

No. \_\_\_\_\_

In the  
**Supreme Court of the United States**

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In Re: *Anthony Pappas*,

*Petitioner.*

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Petition for Writ of Certiorari  
to the United States Court of  
Appeals for the Second Circuit

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APPENDIX

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February 27, 2019

Anthony Pappas, individually  
and as Anthony Pappas for Congress  
Petitioner, pro se  
24-15 24<sup>th</sup> Street  
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## TABLE OF CONTENTS

Questions Presented	i
Table of Contents	ii
Table of Authorities	iii
Opinions Below	1
Jurisdiction	1
Constitution and Statutes	1
Statement of the Case	2
Reasons for Granting Writ	9
<u>Point One:</u> The Second Circuit Court of Appeals committed reversible error when it denied a Writ of Mandamus sought by Petitioner as a candidate for Congress to prevent the seizure of campaign funds by a state divorce court (12)	
<u>Point Two:</u> It was serious error for the Second Circuit Court of Appeals to disregard a prior restraint on free speech issued by a divorce judge along with other retaliatory orders which severely harmed a campaign for federal office (19)	
Conclusion	23

## **APPENDIX**

Final Order of United States  
Court of Appeals denying  
mandamus and extraordinary  
relief dated December 21, 2018 1a

Show Cause Application for  
emergency relief presented to  
the United states District Court  
for the Eastern District of New  
York on July 24, 2018 2a

Verified Complaint executed on  
July 23, 2018 presented in support  
of emergency relief before the  
United States District Court for the  
Eastern District of New York 5a

United States Court of Appeals  
for the  
Second Circuit

E.D.N.Y. – C. Islip  
18-cv-4199  
Seybert, J.

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At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 21<sup>st</sup> day of December, two thousand eighteen.

Present: Jose A. Cabranes,  
Rosemary S. Pooler,  
Christopher F. Droney,

*Circuit Judges.*

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In Re: Anthony Pappas,

18-2701

*Petitioner.*

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Petitioner, pro se, has filed a petition for a writ of mandamus. Upon due consideration, it is hereby ORDERED that the mandamus petition is DENIED because Petitioner has not demonstrated that exceptional circumstances warrant the requested relief. *See In re von Bulow*, 828 F. 2d 94, 96 (2<sup>nd</sup> Cir. 1987).

FOR THE COURT:  
Catherine O'Hagan Wolfe,  
Clerk of Court  
(seal and signature)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Anthony Pappas for Congress,  
a political organization created  
under Title 52 of the Federal Code  
and Anthony Pappas, individually,  
Plaintiffs,

-against-

SHOW CAUSE ORDER

Joseph Lorintz, individually and as  
Supreme Court Judge of the State of New York;  
Henry Kruman; Maria Pappas; TD Bank, N.A.  
and the State of New York,

CV No.

Defendants.

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Upon the annexed declaration of plaintiff  
Anthony Pappas executed on July 24, 2018 with  
exhibits and Verified Complaint filed on \_\_\_\_\_,  
it is

**ORDERED**, that the above named defendants,  
or their counsel, show cause at a term of this court  
located at \_\_\_\_\_,  
New York on \_\_\_\_\_, at \_\_\_\_\_  
o' clock in the \_\_\_\_\_noon of that day or as soon  
thereafter as the parties or their counsel may be heard  
why an order should not be made restraining the  
enforcement of orders, notices, executions and  
information subpoenas placed upon a campaign

account in TD Bank of Queens County, New York under the name, Anthony Pappas for Congress, bearing account number 4354433420 together with orders imposed in violation of federally protected rights during divorce proceedings involving the plaintiffs in Nassau County under New York Supreme Court index number 04-203531, and it is further

**ORDERED**, all enforcement of orders, notices, executions and information subpoenas placed upon a campaign account in TD Bank of Queens County, New York under the name, Anthony Pappas for Congress, bearing account number 4354433420, is hereby restrained until further order of this Court, and it is further

**ORDERED** that an order imposed upon all financial accounts of plaintiffs in a divorce proceeding known as Maria Pappas v Anthony Pappas under New York Supreme Court index number 04-203531 issued by matrimonial judge Hope Schwartz Zimmerman and continued by Judge Joseph Lorintz is hereby restrained until further order of this Court, and it is further

**ORDERED** that a gag order or restraint imposed in a divorce proceeding known as Maria Pappas v Anthony Pappas under New York Supreme Court index number 04-203531 in Nassau County is hereby enjoined together with all proceedings currently pending before Judge Joseph Lorintz, until further order of this Court, and it is further

**ORDERED** that service of this show cause order and supporting papers shall be made by \_\_\_\_\_ upon

\_\_\_\_\_ on or before \_\_\_\_\_ and deemed sufficient service.

ENTER,

\_\_\_\_\_  
Hon.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

---

Anthony Pappas for Congress,  
a political organization created  
under Title 52 of the Federal Code  
and Anthony Pappas, individually,

Plaintiffs,

-against-

VERIFIED COMPLAINT

Joseph Lorintz, individually and as  
Supreme Court Judge of the State of  
New York; Henry Kruman; Maria Pappas;  
TD Bank, N.A. and the State of New York,

Jury Trial Demanded

Defendants.

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Plaintiffs, as and for a Complaint herein, set forth the following:

**Preliminary Statement**

1) On June 26, 2018, Alexandria Ocasio-Cortez defeated long-time incumbent Joseph Crowley in a Democrat congressional primary in New York's 14<sup>th</sup> District (Northern Queens and Eastern Bronx). The upset victory gained national headlines with speculation that the 28-year old newcomer would become the first socialist member of the United States Congress. This was based on a six to one voter registration between Democrats and Republicans respectively in this District.

2) St. John's University Professor Anthony Pappas then became the only major party opponent to Ocasio-Cortez in the general election set for November 6, 2018. He was endorsed by the Republican Party in March, 2018. However, by reason of an abusive divorce process in New York state court, ongoing after more than thirteen years, Professor Pappas was made subject to an overbroad gag order and other draconian impositions in retaliation for his public criticisms of New York's court system. One such order has now restrained the candidate's campaign account.

3) This Court refused to intervene in the state court divorce case in 2013 to protect his federally protected rights, thereby encouraging further retributions of the kind which have now foreclosed his candidacy for Congress while guaranteeing Ocasio-Cortez a victory in November. The gag order prevents Candidate Pappas from commenting or defending himself publicly in the federal election process. It also puts his campaign staff at risk of contempt as third party violators, thereby harming his organizational activities. This action seeks to rectify these infringements while setting important precedent regarding federal-state relations under our dual form of government.

#### **Parties**

4) Plaintiff, Anthony Pappas for Congress, hereinafter "candidate," is a political organization created under the Federal Election Campaign Act of 1971, as amended, for the purpose of electing Republican candidate, Anthony Pappas, to the United States Congress in New York's 14<sup>th</sup> District (Northern Queens and Eastern Bronx). Election Day is November 6, 2018.

5) Plaintiff, Anthony Pappas, hereinafter "Pappas" is a citizen of the United States and resident of New York with a home located at 24-15 24<sup>th</sup> Street; Astoria, New York. He is a father of three still suffering from a thirteen-year divorce and

equitable distribution case. He is also a professor of economics at St. John's University whose reputation has been therefore injured.

6) On information and belief, defendant Judge Joseph Lorintz is a resident of New York State with a home located in Nassau County. As relevant to this action, he was and still is a Supreme Court Judge assigned to a divorce case entitled Maria Pappas v Anthony Pappas, index number 04-203531. He has acted under color of state law and exceeded his authority to impair rights secured to the plaintiff under the United States Constitution and federal Election Law.

7) Defendant Henry E. Kruman is a resident of New York State with a home located in Nassau County. As relevant here, he caused a property execution to be served on TD Bank, N.A. which thereby restrained the campaign account of said organization. He also acted with other defendants to impair rights secured to the plaintiff under the United States Constitution and Election Law. He maintains a business as a divorce lawyer under the name, Kruman & Kruman, P.C. with a principal office located at 353 Hempstead Avenue, Suite 1; Malverne, New York.

8) Defendant, Maria Pappas is a resident of Nassau County with a residence located at 26 Joy Drive; New Hyde Park, New York. As relevant here, she acted in concert with other defendants to impair rights secured to the plaintiff under the United States Constitution and Election Law.

9) On information and belief, defendant, TD Bank, N.A. is a corporation duly organized under the laws of the state of New Jersey with its headquarters located at 1701 Route 70 East, Cherry Hill, New Jersey. It operates banking institutions in New York with plaintiffs as customers, more particularly an office located on Ditmars Boulevard in the Queens portion of the 14<sup>th</sup> District.

10) Defendant, State of New York is a quasi-sovereign state of the United States with a principal place of business located in Albany, New York. As relevant here, it operates the Unified Court System which has authorized, directed or otherwise enforced an excessive restraining notice and property execution on bank accounts maintained by both plaintiffs.

### **Jurisdiction and Venue**

11) This action is brought pursuant to 52 USC Section 30114(b) and related provisions of the federal Election Law; 42 U.S.C. Section 1983 and the First and Fourteenth Amendments to the United States Constitution. Jurisdiction exists under 28 U.S.C. sections 1331, 1332, 2201 and 2202. Declaratory and emergency relief is not available in any other forum as a consequence of jurisdictional disputes, systemic bias in state court, a short remaining election season, and other events described in this Complaint. Venue is proper in the county of Queens, state of New York based upon the residence of the parties and the location of events which give rise to this action.

### **Background**

12) The parties, Anthony and Maria Pappas, were married on July 25, 1982 and thereafter gave birth to three children. The defendant Maria Pappas commenced an action for divorce on December 8, 2004. The age of the children obviated any major issue of custody and support at the time. Matters committed to the New York State Supreme Court for resolution were limited principally to grounds for a divorce under former laws and an equitable distribution of property.

13) More than thirteen (13) years later, the committed matters have remained subject to endless and recurring proceedings due to gender discriminatory laws, practices and customs of the State of New York which advance the fee enhancing interests of its matrimonial bar. As relevant here,

such an interest is an arbitrary one which harmed Pappas and those similarly situated in their liberty rights to a prompt divorce and separate existence without undue state infringement.

14) As part of that undue infringement, attorneys for the parties in the early stages of litigation prevailed upon their clients to trump up defamatory and needless accusations after a review of mandatory financial disclosures which showed total assets subject to potential dispute exceeding \$6 million. Due to the injury which these accusations would cause to a longstanding professional reputation of a university professor, Pappas was compelled to demand a jury trial.

15) As early as April 12, 2006, a since deceased judge, Robert Ross, characterized this litigation as one plagued by "inordinate delays." Nevertheless, the lucrative process continued with a series of non-jury trials which followed the one concluded before a jury exclusively on grounds. Although issues were purportedly decided from time to time, they recurred in meshed fashion over the next twelve years at a high cost to the divorcing parties and their children.

16) Accordingly, Professor Pappas exercised the rights he believed he possessed under the American Constitution by reporting the misconduct and abuses experienced in New York's divorce courts. This proved to be a fallacy when judges assigned to his thirteen year ordeal abused their decision making powers in retaliation, thereby establishing a systemic bias (or prejudice) against him in New York's courts.

17) Necessarily, then, Pappas turned to federal court to protect his federal rights in an action filed in this court on August 30, 2013. His verified complaint set forth profound violations of his federal constitutional rights under 42 USC Section 1983. His claims were premised on that systemic bias in state court resulting from his public criticisms of New York's

divorce courts in the community, social media and events outside the scope of their jurisdiction.

18) Said bias was altogether ignored during motion proceedings in that earlier federal action focused on a dismissal prior to discovery processes or a jury trial. Without the capacity to obtain court subpoenas and related investigation of judge misconduct as an unrepresented litigant, Pappas was seriously impaired in his burden of proof regarding a bias otherwise foreclosed by technicalities. Such impairment occurred despite strong evidence of judge fabrications, an overbroad gag order and a protection order issued in violation of law and without factual support.

19) On August 6, 2014, that action entitled Pappas v Zimmerman, Docket No. 2:13-cv-04883, was dismissed for lack of subject matter jurisdiction under the Domestic Relations Exception. The Second Circuit affirmed in a summary order issued the following year. Since the time of that decision and order, the Supreme Court handed down a ruling in Rippo v Baker, 580 US \_\_\_\_ (2017) which vacated a murder conviction in state court on grounds of “objective bias.” Like the bias here, it occurred on a “totality of circumstances” surrounding a trial judge’s conduct.

20) Since the 2014 and 2015 decision and order, circumstances and events have arisen which take this complaint outside the scope of a Domestic Relations Exception, related abstention practices and preclusion rules while necessitating the emergency and long term relief sought here. Now in its thirteenth year, five more since the time of this Court’s 2013 decision, Pappas’ divorce case shows no sign of conclusion while the marital estate continues to be swallowed up by lawyers.

21) These circumstances and events since 2013 feature, among other things, the following:

a) The state divorce judge (Zimmerman) named in the 2013 federal case disqualified herself in March, 2017 without motion or explanation after issuing a judgment reversed, in part, on appeal in June, 2016. Under state law, such disqualifications have no transparency, grounds for them are neither cited nor required, hence leaving the litigant subject to speculation regarding the extent and duration of any undisclosed prejudice. This law also insulates a self-regulating judge and court system from public accountability impacting other potential or existing litigants.

b) Judge Zimmerman's replacement, defendant Judge Joseph Lorintz, has continued the systemic prejudice (or bias) against Pappas in retaliation for his ongoing criticisms of divorce court. Among other things, he has ignored requests for an explanation or justification for money judgments that remain in effect despite funds restrained, seized or readily available for immediate satisfaction. He has restrained monies needed for personal living expenses and lawyer fees.

c) This malicious or reckless process has now led to a restraint upon the candidate's separate bank account at the defendant TD Bank issued on July 10, 2018 and received by the candidate four days later. Beyond that, defendant Lorintz has entered orders favoring defendants Pappas and Kruman while denying motions to lift, reduce or modify excessive, punitive and retaliatory orders against Pappas. He has taken no action to restrain the fee tactics of defendant Kruman which have caused or influenced nearly \$2 million in total lawyer fees. Such tactics not only contradict New York's "excellence initiative" but they harm his own client and her children.

d) Among other retaliatory misconduct is a 2011 gag order issued by Judge Anthony Falanga which remains in effect. Federal deference practices have yielded no good faith activity on the part of state courts or the judges named in the earlier action. There have been at least five assigned to date.

Hence, when Pappas announced his candidacy for Congress, thereby placing his divorce under public scrutiny, he was subjected to media inquiries regarding these defamatory orders. The gag order placed both Pappas and the Candidate at risk of contempt in any responses.

e) By way of example, in prominent news articles of the New York Times, New York Post and Associated Press distributed around the country, candidate Pappas was compelled to answer questions regarding a 20-year protection order issued without request of the ex-spouse and no findings of any offense. He was subjected to false characterizations of a so-called "terrified" ex-spouse orchestrated as a litigation tactic, and he was accused of "veiled threats" never made upon a judge (hearing officer Gartenstein) in retaliation for Pappas' exercise of First Amendment rights.

f) This appointed hearing officer had simply abused judicial office for personal revenge, more particularly an error in judgment when Pappas made a complaint directly to him instead of his lawyer in 2009. It led to an overkill response and decisional findings unsupported by any proof or corroboration in record. So horrendous was this overkill that Judge Gartenstein compared his public critic to "the perpetrator of the Fort Hood Massacre" in a 2010 decision.

g) When such overkill morphed into undeniable bias, Judge Gartenstein offered to step down from the case only to renege on it after that offer was accepted by Pappas and his attorney in writing. Contrary to the continued fabrications, Professor Pappas has evinced a most restrained character with a traditional gentleman's disposition and a campaign theme which promotes "sensible solutions for a kinder, caring world." That theme is being wholly overshadowed by media unfamiliar with this protracted divorce case and the persons described in this Complaint.

h) As a state Supreme Court Judge, defendant Lorintz possessed general jurisdiction (authority) to lift the 2011 gag order issued by predecessor Judge Falanga. By failing, refusing and even ignoring Pappas' motions to do so in 2017, that gag order placed Pappas and Candidate (separate organization officers) at risk of arrest and/or confinement for contempt. Campaign staff are vulnerable to contempt when the subject of a court order uses third parties to violate its terms.

i) The restraint on fundraising coupled with a risk of contempt severely chills the candidate's rights to seek federal office. Moreover, the expansive nature of this gag order remains a prior restraint on free speech encompassing every conceivable explanation or criticism ventured during this congressional race. Never reduced to an appealable paper, it not only foreclosed or frustrated access to a federal forum by way of appeal, but it has all but ended this congressional race in favor of the Democrat Primary winner, Alexandria Ocasio-Cortez. This gag order reads:

"I am admonishing you right now, you are not to communicate with anybody inside the court system, outside the court system, about how you feel you were being treated or anything like that. If you feel I am violating your right to free speech, you have the absolute right to feel that way and do whatever you feel is appropriate. If I decide to hold you in contempt, we'll cross that bridge when we come to it. Do you understand?"

22) The public activity made subject to this restraint included grievances, inquiries and all manner of speech that featured severe criticisms of New York's abusive system of divorce. Professor Pappas even circulated petitions and informational releases on the St. John's University campus. That public activity is now a central feature of the congressional race in New York's 14<sup>th</sup> District. It is distracting needlessly

from the real issues while crippling a highly qualified candidate who is promoting traditional American values, governance and economic principles.

**First Cause of Action: First Amendment**

23) Plaintiffs repeat, reiterate and incorporate the foregoing paragraphs “1” through “22” of this Complaint as if set forth here in full.

24) The defendants have violated plaintiff’s rights of free speech and court access under the First Amendment to wit: 1) through the imposition of a prior restraint by defendant Judge Anthony Falanga on January 19, 2011 which was neither modified nor vacated to the present day, and 2) punitive measures undertaken on a variety of pretexts for offensive expressions made by plaintiff Pappas from time to time during the course of this maliciously protracted divorce case.

25) In formal submissions and public releases, plaintiff has employed offensive terms and depictions to impress upon their recipients the abuses occurring on a systemic basis in New York’s divorce courts. The Supreme Court has emphasized that offensive speech is more likely to elicit unlawful retaliation, therefore requiring closer scrutiny by our federal courts. Such offensiveness is exemplified by public statements of Pappas which include, but are not limited to, the following:

a) A 2010 petition entitled “Help Me Impeach and Remove Judge Stanley Gartenstein from Office” supported by such statements as “Gartenstein defiles the sacrifices of our soldiers in Iraq and Afghanistan and the sacrifices Americans have made in our wars throughout history” and “Our nation does not need an arrogant and biased bully who thinks he cannot be held accountable... in Nassau County... We do not need a judicial dictator

and tyrant who retaliates against those who cry out for justice.”

b) A detailed newsletter disseminated in 2012 across the St. John's University campus together with on-line versions which added defendant Judge Falanga to his offensive depictions of the state's divorce system. He summarized the ratification of Gartenstein's misconduct as "The Falanga Doctrine." He continued: "What does the Falanga Doctrine mean? You go to court, take off your shoes, and twiddle your toes in the judge's face. You do somersaults while providing testimony. You whistle at the judge." (in an attempt to find definition to the "aberrant" acts and "game" that plaintiff was allegedly exhibiting without specificity or factual support to impose the January 19, 2011 gag order).

c) An ex parte written communication to Judge Gartenstein, albeit improper, in November, 2009, which was later defended by his attorney as a "cry for justice" in the face of endless proceedings which uniquely harmed the plaintiff. The Gartenstein phase comprised nearly 70 days of testimony and 400 exhibits with thousands of documents admitted over a two year period exclusively on the subject of property distribution. Two years later, defendant Judge Falanga described the Pappas case as the oldest one in the system and no end in sight. He also described Gartenstein's recusal "after sixty days or more of testimony, with the case ninety-five percent completed" as "almost criminal. And I think it might be actionable. But I suspect Gartenstein had good reason to do that."

d) In the wake of these abuses, ratified perjury and criminal characterizations of the recusal process by Falanga, plaintiff filed complaints with the county

District Attorney, FBI, state Commission on Judicial Conduct, U.S. Justice Department, state Inspector General and other relevant government agencies. As they became known to the respective defendants, further retributions were exacted, not the least of which was the protracted divorce as a punitive device at plaintiff's expense through court ordered fees.

26) As a direct consequence of the foregoing, plaintiffs have suffered injuries to their liberty interests in promoting a highly qualified candidate for federal office. Plaintiff Pappas remains prevented from moving on with his life without further divorce proceedings after thirteen (13) painful years. He is seeking declaratory and injunctive relief removing an overbroad court restraint on his campaign, personal and joint accounts. He is also seeking an order vacating an ongoing prior restraint on his free speech and that of his campaign staff, an order vacating a still active 20-year protection order, and such other relief as this Court deems just and proper.

#### **Second Cause of Action: Election Law**

27) Plaintiffs repeat, reiterate and incorporate the foregoing paragraphs "1" through "26" of this Complaint as if set forth here in full.

28) Under Title 52 of the United States Code (Election Law), the Federal Election Commission has been granted exclusive jurisdiction to decide campaign funding and expenditure violations. However such express grant of authority does not extend to broader civil rights violations of the kind at issue here or involuntary applications of donated campaign funds to the personal use of a divorce lawyer and ex-spouse.

29) On information and belief, the Federal Election Commission has no express or implied authority to represent a

victimized divorce litigant or to otherwise act upon state judges engaged in divorce proceedings. Plaintiffs have contacted said Commission without an answer or recommendation on how to proceed regarding the extraordinary circumstances presented here. No case or precedent has been uncovered to provide independent guidance. Consequently such federal jurisdiction, jurisdictional disputes and remedies can only be decided by this Court.

29) By reason of the violations of federal election law through the malicious or reckless actions or inactions of these defendants, plaintiffs are entitled to a damage remedy before a jury together with the emergency and equitable relief sought in this complaint.

### **Third Cause of Action: Due Process**

30) Plaintiffs repeat, reiterate and incorporate the foregoing paragraphs "1" through "28" of this Complaint as if set forth here in full.

31) Plaintiff was denied his right to a rational, orderly and timely court proceeding before a neutral and detached magistrate or judge. The bias inflicted against plaintiff was both systemic in the New York's divorce courts and individually among the presiding judge named here.

32) With each judge assignment, a stigma is imposed and remains attached to plaintiff which forecloses any fair and judicious outcome. Meaningful relief is not available in state court which lacks jurisdiction over federal elections, thereby foreclosing ultimate access to a federal forum. In addition, the systemic bias directed against Pappas has complicated an accurate record.

33) Plaintiffs assert both substantive and procedural components in this cause of action. The litigation process

inflicted upon them by these defendants satisfy the threshold of "conduct which shocks the conscience" of a civilized society. Defendants have abused the blanket rule of judicial immunity and attorney licensing privileges beyond their scope and intended application.

#### **Fourth Cause of Action: Equal Protection**

34) Plaintiffs repeat, reiterate and incorporate the foregoing paragraphs "1" through "28" of this Complaint as if set forth here in full.

35) The matrimonial section of New York's court system promotes inherently biased and discriminatory practices against husbands, fathers and male litigants. Women counterparts are encouraged to file false petitions under oath under a "better safe than sorry" doctrine of law in matters of domestic violence. Such a doctrine routinely destroys the careers of men who have been wrongfully accorded no status protection here. To this end, plaintiffs seek to make precedent by way of declaratory relief which instills proper protections under the Fourteenth Amendment.

#### **Fifth Cause of Action: Declaratory and Injunctive Relief**

36) Plaintiffs repeat, reiterate and incorporate the foregoing paragraphs "1" through "28" of this Complaint as if set forth here in full.

35) Plaintiffs seek judgment declaring the orders and processes described in this Complaint unconstitutional under one or more of the claims set forth herein. Plaintiff Pappas further seeks an order permanently enjoining all enforcement of those orders and proceedings underway in the divorce case entitled Pappas v Pappas under Nassau County Supreme Court Index No. 04-203531.

**WHEREFORE**, plaintiffs Anthony Pappas for Congress and Anthony Pappas, individually, respectfully demand judgment as follows:

1) Judgment declaring the orders, edicts and processes described in this Complaint unconstitutional and/or violative of federal Election Law together with an order permanently enjoining the enforcement these orders and any continuation of the subject state court proceedings currently pending before defendant Judge Joseph Lorintz; and

2) Compensatory and punitive damages on the Second Cause of Action to be decided by a jury and such other and further relief as to this Court may appear just and proper.

DATE: July 23, 2018

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Anthony Pappas, individually  
and as Candidate for Congress  
Plaintiffs, pro se  
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