

ATTORNEY REPRESENTATION

ACTION PLAN

CLIENT: BRENNERMAN, Raheem Jefferson

We enclose a draft copy of the "Motion for Stay of enforcement of Judgment of Conviction and Sentence + Appendix". The motion and appendix has also been submitted to civil liberties organizations including Equal Justice Initiative ("EJI") whom we want as co-counsel. They have already commenced review of the case; the website: WWW.FREERAHEEM.COM; and the Motion for Stay. Furthermore, although the draft motion copy states "Pro Se" it will be amend and filed through counsels jointly with the EJI.

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, in addition to our lobbying efforts. Concurrently counsel jointly with the civil liberties organization - EJI e.t.c. will file an expedited Motion for Stay of enforcement of Judgment of Conviction and Sentence so that I may be immediately released from federal custody pending the full briefing of the appeal. We can immediately ask the Supreme Court of the U.S. to review the Motion for Stay in the event that the Second Circuit Court should refuse to grant our motion.

The concurrent public outreach/media campaign and lobbying will pressure the Courts (Second Circuit Court and/or the Supreme Court) 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, elicited support from the Manhattan federal prosecutors then used the media to disseminate falsehood in order to cause reputational damage so as to falsely incarcerate me.

BACKGROUND + INFORMATION

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), doc. nos. 254, 256. The Court replied with a single word "Denied". I immediately filed to appeal the denial and a consolidated appeal is now docketed at the Second Circuit Court at appeal docket nos. 20-4164(L); 21-654 (CON).

Prior to briefing the appeal at the Second Circuit Court at 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 decision on the Motion for Stay to the Supreme Court of the U.S.

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 criminal 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 at Supreme Court of the U.S. at docket no. 20-6895.

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), doc. nos. 254, 256
- e.) Website: WWW.FREERAHEEM.COM

-THE END-

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ATTORNEY REPRESENTATION:

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The intention is to file an expedited "Motion for Stay of enforcement of Judgment of Conviction and Sentence" with the Second Circuit U.S. Court of Appeals. Grant of the motion will release me (Brennerman) from incarceration. In the event that the Second Circuit should reject the motion then we can immediately ask the Supreme Court of the United States to consider and grant the Motion.

We should also bring onboard a civil liberties organization such as "Equal Justice Initiative - EJI" or "Institute for Justice" as co-counsel for these filings.

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BACKGROUND:
(IMMINENT FILING)

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A motion (including evidence) for relief was presented to the U.S. District Court (S.D.N.Y.) on record at 1:17 Cr. 337 (RJS), doc. nos. 254, 256 where I sought relief from judicial misconduct and bias based on demonstrable evidence. The Court replied with a single word "Denied". 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)

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IMMINENT STEP:

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Appeal at docket nos: 20-4164(L); 21-654
U.S. District Court case: 1:17 Cr. 337 (RJS)
(Fraud Case before Judge Richard J. Sullivan)

EXPEDITED FILING:

1.) The expedited "Motion for Stay of enforcement of judgment of conviction and sentence" is based on judicial misconduct with demonstrable evidence of a federal judge misrepresenting, fabricating and distorting evidence so as to falsely satisfy the essential element necessary to convict and imprison me for bank fraud and bank fraud conspiracy. You can view the evidence amongst other issues at WWW.FREERAHEEM.COM

Prior to briefing the appeal at Second Circuit 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" first at the SECOND CIRCUIT U.S. COURT OF APPEALS. Any adverse decision on the "Motion for Stay" by the Second Circuit can immediately be appealed to the SUPREME COURT OF THE UNITED STATES.

The purpose of the Motion for Stay is to release me from incarceration pending the full briefing of the appeal at the appeal docket nos. 20-4164(L); 21-654(CON) at the Second Circuit U.S. Court of Appeals, arising from the denial of relief from judicial misconduct and bias at the U.S. District Court (S.D.N.Y.) at 1:17 Cr. 337 (RJS), at doc. nos. 254, 256

** A draft copy of the "Motion for Stay of enforcement of Judgment of Conviction and Sentence" with detailed background prepared for submission to the Second Circuit U.S. Court of Appeals will be sent to you for your review and to amend/update as necessary.

** The appeal BRIEF can parrot the Motion for Stay of enforcement of Judgment of Conviction and Sentence.

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NEXT STEP:

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1.) APPEAL 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 the disposition on the Motion for Stay of enforcement of Judgment and Conviction, we need to file the APPEAL BRIEF for relief to set-aside the judgment of conviction and sentence based on judicial misconduct and Bias. The APPEAL BRIEF can parrot the MOTION FOR STAY.

2.) MOTION/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 (2016)" where the Second Circuit U.S. Court of Appeals vacated the contempt order in that case while stating directly to him (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 (Brennerman) the equal protection of the law by issuing a contempt order against me, a non-party (see 1:15-cv-0070-LAK, doc. nos. 139-140 in the civil case between ICBC (London) plc and The Blacksands Pacific Group, Inc., at civil 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 went 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, doc. no. 12).

During trial for the criminal contempt of court (which arose from the civil contempt 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 persuaded 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 Blacksands Pacific and 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 "OSRecovery" from the Second Circuit Court prohibited Judge Kaplan from holding a non-party in civil contempt and thus necessitating 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 presented 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 judgment of conviction and sentence to the Second Circuit U.S. Court of Appeals then sought review of their disposition by the Supreme Court of the United States.

In the event that District Court denies the requested relief (writ of error Coram Nobis), we can immediately appeal to the Second Circuit U.S. Court of Appeals.

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GENERAL NOTE
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1.) We are engaging public relations/media strategist to bring public awareness to these highlighted judicial misconduct and bias, Constitutional rights violation etc.

2.) The issues are highlighted at our website: WWW.FREERAHEEM.COM

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