Veronica A. Williams P.O. Box 978 South Orange, NJ 07079 Email StopFraud@vawillian Phone 973-715-8580	ms.com	BE DOWNLOADED AT //Case-Docket F-00839-13 More-Evidence-of-Fraudulent-Mortgage 6-21-19.pdf DURT OF NEW JERSEY
Trustee for Fremon C, Mortgage-Backe 2006-C	National Association as t Home Loan Trust 2006- d Certificates, Series Plaintiff Williams, et als. ndant, Pro Se	IN THE SUPERIOR COURT OF NEW JERSEY ESSEX COUNTY CHANCERY DIVISION Case No. F – 000839-13 MORE EVIDENCE OF FRAUDULENT MORTGAGE EXECUTE INJUNCTON AGAINST SALE OF 541 SCOTLAND ROAD, SOUTH ORANGE, NJ, and DISMISS FORECLOSURE, and DISMISS MORTGAGE AGAINST 541 SCOTLAND ROAD, S. ORANGE, NJ
		RELATED CASES: U.S. Court of Appeals, Third District 19-1032 U.S. District Court of NJ Case 2:16-cv-05301-ES-JAD NJ Case Docket No. ESSX L – 004753-13 NJ Case Docket No. ESSX L – 000081-11

MORE EVIDENCE OF FRAUDULENT MORTGAGE

Expert Confirms Agreement is Forged

An analysis and review of the mortgage agreement filed by the Plaintiffs (NJ Case F-0000839-13) and by Defendants (US Court of Appeals Case 10-19032) **suggests that the mortgage agreement has been forged**. The report by Don Frangipani, a renowned forgery expert, is enclosed.

THE SCOPE OF THE FEDERAL CASE IS BEYOND THE JURISDICTION AND REACH OF THE

STATE OF NEW JERSEY. Additional investigations have been initiated that will corroborate other elements of fraud and illegal acts in all cases surrounding the fraud against Williams.

With patience, I pray the Court dismisses this miscarriage of justice.

Respectfully submitted,

Veronica A. Williams Pro Se Counsel /s/ Veronica A. Williams Veronica A. Williams StopFraud@vawilliams.com (202) 486-4565

June 21, 2019

DONALD FRANGIPANI Examiner of Questioned Documents

7119 13th Avenue ~ Brooklyn, N.Y. 11228 Phone (718) 232-3209 ~ E-Mail: Dfrangipani@aol.com

June 15, 2019

Veronica Ann Williams 541 Scotland Road South Orange, New Jersey 07079-0978

Report of Forensic Signature Examination

Purpose of Examination

To determine whether or not Veronica Ann Williams wrote the questioned signatures and initials, and if the documents were manipulated.

Questioned Document

Q-1 Photoreproduction of Mortgage/Adjustable Rate Note, dated: March 27- BREA, CA. 92821. 541 Scotland Road, South Orange, N.J. 07029 (Exhibit A). This document consists of twenty-six (26) pages. Each page bearing the questioned initials of Veronica Ann Williams and the questioned signature on page four (4).

Comparison Signatures

The following bearing the known/genuine signatures of Veronica Ann Williams were utilized for comparison:

- K-1 A request submitted to the FBI and South Orange Police, dated: March 20, 2019.
- K-2 Copy of signature on a debit card, with two (2) full signatures and two (2) initials.
- K-3 Copy of a first page letter to IRS, dated: December 29, 2004.
- K-4. Copy of a first page of a letter to ACT Inc. Request For Bank Credit. Page 2 of 2 (undated).
- K-5 United States of America passport no. 471277272.

- K-6 New Jersey Motor Vehicle Commission/Application For Vehicle License Plate /And or Placard For Persons With a Disability, dated: 4-23-14.
- K-7 Copy of a filing to the US District Court of N.J. with original signature, dated: June 11, 2017.
- K-8 Copy of a filing to the US Court of Appeals with original signature, dated: May 22 2019.

Examination

Initial examination was based on side-by-side comparison of the questioned and known signatures, along with a microscopic examination or similarities between known and questioned writing.

The objective of this examination was to establish whether there are dissimilarities and/In addition, the writings are examined in detail regarding the line quality, rhythm, letter construction, size, speed, base-line, stroke structure, I-dots, t-bars and variation. Based on all of the aforementioned information obtained, a determination is made as to whether a reasonable conclusion can be drawn.

Findings

A review of all of the pages of the submitted Mortgage was limited to photoreproductions. In order to determine evidence of manipulation/superimposition, cut/paste, study of type font, spacing and signature examination it is imperative to forensically examine the original document(s).

Remarks

This examiner adheres to the reporting standards of the American Society of Testing and Materials (ASTM). All opinions are within a reasonable degree of professional certainty.

This report is respectfully submitted by,

Forensic Document Examiner

Attached hereto and incorporated herein are the following:

- Letter of opinion.
- Copy of questioned document(s)
- Copies of known signatures
- My curriculum vitae

The Attorney-Investigator's Role

into a number of small squares or dots of various sizes and shapes.³² Instead of the writing stroke being a continuous line, it is actually discontinuous, made up of a series of small dots. The effect to the eye is a line of varying intensity and shading, but with the use of a lowpower magnifier, the actual makeup becomes apparent even when a fine screen is used. This curtailment on the use of magnification is a serious limiting factor in document examination.

One of the more common problems in which published copies serve as standards involves the proof of writing of famous persons long since dead. Often this writing comes from an old book containing reproductions of letters or signatures. These older facsimiles are inferior to modern cuts since prior to about 1900 they were made by hand rather than by modern photographic methods. Thus, despite skillful workmanship, these reproductions were less accurate than modern photomechanically made illustrations.

Analysis of Photocopics

The document examiner can make certain examinations of good quality photocopies. In virtually all instances the somewhat defective methods common during the 1950s have been discarded. These methods, Verifax, diffusion transfer, and Thermo-Fax, limited the document examiners work significantly and more so than the better-quality present-day copies or good Photostats. Current photocopying techniques do not record the same degree of detail as properly made photographs, but the examiner can often reach a reasonably accurate conclusion from them.

Not all questions can be answered from a reproduction. However, general handwriting can often be tentatively and sometimes he positively identified. This condition also holds for signatures. These examinations many times lead to conclusions that are consistent with those reached after a review of the original documents, which should reveal greater detail. Photocopies of skillful forgeries can hide subtle defects, although in all probability some suspicious details will be inferred or recognized after careful study. A properly made photocopy of an average or poor-quality forged signature certainly contains typical flaws. Typewriting identifications can be undertaken, but as has been pointed out, if the reproduction is not exactly to scale, they may be significantly restricted when alignment factors are controlling. There

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Reproduction of Documents

are problems in which initially only photocopies can be submitted. A document examiner consequently may need to express a tentative opinion from them despite the fact that he would prefer to make his study from the original documents.

The problems discussed are those most likely to be answered from photocopies. Others cannot. An actual crasure may not be recognized in some photocopies since certain types of flaws such as disturbed paper background are obscured. Differentiation between inks and writing instruments and determination of the sequence of strokes require examination of the original document. Of course proper paper examinations cannot be made, and there are other questions requiring the study of the original documents to reach any opinion.

Only the best photocopies, carefully made directly from the original document, allow accurate preliminary opinions. The second-generation photocopy, that is, a photocopy of a previous copy, can be very restrictive. Each subsequent recopying leads to a less valuable reprorestrictive. Each subsequent recopying leads to a less valuable reproduction. One should inspect a copy to be submitted to a document duction. One should inspect a copy to be submitted to a document examiner for study to assure that fine details are recorded. Those which examiner for study to assure that fine details are recorded. Those which on the copy by any techniques available to the examiner. The only way to retrieve these lost details is to recopy the original document more carefully.

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Should experts work from photocopies? It is debatable. Some workers should experts work from photocopies? It is debatable. Some workers refuse to examine all copies, but the practical examiner recognizes that it is necessary to rely on copies at times. There are problems in which the original can no longer be found. Certain questions still require some answers. He must reserve the right, of course, to inspect the some answers. He must reserve the right, of course, to inspect the need to quality his findings if after a study of the reproductions he should find key elements less clear that they originally appeared. The should find key elements less clear that they originally appeared. The should find key elements less clear that they originally appeared. The should find key elements less clear that the original can necessarily be questioned document examined from the original can necessarily be answered without qualification; qualified answers from somewhat restrictive photocopies must also be expected.

Fraudulent Photocopies

With the widespread use of photocopies, one can expect an occasional copy to have been manipulated in some way or other. Fraudulent photocopies are relatively rare, but they may be encountered in both criminal-and civil problems. Their exposure combines thorough field investigation and careful study by the document examinet.

When there is any question concerning a photocopy, the obvious step is to compare it with the original material. However, circumstanstep is to compare that the document is not readily available or that it ces may dictate that the document is not readily available or that it

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⁴⁷The screen is a transparent plate cross ruled with a series of fine opaque large. Not all acreents have the same number of lines per inch. A finer ruled screen, i.e., one with a greater number of lines per inch, has the advantage of increasing the detail in the lineshed printing. The type of paper used per inch, this the intended use of the cut, and the cost are contributing factors in the selections of the screen size.

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The Requirements and the Results

that can be supported by the more limited material, and, subsequently, the results that are supported by the standards as a whole.

45. What Results can be Expected from Handwriting Examinations?

Insofar as handwriting examinations are concerned, the results of an examination are dependent upon the amount and significance of the evidence that the study discloses. This may be hampered by restriction to photocopies or inadequate standards. It may also be that the questioned writing is too brief to contain a sufficient combination of writing habits to support a conclusion, as is frequently the case with initials or numerals. Given the appropriate material in both nature and amount, definite conclusions are normally achievable. Unfortunately, such circumstances are not always encountered.

Photocopies, etc.

When dealing with reproductions of questioned or disputed handwriting, such as photocopies or facsimile transmissions, care must be exercised in the manner of reporting results. When a handwriting examiner identifies a writing appearing in a photocopy, he or she is, in fact, identifying a writing that is not on the paper of the photocopy, but on another document that the examiner has not seen. Whether writing appearing in the reproduction is an actual inscription on the document on which it purports to reside, only an examination of the original document will determine. Learned examiners are aware of the ease with which photocopies can be falsified. Findings must be so worded, then, that they clearly indicate:

- 1. The identification is of a writing on a document of which the material at hand purports to be a trustworthy reproduction.
- The findings are subject to confirmation of their existence as original writings, upon examination of the original document.

Conclusions vs. Opinions

Some controversy has been noted in the views of examiners as to whether the results of their examinations should be expressed as conclusions or as matters of opinion. It may be that the legal need for a definition and classification of the kind of testimony that an expert gives, that might otherwise be considered inadmissible, has contributed to some confusion in nonlegal minds.

The Shorter Oxford English Dictionary defines opinion in the traditional legal sense as:

"The formal statement by an expert or professional person of what he (she) thinks, judges or advises upon a matter submitted to him (her)."

This then, is the name given to the kind of testimony that a professional might provide. It says nothing about the substance of that testimony or the basis on which that statement has been established. It suggests that it is deemed to be advice. Some examiners, in response to the challenge that their testimony is merely an opinion, have argued that they offer a considered opinion. Questioned Document Examination FAQs

Page 1

FAQs

Can you describe an individual's personality from examining handwriting?

A There is a separate field of study called "Graphology" which deals with personality and handwriting. Questioned Document Examination is a forensic science, concerned with identification of handwriting and technical aspects of document preparation. In some countries during some time periods, document examination and graphology have been studied together and parcticed by the same professionals. Today, in the United States, the two fields tend to be mutually exclusive.

Can right or left handedness be detected by examining handwriting?

A Contrary to popular belief, there are three things that can not be reliably ascertained by examining handwriting. One of those is the "handedness" of the writer. The other two things are the author's gender and age.

Can you compare printed writing to cursive writing?

A No. That is an "apples and oranges" situation. Although there are some writing traits that carry over between cursive and printing, you can not project from cursive how an individual's printing would look, and vice-versa.

Can you examine documents in a foreign language?

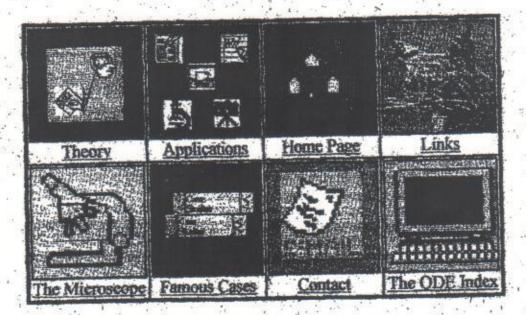
A Yes, it is possible, but the examiner must first learn about the characteristics of the written language and how that writing is taught. For example, in some languages, placement of diacriticals (distinguishing strokes) is important, and in other languages, shading of handwritten strokes is significant. The actual methods of examination are the same, but factors are weighed differently when the structure of the writing varies among languages.

Can a document examiner work with photocopies of questioned documents?

This question must be answered on a case by case basis. If the copy is a good one and if there is enough information in the writing to allow an opinion, a copy is sufficient. But there are some situations where the opinion rests on a subtle aspect of the writing that might only be visible on an original viewed under the microscope. In such situations, examination of the original is critical.

Can a client fax documents to you for examination?

A fax of a questioned document is of very little use. The fax process digitizes the copy, obscures detail, and adds flaws to the document. Of course, there are document questions about faxed documents, but those are best handled by examination of the original faxes themselves.



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DONALD FRANGIPANI EXAMINER OF QUESTIONED DOCUMENTS

7119 13th Avenue ~ Brooklyn, N.Y. 11228 Phone (718) 232-3209 ~ E-Mail: Dfrangipani@aol.com

CURRICULUM VITAE

1955-1958 United States Army - Honorable Discharge

Last Military Assignment

U.S. Army Forensic and Second Field Hospital, Germany

Duties

Forensic Laboratory Technician Colonel Michael Whelan/Captain Raymond Biernacki (Supervisors)

Specialized Training in Questioned Documents

Internship - Document Trainee under tutelage of Professor Wintermatel (University of Stuttgart - 16 months) and members of the GESELLSCHAFT FORENSISCHE (GFS)/Association of Freelancing Forensic Experts.

Training involved various aspects of questioned document examination. Structured reading of textbooks and existing professional papers. Research projects and completing numerous practical exercises.

Topics studied during training included: examination and identification of handwriting, hand-printed numbers, typewriting, stamp impressions, photocopies, paper, inks and writing instruments, detection of erasures, alterations, decipherment of erased, obliterated text, penmanship system and latent fingerprint development.

Additional Training

United States Army Photography and Projectional School-Munich, Germany.

1959-1961 Columbia University College of Physicians and Surgeons (recommended by Col. Michael Whalen - U.S. Army)

Duties

Pathology and Neurology technician.

While employed in this capacity, I continued my studies in handwritten identification. I was engaged in a research program which consisted of handwriting studies on patients with various neurological disorders (e.g. Parkinson's disease motor disorders, multiple sclerosis and brain tumors). This research was to establish the effect of handwriting prior, during and after these problems.

Further research was conducted in both the pre and post operative stages of lobotomy's, trauma and other neurological surgery procedures. Other research studied was the psychophysiological effects of handwriting (e.g. shock, fear, mood, drugs and alcohol).

- 1963-1973 Employed as an Investigator/Security with various investigative services. Continued study in the field of questioned documents.
- 1975 Licensed as a New York State Private Investigator. Founded, All City Investigations and Forensic Services, Inc.
- 1977-1981 Associated with Vincent J. Scalice, retired Detective N.Y.P.D. Continued study in questioned document examination, forensic photography and latent fingerprint examination with Vincent Scalice.
- 1988-1993 Studied under the tutelage of Felix Klein (Manhattan Handwriting Institute).

I continue to study and research in the field of questioned documents and handwriting identification and keeping abreast of periodicals, books and literature published by experts and agency's authority. I have visited government and private questioned document laboratories to observe techniques and procedures. I retained a complete library of texts on handwriting and questioned documents. I attend numerous training conferences.

1968

Professional Courses, Seminars and Workshops Attended

Society of Medical Jurisprudence/Lenox Hill Hospital. Writers health in detecting forgery and identifying signatures. Ordway Hilton, Speaker.

August, 1986 International Association For Identification

- a) Study of mental aptitude while writing under stress
- b) Use of Video Spectral Comparator (Lt. Josey, Escambia Sheriff's Office)
- c) Questioned Document Photography (S.A. Sanders, U.S.)
- d) Signature Workshop
- e) Counterfeit and altered credit card (Darryll Marshall, Pompano Beach P.D.)

April 1, 1987 Tri-State Legal Photographers (Questioned Document Photography - Peter Tytel) Topics

Indented writing, watermarks, seals, rubber stamps, bisecting lines, charred documents, chart preparation and use of transparencies and over-lays.

January, 1989 Valencia Community College/Orlando, Florida Ronald M. Dick - Instructor

Topics

a) Introduction to the Field of Questioned Documents

b) Conducting the examination of handwriting and hand-printing

c) Examination of signatures

d) Examination of typewriter material

e) Acquisition of special material

f) Miscellaneous document problems

g) Legal aspects of questioned documents

h) Handwriting systems

i) Acquisition of exemplars

May, 1989 Evidence Photographers & Tri-State Legal Photography Seminar

Close-up Photography of Demonstrative Evidence Larry Shavelson

May, 1990 Advanced Latent Fingerprint Techniques FBI SA Tim Trozzi/Felix Bigor

Kodak Photography/Fingerprint Techniques

Latent Fingerprint Workshop

- May 7, 1991 Polaroid School of Law Enforcement Imaging Imaging Application
- June 7-10 1991 Conference of the International Association For Identification Fallsview, NY a) Latent Fingerprint Workshop
 - Kenneth Zerchie Connecticut State Police
 - b) Forensic Photography Luther Dey - Rochester Institute of Technology

July, 1991 International Association for Identification (76th Annual Education Conference)

Questioned Document Section Program

- a) Typewritten Examination Supervisory Special Agent David W. Attenburger (Federal Bureau of Investigation)
- b) Signature Workshop Deputy Sheriff Don Fandry (Questioned Document Examiner/Los Angeles County Sheriff's Department)
- c) "The Relationship Between Disguised Handwriting and Years of Formal Education"
- d) "Death of the Depressed Writer"
 "Fraud of a Checking Account"
 "Identification of the Altered Number"
 "Questioned Document Examination Manual for Investigators (Marvin Morgan Q.D. - San Antonio, Texas)

June, 1992 International Association for Identification (77th Annual Education Conference) Questioned Document Section Program

a) Document Diamonds - Sidney Goldblatt

b) Tagger Graffiti - Don Fandry

c) Automated Handwriting Identification - Don Fandry

- d) Document Dating by Ink Analysis John Hargett
- e) Signature Comparison Workshop Don Fandry
- f) Alternate Light/Digital Imaging Enhancement Photography
- g) Preparation of Court Charts
- Dec. 1992 Handwriting Identification and Obtaining Handwriting Exemplars (William Duane - Connecticut State Police)

Oct. 1993 New Jersey Association (I.A.I.)

Handwriting and Questioned Document examination for Law Enforcement personnel (Lt. Glenn Owens - Essex County, N.J.)

April 19, 20, 38th Annual Tri-State Educational (I.A.I.) Conference, 21, 1994 Atlantic City, New Jersey

Latent Fingerprint Techniques - Mitchell Hollars, FBI

3M Fingerprint Visualization Systems - David Weaver

P.C. Based Fingerprint Matching - Det. Roger Brooks, Danbury P.D.

Sept. 1994 National Academy of Forensic Examiners, Branson, Missouri

> Disguised Writing, Longitudinal Case Study of a Heart Attack via Pre-Juncture Post Hand Writing Specimens, Arabian Writing Identification, Report Writing, Light Energy For law Enforcement. Questioned Document Examination, Pen Computing and Digital Signatures, and Opinions: Letters of Opinion and Reasons Why.

April 2-5, 1995Saratoga NY 39th Annual NY State Conference

- a) Evidence Photography Polaroid Corp.
- b) Palm Print Examination Ron Smith
- c) Fingerprint Developing Workshop John Olenik
- d) Behavior Profiting Lt. J. Edward Grant

March 24-27, Tri-State 40th Annual Educational Conference

1996

Use of Alternate Light Source

SPEX Forensic Instruments

April 30, 1996 Tri-State Legal Photographers

- a) Photography and Demonstrative Evidence Stephen Wheeler Esq.
- b) Photography and Demonstrative Evidence Larry Shavelson/Close-up photography
- c) Documentation of Imprint and Impression Evidence Kenneth Zerchie/Connecticut State Police
- d) Footwear Examination Workshop Ernest Hamm/Florida P.D.

May 17-18, 42nd Annual Tri-State Identification Conference, (I.A.I.) 1998 Albany, New York Technology Advance in Latent Fingerprint Technology/Dan Foro, D.C.J.S

Digital Imaging/Ronald Martino/Rochester Institute of Technology.

May 20-23, Tri-State 45th Annual Educational Conference I.A.I. 2001 Suffern, New York

Digital Imaging; PC Pro's - David Witzke

Questioned Document Case Review Herbert McDonell/Laboratory of Forensic Science

Examination of forged test papers (Austin case).

Examination of ink, paper and typewriter utilized to forge a Last Will and Testament.

Examination of knife cutting marks in paper reams.

Professional Associations

American Board of Forensic Examiners

International Association for Identification

New York State Division of the International Association for Identification (Board of Directors)

Licensed Detectives of the New York State

I am presently engaged in a research project involving handwriting specimens of patients in nursing homes who suffer from Parkinson's Disease, Alzheimer's Disease, strokes and other neurological disorders.

Equipment

Unitron comparison microscope, Leitz Stereo microscope, numerous magnification lenses, ultra-light, infra-red equipment, light box and various camera, video and copy machines.

Assignments as an Expert

18B Panel Assigned Counsel

CJA Panel Federal Courts

Nov. 15, 2005 Guest Speaker

New York State Identification Division of the International Association for Identification Conference - Williams Lake, New York

1993 World Trade Center - Assigned as an expert in the Ramzi Yousef trial.

Publications

Written and published an article "The Exemplar" a journal published by the National Bureau of Document Examiners, entitled "Restoration and Decipherment of Obliterated Documents", 1990.

Television Appearances

Nov. 6, 1995 Fox 5 News - "Fake or Not" Autograph Examinations

Nov. 16, 1995 WCBS TV News with Marcia Kramer- "Alteration of Dates On Food"

Nov. 10, 2001 Americas Most Wanted - " 1993 World Trade Center Attacks" Examination of questioned documents/handwriting related to terrorist Ramzi Yousef.

Reference Library

Numerous books, journals, periodicals, and articles authored by experts in the field of Questioned Documents, including Secret Service, F.B.I., Police Departments, autograph books, and various signature specimens of various sports figures and people of notoriety. I have testified and qualified as a Questioned Document Examiner in Federal, State and Civil Courts in New York, New Jersey and Kingston, Jamaica. I have testified in numerous hearings, arbitration's and Grand Juries.

Present Employment

President/Director - ALL CITY INVESTIGATIONS & FORENSIC SERVICES, INC.

New York State Private Investigator Lic. #24629

Appointed as Commissioner of Deeds #22690

REFERENCES UPON REQUEST

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - BERGEN COUNTY INDICTMENT NO. S-1370-90

STATE OF NEW JERSEY

STENOGRAPHIC TRANSCRIPT TESTIMONY OF DONALD FRANCIS

GERALD J. SCHER,

-vs-

Defendant.

BEFORE:

THE HONORABLE ANDREW P. NAPOLITANO, J.S.C.

APPEARANCES:

MARILYN G. ZDOBINSKI, ESQ. Assistant Prosecutor, Bergen County For the State of New Jersey

MARTIN S. GOLDMAN, ESQ. (Harkavy, Goldman, Goldman & Caller and JACOB R. EVSEROFF, ESQ. (New York Counsel) For the Defendant

> REPORTED BY: DIANE SAJLE, C.S.R. OFFICIAL COURT REPORTER

Frangipani-Direct-Goldman

liqualified in the State of New Jersey, Superior Court.

Q Approximately how many times have you testified as a guestioned document expert?

41A 75 to 80 times, approximately.

Q When was the last time you testified as an expert?
 THE WITNESS: Can I review my notes, your Honor?
 THE COURT: Yes.

81A The last time I testified as an expert witness was before 91the State University of New York Board of Education on May 21, 1011991.

11: Q Now, have you ever been retained as an expert by a
12: [federal agency?

13¦A Yes, I have, sir.

14! Q What agency was that?

15¦A National Credit Union Administration.

16 Q And have you ever been appointed as an expert by a
17 Court?

18¦A Yes, I have.

19; Q And when was that?

20 A I'm assigned to the 18-B Panel in New York, legal aid, and 21 the C.J.A. Panel of the Federal Courts.

221 Q Assigned by who?

231A By the Court.

MR. GOLDMAN: I submit Mr. Frangipani is qualified to Solution the area of questioned documents.

Frangipani-Voir Dire-Zdobinski

1 objection to this as part of cross-examination, but I don't think 21 it goes to voir dire with regard to his expertise.

THE COURT: Well, it's the type of thing you would want to bring out before the jury with respect to the expertise. You want to challenge the expertise, or are you going to use the voir dire just to obtain more information so you'll know what you're going to ask him when he testifies before a jury?

8 Q I would ask, sir, if you have ever been qualified as a 9 questioned documents examiner in the Superior Courts of the State 10 of New Jersey?

11|A Yes, I have.

12] 'Q When was that?

131A Last time, I can't remember the exact date, it was before 14 Judge Strelecki in Superior Court in Newark, <u>Tillis vs. Tillis</u>.

15: THE COURT: That was a matrimonial case.

16] THE WITNESS: Yes, sir. That involved a lot of 17 checks.

18: MS. ZDOBINSKI: Your Honor, I don't have any further 19: questions with regard to his qualifications.

THE COURT: The witness is amply qualified, and the 21 Court will so characterize him on the basis of his background and 22 experience, which is extensive, on the basis that his involvement 23 with governmental agencies is very extensive. He may testify in 24 this hearing as an expert in the field of questioned documents 25 with respect to any documents in this case.

Court Qualifications

- 1. New York Bronx Supreme Court
- 2. New York County Civil Court
- 3. New York Supreme Court (Manhattan)
- 4. New York Supreme Court (Brooklyn)
- 5. Kings County Grand Jury
- 6. Kings County Surrogate Court
- 7. New York Landlord/Tenant Court (Kings County)
- 8. Supreme Court (Nassau County)
- 9. Westchester County Criminal Court (White Plains)
- 10. Suffolk County Civil Court (Riverhead)
- 11. Queens Criminal Court (Kew Gardens)
- 12. Queens Civil Court
- 13. Richmond County Supreme Court (Staten Island, New York)
- 14. Federal Court (Southern District New York)
- 15. Federal Court (Eastern District)
- 16: State of New Jersey Superior Court (Hackensack, New Jersey)
- 17. American Arbitration Association of New York

Consultant - New York State Office of Attorney General/Medical Fraud. Frangipani has been retained by State Attorney General Office For Medicaid Fraud, corporation, brokerage houses, insurance companies, numerous law firms, District Attorney Kings County, National Credit Union Administration.

He has also been retained in matters for Legal Aid Society of New York as well as Federal CJA and New York 18B Panel.

7/1/1985	U.S. V. Louis Gauttiero. United States District Court/Southern District. Attorney: Paul Kearson
7/7/1978	Grand Jury – Kings County – New York Re: People v. Otero Case no. 1737-78
4/30/1979	Supreme Court – Kings County New York. Judge: Luigi Marano. Case no. 1737-78.
8/19/1983	United States District Court – Newark New Jersey. Hon. Judge Dickerson R. Debevoire J.U.S.D.C U.S. v. Thomas Riley. Attorney: Louis Sette, Esq.
5//8/84	Queens Supreme Court. Re: John Burke. Atty: Richard Leff
1/1986	National Labor Relation Court. Atty: Chuck Elmore
2/27/87	Federal Bankruptcy Court - Eastern District. Re: Lloyd Schaefer
2/1/1988	Supreme Court – Kings. Judge Ronald J. Aiello Re: People v. Daniel Maldonado. Indictment no. 5672
8/7/1990	Supreme Court – Kings County. Judge: Leroy Hutner Attorney: Steven Murphy Re: Nevilla Clark
1990	Superior Court - Newark, New Jersey. Judge: Hon.Strelecki. Case: Tillis v. Tillis
5/21/1991	Levittown School District. Judge: Hon. Walter Donnaruma Re: Zimmerman, Richard
10/23/1991	State of New Jersey – Superior Court Law Division – Bergain County.
	Ind. no. S-1370-90 Judge: Andrew P. Napolitano. Re: State of New Jersey v. Gerard Scher. Attorney: Martin Goldman
2/21/1992	Supreme Court – Barry Street-Kingston, Jamaica. Re: Michael A. Lorne Attorney at Law
5/1992	Supreme Court - Suffolk County. Judge: Newman. Re: State v. Richard Henning
7/15/1992	Supreme Court – N.Y. County. Judge: Lockman. Att. S. Gelzoff. Re: Syrote v. Hirsch
10/14/92	Federal Court – Eastern District. Postal Inspectors: Martin Biegelman Re: Nicholas Allocco

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6/1993	Supreme Court – White Plains. Judge: Harold Wood. Re: Nemeh v. Nemeh
6/18/1993	Supreme Court - Nassau County Pt. 4. Judge Rucollo. Re: Daley
3/1994	Queens Supreme Court. Attorney: Richard Leff. Re: People v. Teri Eisner
11/13/1995	Supreme Court - Bronx County. Pt. 47. Judge Prire. Re: People v. Rosario
12/1995	Supreme Court Part 20. Judge Kassoff. Re: Daniel King Le v. Pistilli. Attorney: Stanley N. Young
5/20/1996	American Arbitration Association. Case no. 30055995 Between St. Lukes Hospital and New York State Nurses Association Case: M. Mills F. Reynolds J. Goodwin
7/8/1996	Supreme Court – Kings County New York City Transit Law Department, Workers Compensation Division. Gary C. Perry – Counsel v. Ronald Gordon and Gary Rosenberg
4/1997	National Labor Relation Board. St. Lukes Hospital Center. Attorney: Lewis Archor, Human Resources
9/3/1997	Supreme Court - County of Queens (Civil). Judge: Badilla. Re: Lui v. Shiek
9/9/1997	Civil County - Kings County. Judge Greenstein. 15 Willoughby St. Rm. 205A Attorney: Jack D'Emic. Re: NYMEX v. Tsentzelias. Indictment no. 5174/96
8/1998	Attorney: Krieger & Schnieder
8/21/2001	Civil Court - New York City. Rm. 242. Attorney: Gary Pelusso
2/6/2003	Supreme Court – New York State, Kings County. Index no. 127031/02 Nicholas Doyle – Special Referee SRH Healthcare Management v. Manhattan Total Health & Medical Diagnosis and Dr. Thomas Giordano (defendant)
5/27/2004	Civil Court – Queen County. Pto. Judge: Margaret Parisi McGowan Re: Rene Pina's v. Mirsad Selimovic
2/9/2007	Supreme Court N.Y. County. Judge: Hon. Lowenstein Attorney: Herman Tarnow. Re: Oral v. Oral

4/2007	United States District Court – Southern District of N.Y. Hon. Gerard Lynch United States v. Peter Castellanetta & Curtis Gatz
12/12/2007	Supreme Court – Kings County, New York. Judge H. Kramer. Civil Term – Part 13 Index no. 33928/04. Nathan Leefer against Elsie Ward
2/6/2008	Supreme Court – New York County. Judge Richter & Hon. Ref. Doyle Rm. 551 Re: Thomas Giordano/SRH Healthcare v. Manhattan Total Health
7/2006	Supreme Court – Queens County Re: Kettly Bernard Cadet v. Shantel Gobin, Shantel Gobin Mohar UN Nessa Long Beach Mortgages
5/8/2008	Surrogates Court – Kings County. Hon. Judge Margarita Torres Re: Edward Shepard
7/8/2008	Civil Court – Kings County, Judge Edwards, Pt 58 Re: Kindell Robinson. Index no. CV200738-06 CK-1
5/6/2009	Supreme Court – Kings County Re: Adelman
5/7/2009	Supreme Court – Kings County. Re: Zagranichny v. Edelman. Attorney: Yevgeny Tsyngauz.
10/1/2010	Civil Court – Kings County, 141 Livingston Street (Housing). Judge: Silkowitz Re: Pagano v. Salini. Index no. 072952/2010
2/27/2012	New York State Department of Labor/Unemployment Division; Riverhead, New York v. Ziatniski Attorney: Frank S. Scagluso
6/6/2012	New York City County Civil Court. Judge: Sniederman. Re: Kalish v. Roxborough. Attorney: Petuso & Tougher
10/29/2012	Civil Court – Richmond County. Judge: Demond. Attorney: John Dalten Re: Emiliano Navarro

2/21/2014	Family Court – Kings County, 350 Jay Street, Brooklyn NY Judge: Catanzaro. Re: Martinez v. Margary
	Supreme Court – Kings County. Re: 1136 Realty LLC v. Union Street Realty (David Wise) Attorney: Michael Hiller
2/22/2016	Supreme Court – Kings County. Judge: Richard N. Allman Re: Varela v. Yuzefpolsky Attorney: Michael Drobenare
3/31/2017	New York State Division of Housing and Community Renewal – Legal Affairs Judge: Honorable Cecil Hollins
6/5/2017	Manhattan Family Court Judge: Jessica Sin. Re: Charles Barrow Attorney: Elliot Podhorzer
10/27/2017	Surrogates Court – Bronx County Estate of Norman Hammes

LAW OFFICES

FRANK S. SCAGLUSO

191 TERRY ROAD <u>SMITHTOWN, NEW YORK 11787</u> (631) 265-9900 - FACSIMILE (631) 265-6273 Website:www.SCAGLUSO.com

March 20, 2012

Donald Frangipani Forensic Document Examiner 71-19 13th Avenue Brooklyn, NY 11228

RE: NYS Department of Labor Unemployment Division Hearing

Dear Mr. Frangipani:

Please accept this correspondence as our gratitude and appreciation for your professional forensic handwriting services provided with reference to the unemployment hearing held recently. Your preparation and testimony was extremely persuasive and invaluable to our case. I appreciate your professionalism, and look forward to working with you in other matters as the cases may arise.

Again, thank you for your professional expert testimony and assistance.

Very truly yours,

FRANK S. SCAGLUSO FSS:pac Enclosures

**

JOHN R. WINN

ATTORNEY AT LAW 13 NORTH STREET GRANVILLE, NEW YORK 12832

TELEPHONE 518 642-1365

FAX 518-642-1436

April 26, 2013

Very truly yours,

hn R. Winn

Mr. Donald Frangipani 7119 13th Avenue Brooklyn, New York 11228 Fax No. (718) 232-3396

Re: Estate of Marjorie Elaine Hurley

Dear Mr. Frangipani:

On January 20, 2013 you provided me with your Report in the above setting forth your opinion that the signature on the GE Beneficiary Designation form dated February 22, 2012 was not the signature of the decedent, Marjorie Elaine Hurley. Shortly thereafter, I was able to obtain records from GE which established that the blank GE Beneficiary Designation form was not faxed to the attorney's office until the afternoon of February 23, 2012. The hospital records establish that as of the afternoon of the 23rd, Marjorie Hurley was unconscious and would not have been able to sign any documents.

As a result of the above, the defendant withdrew her claims to the GE benefits, which totaled a little over \$115,000.00, and GE is now processing my client's claim for those benefits.

Thank you again for your Report. It was important in establishing my client's position as the proper designated beneficiary of the GE benefits.

LINDUNAFULEIANU

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CIVIL COURT OF THE CITY OF NEW YORK COUNTY OF KINGS: HOUSING PART O

DIANE PAGANO AS EXECUTRIX OF THE ESTATE OF JOSEPHINE FERRANTI,

Petitioner-Landlord,

-against-

L & T INDEX NO.: 072952/2010

DECISION/ORDER

100

VINCENT & MARISSA SALINO,

Respondent-Tenant,

JOHN DOE,

- V

Respondent-Undertenant.

J. SIKOWITZ:

Petitioner, Diane Pagano as executrix of the estate of Josephine Ferranti, commenced this holdover proceeding seeking possession of apartment 1 and basement at 2113 West Street, Brooklyn, NY 11223. It is undisputed that the subject premise is two family house, and respondent's defense to this proceeding is that the owner, Ferranti, entered into a twenty year lease with him dated December 26, 2007 when she was ninety six years old. A trial was conducted on October 1, 2010 and both sides are represented by counsel.

Diane Pagano, the niece of the deceased owner and executor of the estate, testified credibly in support of petitioner's prima facie case. Ms. Pagano testified credibly that no rent or use and occupancy (U&O) has been paid since May 2010 and respondent owes U&O from June through October 2010. The witness testified that her aunt died in October 2010 at the age of ninety nine a market rental value for the subject apartment is \$1500.00. This was not based on her personal knowledge of comparative rents in the area.

On cross examination Ms. Pagano testified credibly that she has knowledge of her aunt's business affairs including her bills, banking and the subject premises. She testified that she was in charge of the property with her aunt, and that she learned about respondent five years ago when he moved into the subject apartment. Her aunt told her about respondent's tenancy and stated that he was a month to month tenant. She testified that Ms. Ferranti had a caregiver, Marie, who was also involved. After Ms. Ferranti died, the witness came up from Florida, where she lives, to clean up her aunt's home and go through all her papets. Ms. Pagano testified credibly that there was no lease in the deceased owner's business or household papers. On re-direct the witness testified that her sunt would have discussed giving the respondent a lease with her. The issue of a lease with respondent was never brought up by the deceased owner or mentioned by her to anyone.

Respondent Vincent Salino testified on his own behalf and he was not a credible witness. He testified that he grew up on the block and moved in alone five years ago. Subsequently he got manied and had two children, who also live in the apartment. Mr. Salino testified that Ms. Ferranti was "stressed and tired" by the maintenance of the property, and he offered to buy the house from her. He testified that he suggested that he would buy the house and give Ms. Ferranti a life estate. He testified she did not like that idea, and he then suggested a long term lease. He testified that he signed this twenty year lease with the deceased landlord and no one else was present except for the notary, Mia Arata, who notarized Ms. Ferranti's signature and not the respondent's signature. The court notes that Ms. Arata was not produced as a witness.

On cross examination the respondent admitted that the notary is a facebook friend of his and an "acquaintance." In addition, respondent testified that he knows Ms. Pagano and he never discussed the lease with her or even mentioned it until after she commenced this holdover proceeding. When asked on cross examination why respondent failed to add his wife's name to the twenty year lease, respondent did not have an answer. On cross examination respondent testified that the lease came about because he performed renovations in his apartment and "Josie" (Ms. Ferranti) became concerned. On direct examination, respondent testified that the lease came about because he wanted to buy the house and give Ms. Ferranti a life estate. When she refused that offer, respondent testified he suggested the lease. Respondent was not credible as he gave two different explanations for the twenty year lease. He offered no explanations for why he never mentioned this lease to Ms. Pagano until after the holdover case commenced, and no explanation for why there was not a copy of the lease in the deceased owner's personal papers.

The respondent testified that he had no idea who prepared the lease, and he did not discuss this lease with anyone. Respondent testified on cross examination that he is a vice president of Wolf Realty company. He has been a licensed real estate broker for seven years. He testified that he did not record this twenty year lease, and he testified that he never heard of recording a lease.

Rebuttal Witnesses

Donald Frangipani testified as an expert witness in the field of questioned documents and handwriting. Mr. Frangipani's extensive curriculum vitae is court exhibit 1. The witness testified credibly that prior to the trial he examined alleged, known and genuine signatures of the deceased owner, Josephine Ferranti, as well as a photocopy of the twenty year lease allegedly signed by Ms. Ferranti. At the trial, the witness was shown the respondent's lease with an "original" signature of the deceased owner. There was a ten minute recess to enable the expert witness to examine the original signature.

The witness examined the respondent's signature on the lease, and compared Ms. Ferranti's signature on the lease to her signature on her will, and on her cancelled checks. Mr. Frangipani

testified credibly that there is no similarity of signatures between the signature on the lease and all the other signatures of Ms. Ferranti that the witness used for comparison. The witness testified that there are many factors that can affect a signature such as standing, sitting, medication and stress. He examined exemplars of Ms. Ferranti's signature from 2008 including her last will and testament, and a series of cancelled checks. He received a "bio" on Ms. Ferranti including her age, country of origin, and medical history as all these factors can affect a person's signature. He learned that at the time the alleged lease was signed. Ms. Ferranti was ninety seven years old, in good health, not on medication, and having no neurological impairments. Her attorney informed him that she would not sign anything without him present. Her attorney was Aldo Alleva, the attorney who witnessed her will.

The witness explained that the signature on the lease has a lot of "hlatus," meaning there are spaces and it goes up. The lease signature is scribble except for the "J" and one other letter. There is no consistency and no base line in the lease signature, which is different than all the exemplars of Ms. Ferranti's signature.

On cross examination, the witness testified credibly that Ms. Ferranti was instructed not to sign anything without Mr. Alleva present. The witness was asked about the effect of age related arthritis on the lease signature, and the witness testified he took it into account. In addition the exemplar signatures were made after the lease was allegedly signed when Ms. Ferranti would have been older. The uncontroverted testimony of the expert witness is that the signature of Ms. Ferranti on the respondent's lease is not the signature of Ms. Ferranti.

Diane Pagano testified as a rebuttal witness and she stated that from 2007 through 2009 Ms. Ferranti was not taking medication. She also testified that Ms. Ferranti did not suffer from arthritis. Ms. Pagano testified credibly that Ms. Ferranti was in exceptionally good health, that she died of eld age, and they spoke to each other constantly until the time of her death, Ms. Pagano saw Ms. Ferranti in the beginning of October 2009, and she died at the end of October 2009.

Based on an overwhelming preponderance of the credible evidence, the court finds that the deceased owner, Josephine Ferranti, did not sign the lease submitted by the respondent, that respondent is a month to month tenant in a two family house, and the tenancy was properly terminated. There is currently due and owing use and occupancy from June through October 2010 at \$1,000.00 per month, which the court finds to be reasonable fair market rental value for the subject first floor and basement. Therefore, petitioner is awarded a final judgment of possession, a money judgment for \$5,000.00 representing outstanding use and occupancy through October 2010, a warrant shall issue forthwith, and execution shall be stayed through October 15, 2010 for payment of \$5,000.00, and if the \$5000.00 is timely paid, execution of the warrant shall be stayed through November 30, 2010 on condition that U&O for November 2010 of \$1,000.00 is paid on or before November 1, 2010. After November 30, 2010, all stays shall be vacated. This constitutes the decision and order of the court.

3

DATED: October 6, 2010

OCT 0 6 ZUIU

Marcia J. Sikowitz, JHC

MARCIA J. SINOWITZ JUDGE, HOUSING COURT

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

ORDER

01CR784 (LMM)

PETER LIOUNIS,

Defendant.

On behalf of Louis Fasulo, attorney for the above named defendant, and upon all the proceedings previously herein, it is apparent that the defendant Peter Liounis will require a forensic document examiner and handwriting expert to analyze and forensically compare the defendant's handwriting for his adequate defense, it is hereby,

ORDERED, that Dominic Frangipani is appointed as a forensic document examiner and handwriting expert in the above tilted matter and will be compensated in accordance with the Criminal Justice Act at the rate of \$125.00 per hours plus expenses reasonably incurred. It is estimated that Mr. Frangipani will require no more than 25 hours to complete this assignment. If additional hours of services are required beyond the limits of this Order the Court will be so petitioned in writing.

DATED: New York, New York November 25, 2006

HON. LAWRENCE M. MCKENNA UNITED STATES DISTRICT JUDGE



KARASYK&MOSCHELLA, LLP

COUNSELLORS AT LAW

May 31, 2007

PHILIP KARASYK

JAMES M. MOSCHELLA

PETER E. BRILL ADAM ETMAN Mr. Donald Frangipani 7119 13th Avenue Brooklyn, NY 11228

OF COUNSEL

MITCHELL HIRSCH

ELLIOT M. RUDICK

Dear Mr. Frangipani:

Re:

ALAN SERRINS BARRY WASHOR

I am writing to thank you for your help and expertise in securing an acquittal for my client, Peter Castellaneta, and his co-defendant, Curtis Gatz, in their recent trial before the Hon. Gerard Lynch in the United States District Court for the Southern District of New York. It is safe to say that the results could have been much different if we had not had you on board.

Expert Witness Testimony in United States District Court

I was impressed not only by your command of the subject material and your depth of experience-which are significant-but also by the unique fact that both the United States Attorneys and the Judge felt that you should not be required to be qualified as an expert. Judge Lynch was more than happy to waive the requirement and the prosecutors were equally happy to consent. Of course, the fact that you have testified for the government in the past contributed to all parties' confidence in your abilities.

As you know, you were one of the last witnesses we called, and I truly believe that you helped "put us over the top."

Thank you again for all your help. We will certainly be requiring your services again in the future. Should you or any future clients have any questions, please do not hesitate to contact me.

Sincerely yours, Peter E. Brill



Laura J. Kennedy, President Michael Goldfarb, Executive Director

To Whom It May Concern:

I am writing to publicly thank Mr. Donald Frangipani for his invaluable assistance to AHRC/NYC in connection with his expert work and report which enabled us to show to governmental auditors that what they perceived as an attempt to increase billings by altering documents was in fact only, at worst, sloppiness in record-keeping, or at best, an attempt by our staff to accurately record what had happened, no matter that the record looked sloppy.

His expertise and diligent work were a major factor in our ability to convince the auditors that there was no fraudulent intent, and led to relatively minor findings.

He has also been of great help in a number of cases where we needed to verify signatures on documents.

Anyone seeking further information should contact me at 212 780-2665.

Most cordially

Robert C. Gundersen Chief Compliance Officer

LAW OFFICES AARON M. FEINBERG 1777 East 10 Street, Brooklyn, N.Y. 11223 Telephone (718) 339-7224 Telecopier (718) 382-1091

New Jersey Office

475 Watchung Avenue, Suite 8 Watschung, New Jersey 07060 Telephone (908) 757-4440 Telecopier (908) 757-7675

Please respond to:

New York Office ____ New Jersey Office ____ Member of U.S. Patent and Trademark Bar

January 31, 2008

Mr. Donald Frangipani 7119 13th Avenue Brooklyn, N.Y. 11218

Re: Nathan Leifer v. Elsie Ward Index Number: 33928/2004

Dear Mr. Frangipani:

I am writing to thank you for your invaluable assistance in connection with the above-referenced trial for specific performance. As you are well aware, the defendant alleged that she never signed the contract of sale. Since she was an elderly person, the court might have looked favorably to her testimony and believed her that the signature was a forgery.

Your testimony as an expert witness on our behalf was the major ace in our litigation in convincing the judge that indeed Ms. Ward signed the contract. Your testimony was invaluable in refuting her claim and stating positively that the signature was indeed hers. Once the court was satisfied that it was her signature, the court dismissed her statement that she was not mentally competent to sign a contract.

I believe the court was very impressed not only with your testimony, but with your wide comprehension and knowledge of the field of document authentication. Your exhibits and layout were unsurpassable and were indicative of your expertise and diligent work. Your work product was easy to follow and simple to understand.

It was a pleasure to deal with you as an expert witness. Thank you again.

Very truly yours. allen M Aaron M. Feinberg

AMF:je

STATE OF NEW YORK DEPARTMENT OF EDUCATION

In the Matter of the Certificate held by

RICHARD F. ZIMMERMAN

REPORT OF THE FINDINGS & CONCLUSIONS OF THE HEARING OFFICER

to teach in the public schools of the State of New York.

APPEARANCES:

PAUL E. SHERMAN, JR., ESO., Attorney for the NYS Education Department

RICHARD F. ZIMMERMAN, pro se.

HEARING OFFICER: WALTER DONNARUMA

INTRODUCTION & ISSUE:

By Order dated April 18, 1991, the Hon. Thomas Sobol, Commissioner of Education of the State of New York, designated the undersigned to conduct a hearing pursuant to Section 305(7) of the Education Law and Part 83 of the Regulations of the Commissioner of Education (8 NYCRR Part 83) concerning the appropriateness of permitting RICHARD F: ZIMMERMAN, hereinafter referred to as the Respondent, to teach in the public schools of the State of New York.

The hearing, held on May 21, 1991 in New York City, was brought about by the issuance, on May 23, 1988 by the Commissioner of Education, of a Notice of Substantial Question as to Moral Character concerning the Respondent. The Notice indicates that the substantial question was raised by (1) the Respondent engaging in inappropriate physical contact with a 14 year old student, and (2) the Respondent writing suggestive letters to the student.

The ultimate issue to be determined by this proceeding is whether the Respondent is morally fit to be certified as a school teacher in the State of New York. Since the Respondent holds certification, the burden is on the Department to prove lack of good moral character.

DISCUSSION:

1

During the 1985-86 school year, the Respondent was employed as a teacher by the Levittown Union Free School District. In 1987, he was the subject of a disciplinary proceeding pursuant to Section 3020-a of the Education Law. At the hearing, a female student testified that during the 1985-86 school year the Respondent kissed her and fondled her on various occasions in the Salk Middle School building. At the time, the student was attending the 8th grade. She further testified that the Respondent wrote and delivered love letters to her.

The young woman did not appear as a witness at the Part 83 hearing. The Education Department was unable to locate her. The transcript of the 3020-a hearing containing her testimony was offered and received into evidence.

The letters allegedly written by the Respondent were introduced into evidence. A handwriting expert testified that the letters were written by the Respondent.

The Respondent denied the alleged touching of the student, and denied that he had written the letters.

The letters contain no names, but the texts indicate that the person addressed is a young female student ('the most beautiful girl in the school") who has been upset by the amorous advances of the author. ("You do not look, act or think like a little girl. You have become a young woman. ... I am sorry that I have made you unhappy or uneasy ... Please forgive me if I have made you upset." "I want to give you so much pleasure. Let me teach you the ways of love.")

The CPLR permits proof of handwriting by the comparison method (CPLR 4536). The basis for the use of expert testimony is that peculiar prevailing characteristics exist in every person's handwriting which distinguish it from the handwriting of every other person. (See <u>Re</u> <u>Hopkins Will</u>, 172 NY 360.) An expert, by studying and analyzing these characteristics, may determine with some degree of certainty whether the author of a known writing is the author of the disputed writing. The opinions of handwriting expert are not to be discounted as weak or unreliable, but, like other proof, must be weighed in light of opposing proof. (See <u>Re Estate of Sylvestri</u>, 44 NY 2d 260.)

The Department's expert, Mr. Franglpani, compared the disputed letters with known samples of the Respondent's handwriting, and rendered the opinion that the letters were written by the same hand. Aside from the Respondent's denial that he had written the letters, there was no proof that Mr. Frangipani's methodology was flawed or that his

The mere writing of the letters is not, in and of itself, immoral conduct. It is the delivery of the letters to the 14 year old student that creates the harm. The only proof that the letters were delivered is the testimony given by the student in the 3020-a proceeding. Is that testimony a sufficient basis for finding that the letters were delivered to the student by the Respondent?

CPLR Rule 4517, applicable to civil actions, allows the introduction of the prior testimony of an unavailable witness in a subsequent action between the same parties where the subject-matter is

a substantial question exists as to the moral character of the Respondent, and that he is not fit to retain teaching certification.

I recommend that the Commissioner forthwith revoke all teaching certifications held by the Respondent.

Report respectfully prepared and submitted by

Walter Donnaruma Hearing Officer

. DATED: 6 September 1991

Corporate Security

Office of General Counsel

World Financial Center South Tower New York, New York 10080-6106 FAX 212 236 3746



October 1, 2003

To Whom It May Concern:

Don Frangipani has been our document examiner for the past several years. He has examined numerous questionable documents for fingerprint and handwriting analysis. Don is noted in the industry for his professionalism and attention to detail.

When the occasion arises, I do not hesitate to recommend Don's services. I do so with the confidence that he will provide the same professional service that he has provided to Merrill Lynch.

Sincerely,

Elliott Donchek Assistant Vice President Security Coordinator Corporate Security 2 World Financial Center – 7th Floor New York, New York 10281 (212) 236-3735

ED:ed

LAW OFFICES HALPERN, BROWN & DARIENZO

26 COURT STREET BROOKLYN, NEW YORK 11242 (718) 875-8580 Fax (718) 852-5360

JOHN A. DARIENZO, JR. FRANK WIEZIOLOWSKI

ISIDORE HALPERN (1901-1990) ARNOLD I. BROWN - Retired

April 8, 2003

Mr. Donald Frangipani 7119 13th Avenue Brooklyn, New York 11228

> RE: SRH Healthcare v. Manhattan Total Health, et ano.

Dear Mr. Frangipani:

I am enclosing herewith for your records the report of Referee, Nicholas Doyle. I am also enclosing Judge Richter's Decision in the Supreme Court/New York County concerning the documents which you examined for authenticity.

Both the Judge and the Referee found, based in good part upon your testimony, that the signatures were indeed forgeries.

The Referee's decision comments on the professional manner in which you arrived at your findings and, in fact, the Referee found you to be more persuasive than the opposing expert.

Judge Richter's decision confirmed the Referee's findings and acknowledged the fact that you examined all the documents at your laboratory and thus your opinion was based on a more complete assessment.

I would like to take this opportunity to thank you for the professional nature in which you prepared your findings, the depth of your expertise and the clarity with which you presented your expert testimony.

Very truly your

(John A. Darienzo, Jr

JAD:md encs.

CRANFORD POLICE DEPARTMENT

8 SPRINGFIELD AVENUE · CRANFORD, NEW JERSEY 07016-2199 (908) 272-2222 · FAX (908) 709-7341 VISIT US ON THE INTERNET - www.cranford.com/police HARRY W. WILDE



May 28, 2002

Donald Frangipani Questioned Document Examiner 7119 13th Ave. Brooklyn, New York 11228

Mr. Frangipani:

The Cranford Police Department's Detective Bureau recently investigated a case of harassment. This was not ordinary harassment. This involved a female victim who was receiving hundreds and hundreds of unsolicited and unwanted items through the mail. Items included everything from ceramic dolls to cutlery sets to memberships at health spas and book clubs.

During our investigation numerous mail order companies were able to send us the original filled out cards.

Two suspects were formulated. Both were interviewed. One suspect vehemently denied any involvement. The second confessed admitting to his infatuation with our victim. Based on this confession he could have been charged with numerous indictable crimes as well as Federal crimes for using the U.S. Mail. To the untrained eye both suspects had identical hand writing. It was at this time that I spoke with you. Exemplars were forwarded the results astounding.

The suspect who had previously confessed was indeed not the criminal. In fact it was the second suspect who had originally vehemently denied any involvement When confronted with your findings the second suspect confessed and criminal charges filled.

It was then learned that the original suspect suffers mental deficiencies causing him to confess to a crime that he had nothing to do with.

Your professionalism and expertise in Document Examination was the single thread that ultimately identified the true perpetrator. More importantly however your dedication and expertise prevented an innocent man from being criminally charged and ultimately incarcerated.

Sincerely; SE

Detective Sergeant Francis Hanley Criminal Investigations Supervisor

CRANFORD POLICE DEPARTMENT

8 SPRINGFIELD AVENUE - CRANFORD, NEW JERSEY 07016-2199 (908) 272-2222 -FAX (908) 709-7341 VISIT US ON THE INTERNET - www.cranford.com/police

HARRY W. WILDE CHIEF OF POLICE



July 3, 2001

Donald Frangipani 7119 13th. Ave. Brooklyn NY 11228

Sir:

Enclosed is a hand writing exemplar obtained from a suspect who has confessed in this matter. This is NOT our original suspect and is NOT the person whose YMCA employment application you were provided with earlier.

In addition I have enclosed several photographs of graffiti written by the same suspect on the bathroom of a local Go-Go Bar.

Please conduct your examination and forward your findings to me. Please also forward your examination fee directly to my attention.

Again my thanks in this matter.

Det. Sergeant Francis Hanley Cranford Police Department Direct: 908-709-7344 Fax: 908-709-7341

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Docket No. Cr-01-1407(NG)

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ORDER

TIN YAT CHIN

Defendant.

IT IS HEREBY ORDERED, upon the application of THOMAS D. WHITE, ESQ., of Counsel to LLOYD EPSTEIN, ESQ., counsel of record for defendant TIN YAT CHIN, dated August 22, 2002, that the expenditure of Criminal Justice Act funds is authorized to dated Mugust 22, 2002, that the expenditure of Criminal Justice Act funds is authorized to dated August 22, 2002, that the expenditure of Criminal Justice Act funds is authorized to dated August 22, 2002, that the expenditure of Criminal Justice Act funds is authorized to dated August 22, 2002, that the expenditure of Criminal Justice Act funds is authorized to dated August 22, 2002, that the expenditure of Criminal Justice Act funds is authorized to dated August 22, 2002, that the expenditure of Criminal Justice Act funds is authorized to a 13th Avenue, Brooklyn, NY 11228, 718 232-3209 at the rate of \$125.00 per hour to a 13th Avenue, Brooklyn, NY 11228, 718 232-3209 at the rate of \$125.00 per hour to a YAT CHIN.

Dated:

New York, New York August 2002

So Ordered:

Hon. John Gleeson United States District Judge

BROOKLYN Ex-INS agent goes on trial Say he swindled nearly \$1M

By JOHN MARZULLI DAILY NEWS STAFF WRITER

An ex-INS agent used his knowledge of the system to swindle nearly \$1 million from immigrants seeking work visas for relatives in China, a federal prosecutor charged yesterday.

Tin Yat Chin, a Chinese immigrant himself, ran the scam out of an office in a Brooklyn apartment building where he posed as a lawyer and an Immigration and Naturalization Service employee to convince his victims that he could obtain visas and green cards.

"The defendant promised his victims that, for a fee, not only would their relatives get work visas to come to the United States, but they would eventually be able to get green cards allowing them to remain in the U.S.," Assistant U.S. Attorney Lara Treinis said in her opening statement to jurors in Brooklyn Federal Court yesterday. "But every dream has its price, and these victims paid the defendant hundreds of thousands of dollars ... but the visas were never issued."

Chin, 45, allegedly told the victims that he had to fill a quota of work visas in an apparent effort to get them to solicit their friends and relatives.

He showed the victims a badge, INS documents and passports and even made trips to China in 1998 and 1999 to make himself appear legitimate to his victims, Treinis said.

Chin worked for the INS as an inspector at Kennedy Airport from 1988 to 1993. He was arrested in 1993 for ripping off Chinese immigrants and sentenced to one year in prison.

The prosecutor said Chin graduated from John Jay College of Criminal Justice and attended Ohio Northern University School of Law for a year.

\$25,000 a worker

"The defendant used the information he learned through his job with the INS and his schooling to successfully swindle innocent people out of their life savings," Treinis said.

Most of Chin's victims were women who worked in factories, laundermats and sweatshops. They were allegedly charged between \$25,000 and \$30,000 by Chin for his services.

Chin's defense lawyer, Lloyd Epstein, told the jurors that there had been victims of a swindle, but blamed the media and authorities for his client's plight.

"The investigators were frustrated and felt pressure to make an arrest," he said. "The Chinese press wanted a villain to plaster on the front page."

He asserted that after Chin was arrested, additional victims were manipulated by authorities into identifying him as the culprit who had ripped them off.

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BOE LABOR RELATIONS Fax: 718-935-2060

Jul 27 2001 11:48 P.02



BOARD OF EDUCATION OF THE CITY OF NEW YORK

HAROLD O. LEVY, Chancellor

OFFICE OF THE CHANCELLOR

July 27, 2001

Mr. Donald Frangipani 71-19 13th Avenue Brooklyn, New York

Re:

Board of Education v. United Federation of Teachers Arbitration (Darren Goldstein) OLR #14825

Dear Mr. Prangipani:

Thank you for your assistance in this matter. Your assistance enabled us to successfully defend the interests of the Board of Education in this case. I would appreciate it if you would please send the bill for your services to my attention. I will then transmit the bill to the appropriate Office. The address is:

Office of Labor Relations and Collective Bargaining 110 Livingston Street, Room 412 Brooklyn, New York 11201

If there are any questions, I may be reached at (718) 935-2640.

Sincerely,

erry Rothman

JR:jr c: Robert B. Waters

American Board of Forensic Handwriting Analysts, Inc.

P.O. Box 1648 • Branson, MO 65616

Robert L O'Block, Ph.D. President RF Westwood Drive Branson MO 65616 Phone 417-335-4787

Carl Anderson, M.D. halman, Board of Regents P:0. Box 346 Elents Rosa CA 95402 Phone 707-546-9843

Board of Regents

Marcelle Feinberg, Ph.D 91 Udwins Close Fairvale Johannesburg South Africa, 2192 Phone 011-540-4433

Alan M. Levine, M.D. 2025 Kings Hwy. Brooklyn NY 11229 Phone 718-339-8850

Cyrus Loo, Ph.D., M.D. 2727 Kolonahe Place Honolulu HI 96813 Phone 808-537-4434

are Manetti, M.D., M.P.H. P.O. Box 4508 Rockford IL 61110 Phone 815-963-1506

James S. Olms, M.D. 8319 Latcha Road Perrysburg Ohio 43551 Phone 419-874-4166

E Edward Peoples, Ph.D 2503 18th Street Road Greely CO 80531 Phone 303-351-2619

Jack C. Rubin, Ph.D 145E Haasa Westchester IL 60154 Phone 312-353-5899

Mart J. Seller, Ph.D. Box 32 Kingston RI 02881 Phone 401-294-2414

largaret T. Singer, Ph.D 17 El Camino Real Berkely CA 94705 Phone 510-848-1855

Wills W:Smith, Ed.D 5310 Burchette Rd. Tampa FL 33647 Phone 813-971-2027

erry O. Teltscher, Ph.D. 165 East BOth SL New York NY 10021 Phone 212-988-7830

se M. Thompson, Ph.D. 1401A Walnut SL Wanatchee WA 98801 Phone 505-662-6474

Hoope: Williams, Ph.D 2150 Violat Way Campbell CA 95008 Phone 408-379-4151

12/1/92

Donald Frangipani 8522 Fifth Ave. Brooklyn, NY 11209

Dear Mr. Frangipani,

I am pleased to have you join us as a fellow member of the American Board of Forensic Handwriting Analysts, Inc. (ABFHA). Your input in the direction of ABFHA's future is important to us. To that end, I would encourage you to mail me any of your ideas and suggestions for our organization. In turn, I will send you our mailing list with updates as needed and you will receive our newsletter with membership news and exchanges. I am also encouraging members to contact one another via phone, letter, or fax to develop a professional interchange that will benefit us all.

I think it's important that we become known as the source to turn to by the criminal justice community and by the private sector in loss prevention, risk management matters, and all other areas pertaining to behavioral profiling. One approach is for individual members to publish articles about the role of forensic handwriting analysis and to mention ABFHA and our address and phone number in various publications that are read by the audience we want to reach. Please share your thoughts with us, as we have the opportunity now to make many contributions to our field and to our individual consulting practice.

A very exciting aspect of our organization is the Board Certification process which is now being developed by the Board of Regents. Within a few months we hope to have finished the criteria and standards for Board Certification. For now all persons who have applied for this category of membership are officially considered Candidates for Board Certification. As soon as the final standards are set you will be sent a copy. To speed up your evaluation for Board Certification please send one copy of any articles or books you have written which will be included in our ABFHA library.

Also I would like your nominations for new members who have investigative, research or consulting interest in forensic handwriting analysis. There is strength in numbers! We have as members the best people in the handwriting world. We would also like to have a large number of police officers and detectives from around the country to join our member category as they will provide us with consulting cases while they at the same time have the opportunity to learn about the forensic aspects of handwriting analysis. So also please pass on the names of any interested police officers and detectives. Thank you for joining our group and welcome!

Sincerely,

Kout Loza Dr. Robert L. O'Block

International Association for Identification



Joseph P. Polski, Chief Operations Officer 2535 Pilot Knob Road, Suite 117 Mendota Heights, MN 55120-1120, USA

Phone: (651) 681-8566 Fax: (651) 681-8443 E-Mail: IAISecty@theiai.org

September 17, 2003

Donald Frangipani 7119 13th Avenue Brooklyn, NY 11228-1605 USA

Dear Donald,

On behalf of the officers and members of the International Association for Identification, it gives me a great deal of pleasure to offer you my warmest congratulations on your achievement of Life Associate status. This is an achievement to which many strive but few attain.

As a life member, you are forever excused from paying annual membership dues to the association but will continue to enjoy all the rights and privileges of an active member.

Your Life Associate certificate and permanent membership card is enclosed. Your life associate lapel pin will be forwarded separately.

Again, congratulations. Do not hesitate to contact me if I can be of any assistance.

Sincerely

Joseph P. Polski Chief Operations Officer



Donald A. Frangipani, Questioned Document Examiner All-City Investigations 1468 86th Street Brooklyn, New York 11228

Dear Don:

I was just reviewing our professional contact lists in anticipation of the New Year and I just wanted to thank you once again for your efforts on behalf of our 7,000 credit unions with deposits of over \$300 billion.

Since early in 1986, you have done an outstanding job for us on many fronts, including surveillance of seized properties in New York, forensic services on many fronts, examination of forged documents, and electronic sweeps.

Your swift, decisive reaction to my requests, coupled with your courtroom competence and professionalism has been one of the assets of my office for well on to 12 years now.

Thanks for your continuing assistance to this office.

With kind regards

DAVID L. ENO, Federal Investigator

DLE:d

29 Dec 1997



A University Hospital of Columbia University College of Physicians & Surgeons

April 1, 1997

Donald Frangipani Examiner of Questioned Documents 1468 86th Street Brooklyn, New York 11228

Dear Mr. Frangipani:

I am writing to thank you for your excellent professional services and assistance to St. Luke's Roosevelt Hospital Center in the presentation of its arbitration case in the termination of the three nurses. As you can see in the enclosed arbitrator's award, the Hospital's position, and a very important principle that is key to good patient care, was upheld. Specific reference to your testimony and the issue of alleged forgery by the grievants is found on pages 13 and 14 of the award. Thank you.

Yours truly,

Lewis Archer Associate Vice President Human Resources

St. Luke's-Roosevelt Hospital Center 1111 Amsterdam Avenue New York, New York 10025

STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL MEDICAID FRAUD CONTROL UNIT MEMORANDUM

To : Donald Frangipani

From : Cecile M. Balestrieri Assistant Administrative Officer

Date : May 2, 1997

Subject : Signature on Expert Retainer Letter

Attached please find your confirmation of being retained as an expert for a case the Medicaid Fraud Control Unit has undertaken.

One letter is to be retained for your files, while the <u>second letter must be signed</u> and returned to me, at the address listed below, before payment for your services can rendered:

> Ms. Cecile M. Balestrieri Office of the Attorney General Medicaid Fraud Control Unit State Capitol Albany, New York 12224

It was stipulated, when the request for your services were sought and approved in the case of People vs Horace, that the Monroe County District Attorney's Office would pay half the cost of your expert services. Please bill the Monroe County DA directly for half of the service rendered.

Thank you for your assistance in this matter.

\cmb c: M. Fox STANLEY N. YOUNG, P.C.

ATTORNEY AT LAW

CLAIRE J. LIEBER

585 STEWART AVENUE. SUITE 700 GARDEN CITY, N.Y. 11530

> (516) 745-6450 (516) 745-6451

January 17, 1996

Donald R. Frangipani 1468 86th Street Brooklyn, NY 11228

RE: Daniel King Le v. Pistilli

Dear Mr. Frangipani:

I want to thank you for your help in proving a forged signature on a Window Guard Lease document in this case. Because of your expertise and reputation, I was able to secure a settlement at trial in excess of \$5,000,000. Enclosed is a copy of the Law Journal article headnote on the case.

It was a pleasure to work with you on this matter and I look forward to working with you in the future.

Sincerely,

SNY/db Encl.

By FedEx

Doesaa Soberd

* MATTER OF LE and YOUNG (Le) - This is a proceeding pursuant to Article 81 of the Mental Hygiene Law, seeking an appointment of a guardian for the property management of the alleged Incapacitated person, Daniel King Le, also known as Daniel King Walldon. The petitioners are the adoptive sister and the attorney of the alleged incapacitisted person.

leged incapacitated person. Daniel King Le was born May 2, 1985 in New York: On August H, 1985, Daniel and his one-year old sister were removed from their parents' home and placed in loster care with the Brooklyn Home for Children. Subsequently, in May 1987, Daniel and his sister were placed with their grandparents. Vincent Le and Sang Tran Le, by the New York City Department of Social Services, in their apartment in Astoria, Queens. The Les adopted the two children on October 31, 1989. They currently reside in San Jose, Calidornia.

On November 22, 1987, Daniel suffered' severe injuries after falling four stories from a window in his Queens apartment. As a result of his injuries, Daniel underwent brain surgery on April 20, 1989 and an operation to repair a perforated car drum on July 2, 1991. Despite the seriousness of Daniel's injuries, he made a remarkable recovery and is no tonger under the regular care of any doctors. Daniel is a fun-toving active youngster who participates in all types of activities. However, Daniel has some difficulty with his school work and is functioning at least one grade below has normal grade level. It is unclear at this time how far he will advance at school

Alice your Lace formers 12-21-95

PERMIN Queens County

Jurisdiction for Guardianship Exists For Physically Present Nonresident

FLO

PETITIONERS, SISTER and attorney for a 10-year-old boy residing in Callfornia, sought to be named property management co-guardians. The boy, injured falling out of a window when he lived in New York, was to receive a \$5.3 million settlement from the building landlords. An issue was whether the nonresident child was "present" in New York for jurisdiction purposes. The court concluded that jurisdiction existed, as the child was physically present when the guardianship proceeding commenced.

* Matter of Le and Young (Le), Supreme Court, 1A Part 20, Justice Kassoff (p. 33, col. 2).

New York City Transit

July 8, 1996

Mr. Donald Frangipani 1467 79th Street Brooklyn, New York 11228

RE: RONALD GORDON AND GARY ROSENBERG FORENSIC EXAMINATIONS

Dear Mr., Frangipani:

I write on behalf of the New York City Transit's Law Department, Workers' Compensation Division, to extend to you my sincere gratitude for your superb investigation and pursuasive testimony on behalf of the New York City Transit in the above-cited cases. Your professional contributions were invaluable.

As you know, both cases were bitterly contested. The Ronald Gordon claim was flatly rejected by the Board. Following this denial by the Board, Mr.-Gordon was indicted on fraud and forgery charges. Thereafter, following a jury trial, he was convicted on multiple felony counts of criminal fraud and forgery. The forensic exhibits generated by you were the most compelling evidence introduced at the criminal trial. The Gary Rosenberg case was likewise denied by the Board. Once again, the pivotal evidence proved to be your forensic investigation. Without your timely forensic expertise in both cases, there is no doubt the Transit faced unjustified and substantial money damages, together with costly and extensive medical bills. The public purse, as well as the interest of justice, is well served by your efforts.

Kindly accept the enclosed MTA Law Department Certificate of Appreciation as a small token of the personal and professional esteem you so richly deserve. I remain,

> Very truly yours. George C. Perry Assistant General Counsel tel: (718) 694-3810 fax: (718) 694-3807

cc:: N. White

MTA New York City Transit is an agency of the Motropolitan Transportation Authority, State of New York F. Virgil Conway, Chairman

Richard R. LEff ATTORNEY AT LAW

80-02 KEW GARDENS ROAD SUITE 300 KEW GARDENS, N.Y. 11415 TEL: (718) 793-1311 FAX: (718) 575-4070

March 2, 1994.

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Donald Frangipani Examiner Of Questioned Documents 1468 86th Street Brooklyn, New York 11228

Re: People vs. Teri Eisner

Dear Mr. Frangipani:

I would like to thank you for your superb preparation and testimony as a qualified expert witness in the field of handwriting and questioned documents. The innocense of the defendant hinged on the refutation of the main prosecution witness'denial that she had written a certain letter. You showed clearly through charts and testimony that the witness was lying.

Thank you once again for your expertise.

Very truly yours,

Richard R. Leff



POSTAL INSPECTOR P.O. Box 160 Hicksville, NY 11802-0160

October 15, 1992

12

Dear Mr. Donald Frangipani:

I am sure that you are interested as to the outcome of the trial of Nicholas Allocco. On October 14, 1992, the jury convicted Mr. Allocco on all five counts of Mail Fraud. He is expected to be sentenced in the next fev months.

Your testimony was instrumental in helping the government obtain this conviction. Your assistance and testimony in this case is deeply appreciated by us. While we may investigate and prosecute cases, without your help we could never convict those who engage in arson and insurance fraud. On behalf of the Postal Inspection Service and Assistant United States Attorney Bridget Rohde, please accept our deep felt thanks.

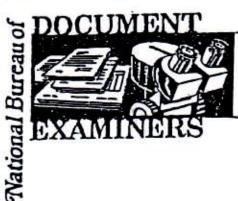
If you have any questions, please contact me at the above address or by telephone at (516) 933-2416.

Again, your cooperation was deeply appreciated.

Sincerely yours,

auter T- Bun

Martin T. Biegelman Postal Inspector



January 18, 1988

Don Frangipani, Director All City Investigations 1407-77th Street Brooklyn, NY 11228

Dear Don:

On behalf of the National Bureau of Document Examiners, I want to thank you for your excellent presentation at our meeting held on Saturday, January 16, 1988.

It was obvious that your choice of subject, <u>The Rules of Evidence</u>, was exactly what the members wanted. Your scholarly lecture was beautifully enhanced by the pertinent case studies from your files which you so generously shared with us. The practical applications demonstrated the rules and defined the parameters within which the forensic practitioner must work.

The group was remarkably attentive to your every word and it was clear that noone wanted the meeting to end:

Sincerely yours,

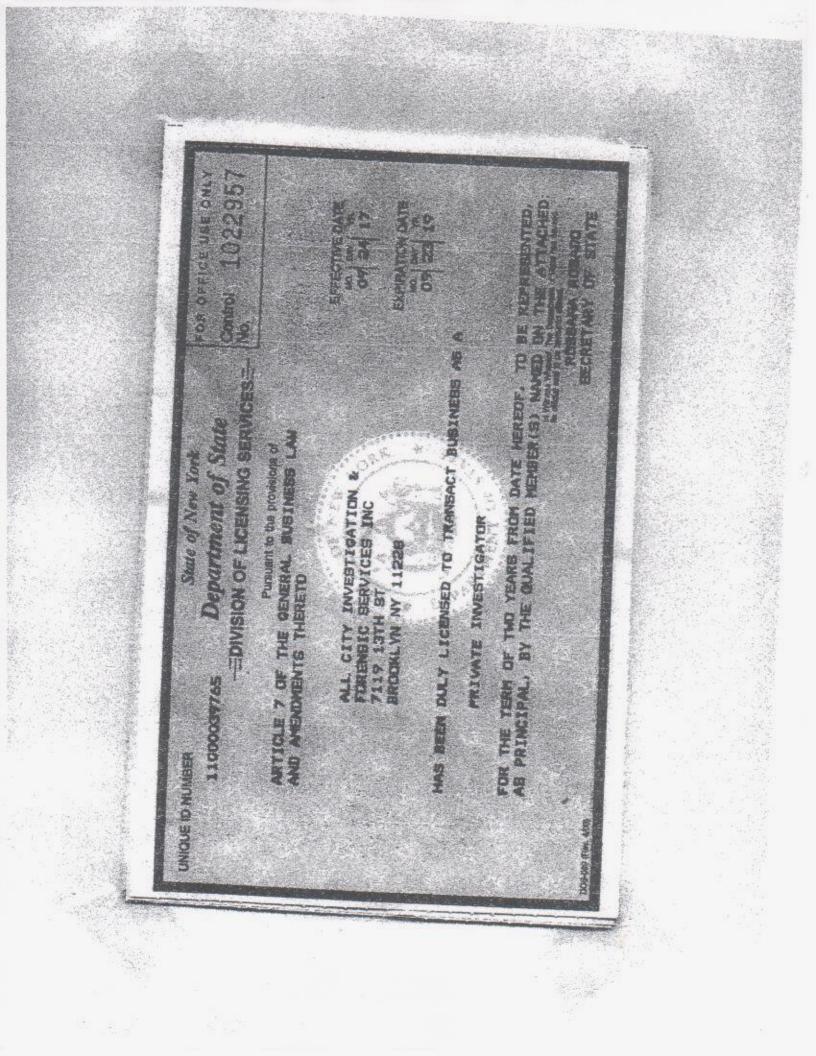
National Bureau of Document Examiners

eiler Evanne Geltzeiler

Vice President

(20) 200 111 .

250 WEST STTH STREET . HEW YORK HIT 1



American College of Forensic Examiners

+21

hereby recognizes the high level of professional scientific involvement as well as the contribution to the field of forensic examination and bestows upon

Donald Frangipani, BCFE

the title of Member of the American College of Forensic Examiners with all the rights and privileges pertaining thereto, as long as annual membership requirements are met and the Code of Ethics are upheld.

Robert L. O'Block, Ph.D. + Executive Director

Vincent Scalice Chairman of the Board

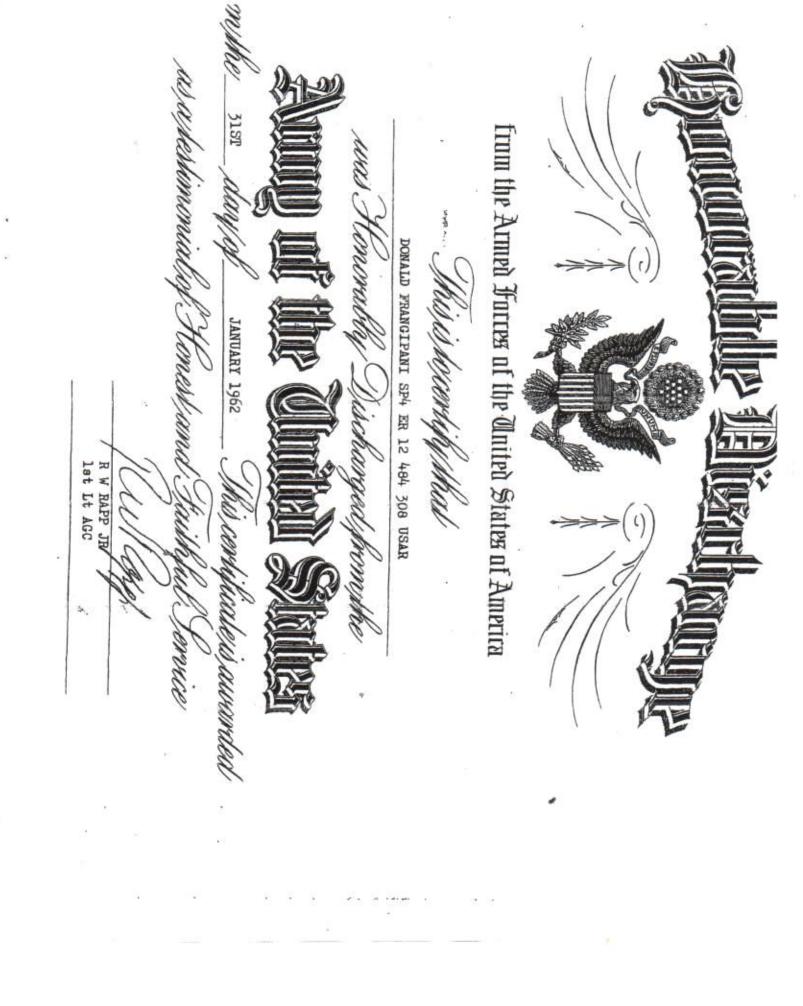
Rom

85

Membership Identification Number

12/20/95

Date



SUPERIOR COURT OF NEW JERSEY

HSBC Bank USA, National Association as Trustee for Fremont Home Loan Trust 2006-C, Mortgage-Backed Certificates, Series 2006-C

Plaintiff

Veronica Williams, et als.

Defendant, Pro Se

IN THE SUPERIOR COURT OF NEW JERSEY ESSEX COUNTY CHANCERY DIVISION

Case No. F - 000839-13

MORE EVIDENCE OF FRAUDULENT MORTGAGE

RELATED CASES:

U.S. Court of Appeals, Third District 19-1032 U.S. District Court of NJ Case 2:16-cv-05301-ES-JAD NJ Case Docket No. ESSX L – 004753-13 NJ Case Docket No. ESSX L – 000081-11

CERTIFICATION OF SERVICE

I, Veronica Williams, certify that on this 21st day of June 2019, a true and correct copy of this document will be sent to the parties via the method and as addressed below:

Via Email Steven Keith Eisenberg, Esq Attorney for Stern & Eisenberg	Via Email Attorney General for the State of NJ Mr. Gurbir S. Grewal	Via Email Stuart I. Seiden, Associate Brett Messinger, Partner Attorneys for Litton Loan Servicing, HSBC Bank USA, Goldman Sachs, Ocwen,
Senior Partner Stern & Eisenberg, PC 1581 Main Street, Suite 200 Warrington, PA 18976 Office 267-620-2130 Fax 215-572-5025 jefis@sterneisenberg.com seisenberg@sterneisenberg.com	Attorney General Office of The Attorney General The State of New Jersey Richard J. Hughes Justice Complex (HJC) 25 Market Street 8th Floor, West Wing Trenton, NJ 08625-0080 <u>ethics@ethics.nj.gov</u> <u>OBCCR@njdcj.org</u>	Fremont Home Loan trust 2006-C Mortgage- Backed Certificates Series 2006-C Duane Morris LLP 30 South 17th Street Philadelphia, PA 19103-4196 Phone (215) 979-1124 Fax (215) 827-5536 siseiden@duanemorris.com and LMTRYON@DUANEMORRIS.COM

Respectfully submitted,

Veronica A. Williams Pro Se Counsel /s/ Veronica A. Williams StopFraud@vawilliams.com (202) 486-4565

June 21, 2019