

UNITED STATES COURT OF APPEALS

FOR THE SIXTH CIRCUIT

100 E. FIRST STREET

CINCINNATI, OHIO 45202

UNITED STATES OF AMERICA

v.

JANET MARCUSSE

CASE NOS. 05-2586, 05-2668, 08-1003

Criminal Case No: 1:04-cr-00165

Robert Bell, "Judge"

WESTERN DISTRICT OF MICHIGAN

**AMENDMENT TO**

**THE CALL FOR RECALL OF THE MANDATE  
FOR  
ATTORNEY & JUDICIAL FUNDAMENTAL FRAUD  
THE DENIAL OF ALL DUE PROCESS**

FEDERAL RULES OF CIVIL PROCEDURE RULE 15(c)(1)

FEDERAL RULES OF EVIDENCE RULE 201(d)

Appellate Procedure Rule 41(d)

BY RIGHT OF INTERVENTION IN HER OWN RIGHT

Janet Marcusse

[#17128-045]

c/o Federal Correctional Institution

501 Capital Circle, NE

Tallahasee, Florida 32301

NOW COMES, Janet Marcusse, by right of intervention, in my own right, to submit this Amendment to the Call for the Recall of the Mandate for attorney and judicial fraud.

This Amendment is in reference to Docket 2 (R. 2), which is FBI Agent Samuel Moore's 12/5/03 Criminal Complaint & Affidavit (Supp. Apdx. Vol. III). I indicated in the 2/12/09 brief to Recall the Mandate that the Bahamas CD Program had **not** been in Agent Moore's Attachment D to his sworn Affidavit (p. 7). Attachment D contained the 10/99 newsletter. This was an error on my part as the result of FCI Tallahassee officials blocking my mail and previously confiscating my legal documents. Once I found transcript page 102 after the trial transcript was returned to me on 12/29/08, I asked over the recorded phone that a loved one send me Docket 2. It was sent to me, however, this mail has never been given to me in spite of the fact the USPS website indicates Certified Mail #0308-1400-0000-2564-2744 was delivered here on 1/5/09. I was forced to write to request another copy in order to obtain it, but I did not receive it until after the brief was mailed. It is a matter of this Court's record that I have repeatedly objected to FCI Tallahassee officials confiscating and tampering with my legal documents.

Therefore, in Agent Moore's Affidavit, Attachment D (the 10/99 newsletter made GX-33 at trial), was **included** the Bahamas CD Program flyer (made GX-2 at trial). This **proves** the prosecution team **knew from the start** the Bahamas CD Program was a **stock** program, and **not a prime bank** program, hence, the apparent need to tamper with the evidence to proceed as the bank records proved over \$10 million in non-prime bank investments were made. Because the 7/29/04 indictment describes an investment which combines the features of both GX-1 and

GX-2, this further **proves** the prosecution team tampered with this evidence in order to obtain their indictment from the grand jury. Comparing transcript page 102 with Docket 2 also **proves** these federal attorneys added page numbers to Attachment B (GX-1 at trial), that they removed the 10% monthly program from it, and that they added the investor contracts to it. AUSA Schipper **admits** the 10% program was prior to 1999 (App. 13a), which would make it **irrelevant** to all 39 mail fraud and 40 money laundering counts. The first mail fraud count was 10/21/99 (See Exh. A). Without GX-1, **there is NO CASE.**

On 6/17/07, I submitted a motion under FRAP 10(b)(2)&(e)(2), which was filed at this Court on 6/22/07, because Judge Bell would not permit me to make filings at his court (R. 601, 616). AUSA Schipper was copied in this motion in which I objected to GX-1, GX-2, GX-3, and GX-33 for evidence tampering, using as proof Mr. Buffin's civil litigation from 2003 in the same U.S. District Court (App. 46-53a). On 7/9/07, however, Judge Bell fraudulently and corruptly proceeded to grant AUSA Schipper's motion to "certify" these falsified exhibits so that they "may be included in the certified record for purposes of appeal" (R. 639). There were 66 additional trial exhibits that relied upon this falsified evidence (Refer to my 6/17/07 motion, p. 3).

As an additional note, Docket 2 contains an arrest warrant. I was not arrested on it. Instead, I was arrested on a sealed, expired, and falsified civil "contempt" warrant (See Exh. B) to provide the deceitful excuse to unlawfully detain me pretrial to tamper with, block, and spy on my defense.

Thus, there now can be no reasonable doubt that AUSA's Gezon and Schipper, in collusion with Judge Bell, have engaged in massive fraud upon this Court's record in order to obtain, pursue, and sustain

knowingly bogus charges against me to falsely imprison me and extort restitution, including for the IRS, that is not lawfully due. This fraud also allowed these federal actors to abuse their authority to favor those individuals and entities that defrauded me out of investor funds, keeping them, thereby avoiding civil and criminal liability.

That the Bahamas CD Program is in Attachment D only makes my claim to void this case for fraud ab initio all the more compelling as it is not reasonable to expect that none of these federal actors, including the trial judge, read Agent Moore's Criminal Complaint, particularly in light of my repeated objections to the relevance of GX-1 to the charges.

Respectfully submitted,

Date: \_\_\_\_\_

2/19/09



Autograph for Value  
All rights and remedies fully  
Reserved  
Without prejudice or recourse

**CERTIFICATE OF SERVICE**

This is to certify that I have served a true and correct copy of the foregoing:

**AMENDMENT TO CALL FOR RECALL OF  
THE MANDATE FOR ATTORNEY & JUDICIAL FRAUD**

upon the following individuals and their addresses, by placing same in a sealed envelope bearing the sufficient postage for delivery via via the United States Postal Service to:

Judge William Bertelsman  
United States District Court  
P.O. Box 1012  
Covington, KY 41012


Judge Jeffrey Sutton  
260 Kinneary U.S. Courthouse  
85 Marconi Boulevard  
Columbus, OH 43215

Judge John Rogers  
Post Office Drawer 3074  
Lexington, KY 40588

Clerk of Court  
Sixth Circuit Court of Appeals  
100 East Fifth Street, Room 540  
Cincinnati, OH 45202

Clarence Maddox, Circuit Executive  
Sixth Circuit Court of Appeals  
500 Potter Stewart Courthouse  
100 East Fifth Street  
Cincinnati, OH 45202

and deposited it in the postal box provided for prisoners on the grounds of the Federal Correctional Institution, Tallahassee, Florida 32301, on this 19th day of February, 2009.

  
Janet Marcusse [#17128-045]  
c/o Federal Correctional Institution  
501 Capital Circle, NE  
Tallahassee, FL 32301

funds had been used to pay the monthly checks; and (3) the investors' funds had been used to pay for personal expenses and purchases of the Defendants.

Mailings in Execution of Scheme

On or about the dates listed below, in Kent and Ottawa Counties, the Defendants, having devised and participated in the above-described scheme to defraud and to obtain money, for the purpose of executing and promoting the scheme, did knowingly cause to be sent, delivered and moved by the United States Postal Service, from the Western District of Michigan, according to the direction thereon, mail matter described as follows:

Count	Date of Mailing	Matter Mailed	Amount of Check	Payee/Recipient
1	10/21/99	Check #1755	\$450.00	T.E.B.
2	11/20/99	Check #1913	\$450.00	T.E.B.
3	03/25/00	Check #2891	\$8,027.52	Stewardship Ministries/J.B.
4	04/25/00	Check #3133	\$8,027.52	Stewardship Ministries/J.B.
5	05/25/00	Check #3390	\$8,027.52	Stewardship Ministries/J.B.
6	06/25/00	Check #3667	\$8,027.52	Stewardship Ministries/J.B.
7	05/25/00	Check #3486	\$4,800.00	G.J. or S.J.
8	06/25/00	Check #3768	\$4,800.00	G.J. or S.J.
9	07/25/00	Check #4067	\$4,800.00	G.J. or S.J.
10	10/25/00	Check #5022	\$4,800.00	Seeker's/G.J. or S.J.
11	11/25/00	Check #5380	\$4,800.00	Seeker's/G.J. or S.J.
12	08/25/00	Check #4392	\$3,900.00	Out Reach Ministry/D.K.
13	09/25/00	Check #4706	\$3,900.00	Out Reach Ministry/D.K.
14	11/25/00	Check #5399	\$3,900.00	Out Reach Ministry/D.K.
15	12/20/00	Check #10177	\$3,900.00	Out Reach Ministry/D.K.

16	02/23/01	Check #10653	\$3,900.00	Out Reach Ministry/D.K.
17	03/23/01	Check #11101	\$3,900.00	Out Reach Ministry/D.K.
18	12/20/99	Check #2255	\$3,000.00	Servant's Heart/S.K.
19	01/20/00	Check #2506	\$3,000.00	Servant's Heart/S.K.
20	03/25/00	Check #2988	\$3,000.00	Servant's Heart/S.K.
21	01/20/00	Check #2533	\$2,400.00	C.M.
22	02/25/00	Check #2765	\$2,400.00	C.M.
23	03/25/00	Check #3021	\$2,400.00	C.M.
24	04/25/00	Check #3267	\$2,400.00	C.M.
25	06/25/00	Check #3820	\$2,400.00	C.M.
26	11/25/00	Check #5482	\$1,050.00	R.R.
27	12/20/00	Check #10264	\$1,050.00	R.R.
28	02/23/01	Check #10748	\$1,050.00	R.R.
29	03/23/01	Check #11199	\$1,050.00	R.R.
30	05/25/00	Check #3588	\$6,000.00	P.S. or J.S.
31	06/25/00	Check #3872	\$6,000.00	P.S. or J.S.
32	10/25/00	Check #5155	\$6,000.00	P.S. or J.S.
33	04/25/00	Check #3335	\$4,950.00	R.W.
34	07/25/00	Check #4208	\$4,950.00	Children's Hope/R.W. & K.W.
35	08/25/00	Check #4519	\$4,950.00	Children's Hope/R.W. & K.W.
36	09/25/00	Check #4838	\$4,950.00	Children's Hope/R.W. & K.W.
37	06/25/00	Check #3825	\$450.00	R.N. or D.N.
38	07/25/00	Check #4129	\$450.00	R.N. or D.N.
39	08/25/00	Check #4438	\$450.00	R.N. or D.N.

18 U.S.C. § 1341

18 U.S.C. § 2

		THIS ENTRY![1:03-mj-00666-ESC] (Entered: 07/08/2004)
12/05/2003	<u>2</u>	COMPLAINT as to Janet Marcusse (Attachments: # <u>1</u> Attachment A# <u>2</u> Attachment B# <u>3</u> Attachment C# <u>4</u> Attachment D# <u>5</u> Attachment E# <u>6</u> Attachment F# <u>7</u> Attachment G) (cr, ) [1:03-mj-00666-ESC] (Entered: 07/08/2004)
12/05/2003	<u>3</u>	MOTION and ORDER To SEAL CASE by USA as to Janet Marcusse signed by Magistrate Judge Ellen S. Carmody cr, ) Modified on 7/8/2004 (cr, ). [1:03-mj-00666-ESC] (Entered: 07/08/2004)
12/05/2003	<u>4</u>	WARRANT issued by Magistrate Judge Ellen S. Carmody for arrest of defendant Janet Marcusse (cr, ) [1:03-mj-00666-ESC] (Entered: 07/08/2004)
07/06/2004	<u>5</u>	RULE 5 DOCUMENTS received from Western District of Missouri as to defendant Janet Marcusse (cr, ) [1:03-mj-00666-ESC] (Entered: 07/08/2004)
07/08/2004	<u>6</u>	MOTION and ORDER to unseal case as to Janet Marcusse ; signed by Magistrate Judge Ellen S. Carmody (cr, ) [1:03-mj-00666-ESC] (Entered: 07/08/2004)
07/21/2004		ARREST of Janet Marcusse (cr, ) [1:03-mj-00666-ESC] (Entered: 07/23/2004)
07/22/2004	<u>7</u>	ORDER APPOINTING FEDERAL PUBLIC DEFENDER as counsel for defendant Janet Marcusse (faxed to FPD by cbh); signed by Magistrate Judge Ellen S. Carmody (Magistrate Judge Ellen S. Carmody, cbh) [1:03-mj-00666-ESC] (Entered: 07/22/2004)
07/22/2004	<u>8</u>	ORDER OF TEMPORARY DETENTION pursuant to the Bail Reform Act as to defendant Janet Marcusse: detention hearing, with preliminary hearing, set for 7/26/2004 at 03:00 PM at 654 Federal Building, Grand Rapids, MI before Magistrate Judge Ellen S. Carmody [1:03 (faxed to FPD by cbh); signed by Magistrate Judge Ellen S. Carmody (Magistrate Judge Ellen S. Carmody, cbh) [1:03-mj-00666-ESC] (Entered: 07/22/2004)
07/22/2004	<u>9</u>	ARREST WARRANT RETURNED EXECUTED; defendant Janet Marcusse arrested on 7/21/2004 (cr, ) [1:03-mj-00666-ESC] (Entered: 07/23/2004)
07/22/2004	<u>10</u>	MINUTES of FIRST APPEARANCE of defendant Janet Marcusse; deft appeared without counsel; deft has not decided if she would like court appointed counsel; counsel appointed conditionally for deft; Govt moved for detention/3-day detention; Prelim and Det[1:03ention Hearings set for Monday July 26, 2004 @ 3:00 p.m.; deft remanded to USM; held before Magistrate Judge Ellen S. Carmody on July 22, 2004 (Tape #C-G04 - #83) (Magistrate Judge Ellen S. Carmody, cr) [1:03-mj-00666-ESC] (Entered: 07/23/2004)
07/22/2004	<u>11</u>	MOTION for pretrial/temporary detention by USA as to Janet Marcusse (cr, ) [1:03-mj-00666-ESC] (Entered: 07/23/2004)
07/23/2004	<u>12</u>	NOTICE OF HEARING as to defendant Janet Marcusse: detention hearing and preliminary hearing rescheduled to 7/28/2004 at 02:00 PM at 654 Federal Building, Grand Rapids, MI before Magistrate Judge Ellen S. Carmody (faxed to attorney Ray Kent by cbh) ([1:03Magistrate Judge Ellen S. Carmody, cbh) [1:03-mj-00666-ESC] (Entered: 07/23/2004)
07/27/2004		Federal Public Defender recommends that Ray Kent be appointed to represent defendant Janet Marcusse (Federal Public Defender, ) [1:03-mj-00666-ESC] (Entered: 07/27/2004)
07/28/2004	<u>13</u>	NOTICE OF HEARING as to defendant Janet Marcusse: continued detention hearing and preliminary hearing set for 7/29/2004 at 10:15 AM at 654 Federal Building, Grand Rapids,



# United States District Court

WESTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

## WARRANT FOR ARREST

V.  
JANET MARCUSSE

CASE NUMBER: 1:03-MJ-866

To: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest Janet Marcusse  
Name

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

Indictment  Information  Complaint  Order of court  Violation Notice  Probation Violation Petition

charging him or her with (brief description of offense)  
Mail Fraud and Money Laundering

Certified as a true copy  
Ronald C. Weston, Sr., Clerk  
By Chomer  
Deputy Clerk  
U. S. District Court  
Western Dist. of Michigan  
Date 12/5/03

in violation of Title 18 United States Code, Section(s) 1341 and 1956(a)(1)(A)(i)

ELLEN S. CARMODY  
Name of Issuing Officer  
Ellen S. Carmody  
Signature of Issuing Officer  
U.S. Magistrate Judge

United States Magistrate Judge  
Title of Issuing Officer  
12-05-2003 Grand Rapids, MI  
Date and Location

Bail fixed at \$ \_\_\_\_\_ by \_\_\_\_\_  
Name of Judicial Officer

RETURN		
This warrant was received and executed with the arrest of the above-named defendant at _____		
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

This form was electronically produced by Elite Federal Forms, Inc.

# United States District Court

01 JUL 23 PM 1:29

WESTERN DISTRICT OF MICHIGAN

## WARRANT FOR ARREST

In Re: Grand Jury 2002-1

679460

CASE NUMBER: 1:02-MC-78

To: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest JANET MAVIS MARCUSSE  
Name

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

Indictment  Information  Complaint  Order of court  Violation Notice  Probation Violation Petition

charging him or her with (brief description of offense)  
Contempt of Court

In violation of Title 28 United States Code, Section(s) 1826

ROBERT HOLMES BELL

Name of Issuing Officer

Signature of Issuing Officer

Chief District Court Judge

Title of Issuing Officer

Date and Location Grand Rapids, Michigan

Date and Location

Bail fixed at \$ \_\_\_\_\_ by \_\_\_\_\_  
Name of Judicial Officer

RETURN		
This warrant was received and executed with the arrest of the above-named defendant at <u>AIRLIFT -</u> <u>SPRINGFIELD, MO</u>		
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST <u>7-21-04</u>	<u>TED Q WIST</u> USMS	<u>[Signature]</u>

This form was electronically produced by Elite Federal Forms, Inc.

COPY IN USMS FILE

JUL 12 PM 2:05  
CLERK  
OF HIGH

UNITED STATES OF AMERICA  
IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

IN THE MATTER OF:

No. 1:02-MC-78

IN RE: GRAND JURY 2002-1  
(JMM, Witness)

Hon. Robert Homes Bell  
Chief Judge

**MOTION AND ORDER TO UNSEAL CASE**

Now comes the United States of America by Margaret M. Chiara, United States Attorney for the Western District of Michigan, and Thomas J. Gezon, Assistant United States Attorney, and moves this Court to unseal the arrest warrant and report and recommendation of the Magistrate Judge Joseph G. Scoville, dated July 23, 2002, as continued secrecy is unnecessary for the following reasons:

1. On or about June 28, 2002, the United States moved this Court for a show cause hearing, claiming that grand jury witness, Janet Mavis Marcusse, had refused to testify before a grand jury.
2. On July 1, 2002, the Court issued a Show Cause Order and set a hearing date before Magistrate Joseph G. Scoville on July 23, 2002.
3. The witness, Janet Mavis Marcusse, failed to appear at the hearing. Magistrate Judge Joseph G. Scoville then issued a report and recommendation that a bench warrant be issued to arrest the recalcitrant witness (see attached report).
4. On July 29, 2002, the Court issued a warrant of arrest, which was placed under seal, at the Government's request.
5. The witness, Janet Mavis Marcusse, remained a fugitive and was not arrested on the warrant. The grand jury before whom the proceedings occurred, expired on August 29, 2003 and, thus the Court's civil contempt warrant became moot and was recalled from the lein system,

unexecuted.

6. On December 5, 2003, the United States filed a complaint and warrant for arrest against defendant, Janet Mavis Marcusse for conducting a ponzi scheme investment fraud (see attached Complaint and Affidavit). The defendant remained a fugitive until arrest and apprehension on July 1, 2004.

7. The United States intends on asking the Court to detain Janet Mavis Marcusse, pre-trial, as she is considered to be a flight risk.

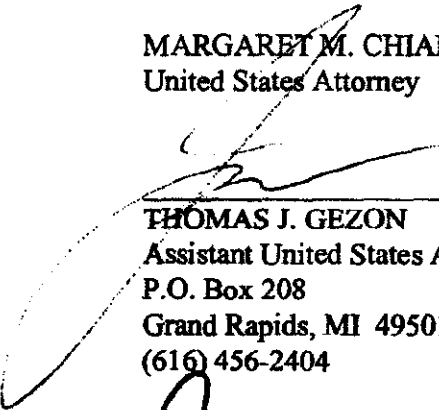
8. Continued secrecy as to the Warrant of Arrest is no longer necessary, as the defendant has been apprehended.

9. Therefore, the United States respectfully requests the Court to unseal the requested arrest warrant and report and recommendation so that the Magistrate Judge and Pretrial Services can be informed of the defendant's contemptuous conduct, as it is relevant to the issue of whether or not the defendant is an appropriate candidate for pre-trial release.

Respectfully submitted,

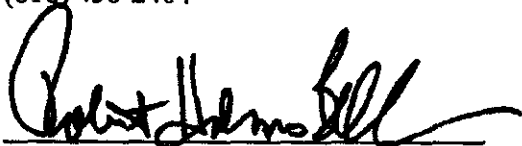
MARGARET M. CHIARA  
United States Attorney

Dated: July 7, 2004

  
THOMAS J. GEZON  
Assistant United States Attorney  
P.O. Box 208  
Grand Rapids, MI 49501-0208  
(616) 456-2404

**IT IS SO ORDERED**

Dated: July 12, 2004

  
ROBERT HOLMES BELL  
United States Chief District Court Judge  
Western District of Michigan

CC: AUSA  
& witness

UNITED STATES OF AMERICA  
UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

02 JUL 24 AM 11:06  
U.S. DISTRICT COURT  
WESTERN DISTRICT MICH.  
SOUTHERN DIVISION

IN RE:

Case No. 1:02:MC:78

GRAND JURY 2002-1  
(JMM, Witness)

Hon. Robert Holmes Bell

**REPORT AND RECOMMENDATION**

On July 1, 2002, Chief Judge Robert Holmes Bell issued an order directing Janet Mavis Marcusse to appear before me on July 23, 2002, at 2:00 p.m., to show cause why she should not be held in contempt for her failure to comply with a Grand Jury subpoena requiring her to provide testimony and records to the Grand Jury on May 22, 2002. Ms. Marcusse failed to appear in response to the order to show cause. The United States Attorney established that Ms. Marcusse had refused to accept regular and certified mail notifying her of the hearing. I have reviewed the transcript of proceedings before the Grand Jury and conclude that Ms. Marcusse willfully failed and refused to answer lawful questions put to her and that the privileges that she attempted to assert are frivolous and nonexistent. Accordingly, I recommend as follows:

- A. That a warrant be issued authorizing the arrest of Janet Mavis Marcusse and her appearance before the Chief Judge;

Emphasis Added

B. That Janet Mavis Marcusse be held in civil contempt of court, unless she can establish a valid privilege supporting her refusal to answer questions and produce documents for the Grand Jury.

Dated: July 23, 2002

  
\_\_\_\_\_  
Joseph G. Scoville  
United States Magistrate Judge

**NOTICE TO PARTIES**

Any objections to this Report and Recommendation must be filed and served within ten days of service of this notice on you. 28 U.S.C. § 636(b)(1)(C); FED. R. CIV. P. 72(b). All objections and responses to objections are governed by W.D. MICH. LCIVR 72.3(b). Failure to file timely objections may constitute a waiver of any further right of appeal. See *Thomas v. Arn*, 474 U.S. 140 (1985); *Neuman v. Rivers*, 125 F.3d 315, 322-23 (6th Cir. 1997); *United States v. Walters*, 638 F.2d 947 (6th Cir. 1981).

02 JUL -2 PM 3: 53  
REC'D  
JUL 12 2004  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
9C

UNITED STATES OF AMERICA  
IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:02-MC-78

vs.

Hon. Robert Holmes Bell  
Chief Judge

JANET MAVIS MARCUSSE,

Defendant.

CERTIFICATE OF SERVICE

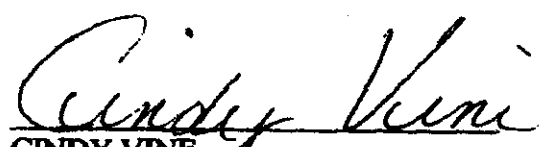
\_\_\_\_\_ /

The undersigned hereby certifies that on the 2nd day of July, 2002, she delivered a copy

of: Order to Show Cause

Janet Mavis Marcusse  
c/o Attorney James Sullivan  
2219 - 28th Street, S.W.  
Suite 102  
Wyoming, MI 49509

by placing same in a properly addressed envelope and depositing it in the United States Mails,  
Grand Rapids, Michigan.



CINDY VINE  
Legal Secretary  
Assistant United States Attorney's Office  
330 Ionia NW  
P.O. Box 208  
Grand Rapids, Michigan 49501-0208  
(616) 456-2404



Law Office of  
**JAMES H. SULLIVAN, P.C.**  
2219 - 28th Street, S.W. Suite 102  
Wyoming, Michigan 49509

Telephone  
(616) 531-6060

E-Mail: [jamesullivanpc@chartermi.net](mailto:jamesullivanpc@chartermi.net)

July 9, 2002

Facsimile  
(616) 531-1010

Tom Gezon  
United States Attorney  
300 Ottawa Ave., N.W.  
Grand Rapids, MI 49503

RE: Access Financial

Dear Tom:

I am continuing to receive calls from Mr. Moore from the FBI, as it would relate to Jan Marcusse in reference to the Grand Jury investigation. As you are aware, and I have advised you orally and in writing our office does not represent her. I would ask that you direct Mr. Moore to discontinue contact with our office on this matter. If you should have any questions on this matter please feel free to contact the undersigned. Thank you.

Very truly yours,

JAMES H. SULLIVAN, P.C.

A handwritten signature in dark ink, appearing to read "James H. Sullivan".

James H. Sullivan

rdp