLY HANDICAP THE WIFE DURING LITIGATION

THE EXTRINSIC FRAUD PREVENTED HER FROM A FAIR DIVORCE

AND PREVENTED HER FROM APPEALING THE FINAL ORDER .

**DEFENDANTS STATEMENT OF FACTS REGARDING THE USE OF THE 12-
19-12 FRAUD ON THE COURT AND THE ON GOING EXTRINSIC
FRAUD .**

**I, DEBORAH BUJDOS STATES: THAT I HAVE REVIEWED HUNDREDS OF DIVORCE CASES IN
THIS COUNTY ON THE DOCKET , AMONG ALL OF THOSE YOU WILL NOT FIND A CASE
DURING THE ENTIRE LITIGATION THERE WAS REPEATED MOTIONS FOR THE WIFE TO HAVE
HER INCOME RELEASED OR REQUESTED MONEY TO DEFEND HERSELF REPEATEDLY AND
HERE THE ENTIRE 5 YEARS SHOWS ME BEGGING THE COURT TO RELEASE MY INCOME TO
DEFEND MYSELF.**

**YOU WONT FIND ONE WHERE A MASTER IS PAID BY OPPOSING COUNSEL 10,000.00
UPFRONT IN A CHECK WRITTEN OUT TO HIM FROM A WIFE'S RTIREMENT ANNUITY INCOME
, WITHOUT HER KNOWLEDGE OR CONSENT.**

**YOU ALSO WONT FIND ANY CASE WHERE THE HUSBAND HAD AN INCOME OF 20,000.00
AFTER TAXES A MONTH AND THE WIFE WAS ONLY RECEIVING 3,500.00 A MONTH WHEN
SHE WAS RESPONSIBLE FOR THE MARITAL HOME AND MARITAL BILLS.**

**YOU WONT FIND A CASE WHERE THE WIFE ASKS FOR FUNDS TO DO AN APPEAL WHEN SHE
HAS INCOME OF HER OWN BEING UNLAWFULLY HELD HOTAGE BY THE OPPOSING
ATTORNEY.**

1. There is no question that the case was deliberately delayed by: **EXTRINSIC FRAUD AND FRAUD ON THE COURT THAT BEGAN ON 12-19-12**
2. **Accomplished** : by the husband, his attorney the wife's attorney selling out her interest in her own income.
3. **They committed fraud on the court on 12-19-12 when they:** presented a false order stating the wife agreed to let her annuity income be taken from her. And held in escrow.
4. They Acquired the 12-19-12 void order to financially suppress wife from Being able to afford to defend herself and prevent her from moving the case along faster .and do a prompt discovery.
5. Without the fraudulent order that financially handicapped the wife ,
6. It is a fact There could not have been any of the 5 Exclusive Possession of the home hearings that were always based on the wife not having enough money to continue paying her taxes.
7. It is a fact If she was receiving her own \$3,750,00 a month annuity income she would have always had her taxes paid on time and
8. It is a fact there could not have been an eviction of the wife during the litigation they based on her not paying taxes. If she had her own income .
9. It is a fact there would not have been a 9 month long contempt hearing that stemmed from the wrongful eviction of the wife , that contempt matter cost the wife \$87,000.00 that was taken from her in the final order