

BEFORE THE BOARD OF DISCIPLINARY APPEALS  
APPOINTED BY  
THE SUPREME COURT OF TEXAS



FILED  
Jan 13 2025

THE BOARD of DISCIPLINARY APPEALS  
*Appointed by the Supreme Court of Texas*

IN THE MATTER OF §  
WILLIAM TOPP MAXWELL § CAUSE NO.: 56591  
STATE BAR CARD NO.: 24028775 §

MOTION TO CONTINUE HEARING ON  
CHIEF DISCIPLINARY COUNSEL'S MOTION  
FOR ENTRY OF JUDGMENT OF DISBARMENT  
AND OBJECTIONS

To the Honorable Board of Disciplinary Appeals:

Comes Now, William Maxwell (SBN #24028775) and files this Motion to Continue Hearing on Chief Disciplinary Counsel's Motion for Entry of Judgment of Disbarment and Objection to the U.S. District Court's Judgment as Conclusive Proof, and for just cause would show unto the Board of Disciplinary Appeals as follows:

Procedural and Factual Background

1) On May 16, 2024, the Commission for Lawyer Discipline (CLD) filed a Motion for Entry of Judgment of Disbarment based on Maxwell's conviction in Cause No. 1:11-CR-00740-(03), out of the United States District Court in Camden, New Jersey.

2) The jury returned a verdict on July 3, 2014, and the direct appeal was not final until October 7, 2024. (The case having been remanded preliminarily for conflict of counsel as to Pelullo, conflict of counsel as to William Maxwell is yet to be addressed.)

3) Maxwell, previously, filed two prior motions for continuance because his direct appeal was still pending before the United States Supreme Court.

4) On October 7, 2024 the Supreme Court denied certiorari without comment on the merits.<sup>EN1</sup> Maxwell, as he had assured the BODA and the CLD he would, promptly notified the BODA and CLD.

5) The matter is currently set for the January, 2025 docket.

6) There are currently two habeas corpus petitions on this matter pending. Scarfo v. United States, No.: 1:23-CV-22432-MAS, in the United States District Court of New Jersey; John Maxwell v. United States, 1:23-CV-2300-MAS also in the United States District Court of New Jersey. William Maxwell, petitioner has until October 7, 2025 to file his 28 U.S.C. §2255 petition for habeas corpus relief.<sup>EN2</sup>

Post William Maxwell's Third Circuit Panel decision in July of 2022, the Supreme Court issued a series of decision which, even if the United State's factual arguments were true (and Maxwell expressly denies them), Maxwell's conduct would not be criminal under the wire fraud statutes and other statutes under he was charged.<sup>EN3</sup>(See infra)

7) Because the new legal precedents issued by the United States Supreme Court were issued post Maxwell's Third Circuit Panel decision, but prior to his Supreme Court petition, they are retroactive. See Teague v. Lane, 489 U.S. 288 (1989); Rock v. Arkansas, 483 U.S. 44 (1987).

#### Structural Error and New Law

8) In Scarfo v. United States and John Maxwell v. United

States, the United States conceded structural error (the United States conceded the factual basis). Scarfo and John Maxwell were tried with William Maxwell and found guilty by the same jury on July 3, 2014.

9) Prior to trial the defendants' objected to the United States' use of exhibits prior to their admission into evidence. The United States confessed that the failure to obtain admission of even one exhibit, to be used in the opening statements, would result in a mistrial. See Excerpt below:

**AUSA Gross:** ... if [AUSA] Mr. Weaner talks about a particular transcript in his opening and that transcript, that tape doesn't come into evidence for any reason, we're going to be sorry that we talked about it in the opening statement ....

**The Court:** It might also be grounds for a mistrial, wouldn't it?

**AUSA Gross:** That's true as well. So your Honor, we talk about these exhibits and quote from these transcripts at our peril. We understand that.

(Joint Appendix "B" 4102-4103:10)EN4

10) The United States not only did not obtain admission of the six exhibits used in opening statements, the United States did not offer or obtain admission of an additional 280 exhibits (for a total of 286 exhibits). (See Exhibit 1) The United States nevertheless, submitted the 286 unoffered and unadmitted exhibits to the jury. The jury relied upon the 286 unoffered and unadmitted exhibits in reaching a verdict. The trial court relied on the 286 unoffered and unadmitted exhibits in ruling on

Rule 29 and Rule 33 motions for New Trial and Motion to Dismiss. The Court of Appeals relied upon the 286 unoffered and unadmitted exhibits in affirming the conviction at the appellate court. See United States v. Scarfo, et al., 2022 WL 2763761 \*fn.2 (3rd Cir., July 15, 2022). Only admitted evidence can be considered by juries, judge and appellate courts.<sup>EN5</sup>

11) The United States admits that these facts are true. See Scarfo v. United States, 1:23-CV-22432-MAS; In the District of New Jersey.

In the United State's Response to Scarfo's §2255 petition, the United States Confesses:

... To be sure, the cases discussed above<sup>EN6</sup> did not involve anywhere near the number of unadmitted exhibits at issue here. Nor does the Government dispute that, had the unadmitted exhibits been excluded from evidence,<sup>EN7</sup> the overall strength of the Government's case against [the defendants] would have been eroded."

1:23-CV-22432-MAS, Doc. 7, PageID# 101

This structural error was compounded by the United States fraud upon the Court. When the United States prepared its exhibit list, it falsely listed the 286 exhibits as being both offered and admitted on dates certain. The offending 286 exhibits are highlighted in the attached exhibit hereto. On Page 2 of the exhibit, Doc. No. 1545-6 filed 02/14/2019, Page 3 of 38 [PageID# 51218](found in the ROA at JAD 1-70) appears the following:

<u>200 Series</u>	<u>Miscellaneous Recordings</u>	<u>Date</u>	<u>ID</u>	<u>Evid</u>
200	SP2 Session #21084	3/5/14	X	X
200A	Transcript	3/5/14	X	X
201	SP1 Session #1580	4/10/14	X	X

These are four of the 286 unoffered and unadmitted exhibits, both material and prejudicial, as the Government has conceded. The BODA will note, that despite these exhibits having not been offered or admitted, ever, into evidence, the United States affirmatively covered-up its structural and plain errors by falsely listing the dates on which the offending exhibits were offered and admitted into evidence. They were not, ever.

12) To further complicate matters, at the February 14, 2019 hearing [Doc. 1450] the Trial Court disclosed that the Court's staff had lost or destroyed the Court's exhibit list thereby requiring the defendants to rely on appeal on the Government's exhibit list with the false 286 entries.

Justice Scalia, in his dissent in Bousely v. United States, 523 U.S. 614, 630 (1998) teaches, "No criminal-law system can function without rules of procedure conjoined with a rule of finality, evidence not introduced, or objections not made, at the appropriate time cannot be brought forward to reopen the conviction after judgment has been rendered." (Emphasis added) This case is the obverse. Here, the United States did not offer or introduce evidence and the 286 exhibits were not admitted, ever.

Statutorily, Fed.R.Crim.P. 52 addresses Harmless and Plain error. Under 52(a), the Government has conceded error and prejudicial error. Defendants objected pretrial. The objection is preserved and the United States has conceded prejudicial error. The conviction is an error as a matter of law. Under 52(b), plain error, in addition to error under 52(a), attaches as the trial court confessed its awareness of the United States

failure to properly offer or admit the offending exhibits at the February 14, 2014 hearing.

13) The United States concedes a second structural error, the violation of Maxwell's Sixth Amendment right to compel witnesses in his defense. Vivian Huntsman, William Maxwell's personal assistant was to testify in rebuttal to most of the United States' allegations. When she was preparing to testify, she was advised that if she showed up to testify in Maxwell's defense, Ms. Huntsman would be indicted.

14) The United States confesses these facts are true. The United States confesses, at fn.7 on Page 38, John Maxwell v. United States, Cause No.: 1:23-CV-2300-MAS, of their response:

Huntsman spoke at sentencing hearings for both of her brothers, [John] Maxwell and William Maxwell, and claimed she had been threatened by the Government with possible indictment if she had testified at trial. JAF 141 (William Maxwell sentencing); JAF 198-199 ([John] Maxwell sentencing) **EN8**

[At William Maxwell's sentencing, after Ms. Huntsman produced the email with the United States' threat contained therein, the Court instructed William Maxwell's counsel Huff to speak with Ms. Huntsman]

But Ms. Huntsman [sometime later at John Maxwell's sentencing] admitted that Michael Huff, the attorney for William Maxwell, had informed her that she had "misinterpreted" what the Government had said to her in that regard. JAF 198

The email expressly reads that Ms. Huntsman will be indicted if she testifies. Misinterpretation is not a defense to threatening a witness.

William Maxwell was sentenced before John Maxwell. The United States post sentencing pronouncements of "misunderstanding" by Ms. Huntsman are spurious at best. The email states, expressly, that Ms. Huntsman would be prosecuted if she testified -- and it had the desired effect of precluding Ms. Huntsman from testifying, denying Maxwell's Sixth Amendment rights.

15) Collectively, Maxwell's conviction is tainted and reliance upon it strains credulity.

### Disciplinary Actions

16) BODA does not typically delve into the merits of the underlying conviction when making its determination on compulsory discipline. In a compulsory discipline action, "the record of conviction [is typically] conclusive evidence of the attorney's guilt." Tex. Disciplinary P. Rule 8.02. BODA may only consider if the underlying crime is an intentional crime and if compulsory discipline was proper. Here both are missing.

17) First, the trial itself is so irregular as to cast grave doubts on the outcome. In the ordinary context, BODA is justified in relying on the fact the "convictions" are deemed "conclusive evidence" of an attorney's guilt. However, if a showing can be made of such an infirmity of proof to establish misconduct as to give rise to a clear conviction that the BODA should not accept the conviction at face value the conviction should not be accepted as conclusive proof of evidence in support of compulsory disciplinary action.

The Fifth Circuit, In re Wilkes, 494 F.2d 472 (5th Cir. 1974) noted that typically attacks to a Bar's reliance on a judgment are limited to (1) want of due process; (2) infirmity of proof; and (3) "other grave error" that would justify federal court's not giving effect to the New York judgment "directly or indirectly."**EN9**

18) Here, the tender to the jury of 286 unoffered and unadmitted exhibits, over objection (see Fed.R.Crim.P. 52), the use by the jury of what the United States confesses was material and prejudicial exhibits, the use by the trial court of the exhibits in denying Rule 29 and Rule 33 motions, the use by the Third Circuit Court of Appeals of the 286 unoffered and unadmitted exhibits to support its affirmation of Maxwell's conviction constitutes such an infirmity of evidence and other "grave error" as to warrant further consideration.

19) Here, the United States confessed obstruction of Maxwell's Sixth Amendment right to compel witnesses in his defense is another "grave error" which warrants further consideration.

The Supreme Court further teaches that some arbitrary deprivations raise a presumption of a violation of the Due Process Clause.**EN10** Here, the tendering to the jury of 286 exhibits that were neither offered into evidence nor admitted by the trial court, the cover-up of its nefarious conduct by the United States by fabricating 286 false entries on the Government Exhibit list (attached hereto) -- purporting to show both the exhibits being offered and admitted by the trial court; the failure of the United States to notify the court of appeals of this



irregularity; the threatening of a witness with indictment if they showed up to testify for Maxwell -- in violation of the Sixth Amendment, are all such unconscionable realities as to make reliance on a conviction obtained thusly repugnant to the practice of law and the American Adversary System of justice. EN11

The Supreme Court further discusses the ability to impeach the original justice of a judgment. The Court wrote:

It is easy to understand that the defendant may be at liberty to impeach the original justice of the judgment by showing that the court had no jurisdiction; or that he never had any notice of the suit; or that it was procured by fraud; or that upon its face it is founded in mistake; or that it is irregular and bad by local law, fori rei judicatae."

Hilton v. Guyot, 159 U.S. 113, 190 (1895)(discussing "the conclusiveness of foreign judgments.")

20) Here, the wholesale removal from "criminal classification" of the conduct listed in the jury instructions by Cimminelli, Fischer, Range, Bruen, Rahimi, Macquerie Infrastructure Corp, et al., (See EN3 supra) makes Maxwell's conviction under current law inapplicable (even assuming the factual allegations of the United States -- which Maxwell does not concede -- but argues in the alternative).

21) Here, the lack of 286 exhibits, neither offered or admitted into evidence, undermines even the jury instructions themselves. (Willful blindness and other culpable mental states were considered and included in the jury instruction. Those could not have even been considered absent the 286 unoffered and unadmitted exhibits).

22) Under these specific circumstances the conviction provides little confidence to BODA regarding the alleged criminal conduct of Maxwell purported to be demonstrated by the criminal conviction.

23) The Texas Supreme Court in In re Lock, 54 S.W.3d 305, 309-10 (Tex. 2001) does not generally consider, in hearing BODA appeals, "any underlying facts or mitigating circumstances in a compulsory discipline proceeding." The Supreme Court typically only considers the elements of the crime and whether compulsory discipline was appropriate. Id. at 310-11.

24) Here, given the irregularities in the case, irregularity in the procedure and constitutionality of Maxwell's conviction, compulsory discipline is not appropriate at this time. Maxwell's case is not merely a mitigating circumstances case -- nor a challenge to the underlying facts (although those are necessarily challenged here) -- but rather a product of a wholesale collapse of the American Justice Adversary system where defendants are convicted only by the admitted evidence and reasonable inferences drawn therefrom; where witnesses needed to assert defenses are permitted -- nay even compelled to offer testimony -- as opposed to being threatened by the United States with indictment if they testify. (See Star Chamber) **EN12**

25) It is for these reasons that Maxwell requests a continuance until his habeas corpus challenge to his conviction and sentence is resolved. The trial transcripts and record of appeal (ROA) numbers more that 78,000 pages. The exhibits required to be excluded from evidence from the ROA numbers in the thousands of pages. The United States had conceded the

materiality and prejudice of the 286 unoffered and unadmitted exhibits that were given to the jury. Given the thousands of pages in motions and briefings that will constitute the 28 U.S.C. §2255 proceeding, the court of conviction, the United States District Court for New Jersey is the proper forum to determine the relief for all the irregularities of this case (whether the conviction should stand) in the first instance and whether a "want of due process," or "infirmity of proof," or "other grave error" finding is warranted in this case.

Further still, because of the irregularities and improprieties in the procedure, whether actual criminal conduct exists, Maxwell's actual innocence, Maxwell denies, expressly, the propriety of the United States district Court Judgment -- make the basis of the complaint under compulsory discipline, unripe.

26) Finally, the BODA function in disciplining attorneys is in protecting the public. Maxwell is and has been incarcerated for almost 11 years. The direct appeal lasted almost 10 and one half years. Maxwell's license remains suspended and no person or the public at large is prejudiced by the continuance. Given the circumstances of this unusual case, compulsory discipline is not proper at this time.

27) Maxwell will promptly notify the BODA and CLD of the proceedings involving his conviction as a result of his 28 U.S.C. §2255. Maxwell will further provide service of the proceedings in the 28 U.S.C. §2255 to the BODA and CLD if requested. Maxwell recognizes the unusual nature of his request. That being said, no case in United States history involves the

tender to the jury, trial court, and court of appeals 286 material and prejudicial exhibits that were not offered into evidence nor admitted into evidence. Witness tampering has happened, but it is irregular. Fraud upon the Court by the United States has occurred (Senator Steven's case, for example), but is irregular. A delay between the Circuit Court's opinion and Supreme Court petition for certiorari of 22 months is highly irregular. The Supreme Court issuing a series of decisions undermining the conviction between the time the circuit court opinion is issued and the petition for certiorari is also irregular. Collectively, all of these irregularities happening in a single case -- has never happened before, and Maxwell demonstrates just cause thereby for a continuance in the disbarment hearing -- along with a proper denial -- published herewith -- of the veracity of the conviction for purposes of compulsory discipline, at this time.

28) Maxwell does not know whether the CLD is opposed to the relief requested.

29) Maxwell will provide notice, promptly, as both BODA and CLD order or request (respectfully) of the status, change in status, or otherwise the proceedings of the 28 U.S.C. §2255 proceeding in the United States District Court of New Jersey.

30) As soon as possible after the United States Supreme Court issuance of the Kousisis decision (spring, 2025), Maxwell will be filing his 28 U.S.C. §2255 petition and moving to join the two §2255 petitions now pending before the court in New Jersey. Maxwell's deadline to file is on or before October 7, 2025.


31) Maxwell does not request this continuance solely for purposes of delay, but for the reasons set forth herein and in the interest of justice.

32) Maxwell's arguments herein are, in the alternative; Maxwell's objections are to the veracity of the United States District Court judgment for purposes of use as conclusive evidence in a compulsory discipline matter. Maxwell addresses the conviction in the §2255 proceeding.

Prayer

For these reasons, Maxwell respectfully request a continuance of the hearing on CLD's Motion for Disbarment until his 28 U.S.C. §2255 petition is decided. Maxwell will comply with any terms and conditions imposed as part of this continuance request. Maxwell requests such other and additional relief in equity to which he may be entitled.

Respectfully Submitted,

  
WILLIAM MAXWELL (24028775)  
Fed. Reg. No. 71844-279  
FCI-Beaumont-Low  
Post Office Box 26020  
Beaumont, Texas 77720

## ENDNOTES

EN1 An order denying a petition for certiorari expresses no opinion on the merits of the case. Barber v. Tenn., 513 U.S. 1184 (1995)(citing United States v. Carver, 260 U.S. 482, 490 (1923)("The denial of a writ of certiorari imports no expression of opinion upon the merits of the case, as the bar has been told many times."); Singleton v. Commissioner, 439 U.S. 940, 942-46 (1978)(opinion of Stevens, J. respecting denial of petition for writ of certiorari) ("The sole significance of such a denial of a petition for writ of certiorari ... simply means that fewer than four members of the Court deemed it desirable to review a decision of the lower court as a matter 'of sound judicial discretion.' Rule 38, paragraph 5" (citing Justice Frankfurter)); 28 U.S.C. §2255(f)(1).

EN2 On December 9, 2024, the United States Supreme Court had oral arguments in Kousisis further explaining and determining the scope of the term "property" under 18 U.S.C. §1343, 1349. The Supreme Court in Ciminelli v. United States, 598 U.S. 306 (2023) called the United States wire fraud practice paradigm into question.

It is further anticipated, in accordance with U.S. District Court policy, that all three (Scarfo, John Maxwell, and William Maxwell) 28 U.S.C. §2255 petitions now pending will be joined into a single case.

EN3 The "right-to-control theory" criminalizes matters and federalizes traditionally state matters. Ciminelli v. United States, 598 U.S. 306 (2023) (Slip Op. at 8). "[T]he right-to-control theory [in Maxwell's case, information to make economic decisions and/or board of director seats of FirstPlus Financial Group and thus control of FPF] vastly expands federal jurisdiction without statutory authorization. Because the theory treats mere information as a protected interest, almost any deceptive act would be criminal." Ciminelli, (Slip Op. at 8)(internal citations omitted). "The theory thus makes a federal crime of an almost limitless variety of deceptive activities traditionally left to state contract and tort law -- in flat contradiction with our caution that '[a]bsent [a] clear

statement by Congress,' courts should 'not read the mail [and wire] fraud statutes to place under federal superintendence a vast array of conduct traditionally policed by the states.'" Ciminelli, (Slip Op. at 8)(alterations in original)(emphasis added).

The Supreme Court further issued decisions in New York Rifle & Pistol Assn. v. Bruen, 142 S.Ct. 2111 (2022); Fischer v. United States, 144 S.Ct. 2176 (2024); United States v. Rahimi, 219 L.Ed. 2d 351 (2024); Macquerie Infrastructute Corp, et al. v. Moab Partners, L.P., 601 U.S. 257 (2024). These and additional cases are discussed briefly later in the motion.

Also, in related decisions before the Third Circuit, the Circuit in which Maxwell's case arises, the Third Circuit issued Range v. Atty. General, 54 F.4th 992(3d Cir. 2023).

Further still, the Fifth Circuit issued Proskauer Rose L.L.P. et al, 816 F.3d 341, 346 (5th Cir. 2016) and the Texas Supreme Court issued Cantey Hanger, LLP v. Boyd, 467 S.W.3d 477, 484 (Tex. 2015). These cases collectively, issued post Maxwell's conviction call the foundation of Maxwell's conviction into question.

**EN4** Maxwell recognizes that BODA does not typically address the merits of the underlying conviction in a compulsory discipline case. Maxwell would assert that this case is an exception to the rule and the propriety of the conviction cannot be affixed because of the due process and irregularities in the case. As such Maxwell provides limited background only and does not file the 78,000 page Record on Appeal.

**EN5** Evidence and inferences from the evidence can only be considered from evidence admitted into the record. Lockhart v. Nelson, 488 U.S. 33, 40-42 (1988)("It is quite clear from our opinion in Burks [Burks v. United States, 437 U.S. 1, 16-17(1978)] that a reviewing court must consider all of the evidence admitted by the trial court...")

**EN6** As a deflection for its conduct, the United States cites to a sample of cases where 1 or 2 exhibits, non-material and non-prejudicial exhibits, found their way into the jury room -- and on appeal, because the offending exhibits were "non-material"

and "non-prejudicial" the courts of appeal held them to be harmless error. That is not the case. No case in U.S. history can be located where even 30 non-offered and non-admitted exhibits, material and prejudicial exhibits, were tendered to the jury and considered by the trial court and the appellate court in its decisions. Here is the worst case in U.S. history of the government tendering to a jury 286 material and prejudicial exhibits that were neither offered for admission into evidence nor admitted into evidence by the trial court.

EN7 ... "had the unadmitted exhibits been excluded from evidence" -- unadmitted exhibits are excluded from the evidence by definition!

EN8 Notably the United States omits that Ms. Huntsman produced a email which expressly contained the threat of indictment if she presented to testify for William Maxwell.

EN9 The arguments are Wilkes' which the Fifth Circuit commented on approvingly. Id. at 474-475 ("Federal courts must 'determine for ourselves the right to continue to be a member of [the federal bar]' after giving 'intrinsic consideration' to the underlying record.") (internal citations omitted); see also Selling v. Radford, 243 U.S. 46 (1917); Theard v. United States, 354 U.S. 278 (1957); In re Ruffalo, 390 U.S. 544 (1968) ("Federal Courts must "determine for ourselves the right to continue to be a member of [the federal bar]' after giving "intrinsic consideration' to the underlying record to verify whether there are "one or all of the following questions ...: (1) that, state procedure, from want of notice or opportunity to be heard, was wanting in due process; (2) that there was such a infirmity of proof as to facts found to have established the want of fair private and professional character as to give rise to a clear conviction on our part that we could not, consistent with our duty, accept as final the conclusion on that subject; or, (3) that some other grave reason existed which should convince us that to allow the natural consequences of the judgment to have their effect would conflict with the duty which rests upon us not to disbar except upon the conviction that, under the principles of right and justice, we were constrained



so to do." Selling, 243 U.S. at 51; In re Wilkes, 494 F.2d at 476-477.) (emphasis added).

If the "infirmity of proof" does not exist in this case, then it exists in no case. If the irregularities in this case are not sufficient to question the veracity of the conviction, then no irregularities for any reason exist.

EN10 See Honda Motor Co. v. Oberg, 512 U.S. 415, 430 (1994) ("... abrogation of a well-established common-law protection against arbitrary deprivations of property [law license] raises a presumption that its procedures violate the Due Process Clause. As this Court has stated from its first due process cases, traditional practice provides a touchstone for constitutional analysis." (internal citations omitted)(emphasis added). "Because the basic procedural protections of the common law have been regarded as so fundamental, very few cases have arisen in which a party complained of their denial." Id. (internal citations omitted)... "When the absent procedures would have provided protection against arbitrary and inaccurate adjudication, this Court has not hesitated to find the proceedings violate due process." Id. (internal citations omitted).(emphasis added)

EN11 See Schwabe v. Board of Bar Examiners, 353 U.S. 232 (1957). "A state cannot exclude a person from the practice of law... in a manner or for reasons that contravene the Due Process or Equal Protection Clause of the Fourteenth Amendment." Id. at 353 U.S. at 238-239. See also Wilner v. Committee on Character Fitness, 373 U.S. 96, 108 (1963) "of course, if the denial [of a license] depends upon information [here the irregular conviction] supplied by a particular person whose reliability or veracity [conviction in this particular case] is brought into question by the applicant, confrontation and the right of cross-examination should be afforded." Here, this is appropriately performed in the §2255 process, before the court of conviction, prior to the Bar proceeding against Maxwell in a disbarment proceeding.

EN12 Given the cases issued by the Supreme Court post Maxwell's Third Circuit Affirmance, noted supra and the instructions regarding

attorney immunity issued by the Texas Supreme Court in Cantey Hanger, LLP v. Boyd, 467 S.W.3d 477, 484 (Tex.2015) and as explained in Proskauer Rose LLP et al. v. Samuel Troice, et al., 816 F.3d 341, 346 (5th Cir. 2016), whether this proceeding, at this time, is appropriate is at least questionable. Maxwell was retained as outside counsel for FirstPlus Financial Group (FPFG) for a wide range of legal matters to include prosecuting lawsuits in the Southern District of Texas and in the District Court of Cameron, County, Texas, against FPFG shareholders, and yet the alleged criminal complaint would purport to place a duty on Maxwell, as outside counsel, to the very shareholders he was tasked with suing. See United States v. Scarfo, et al., \_\_\_ F.4th \_\_\_ (3d. Cir. 2022) at ¶¶36-37. These duties, the Third Circuit opines on Maxwell's actions as counsel (in part) for FPFG, support the basis for the case against him (including all the exhibits that were never offered or admitted into evidence (note Maxwell raised sufficiency of the evidence in his appeal...but the falsity of the United States and the non-admission of the exhibits was not raised by counsel and will have to be addressed in the §2255)). Those "Maxwell actions" are: (1) not supported by the evidence once the 286 exhibits are removed (e.g. there is not even an argument of support -- as the United States concedes); (2) not actionable post Cantey Hanger, LLP v. Boyd; (3) not criminal post the Supreme Court holdings in Ciminelli, McNally, Bruen, Fischer, Rahimi, Macquerie Infrastructure Corp, et al. Because of the irregularities in this case and the fact that this type of case (to this degree) has never happened previously in U.S. history; prudence teaches that rather than create an entirely new procedure and precedent, a continuance should be granted to allow the U.S. District Court to sort out all the irregularities of this "monster trial" case, in the first instance.

At that point BODA can proceed further, if necessary, with the proper insight provided by the United States District Court post §2255.

Maxwell, ofcourse, argues in the alternative throughout.

EN13 "Unlike other litigants, pro se prisoners cannot personally

travel to the courthouse [or use electronic filings] to see that the notice is stamped 'filed' or to establish the date on which the court received the notice. Other litigants may choose to entrust their appeals to the vagaries of the mail and the clerk's process for stamping incoming papers, but only the pro se prisoner is forced to do so by his situation. And if other litigants do choose to use the mail, they can at least place the notice directly into the hands of the United States Postal Service (or a private express carrier); and they can follow its progress by calling the court to determine whether the notice has been received and stamped, knowing that if the mail goes awry they can personally deliver notice at the last moment or that their monitoring will provide them with evidence to demonstrate either excusable neglect or that their notice was not stamped on the date the court received it. Pro se prisoners cannot take any of these precautions, nor, by definition, do they have lawyers who can take these precautions for them. Worse, the pro se prisoner has no choice but to entrust the forwarding of his notice of appeal to prison authorities whom he cannot control or supervise and who may have every incentive to delay. No matter how far in advance the pro se prisoner delivers his notice to prison authorities he can never be sure that it will ultimately get 'filed' on time. And if there is a delay the prisoner suspects is attributable to the prison authorities, he is unlikely to have any means of proving it, for his confinement prevents him from monitoring the process sufficiently to distinguish delay on the part of prison authorities from slow mail service or the clerk's failure to stamp the notice on the date received."

[]

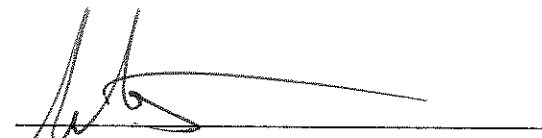
"...the notice of appeal was filed at the time petitioner delivered it to the prison authorities for forwarding to the court clerk."  
487 U.S. at 271.

Maxwell, in accordance with the "prison mailbox rule" timely delivered his motion and objections to the prison authorities.

VERIFICATION

I hereby verify that all material facts contained in the foregoing Motion and Objections are true and correct to the best of my knowledge and belief. I make this verification under penalty of perjury and pursuant to 28 U.S.C. §1746.

January 6, 2025

  
WILLIAM MAXWELL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion and Objections were placed in the BOP Legal Mail System, first class postage prepaid and properly addressed to:


Ms. Jenny Hodgkins  
Board of Disciplinary Appeals  
Supreme Court of Texas  
Post Office Box 12426  
Austin, Texas 78711

Ms. Amanda M. Kates  
Assistant Disciplinary Counsel  
State Bar of Texas  
Post Office Box 12487  
Capital Station  
Austin, Texas 78711-2487

on the 6 day of January, 2025. In doing so I complied with the requirements of Houston v. Lack, 487 U.S. 266 (1988)(Which provides that for prisoners, filings are deemed filed when delivered to prison authorities for forwarding.)<sup>EN13</sup>

I make this certification under penalties of perjury and pursuant to 28 U.S.C. §1746.

January 8, 2025

  
WILLIAM MAXWELL

**EXHIBIT ONE**

6/20/14

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Honorable Robert B. Kugler

UNITED STATES OF AMERICA

v.

NICODEMO S. SCARFO

s/k/a "Nicky"

s/k/a "Nick"

s/k/s "Cousin"

s/k/a "Junior"

s/k/s "Nick Promo"

s/k/a "Mr. Apple"

s/k/a "Mr. Macintosh"

SALVATORE FELULLO

s/k/a "Sal"

s/k/a "The Consultant"

s/k/a "Cousin"

s/k/a "Mr. Turner"

WILLIAM MAXWELL

s/k/s "Bill"

JOHN MAXWELL

DAVID ADLER

GARY MCCARTHY

DONALD MANNO

s/k/s "Dummy"

Crim. No. 11-760 (RBK)

EXHIBIT LIST

EXHIBIT "D"

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
100 Series	Physical Surveillances			
135A	Surveillance video - Parisi and JM at 1125 Atlantic Ave	2/26/14	X	X
140A-1	Surveillance photo - SP, NS and David Roberts at Macedonia Grill, parking lot	1/29/14	X	X
140A-2	Surveillance photo - SP, NS and David Roberts at Macedonia Grill	1/29/14	X	X
154A	Surveillance video - SP, JM, WH, TS and others outside Capital Grill on 11/5/07	4/17/14	X	X
161A-1	Surveillance video - SP and NS outside Adelphi's Restaurant on 12/20/07 (part 1)	4/17/14	X	X
161A-2	Surveillance video - SP and NS outside Adelphi's Restaurant on 12/20/07 (part 2)	4/17/14	X	X
172A	Surveillance video - LMS, JP, Peter Fox outside closing for 9 Hartford Drive on 3/28/08	4/9/14	X	X
187A-1	Surveillance photo - SP & NS entering Miami Beach Marina on 4/26/08	4/8/14	X	X
187A-2	Surveillance photo - SP & NS walking towards Pricelass on 4/26/08	4/8/14	X	X
187A-3	Surveillance photo - SP & NS on Pricelass on 4/26/08	4/8/14	X	X
200 Series	Miscellaneous recordings			
200	SP2 session #21084	3/5/14	X	X
200A	Transcript	3/5/14	X	X
201	SP1 session #1500	4/10/14	X	X
201A	Transcript	4/10/14	X	X
202	Casale wire #39285	4/16/14	X	X
202A	Transcript	4/16/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
300 Series	Miscellaneous photographs/video recordings			
305	Video - USP Atlanta, 8/23/07 visit between NDS and SP	1/13/14	X	X
306	Photo - Nicodemus D. Scarfo, Vittorio Amuso - USP Atlanta, 1997-1998	1/13/14	X	X
307	Photos - SP birthday party			
307A	Photo of SP and NS at SP birthday party	2/26/14	X	X
307B	Photo of Persiano and Piccolo	2/26/14	X	X
307C	Photo of group (JP, NS, SP, CL and others) at SP birthday party	2/26/14	X	X
307D	Photo of Persiano and Piccolo	5/1/14	X	X
307E	Photo of JM and WM at SP birthday party	2/26/14	X	X
307F	Photo Svetlana Pehillo, SP, NS, WM at SP birthday party	2/26/14	X	X
307G	Photo of individuals at SP's birthday party	5/1/14	X	X
307H	Photo of individuals at SP's birthday party	5/1/14	X	X
307I	Photo of Andre (aka Andre #1)	5/1/14	X	X
307J	Photo of Svetlana Pehillo, Anna Pelullo, Sophia Pehillo	5/1/14	X	X
307K	Photo of Anna Pelullo	5/1/14	X	X
307L	Photo of Frank McGonigal and Anna Pelullo	5/1/14	X	X
308	Photo - Philip Casale, Peter Caprio, Joseph Servidio	4/16/14	X	X
310	Photo - NS with Joe Dibenedetto in Queens, NY	4/16/14	X	X
311	Photo - 227 Sun Valley, Egg Harbor Twp	4/21/14	X	X
312	Photo - Bill Bianco, NS, TS, SP	4/23/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
1XXX Series	<i>Learned Associates of North America LMDs Trust</i>			
1000 to 1099	Audio Recordings			
1000	SP1 session #74	1/14/14	X	X
1000A	Transcript	1/14/14	X	X
1001	SP1 session #197	1/14/14	X	X
1001A	Transcript	1/14/14	X	X
1002	SP1 session #399	1/14/14	X	X
1002A	Transcript	1/14/14	X	X
1003	SP1 session #446	1/14/14	X	X
1003A	Transcript	1/14/14	X	X
1004	SP1 session #1898	1/15/14	X	X
1004A	Transcript	1/15/14	X	X
1005	SP1 session #2112	1/15/14	X	X
1005A	Transcript	1/15/14	X	X
1006	SP1 session #424	2/27/14	X	X
1006A	Transcript	2/27/14	X	X
1100 to 1199	Documents			
1100	The LMDs 2006 Trust [G0141608-638]	2/26/14	X	X
1100A	Cover letter 8/29/06 from Thomas Shea to Domenica Scarfo re: 2006 LMDs Trust [G0141607]	2/26/14	X	X
1101	LANA/LMDS Operating Agreement [G0141247-254]	2/26/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
1103	LANA/Seven Hills Operating Agreement [G0143409-414]	1/14/14	X	X
1105A	Letter 8/31/06 from GM to SP re: organizational chart [G0149542-545]	1/23/14 By Gelb	X	X
1108	LANA/DMM bill - 6/29/07 [G0140756-758]	1/14/14	X	X
1120	NS Appointment - 11/2/07 Dinner with Ken Stein	3/12/14	X	X
1123A	LIC company record book for LANA [01480-01504]	1/16/14	X	X
1148	LANA brochure [G0146188-191]	2/26/14	X	X
1150A	Handwritten notes re: LMDS Trust is ok	5/13/14	X	X
1150B	Handwritten notes re: Scarfo LMDS Trust	5/13/14	X	X
1150C	Handwritten notes re: revocable trust	5/13/14	X	X
1150D	Handwritten notes re: SP-NS trust layout	5/13/14	X	X
1175	Elzen, Finelung & McCarthy invoices			
1175B	Folder - Legal Bills (FD) Gary McCarthy Paid in Full [G0143838-843]	4/21/14	X	X
1200 to 1299	Emails			
1208	12/19/07 from SP to Marie Rosario re: Shore Escapes LLC	3/5/14	X	X
1300 to 1399	Financial Records			
1300	LMDS 2006 Trust - BOA -- acct #0963 -- statements and related items (obtained pursuant to subpoena except where otherwise indicated)			
1300G	June 2007	4/17/14	X	X



EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
1306F-1	Residential Lease 8/25/07 for 66 Salfish Drive	4/21/14	X	X
1306V	Palace Diamonds receipt 12/4/07 [G0143846]	4/10/14	X	X
1306X	Palace Diamonds receipt 12/5/07 [G0143845]	4/9/14	X	X
1307	Miscellaneous documents			
1311	Invoice 1/3/08 from DM to JP at LANA for \$10,000 - retainer and legal services [G0217417-419]	1/28/14 by Manno	X	X
1325	Check dated 6/26/07 from LANA (3017) payable to DM for \$5,000 [02315]	1/15/14	X	X
1326	Check dated 7/16/07 from LANA (3017) payable to DM for \$10,000 for "Legal Expenses" [02312]	1/15/14	X	X
1327	Check dated 8/20/07 from LANA (3017) payable to DM for \$5,000 for "Legal Expenses" [02311]	1/15/14	X	X
1343	Folder - Gavin Lantz Legal [G0144089-093]	1/15/14	X	X
1347A	PPFG Stock Certificate in the name of Learned Associates of North America, LLC - 250,000 shares	1/16/14	X	X
1347B	PPFG Stock Certificate in the name of Learned Associates of North America, LLC - 200,000 shares	1/16/14	X	X
1350A	PPFG Stock Certificate #C17214 registered to Seven Hills Management - 250,000 shares	4/21/14	X	X
1350B	PPFG Stock Certificate #C17216 registered to Seven Hills Management - 200,000 shares	4/21/14	X	X
1350C	PPFG Stock Certificate #C17234 registered to Seven Hills Management - 250,000 shares	4/21/14	X	X
1351	PPFG Stock Certificate #C17235 registered to Learned Associates of North America, LLC - 250,000 shares	4/21/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
1375	LANA Monthly Transaction List - June, 2007	3/10/14	X	X
1375A	July, 2007	3/10/14	X	X
1375B	August, 2007	3/10/14	X	X
1375C	September, 2007	3/10/14	X	X
1375D	October, 2007	3/10/14	X	X
1375E	November, 2007	3/10/14	X	X
1375F	December, 2007	3/10/14	X	X
1375G	January, 2008	3/10/14	X	X
1375H	February, 2008	3/10/14	X	X
1375I				
2XXX Series	Seven Hills Management			
2000 to 2099	Audio Recordings			
2000A	SPI session #5885 (text message)	1/15/14	X	X
2001	SPI session #5887	1/15/14	X	X
2001A	Transcript	1/15/14	X	X
2002	SPI session #5889	1/15/14	X	X
2002A	Transcript	1/15/14	X	X
2003	SPI session #475	2/27/14	X	X
2003A	Transcript	2/27/14	X	X
2004	SPI session #3158	2/27/14	X	X
2004A	Transcript	2/27/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
2005	SF1 session #3858	2/27/14	X	X
2005A	Transcript	2/27/14	X	X
2100 to 2199	Documents			
2100	Seven Hills/William Maxwell consulting agreement - 5/1/07 [G0118500-504]	2/27/14	X	X
2101	Seven Hills/William Maxwell consulting agreement - 6/15/07 [G0118505-511]	1/14/14	X	X
2102	Seven Hills/LANA consulting agreement [G0013036-041]	3/26/14 by Gross	X	X
2103	Seven Hills/Rutgers Operating Agreement [G0112900-923]	3/5/14 by Farrell	X	X
2104	Seven Hills/Globelink Operating Agreement [G0033672-692]	4/23/14	X	X
2106	Organizational documents [G0005668-682]	2/26/14	X	X
2106A	Letter 8/3/06 from GM to SP with Certificate of Organization [G0012104-107]	2/26/14	X	X
2106B	Engagement letter 5/10/07 from Buzzek to SP re: audit services	4/2/14	X	X
2107	Elzen, Fireburg & McCarty Invoices			
2107C	To Seven Hills 5/21/07 [G0074784]	2/27/14	X	X
2107D	To Seven Hills 6/28/07 [G0074766-767]	2/27/14	X	X
2107F	Letter 7/24/07 to Seven Hills summarizing invoices due through 6/30/07	4/21/14	X	X
2107G	Letter 7/25/07 to Seven Hills summarizing invoices due through 6/30/07	2/27/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
2107M	Letter 8/17/07 to Seven Hills summarizing invoices due through 7/31/07	2/27/14	X	X
2107N	To Seven Hills 8/17/07	4/21/14	X	X
2107Y	To WM c/o Seven Hills 9/17/07 with handwritten notes re: Payment [G0183707-708]	4/21/14	X	X
2108	Miscellaneous Documents			
2112G	Coconut Grove Trust	2/26/14	X	X
2280 to 2299	Emails			
2200	8/16/06 from Mary Malcolm to SP RD GM & NS re: Operating Agreement	2/26/14	X	X
2200A	Attachment - Letter from GM	2/26/14	X	X
2200B	Attachment - LMDS trust operating Agreement	2/26/14	X	X
2200C	Attachment - Seven Hills Operating Agreement	2/26/14	X	X
2201	6/29/07 from CL to Mary Malcolm re: "Std and Seven Hills"	2/27/14	X	X
2201A	Attachment - Seven Hills/WM draft Consulting Agreement 5/1/07	2/27/14	X	X
2201B	Attachment - Seven Hills/WM Consulting Agreement 6/15/07	2/27/14	X	X
2202	7/25/07 from SP to CL re Seven Hills/LANA Consulting Agreement	2/27/14	X	X
2207	9/8/07 from CL to Drossner & Drobnas re: 7Hills documents	4/2/14	X	X
2207A	Attachment - Consulting Agreement LANA & 7 Hills	4/2/14	X	X
2207B	Attachment - Consulting Agreement 5/1/07	4/2/14	X	X
2207C	Attachment - Consulting Agreement 6/15/07	4/2/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
2208	5/2/08 from CL to Tom Shea, SP re: Corrected equity sheet	5/13/14	X	X
2208A	Attachment - Real and Personal Property Equity Sheet - 5/2/08	5/13/14	X	X
2309 to 2399	Financial Records			
2302	Seven Hills - Commerce Bank - Acct #7216 - statements and related items (obtained pursuant to subpoena except where otherwise indicated)			
2302E	June 2007	1/14/14	X	X
2302F	July 2007	1/14/14	X	X
2302G	August 2007	1/14/14	X	X
2302H	September 2007	1/14/14	X	X
2302H-1	8/31/07 check to Jeff Bianchi - \$7,400.00	5/1/14	X	X
2302I	October 2007	1/14/14	X	X
2302J	November 2007	1/14/14	X	X
2302K	December 2007	1/14/14	X	X
2302L	January 2008	1/14/14	X	X
2302M	February 2008	1/14/14	X	X
2302N	March 2008	1/14/14	X	X
2302O	April 2008	1/14/14	X	X
2302P	May 2008	4/17/14	X	X
2303	Seven Hills Management Expense Reports			
2303A	8/1/07 through 8/27/07	2/23/14	X	X
2303B	9/1/07 through 9/30/07	2/27/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
2303B-1	LANA Expense Report	2/27/14	X	X
2303C	9/5/07 through X	2/27/14	X	X
2305	Seven Hills Management Monthly Transaction List			
2305A	June, 2007	3/10/14	X	X
2305B	July, 2007	3/10/14	X	X
2305C	August, 2007	3/10/14	X	X
2305D	September, 2007	3/10/14	X	X
2305E	October, 2007	3/10/14	X	X
2305F	November, 2007	3/10/14	X	X
2305G	December, 2007	3/10/14	X	X
2305H	January, 2008	3/10/14	X	X
2305I	February, 2008	3/10/14	X	X
2305J	March, 2008	3/10/14	X	X
2305K	April, 2008	3/10/14	X	X
300X Series	FirePlus Financial Group, Inc.			
3000 to 3099	Audio Recordings			
3000	BOP 6/7/07 session #1749	1/13/14	X	X
3000A	Transcript	1/13/14	X	X
3001	BOP 6/8/07 session #1018	1/13/14	X	X
3001A	Transcript	1/13/14	X	X

X  
X  
X  
X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
X	3002 BOP 6/11/07 session #1209	1/13/14	X	X
X	3002A Transcript	1/13/14	X	X
X	3003 BOP 6/12/07 session #1742	1/13/14	X	X
X	3003A Transcript	1/13/14	X	X
X	3004 BOP 6/14/07 session #1726	1/13/14	X	X
X	3004A Transcript	1/13/14	X	X
X	3005 BOP 6/17/07 session #1136	1/13/14	X	X
X	3005A Transcript	1/13/14	X	X
X	3006 BOP 6/21/07 session #1838	1/13/14	X	X
X	3006A Transcript	1/13/14	X	X
X	3007 BOP 6/28/07 session #1011	1/13/14	X	X
X	3007A Transcript	1/13/14	X	X
X	3008 SP1 session #3664	1/15/14	X	X
X	3008A Transcript	1/15/14	X	X
X	3009 SP1 session #4818	1/15/14	X	X
X	3009A Transcript	1/15/14	X	X
X	3010 SP1 session #5878	1/15/14	X	X
X	3010A Transcript	1/15/14	X	X
X	3011 SP1 session #6714	1/15/14	X	X
X	3011A Transcript	1/15/14	X	X
X	3012 SP1 session #7809	1/15/14	X	X
X	3012A Transcript	1/15/14	X	X
X	3013 SP1 session #7819	1/15/14	X	X
X	3013A Transcript	1/15/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
X	3014 SP1 session #7820	1/15/14	X	X
X	3014A Transcript	1/15/14	X	X
X	3015 SP1 session #7822	1/15/14	X	X
X	3015A Transcript	1/15/14	X	X
X	3016 SP1 session #7833	1/15/14	X	X
X	3016A Transcript	1/15/14	X	X
X	3017 SP1 session #7834	1/15/14	X	X
X	3017A Transcript	1/15/14	X	X
X	3018 SP1 session #7929	1/15/14	X	X
X	3018A Transcript	1/15/14	X	X
X	3019 SP1 session #8005	1/16/14	X	X
X	3019A Transcript	1/16/14	X	X
X	3020 SP1 session #8337	1/16/14	X	X
X	3020A Transcript	1/16/14	X	X
X	3021 SP1 session #9492	1/16/14	X	X
X	3021A Transcript	1/16/14	X	X
X	3022 SP1 session #9493	1/16/14	X	X
X	3022A Transcript	1/16/14	X	X
X	3023 SP1 session #9496	1/16/14	X	X
X	3023A Transcript	1/16/14	X	X
X	3024 SP1 session #9498	1/16/14	X	X
X	3024A Transcript	1/16/14	X	X
X	3025 SP1 session #9518	1/16/14	X	X
X	3025A Transcript	1/16/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
3026	SP1 session #9519	1/16/14	X	X
3026A	Transcript	1/16/14	X	X
3027	SP1 session #10027	1/16/14	X	X
3027A	Transcript	1/16/14	X	X
3028	SP1 session #10029	1/16/14	X	X
3028A	Transcript	1/16/14	X	X
3029	SP1 session #10113	1/16/14	X	X
3029A	Transcript	1/16/14	X	X
3030	SP1 session #10147	1/16/14	X	X
3030A	Transcript	1/16/14	X	X
3031	SP1 session #10195	1/16/14	X	X
3031A	Transcript	1/16/14	X	X
3032	SP1 session #8605	2/3/14	X	X
3032A	Transcript	1/29/14	X	X
3033	SP1 session #811	2/27/14	X	X
3033A	Transcript	2/27/14	X	X
3034	SP2 session #1023	2/27/14	X	X
3034A	Transcript	2/27/14	X	X
3035	SP1 session #7481	3/4/14	X	X
3035A	Transcript	3/4/14	X	X
3036	SP1 session #7483	3/4/14	X	X
3036A	Transcript	3/4/14	X	X
3037	SP1 session #7545	3/4/14	X	X
3037A	Transcript	3/4/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
3038	SP1 session #7562	3/4/14	X	X
3038A	Transcript	3/4/14	X	X
3039	SP1 session #7565	3/4/14	X	X
3039A	Transcript	3/4/14	X	X
3040	SP1 session #7603	3/4/14	X	X
3040A	Transcript	3/4/14	X	X
3041	SP1 session #7604	3/4/14	X	X
3041A	Transcript	3/4/14	X	X
3042	SP1 session #7628	3/4/14	X	X
3042A	Transcript	3/4/14	X	X
3043	SP1 session #16718	3/4/14	X	X
3043A	Transcript	3/4/14	X	X
3044	SP1 session #16941	3/4/14	X	X
3044A	Transcript	3/4/14	X	X
3045	SP1 session #15848	3/11/14	X	X
3045A	Transcript	3/11/14	X	X
3046	SP1 session #16335	3/11/14	X	X
3046A	Transcript	3/11/14	X	X
3047	SP1 session #9226	3/11/14	X	X
3047A	Transcript	3/11/14	X	X
3048	SP1 session #11562	3/12/14	X	X
3048A	Transcript	3/12/14	X	X
3049	SP1 session #11505	3/18/14	X	X
3049A	Transcript	3/18/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
3050	SP1 session #11010	3/19/14	X	X
3050A	Transcript	3/19/14	X	X
3051	SP1 session #12248	4/2/14	X	X
3051A	Transcript	4/2/14	X	X
3052	SP2 session #11494	4/2/14	X	X
3052A	Transcript	4/2/14	X	X
3053	SP2 session #11289	4/8/14	X	X
3053A	Transcript	4/8/14	X	X
3054	SP2 session #12122	4/8/14	X	X
3054A	Transcript	4/8/14	X	X
3055	SP2 session #860	4/8/14	X	X
3055A	Transcript	4/8/14	X	X
3056A	SP2 session #840, 841, 842, 844, 848, 849, 850, 857, 859, 862	4/8/14	X	X
3057	SP2 session #1101	4/8/14	X	X
3057A	Transcript	4/8/14	X	X
3058	SP2 session #1646	4/8/14	X	X
3058A	Transcript	4/8/14	X	X
3059	SP2 session #1971	4/8/14	X	X
3059A	Transcript	4/8/14	X	X
3060	SP2 session #3759	4/8/14	X	X
3060A	Transcript	4/8/14	X	X
3061	SP2 session #6061	4/9/14	X	X
3061A	Transcript	4/9/14	X	X
3062	SP2 session #11042	4/9/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
3062A	Transcript	4/9/14	X	X
3063	SP2 session #11044	4/9/14	X	X
3063A	Transcript	4/9/14	X	X
3064	SP2 session #11735	4/9/14	X	X
3064A	Transcript	4/9/14	X	X
3065	SP2 session #12000	4/9/14	X	X
3065A	Transcript	4/9/14	X	X
3066	SP2 session #12768	4/9/14	X	X
3066A	Transcript	4/9/14	X	X
3067	SP2 session #14600	4/9/14	X	X
3067A	Transcript	4/9/14	X	X
3068	SP2 session #17136	4/9/14	X	X
3068A	Transcript	4/9/14	X	X
3069	SP1 session #4841	4/9/14	X	X
3069A	Transcript	4/9/14	X	X
3070	SP2 session #802	4/9/14	X	X
3070A	Transcript	4/9/14	X	X
3071	SP1 session #3375	4/9/14	X	X
3071A	Transcript	4/9/14	X	X
3072	SP1 session #1994	4/28/14	X	X
3072A	Transcript	4/28/14	X	X
3100 to 3199	Documents			

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
4000 to 4099	Audio Recordings			
4000	SPI session #3977	2/3/14	X	X
4000A	Transcript	1/29/14	X	X
4001	SPI session #4468	2/3/14	X	X
4001A	Transcript	1/29/14	X	X
4002	SPI session #4475	2/3/14	X	X
4002A	Transcript	1/29/14	X	X
4003	SPI session #10595	2/3/14	X	X
4003A	Transcript	1/29/14	X	X
4004	SPI session #2914	2/27/14	X	X
4004A	Transcript	2/27/14	X	X
4005	SPI session #2978	2/27/14	X	X
4005A	Transcript	2/27/14	X	X
4006	SPI session #3575	2/27/14	X	X
4006A	Transcript	2/27/14	X	X
4100 to 4199	Documents			
4100	Ruigers/LANA/Seven Hills Asset Purchase Agreement [0461-0522]	1/14/14	X	X
4101	First Amendment to Operating Agreement [G0112941-947]	2/26/14	X	X
4104	Limited Business Scope Evaluation [G0183965-4062]	2/3/14	X	X
4107	Letter 5/15/07 from Peter Fox to PFFG re: sale of Ruigers [G0177701-807]	2/3/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
4110	Memo 6/19/07 from DA to GM and Peter Fridirici re: Ruigers Investment Group, cc to JM, WH, WM and Dave Roberts [G0125150]	6/3/14	X	X
4110A	Memo 6/19/07 attachment -- Draft Ruigers Asset Purchase Agreement [G0125151-176]	3/11/14	X	X
4125	Ruigers Investment Group contact list	3/27/14	X	X
4126	Ruigers Asset Purchase Agreement with initials	4/2/14	X	X
4127	10/26/07 letter from Globalnet Enterprises to BNY Mellon Shareowner Services re: Transfer of 1,100,000 shares of common stock	4/21/14	X	X
4128	10/26/07 letter from Globalnet Enterprises to BNY Mellon Shareowner Services re: Transfer of 500,000 shares of common stock	4/21/14	X	X
4139	Elzen, Flinsburg & McCarthy Invoices			
4130B	EFM invoice 8/17/07 (Ruigers sale to PFFG)	4/21/14	X	X
4130E	EFM invoice 12/12/07 (Ruigers-acquisition of Dream House)	4/21/14	X	X
4200 to 4299	Emails			
4200	6/12/07 from Mary Malcolm to JP, Peter Fox, SP, GM, and Peter Fridirici re: Ruigers purchase agreement	4/21/14	X	X
4200A	Attachment - Cover letter by Peter Fridirici	4/21/14	X	X
4200B	Attachment - Cover letter by GM	4/21/14	X	X
4200C	Attachment - Assoc Purchase Agreement	4/21/14	X	X
4201	6/20/07 from DA to GM, SP, WH, WM, JM and others re: Ruigers purchase agreement	2/10/14 by Huff	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
4204	7/19/07 from DA to RM, WM, WH, David Roberts and SP re: Rutgers open items	6/3/14	X	X
4209	6/28/07 from CL to Ken Stein re: Rutgers pro-formas	3/11/14	X	X
4210	4/30/08 from Matt Dubler to Ken Schulz, SP re: Rutgers - fidelity board	4/28/14	X	X
4210A	Attachment - Combined Narrative Business Plan	4/28/14	X	X
4380 to 4399	Bank Statements, Financial Records & Related Items			
4307	Rutgers (Operating Act) - Commerce Bank - Act #6087 - statements and related items (obtained pursuant to subpoena)			
4307H	June 2007	1/4/14	X	X
4307L	July 2007	4/17/14	X	X
4307M	August 2007	4/17/14	X	X
4307N	September 2007	4/17/14	X	X
4307O	October 2007	4/17/14	X	X
5XXX Series	Globalnet Enterprises			
5000 to 5099	Audiot Recordings			
5000	SP2 session #11130	5/1/14	X	X
5000A	Transcript	5/1/14	X	X
5100 to 5199	Documents			

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
5100	Agreement for Purchase and Sale of Membership Interests [G0209941-995]	3/13/14 by Gross	X	X
5101	Fixed Valuation Report dated 6/20/07 prepared by Kensington Company [G0209941-995]	3/13/14 by Gross	X	X
5102	Limited Business Scope Evaluation [G0226693-781]	2/3/14	X	X
5105	Globalnet binder [0693-1479]	1/14/14	X	X
5105A	Globalnet chart contained within #5105	1/14/14	X	X
5106	NS Contact information for Ken Stein	3/11/14	X	X
5107	NS appointment 9/13/06 Ken Stein	3/11/14	X	X
5108	Letter 10/25/06 from Harold Kestenbaum re: franchising the Globalnet program [0001-0004]	3/12/14	X	X
5113	Globalnet/Atl Atlantic purchase documents [G0149480-555]	3/5/14 by Farrell	X	X
5118	SEC filed copy of FPPG Promissory Note for \$1,495,000 re purchase of Globalnet [G0108624-630]	3/6/14 by Farrell	X	X
5122	Globalnet Asset Purchase Agreement with Anthony Butzack's initials	4/2/14	X	X
5130	Miscellaneous Documents			
5131	9/29/06 letter from John Phillips to GM & SP re: Mid-Atlantic Fire Restoration	4/30/14	X	X
5132	10/3/06 letter from John Phillips to SP re: General Network Enterprises	4/30/14	X	X
5133	12/2/06 Memo to file from Brian Furman re: GNETXX-1	4/30/14	X	X
5135	5/1/07 letter from Brian Furman to SP re: Outstanding Accounts	4/30/14	X	X
5137	6/12/07 letter from John Phillips re: Instruction on Pay Out of Outstanding Accounts	4/30/14	X	X



EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
5303	Globalnet Facility Services/FirstPlus Facility Services (Operating Acct) - Bank of America - Acct #6061 - statements and related items (obtained pursuant to subpoena)			
5303K	May 2008	4/23/14	X	X
5303L	June 2008	4/23/14	X	X
5303M	July 2008	4/23/14	X	X
5303N	August 2008	4/23/14	X	X
5303O	September 2008	4/23/14	X	X
5307	Miscellaneous Documents			
5307B	Account Transfer Request - 6/21/07, \$514,104 from Globalnet (5174); \$50,000 to Seven Hills (7216) and \$50,000 to LANA (3017) [50075346]	1/14/14	X	X
5308	Counter debit to FC Kerbeck Son for purchase of Bentley in the amount of \$216,963.80	4/9/14	X	X
6XXX Series	FS Charters			
6000 to 6099	Audio Recordings			
6000	SP1 session #6180	2/27/14	X	X
6000A	Transcript	2/27/14	X	X
6001	SP1 session #6189	2/27/14	X	X
6001A	Transcript	2/27/14	X	X
6002	SP1 session #6370	2/27/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
6002A	Transcript	2/27/14	X	X
6003	SP1 session #8051	3/4/14	X	X
6003A	Transcript	3/4/14	X	X
6004	SP1 session #8107	3/4/14	X	X
6004A	Transcript	3/4/14	X	X
6005	SP1 session #9310	3/4/14	X	X
6005A	Transcript	3/4/14	X	X
6006	SP1 session #11125	3/4/14	X	X
6006A	Transcript	3/4/14	X	X
6007	SP1 session #14396	3/4/14	X	X
6007A	Transcript	3/4/14	X	X
6008	SP1 session #15122	3/4/14	X	X
6008A	Transcript	3/4/14	X	X
6009	SP1 session #11949	3/4/14	X	X
6009A	Transcript	3/4/14	X	X
6010	SP1 session #11952	3/4/14	X	X
6010A	Transcript	3/4/14	X	X
6011	SP1 session #17400	3/4/14	X	X
6011A	Transcript	3/4/14	X	X
6012	SP2 session #10402	4/8/14	X	X
6012A	Transcript	4/8/14	X	X
6013	SP2 session #10674	4/8/14	X	X
6013A	Transcript	4/8/14	X	X
6014	SP2 session #16114	4/8/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
6014A	Transcript	4/8/14	X	X
6100 to 6199	Documents			
6100	Operating Agreement - PS Charters [G0143774-797]	2/27/14	X	X
6106	Letter 10/5/07 from GM to Sea-America Yacht Sales re: corrections to Purchase Agreement [G0217948-956]	2/27/14	X	X
6109	Settlement Statement [G0143760]	2/27/14	X	X
6110	Folder marked "Boat Agreement PS Charters File Folder" [G0143812]	2/27/14	X	X
6110A	Letter 10/12/07 from GM to CL re: attached Yacht Purchase and Sale Agreement [G0143813-819]	2/27/14	X	X
6115	Letter 12/1/07 from JP to CL re: WM trip to Bahamas on Pricelless [G0116119-136]	2/27/14	X	X
6116	PS Charters brochure [G0234452-455]	2/27/14	X	X
6200 to 6299	Emails			
6203	10/12/07 from CL to Aida Torrealba re: Pricelless loan application	2/27/14	X	X
6203A	Attachment -	2/27/14	X	X
6205	11/16/07 from CL to SP re: Outstanding items for Pricelless	3/4/14	X	X
6206	10/5/07 from Ken Schultz to NS, GM re: Link to specs and info for yacht in florida	4/28/14	X	X
6300 to 6399	Financial Records			

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
6300	P.S. Charters - BOA - Acct #1383 - statements and related items (obtained pursuant to subpoena)			
6300A	August 2007	4/17/14	X	X
6300B	September 2007	4/17/14	X	X
6300C	October 2007	4/17/14	X	X
6300D	November 2007	3/4/14	X	X
6300E	December 2007	4/17/14	X	X
6300F	January 2008	4/17/14	X	X
6300G	February 2008	4/17/14	X	X
6400 to 6499	Photographs/Video Recordings			
6400	Photo of Pricelless	2/27/14	X	X
6401	Photo of Pricelless, top view	2/27/14	X	X
6402	Photo of Pricelless, aft section	2/27/14	X	X
6403	Photo of Pricelless, grill in aft section	2/27/14	X	X
6404	Photo of handguns located on Pricelless	2/27/14	X	X
6405	Photo of compartment under couch	4/2/14	X	X
6406	Photo of storage cabinet containing ammunition	4/2/14	X	X
6407	Photo of ammunition found in storage cabinet	4/2/14	X	X
6408	Photo of brown box of ammunition, 7.62 x 39mm	4/2/14	X	X
6409	Photo of ammunition, 7.62 x 39mm	4/2/14	X	X
6410	Photo of white box of ammunition, shells	4/2/14	X	X
6411	Photo of ammunition, shells	4/2/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
6412	Photo of bedroom in master suite	4/2/14	X	X
6413	Photo of storage cabinet in master suite	4/2/14	X	X
6414	Photo of rifle found in under bed compartment, master suite	4/2/14	X	X
6415	Photo of rifle found in under bed compartment, master suite	4/2/14	X	X
6416	Photo of rifle found in under bed compartment, master suite	4/2/14	X	X
6417	Photo of shotgun found in under bed compartment, master suite	4/2/14	X	X
6418	Photo of shotgun found in under bed compartment, master suite	4/2/14	X	X
6419	Photo of storage compartment, master suite	4/2/14	X	X
6420	Photo of rifle found in under bed compartment, master suite	4/2/14	X	X
6421	Photo of 3 rifles located within master suite	4/2/14	X	X
6422	Photo of magazines located within master suite	4/2/14	X	X
7XXX Series	Premier Group			
7000 to 7099	Audio Recordings			
7000	SP2 session #2363	3/1/14	X	X
7000A	Transcript	3/1/14	X	X
7001	SP2 session #1118	3/19/14	X	X
7001A	Transcript	3/19/14	X	X
7100 to 7199	Documents			
7100	Premier/LANA Consulting Agreement [G0000322-327]	3/5/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
7101	Executive Summary by GM re: Seven Hills in re: sale of Premier Group to FirstPlus Enterprises, Due diligence checklist, Agreement for Purchase and Sale [G0108650-780]	3/5/14	X	X
7102	Due diligence checklist regarding the acquisition of the Premier Group [G0108027-033]	2/18/14 by Farrell	X	X
7103	Agreement for Purchase and Sale of Membership Interests of Premier Group [G0024617-650]	3/5/14	X	X
7104	Independent evaluation of the Premier Group 1/31/08 [G0008216-304]	3/5/14	X	X
7109	Limited Business Scope Evaluation (draft for Premier) [G0226871-897]	3/11/14	X	X
7110	Limited Business Scope Evaluation (final for Premier) [G0149017-105]	3/6/14 by Farrell	X	X
7112	Premier Group 10/19/07 Report to WM [G0161280-283]	3/5/14	X	X
7114B	Enclosure -- Letter 1/23/08 from GM to Board of Directors of FP Enterprises & FPG re: sale of remaining interest in Premier [G0206250-253]	3/5/14	X	X
8XXX Series	Hardford Drive			
8000 to 8099	Audio Recordings			
8000	SP1 session #10180	3/5/14	X	X
8000A	Transcript	3/5/14	X	X
8001	SP2 session #752	3/5/14	X	X
8001A	Transcript	3/5/14	X	X
8002	SP2 session #794	3/5/14	X	X
8002A	Transcript	3/5/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
X	8003 SP2 session #790	4/9/14	X	X
X	8003A Transcript	4/9/14	X	X
X	8004 SP2 session #1222	4/9/14	X	X
X	8004A Transcript	4/9/14	X	X
X	8005 SP2 session #1860	4/9/14	X	X
X	8005A Transcript	4/9/14	X	X
X	8006 SP2 session #2910	4/9/14	X	X
X	8006A Transcript	4/9/14	X	X
X	8007 SP2 session #3034	4/9/14	X	X
X	8007A Transcript	4/9/14	X	X
X	8008 SP2 session #3148	4/9/14	X	X
X	8008A Transcript	4/9/14	X	X
X	8009 SP2 session #3149	4/9/14	X	X
X	8009A Transcript	4/9/14	X	X
X	8010A SP2 session #456 & 457	4/9/14	X	X
X	8011 SP2 session #5821	4/9/14	X	X
X	8011A Transcript	4/9/14	X	X
X	8012 SP2 session #922	4/9/14	X	X
X	8012A Transcript	4/9/14	X	X
X	8013 SP2 session #1051	4/9/14	X	X
X	8013A Transcript	4/9/14	X	X
X	8014 SP2 session #1119	4/9/14	X	X
X	8014A Transcript	4/9/14	X	X
X	8015 SP2 session #6948	4/9/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
X	8015A Transcript	4/9/14	X	X
X	8016 SP2 session #6964	4/9/14	X	X
X	8016A Transcript	4/9/14	X	X
X	8017 SP2 session #6984	4/9/14	X	X
X	8017A Transcript	4/9/14	X	X
X	8018 SP2 session #7278	4/9/14	X	X
X	8018A Transcript	4/9/14	X	X
X	8019 SP2 session #7606	4/9/14	X	X
X	8019A Transcript	4/9/14	X	X
X	8020 SP2 session #8125	4/9/14	X	X
X	8020A Transcript	4/9/14	X	X
X	8021 SP2 session #8412	4/9/14	X	X
X	8021A Transcript	4/9/14	X	X
X	8022 SP2 session #10003	4/9/14	X	X
X	8022A Transcript	4/9/14	X	X
X	8023 SP2 session #10264	4/9/14	X	X
X	8023A Transcript	4/9/14	X	X
X	8024 SP2 session #11712	4/9/14	X	X
X	8024A Transcript	4/9/14	X	X
X	8025 SP2 session #1419	4/21/14	X	X
X	8025A Transcript	4/21/14	X	X
X	8026 SP2 session #1504	4/21/14	X	X
X	8026A Transcript	4/21/14	X	X
X	8027 SP2 session #1872	4/22/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
8200 to 8299	E-mails			
8201	2/3/08 from CL to HD with cc to SP, attaching LMS's 2007 W2s for Labor Rental Company	4/9/14	X	X
8201A	Attachment - LMS 2007 W2s	4/9/14	X	X
8202	2/4/08 from CL to SP forwarding HD's reply - he finished the returns and where should he send them	4/9/14	X	X
8203	2/5/08 from HD to SP enclosing LMS's tax returns for SP's review	4/9/14	X	X
8203A	Attachment - 2006 tax returns for LMS	4/9/14	X	X
8203B	Attachment - 2007 tax returns for LMS	4/9/14	X	X
8204	2/3/10 from Janet Gold to Melissa Dick re: Lisa Scarfo nec Murray - 9 Hartford Drive	4/16/14	X	X
8206	3/21/08 from NS to Bill Bianco, SP re: Please Read	4/24/14	X	X
8207	3/22/08 from NS to Deborah Corso & Bill Bianco re: It's A Boy!!	4/24/14	X	X
8210	4/14/08 from Lisa Murray to Bill Bianco & NS re: Closet design	4/24/14	X	X
8211	3/17/08 from Bill Bianco to NS re: Please Read - Hartford Drive	4/24/14	X	X
8212	1/28/08 from CL to Thomas Shea re: Murray Trust	5/13/14	X	X
8300 to 8399	Financial Records			
8300	Donald F Manno (Atty Trust Acct) - BOA - Acct #7790 - statements and related items (obtained pursuant to subpoena)			

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
8300H	January 2008	4/9/14	X	X
8300I	February 2008	4/9/14	X	X
8301	BOA check from LMDS 2006 Trust-Real Estate Acct (1435) to DM \$5,000 re: loan for deposit on 9 Hartford [G0145009]	4/9/14	X	X
8302	BOA check from LMDS 2006 Trust-Real Estate Acct (1435) to DM \$70,000 re: loan for 2 <sup>nd</sup> deposit on 9 Hartford [G0145010]	4/9/14	X	X
8312	Check from Ansley Investment Group/Coconut Grove Apartment Account payable to St. Edmunds Federal Savings Bank for \$4,646.00	4/16/14	X	X
8400 to 8499	Photographs/Video Recordings			
8400	9 Hartford Drive	2/26/14	X	X
8401	9 Hartford Drive, side view with vehicles	2/26/14	X	X
9XXX Series	Obstruction Money Laundering Firearms			
9000 to 9099	Audio Recordings			
9000A	SP1 session #1007 - 1009 (text messages)	1/14/14	X	X
9001	SP1 session #1010	1/14/14	X	X
9001A	Transcript	1/14/14	X	X
9002	SP1 session #1013	1/14/14	X	X
9002A	Transcript	1/14/14	X	X
9003	SP1 session #1095	1/14/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
9003A	Transcript	1/14/14	X	X
9004	SP1 session #1096	1/14/14	X	X
9004A	Transcript	1/14/14	X	X
9005	SP1 session #1104	1/14/14	X	X
9005A	Transcript	1/14/14	X	X
9006	SP1 session #3958	1/14/14	X	X
9006A	Transcript	1/14/14	X	X
9007	SP1 session #3976	1/14/14	X	X
9007A	Transcript	1/14/14	X	X
9008A	SP1 session #16289-16291 (text messages)	1/29/14	X	X
9009	SP1 session #18922	2/26/14	X	X
9009A	Transcript	2/26/14	X	X
9010	SP1 session #857	2/26/14	X	X
9010A	Transcript	2/26/14	X	X
9011	SP1 session #1187	2/26/14	X	X
9011A	Transcript	2/26/14	X	X
9012	SP1 session #1263	2/26/14	X	X
9012A	Transcript	2/26/14	X	X
9013	SP1 session #1293	2/26/14	X	X
9013A	Transcript	2/26/14	X	X
9014	SP1 session #1297	2/26/14	X	X
9014A	Transcript	2/26/14	X	X
9015	SP1 session #1301	2/26/14	X	X
9015A	Transcript	2/26/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
9016	SP1 session #1304	2/26/14	X	X
9016A	Transcript	2/26/14	X	X
9017	SP1 session #1337	2/26/14	X	X
9017A	Transcript	2/26/14	X	X
9018	SP1 session #1371	2/26/14	X	X
9018A	Transcript	2/26/14	X	X
9019	SP1 session #1378	2/26/14	X	X
9019A	Transcript	2/26/14	X	X
9020	SP1 session #8734	3/5/14	X	X
9020A	Transcript	3/5/14	X	X
9021	SP1 session #17530	4/8/14	X	X
9021A	Transcript	4/8/14	X	X
9022	SP1 session #17549	4/8/14	X	X
9022A	Transcript	4/8/14	X	X
9023	SP1 session #18091	4/8/14	X	X
9023A	Transcript	4/8/14	X	X
9024	SP1 session #18251	4/8/14	X	X
9024A	Transcript	4/8/14	X	X
9025A	SP1 session #18276 (text)	4/8/14	X	X
9026	SP2 session #12906	4/10/14	X	X
9026A	Transcript	4/10/14	X	X
9027	SP2 session #13028	4/10/14	X	X
9027A	Transcript	4/10/14	X	X
9028	SP2 session #13127	4/10/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
9028A	Transcript	4/10/14	X	X
9100 to 9199	Documents			
9100	2006 United States Probation Monthly Supervision Reports and related documents			
9100A	August, 2006	2/20/14	X	X
9100B	September, 2006	2/20/14	X	X
9100C	October, 2006	2/20/14	X	X
9100D	November, 2006	2/20/14	X	X
9100E	December, 2006	2/20/14	X	X
9101	2007 United States Probation Monthly Supervision Reports and related documents			
9101A	January, 2007	2/20/14	X	X
9101B	February, 2007	2/20/14	X	X
9101C	March, 2007	2/20/14	X	X
9101C-1	Fax 3/28/07 re: Business Trip Florida	2/20/14	X	X
9101C-2	Fax 3/28/07 from NS to Sharon O'Brien re: Business Trip Florida	1/29/14	X	X
9101D	April, 2007	2/20/14	X	X
9101E	May, 2007	2/20/14	X	X
9101F	June, 2007	2/20/14	X	X
9101G	July, 2007	2/20/14	X	X
9101H	August, 2007	2/20/14	X	X

EXHIBIT NUMBER	DESCRIPTION	DATE	ID	EVID.
9101I	September, 2007	2/20/14	X	X
9101J	October, 2007	2/20/14	X	X
9101K	November, 2007	2/20/14	X	X
9101K-1	Weekly Itinerary 11/5/07	2/20/14	X	X
9101K-2	Letter 11/5/07 from NS to O'Brien re: new job and new address	2/20/14	X	X
9101K-3	Fax 11/12/07 from WM to Sharon O'Brien re: employment offer to NS	1/23/14 By Greib	X	X
9101K-4	Letter 11/12/07 from NS to O'Brien re follow-up address & job change	1/28/14 by Manno	X	X
9101L	December, 2007	2/20/14	X	X
9101L-3	Letter 12/18/07 from DM to Sharon O'Brien re: enclosed Waiver of Hearing	1/28/14 by Manno	X	X
9101L-3a	Enclosed Waiver of Hearing to Modify Conditions of Probation/Supervised Release or Extend Term of Supervision	1/28/14 by Manno	X	X
9102	2008 United States Probation Monthly Supervision Reports and related documents			
9102A	January, 2008	2/20/14	X	X
9102B	February, 2008	2/20/14	X	X
9102C	March, 2008	2/20/14	X	X
9103	Miscellaneous correspondence and notes			
9103A	Filed Modification of Supervised Release - 3 months home confinement	1/28/14 by Manno	X	X

WILLIAM MAXWELL  
71944-279  
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BEAUMONT, TEXAS 77720

(71944-279)

RECEIVED

JAN 10 2025

CHIEF Disciplinary Counsel  
State Bar of Texas

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