

SUBJECT TO ATTORNEY/CLIENT PRIVILEGE

ATTORNEY REPRESENTATION ACTION PLAN

CLIENT: BRENNERMAN, Raheem Jefferson

Enclosed within this link: www.freeraheem.com/documents.html is a copy of the draft "MOTION FOR STAY OF ENFORCEMENT OF JUDGMENT OF CONVICTION AND SENTENCE" and "MOTION FOR STAY OF ENFORCEMENT OF JUDGMENT OF CONVICTION AND SENTENCE APPENDIX". The motion and appendix have also been provided to civil liberties organizations whom we desire as co-counsel or for amicus brief. One of the civil liberties organization has commenced review of the case; the website: WWW.FREERAHEEM.COM; and the Motion for Stay. Furthermore, although the draft motion copy currently states "Pro Se" it will be amended and filed through counsels.

The plan/strategy is to have an aggressive public relations campaign to highlight the egregious judicial misconduct and bias as well as prosecutorial misconduct with my wrongful prosecution and false imprisonment, we have already engaged media strategist and lobbyist. Concurrent with the media campaign and lobbying, counsel will immediately file:

(a.) An expedited Motion for Stay of enforcement of Judgment of Conviction and Sentence at the United States Court of Appeals for the Second Circuit; jointly with

(b.) Petition for Temporary Restraining Order ("TRO"), Preliminary Injunction, or Permanent Injunction at the U.S. District Court for the Middle District of Pennsylvania, based on the substantive issues highlighted in the Motion for Stay. (This Petition will need to be prepared by counsel based on the Motion for Stay).

Depending on the disposition by the United States Court of Appeals for the Second Circuit to the Motion for Stay enforcement of Judgment of Conviction and Sentence, we will immediately request for each of the Justice of the Supreme Court of the United States to review and grant the Motion for Stay.

The concurrent public outreach/media campaign and lobbying will pressure the Courts in rectifying the gross miscarriage of justice. The public outreach/media campaign will highlight the fact that two federal judges concocted these criminal charges against me (Raheem J. Brennerman),

elicited support from the Manhattan federal prosecutors then used the media to disseminate falsehood about him including about his name, nationality etc.. in order to cause reputational damage so as to falsely incarcerate me.

BACKGROUND + INFORMATION

Around February 2021, Motion (including evidence) for relief based on judicial misconduct and bias was presented to the U.S. District Court (S.D.N.Y.) on record at 1:17 CR. 337 (RJS), at doc. nos. 254, 256. The Court replied with a single word "Denied" without any further explanation. I immediately filed to appeal the denial and a consolidated appeal is now docketed at the Second Circuit U.S. Court of Appeals at appeal docket nos. 20-4164(L); 21-654(CON)

Prior to briefing the appeal at the Second Circuit U.S. Court of Appeals at appeal docket nos. 20-4164(L); 21-654(CON), the intention is to file an expedited "MOTION FOR STAY OF ENFORCEMENT OF JUDGMENT OF CONVICTION AND SENTENCE" at the above appeal so that I may be immediately released from federal custody. We will immediately appeal any adverse disposition by the Second Circuit to each Justice of the Supreme Court of the U.S.

Concurrent with filing the MOTION FOR STAY OF ENFORCEMENT OF JUDGMENT OF CONVICTION AND SENTENCE at the Second Circuit Court, we will also file PETITION FOR TEMPORARY RESTRAINING ORDER ("TRO"), or TEMPORARY INJUNCTION, or PERMANENT INJUNCTION at the United States District Court for the Middle District of Pennsylvania based on the substantive issues argued/highlighted in the Motion for Stay of enforcement of Judgment of Conviction and Sentence.

The TRO, Preliminary Injunction or Permanent Injunction (to be prepared by counsel based on Motion for Stay) will be filed against Merrick Garland, Attorney General of the United States of America; Michael Carvajal, Director of the Bureau of Prisons; and Warden Rachel Thompson, warden of Federal Correctional Institution Allenwood Low, in their official capacity.

Upon my release from federal custody we will deal with the BRIEF for the appeal at 20-4164(L); 21-654(CON) seeking to reverse and/or vacate and set-aside the judgment of conviction and sentence for the fraud case at U.S. District Court (S.D.N.Y.), 1:17 CR. 337 (RJS) based on judicial misconduct and bias in addition to prosecutorial misconduct. The BRIEF can parrot the Motion for Stay of enforcement of Judgment of Conviction and Sentence.

Additionally, we will file for "WRIT OF ERROR CORAM NOBIS" for the criminal contempt of court case at U.S. District Court (S.D.N.Y.), 1:17 CR. 155 (LAK) based on Constitutional rights violation, Brady violation, Judicial misconduct and bias and Ineffective assistance of Counsel. The WRIT OF ERROR CORAM NOBIS can parrot the arguments presented within the Petition for Writ of Certiorari + Appendix submitted at Supreme Court of the U.S. at docket no. 20-6895.

NEXT STEPS:

(UPON RELEASE FROM FEDERAL CUSTODY)

1.) APPEAL BRIEF FILING

Appeal at docket nos. 20-4164(L); 21-654(CON)

U.S. District Court case: 1:17 CR. 337 (RJS)

(Fraud case before Judge Richard J. Sullivan)

Following disposition on the Motion for stay of enforcement of Judgment of Conviction and Sentence, we will need to file the APPEAL BRIEF for relief to set-aside the judgment of conviction and sentence based on judicial and prosecutorial misconduct and bias. The APPEAL BRIEF can parrot the MOTION FOR STAY,

2.) PETITION FOR WRIT OF ERROR CORAM NOBIS

U.S. District Court case: 1:17 CR. 155 (LAK)

(Criminal contempt of court case before Judge Lewis A. Kaplan)

File "Writ of Error Coram Nobis" for relief to vacate and set-aside the Judgment of Conviction and Sentence based on Constitutional rights violation; Brady violation; Judicial misconduct and Bias; and Ineffective assistance of counsel.

Constitutional rights violation, Brady violation & Judicial misconduct and Bias:

Judge Lewis A. Kaplan ignored the law in "OSRecovery, Inc., v. One Groupe Int'l, Inc., 462 F.3d 87, 90 (2006)" where the Second Circuit U.S. Court of Appeals vacated the contempt order in that case while stating directly to Judge Kaplan that the Court abused its discretion by issuing a contempt order to a non-party for failing to respond to discovery requests propounded to him as a party without providing sufficient legal authority or explanation for treating him as a party solely for the purpose of discovery.

However, in 2016 Judge Kaplan ignored the law and deprived me (Raheem J. Brennerman) the equal protection of the law by issuing a contempt order against me, a non-party (see 1:15 CV. 0070 (LAK), at doc. nos. 139-140) in the civil case between ICBC (London) plc and The Blacksands Pacific Group, Inc., at civil case docket no. 1:15 CV. 0070 (LAK) without providing any sufficient legal authority or explanation for treating me (Brennerman) as a party solely for the purpose of discovery.

This time, Judge Kaplan when a step further referring me to the U.S. Attorney (S.D.N.Y.) and persuading them to prosecute me criminally (see 1:17 CR. 155 (LAK), at doc. no. 12).

During trial for the criminal contempt of court which arose from the civil contempt erroneously propounded against me by Judge Kaplan in violation of the "OSRecovery" law, Judge Kaplan permitted the prosecution to present the erroneously adjudged civil contempt order against me to the jury overruling defense objection (see 1:17 CR. 155 (LAK), at trial tr. 3-7). The jury were swayed by the erroneously adjudged civil contempt order and concluded that I was guilty of criminal contempt (see 1:17 CR. 337 (RJS), doc. no. 236, Exhibit 3).

Ineffective Assistance of Counsel:

Trial counsel, Thompson Hine LLP failed to obtain the pertinent ICBC files (underwriting files and negotiations between agents of Blacksands Pacific and agents of ICBC (London) plc) pursuant to Rule 17 of the Federal Rule of Criminal Procedure and/or 28 U.S.C.S. 1781 ("Letter Rogatory").

Furthermore, trial counsel, Thompson Hine LLP failed to highlight to District Court prior to and during trial that precedent law in "OSRecovery" from the Second Circuit Court prohibited Judge Kaplan from holding me, a non-party in civil contempt and thus necessitating the dismissal of the criminal contempt case which arose from the civil contempt erroneously propounded against a non-party in violation of the law.

* These issues are succinctly highlighted within the Petition for writ of certiorari at the Supreme Court of the United States at docket no. 20-6895. The Writ of Error Coram Nobis can parrot the Petition for Writ of Certiorari.

The delay in seeking this relief for Writ of Error Coram Nobis is due to the fact that I appealed the judgement of conviction and sentence to the Second Circuit U.S. Court of Appeals then sought review of their disposition from the Supreme Court of the United States.

In the event that U.S. District Court (S.D.N.Y.) denies the request for relief (Writ of Error Coram Nobis), we can immediately appeal to the Second Circuit U.S. Court of Appeals.

PERTINENT REFERENCE(S):

- a.) Draft Motion for Stay of enforcement of Judgment of Conviction and Sentence
- b.) Supreme Court Petition for writ of certiorari at docket no. 20-6638 (for the fraud case)
- c.) Supreme Court Petition for writ of certiorari at docket no. 20-6895 (for the contempt case)
- d.) U.S. District Court submission at 1:17 CR. 337 (RJS), at doc. nos. 254, 256
- e.) Website: WWW.FREERAHEEM.COM

GENERAL NOTE:

- 1.) The issues are highlighted at: WWW.FREERAHEEM.COM

--THE END--

LEGAL NOTICE:

This document was prepared by Raheem Jefferson Brennerman based on his first hand experience of the issues highlighted above. The document is confidential and privilege and should not be amended or disseminated without the expressed consent of Raheem Jefferson Brennerman.