

18-1227

No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

ALVIN S. KANOFSKY – PETITIONER

VS.

COMMONWEALTH OF PENNSYLVANIA

WILLIAM BARR – ATTORNEY GENERAL OF THE UNITED STATES

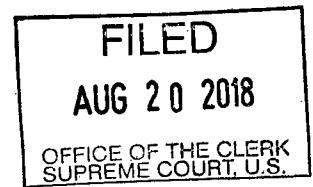
NOEL FRANCISCO – SOLICITOR GENERAL OF THE UNITED STATES

ROOM 5614, DEPT. OF JUSTICE
950 PENNSYLVANIA AVE, WASHINGTON, D.C.

PETITION FOR WRIT OF CERTIORARI

SUPREME COURT OF PENNSYLVANIA CASE 798 MAL 2017 DECISION OF
APPEAL ENTERED IN HARRISBURG, PA. MAY 21, 2018

DR. ALVIN S. KANOFSKY. 229 E. CHURCH
STREET BETHLEHEM, PA 18018
610-867-8064



ORIS.

QUESTIONS ASKED

1. Was Kanofsky Responsible for Building Damage? **NO**
2. Is City of Bethlehem responsible for Damage to Building as Charged by Judge Leonard Zito? **YES**
3. Did City Purposely Cite and harass Petitioner to get Building? **YES**
4. Did Court delay access to transcripts of trials? **YES**
5. Did Kanofsky have permission from City to Occupy Building? **YES**
6. Did Kanofsky utilize building for ten years with flea market ? **YES**
7. Did neighbor Saraceno make false libelous slanderous statements? **YES**
8. Did City force entry into building several times? **YES**
9. Did Judges collude with City to seize building from Petitioner? **YES**
10. Did Judge BROBSON make false statements in the Kanofsky appeals? **YES**
11. Is Judge Beltrami biased against Petitioner and has conflicts of interest?
YES
12. Did witnesses for City at trial make false scandalous testimony? **YES**
13. Did the judges purposely schedule the trials at conflicting times to prevent Kanofsky attending? **YES**
14. Was Kanofsky subjected to pressure from City over Decades to give up building? **YES**
15. Were all of the conditions of the Conservatorship satisfied? **NO**
16. Are some of the conditions still in litigation? **YES**
17. Did the President Judge LEAVITT of Commonwealth Court rule the lot is not blighted? **YES**
18. Is the United States a co-defendant along with Kanofsky in the case? **YES**
19. Was the adjacent lot blighted and satisfying the Conservatorship requirements? **NO**
20. Is the property worth substantially more now with the recent completion that the giant office building and parking lot 200 feet from Kanofsky's properties? **YES**
21. Has Judge BROBSON consistently ruled against Kanofsky over many years including earlier in 2012 with The City of Philadelphia breaking into Kanofsky's property in Philadelphia? **YES**
22. Is further litigation moot regarding Conservatorship proceedings until the this initial case is affirmed by the courts? **YES**
23. Is it correct to have United States as a co-appellant with the Commonwealth as seemingly arranged by Judge BROBSON? **NO**
24. Was the Northampton County Court correct in finally overturning Judge Beltrami's guilty verdict, jail sentence, and \$625 K restitution order on the thirteen year old boy for his wrongful conviction of setting fire to a house, with this case being cited nationally by the Michigan University Innocence Project as one of the country's major travesties of Justice. **YES**
25. Did City of Bethlehem attempt to Delay and cover up the court hearing on

the Front Broken Window case heard by Judge Samuel Murray for fear of it revealing incriminating actions on their part. Specifically, the city front loader hitting the side wall by the window while dumping snow on Petitioner's lot after the January 22, 2016 record 32 inch snow storm, causing the breakage of the front wind, side wall stucco damage, and roof damage, and thus exonerating Kanofsky? **YES**

26. Did Judge Zito acknowledge Kanofsky's claims that the City is responsible for damage? **NO**
27. Does the Allentown Trial of the United States vs. the Mayor Pawlowski for fraud and corruption support Kanofsky's claims of fraud and corruption by the local entities? **YES**
28. Did City block bids for building conservator Entities from outside parties, e.g. Rich Morales – Leonare Mohr Group? **YES**

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JURISDICTION

Jurisdiction lies with the Common Pleas Court of Northampton County, Pa. Also, with the Federal Courts of the United States of America and with the Commonwealth Court of Pennsylvania, and finally with the Supreme Court of Pennsylvania.

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Constitutional and Statutory Provisions Involved

1. Smucker v. Lancaster City Planning Commission, 74 A.3D 349, 352 n. 8 (Pa. Cmwlth. 2013)
2. Commonwealth v. Ali, 10 A.3d 282.293 (Pa.2010)
3. In re Condemnation by Redevelopment Authority of Lawrence County, 962. A 2d 1257, 1269 (Pa Cmwlth. 2008), appeal denied. 973 A 2d 1008 (Pa. 2009)
4. 35 P.S. Sec 1712 .1 Sec. (6)-(7)
5. 35 P.S. Sec. 1712.1. Sec (2)
6. Redevelopment Authority of City of York v. Bra tic 45 A.3d 1168 (Pa. Cmwlth. 2012)
7. Allstate Life Insurance Company v. Commonwealth, 52 A 3D 1077, 1080

CONCISE STATEMENT OF THE CASE

What follows is a concise statement of the case as required by Supreme Court Rule 14.1(g), as requested by the court in a November 6, 2018 correspondence.

The Petitioner, Alvin Kanofsky, has owned a major building and lot in Downtown Bethlehem, Pa. next to Lehigh University and Saint Luke's Hospital. About five years ago it was decided by both institutions to further expand into the neighborhood by the Petitioner, where he had been operating his businesses within the building and using it to store items written documents and materials relevant to his business activities.

The petitioner had operated the building as a retail store, a flea market with forty dealers and a music club and theater group for ten years prior to using it primarily for his own business activity and storage.

It underwent a massive renovation and clean out in 2006 to 2008 which then allowed for city approved occupancy of the owners' items in the building.

As well, more recently, the State of Pennsylvania had passed new laws encouraging business development in older historic districts, with tax breaks for the development – the CRIZ (Community Revitalization Incentive Zone) in Bethlehem, and the even more powerful NIZ (Neighborhood Incentive Zone) in neighboring Allentown.

The owner sought to develop his property utilizing these benefits and began approaching various city and state development entities starting in 2014. But then, the owner started receiving violations of building codes which he had not received before. As well, he was getting pressure from a competing developer, Atty.Dennis Benner, to sell the properties, building and lot, to him.

Soon, there was an accumulation of so called violations for minor exterior building and lot items – e.g. External cosmetic cracked Stucco wall, weeds on the lot, no certificate of occupancy (even though this had been allowed by the City after the Clean-out and Repairs during 2006-2008).

These items were repeatedly repaired and dealt with by the Petitioner, but the frequency and intensity increased with subsequent appearances before the local Magistrate, the Hon. Nancy Matos . As well, the city inspector Michael Palos, who had handled all earlier violations on the building and lot, was removed from employment with the city, and replaced by the Chief inspector, Mr. Craig Hynes.

During the winter of 2015- 2016, there a record breaking snowfall On January 22-23 where 32 inches of snow fell. This crippled the entire Lehigh Valley. Consequently, the City snow removal equipment was called into service and their giant front end loaders were utilized to clear the city streets around the owner's building since it fronts on the major thoroughfare, Third Street, in South Bethlehem. The snow from the streets was pushed onto the Petitioner's lot and piled against the sidewall of the adjacent building. The street storm sewer covers were demolished by the process with their remains found later strewn along the path the front loader took on its way to the Petitioner's cosmetic stucco building wall, with numerous concrete chunks found along the building wall.

Soon after this storm occurred, the Chief inspector, Craig Hynes started issuing numerous violations to the Petitioner – in fact, two a day. Most of these were for now a newly discovered broken front display window with a semicircular crack of radius approximately one half meter centered on the lower left hand corner of the window. Cracks in the cosmetic stucco, not essential to the structural strength of the wall, were found as well. These violations are the ones receiving the fines imposed by Judge Zito in his court in this case.

It was these violations, for initial conviction by the Magistrate Nancy Matos and then presented in Northampton County Common Pleas Court and further ruled on by Judge Zito that form the basis for

the Petitioner's present case before this Supreme Court. A total of some 18 convictions given for violations in successive days which resulted in about \$30K in fines and finally five days in Northampton County Prison (without it not being postponed until after being heard by the Supreme Court of the United States).

This, despite the Petitioner arguing during the court appearance before Judge Zito that it was the City and not him responsible for the so called damage to the building. City Attorney Matthew Deschler, acting for the State of Pennsylvania as the representative of the District Attorney even earlier moved to impose Bail on the Petitioner, but Judge Zito called him vindictive at the hearing, for insisting on bail.

The United States of America is a Co-defendant with Kanofsky on the subsequent building cases, for taxes supposedly owed, (which have been disputed by the defendant). By virtue of the liens which it has filed, which were included in the subsequent Conservator case filing in November 2016 to obtain the building and adjacent lot. This explains why in all the subsequent court filings, the United States of America is listed as a codefendant with the Petitioner.

As well, the Petitioner did serve five days in Prison under Judge Zito Order despite the case still being considered by the Pennsylvania courts. As well, apparently, any appeal to the U.S. Supreme Court does not stay his serving the Prison Sentence of Judge Zito

The Petitioner was ordered by Judge Zito in April 2018 to serve five days incarceration in Northampton County Prison. This was before all of his appeals to the state courts had been exhausted. Petitioner challenged the order with it being premature, but the judge insisted that he serve the time in prison. Petitioner complied, entering the Northampton County Prison on Friday, May 8, was processed, and served his five days with him being discharged the following Wednesday afternoon.

It wasn't until two months after the citations were issued through the Magistrate Nancy Matos that the city illegally gained entry to the building and it was discovered that the front roof next to the lot where

the snow was being piled had collapsed exposing the interior of the third top floor of the building to the elements,

The City then arranged, independently of the Petitioner, for a temporary repair of the building roof with the Serfass Construction Company. This repair in August of 2016 still left large openings in the roof temporarily propping up the roof, but had not sealed numerous other openings for roof leaks.

United States Government Funds given by the State Harrisburg Development Agency through a grant to the City were used for this repair purpose. However, water was now leaking into the building through the large unsealed openings not repaired by Serfass, causing further damage to the interior of the building. (It is worth noting that Serfass is a major contractor in the construction of many of the Allentown Redevelopment skyscrapers.)

In the meantime, this case was working its way through the court system and had finally reached the State Supreme Court, where it was finally denied the last Appeal of the Petitioner. Before the final appeal Reconsideration Filing had been ruled on, Judge Zito ordered the Petitioner to serve the five days in County prison that he had originally sentenced the Petitioner to, but he was out of prison without any bail being required, as requested by the City Lawyer Matthew Deschler, but denied by Judge Zito.

In this case there is a total lack of due process, as supposedly guaranteed in the constitution of the United States. There was forced entry into the petitioner's building numerous times, without a search warrant. There was numerous false testimony by the city witnesses, without a fair hearing by the judges, who rejected any testimony and evidence of the Petitioner. There were conflicts of interest with, for example, the City case being tried with subsequent Judge Beltrami's former law student Atty. Matthew Deschler as the attorney representing the state, rather than by the usual district attorney, John Morganelli, or his staff etc. Furthermore, the subsequent transcript of the conservator hearing before Judge Beltrami was not made available to the Petitioner, Kanofsky.

As well, Judge Beltrami presided over one of the most famous cases of a travesty of justice, sentencing a thirteen year old boy for setting fire to a house, when he was completely innocent, and it was only several years later when the supposed owner of the house again appeared in court that the Judge's stenographer, Ms. Jane Walker realized that it was the owner who had committed the arson.

As well, Kanofsky is being targeted for being Jewish, the sole Jewish presence left in the Southside downtown Bethlehem Business District. This was an area which previously had a large Jewish Presence with most of the Southside merchants being Jewish.

In summary, in regard to the guarantees of the Constitution of the United States, these were violated in Kanofsky's case as listed:

1. Due Process of law(VII)
2. Practice of Religion(I)
- (3) Illegal Taxation
- (4) Freedom of Speech(I)
- (5) Excessive Bail, Fines, and Punishment(VIII)

REASONS RELIED ON IN SUPPORT OF THE PETITION

The Petitioner, Kanofsky, presents below his arguments to reverse the earlier decisions by the Commonwealth Court issued on August 14, 2017. The same arguments apply to the earlier August 12 decision.

It was only recently, during the City's attempt to prevent a court trial on the cracked front window of the Petitioner's building that it became clear as to the true sequence of events and actions by the City to fraudulently and corruptly seize Petitioner's building and adjacent lot.

It is worth noting that just recently, the United States of America, which is a co-defendant with the Petitioner in these Proceedings, has finally indicted the mayor of Allentown, Pawlowski, with 54 counts of corruption. The office of the U.S. Justice Department, which is involved with Petitioner's case, headed by U.S. Attorney Louis Lappen, is also the one involved with petitioner's case (Exhibit A).

Also, it is worth noting that it is the same entities which control the combined areas of Bethlehem, Allentown, and Easton, - I.e. The Greater Lehigh Valley, the Chamber of Commerce, the Economic Development Authority, the Courts, elected representatives, etc. are all shared by the same three cities of the Lehigh Valley. For example, the Federal Court System for all three are shared and have their local court facilities in the Federal Courthouse in Allentown. The Chamber of Commerce is only the one Chamber of Commerce for the entire area, located a few blocks down Hamilton Street from the Federal Courthouse.

Thus it is obvious that the Corruption and fraudulent actions are shared and common to all three cities. It was only after the Petitioner approached these organizations for support and assistance in developing his two strategically located properties that his problems with the city began.

Thus, these court actions by the two defendants in this case, the United States of America and Alvin S. Kanofsky share a common defense to counter the fraud and corruption prevalent in the Lehigh Valley. Appellant lists below the sequence of events on which this reconsideration is based.

1. City damages building by piling snow against building on petitioner's lot after the record January 22, 2016 snow storm. Evidence is total replacement of sewer cover and fragments from old cover piled against building wall and breakage in stucco wall. Also, crack in front window for which the city cites me for violation.

2. Petitioner appealed the citation for the cracked window violation. The review board rules against me despite presenting evidence of the sewer cover demolition by the city's big front loader with the construction cones and fragments on the lot. They say he must repair the window before he can then sue the city to recover the costs for the damages.
3. Petitioner files an appeal with common Pleas Court.
4. In the meantime, the city brought Kanofsky before the Common pleas Court for the building code violations and trials were held first before Judge Koury, and then two months later before Judge Zito. Kanofsky was found guilty in both cases, with numerous violations for successive days being filed.
5. Petitioner appealed both of these in Superior Court.
6. Petitioner avoids Bail being set on his case, as requested by the city, with Judge Zito denying it.
7. The broken window case eventually comes up for consideration by the Common Pleas Court after being neglected for a long time. Judge Roscoli brought it up and scheduled a hearing.
8. City asks for a initial continuance on the window case and then later, another continuance.
9. At third scheduling, the city again asks for another continuance. This time with the City Lawyer's father (also a lawyer) asking for it and denying the filing for a previous continuance. This now while the case has evolved to where the conservator case under Judge Anthony Beltrami to seize Petitioner's properties are proceeding with the city preparing to take the title to Petitioner's properties. The third hearing was before the President Judge Baratta on June 12, 2017.
10. The Petitioner, upon examination of the conservator papers filed in Common Pleas Court, discovered numerous violations for which he was found guilty on the broken windows and roof and the roof.
11. Police Lt. Benjamin Hackett had claimed after entry (according to supposedly investigate the doors of the building being open) to the building on March 24, 2017 and with an interior inspection he had found roof leakage. Outside the building he falsely claimed he had discovered bricks strewn on the sidewalk behind the building on Mechanic Street.

12. The neighbor, Mr. John Saraceno, illegally grows his grape vines over the entire side wall of the building and onto the rear wall and roof causing roof and mortar water leakage. This despite numerous attempts by Petitioner to get him to remove them. The City refuses to assist Petitioner in having Saraceno remove the vines.
13. Commonwealth Court used Police Lt. Seargent Hackett's statements at trial in May 16, 2016 before Judge Koury as strong evidence against Kanofsky for the violations. They also cite Kanofsky's unconvincing verbal defense, and lack of honesty and veracity as indicated by his mannerisms. The decision by the court could include prison time.
14. Unbeknownst to the Petitioner at the time of the hearings, the repeated impact of the City front loader shortly after January to clear the snow of the city caused a collapse of the roof strut in the front portion of the building as well as a crack in the front window. Petitioner did not discover it in the building until much later on July 16, after the city forced illegal entry into the building.
15. With finally having a hearing on the front window before Judge Paul Murray of Common Pleas Court on July 17, 2017, and with Judge Murray siding with the Petitioner, petitioner realized he had received citations from the city on the related broken glass window (And even for the broken glass) which were listed in the conservator filings.
16. These citations were then used by the city to fine the petitioner, and were included in the Conservator filings by the City for liens against the building.
17. Commonwealth Court had ruled against the Petitioner in part for these window citations, as well as roof violations, all of which were caused by the city, but were fraudulently used.
18. In regard to the certificate of occupancy violations, the petitioner submits new recently discovered evidence that shows he was allowed to store items in the building.
19. The city inspector Michael Palos was apparently abruptly removed from service after the first so called violation was issued to Petitioner and replaced by the chief inspector Craig Hynes who had falsely testified against the Petitioner in all of these subsequent proceedings.
20. In addition, the city claimed that the city (Commonwealth of Pa) was in possession of the petitioner's building many months before it entered into

the Conservator Proceedings. The fines for the broken glass windows among others subsequently were not issued against the Petitioner.

21. When Petitioner sought to use a nunc pro tunc proceeding to recover some couple of thousand dollars in fines for these violations that he had already paid, the District attorney and City Lawyer threatened to fight Petitioner on this action.
22. The Commonwealth of Pa. Is proceeding in total disregard for the rules of law. The higher courts should not be a participant to these actions.
23. Petitioner respectfully requests that the U.S. Supreme Court Court Rule against the Commonwealth of Pennsylvania in these egregious actions against one of its most devoted, supportive, and contributing citizens.

REASONS FOR GRANTING THE WRIT

(TAKEN FROM APPEAL TO COMMONWEALTH COURT)

RECONSIDERATION OF COURT ORDER DENYING PETITION FOR ALLOWANCE OF APPEAL OF APRIL 16, 2018

1. The Petitioner was not responsible for the damage to the building such as the cracked front window, stucco damage, etc. This was due to the city piling and shoving snow against his building with a huge front loader after the record 32 inch snowfall of January 22, 2016. The impacts were also responsible for the roof collapse. This was evident from the total destruction of the adjacent concrete and steel sewer cover with the remains found on the Petitioner's lot and against his building's wall. **Exhibit A**

This resulted in numerous citation violations for which Kanofsky was fined a total of \$30K and a sentence of 5 days in prison. **Exhibit B**

2. The city has been determined to seize the building of the Petitioner over the many years he has owned it, with the most recent attempt being the

Conservator proceedings. In the hearing before Judge Beltrami, the \$30 K in fines were incorporated into the costs billed against Kanofsky in the Conservator settlement of funds obtained from the sale of the Petitioner's building. **Exhibit C**

3. There was an attempt by the City to silence any opposition with bail and conditions of Bail. There was a Statement by Judge Zito to the Prosecuting City Solicitor Matthew Deschler that :

"My impression is he's become a burr in your saddle so to speak" Zito said to Deschler. "I had to think that the city of Bethlehem just wants bail to make a statement to be punitive." **Exhibit D**

4. The Petitioner discovered a Beltrami Case several years earlier that became nationally known as one of the top Travesty of Justice cases in the country. This was a case of a thirteen year old boy who was sentenced by Judge Beltrami to two years incarceration and restitution of \$625 K for setting fire to a house. The only witness to the case was the woman who owned the house. Despite the boy's insistence that he was innocent, acting on the promise of the arresting officer that he could be home for Christmas if pleaded guilty, Judge Beltrami imposed the sentence.

It was only several years later that the Judge's stenographer Jane Walker noticed the same woman who had accused the boy was there for a similar case with another house. She suspected the woman had wrongfully accused the boy. Judge Beltrami recused himself. The woman was indeed the guilty one in the earlier case. The boy was totally exonerated and won \$175K for damages in his wrongful conviction. **Exhibit E**

5. There are numerous conflicts of interest with

Judge Beltrami. For example, Sharon Fields (head of Lehigh University Parking Authority) is the ex wife of Beltrami's High School classmate, John Conahan, who works at the main Bethlehem Post Office. Prosecuting Attorney, Mathew Deschler, Assistant

Solicitor of Bethlehem, was Judge Beltrami's former law clerk. **Exhibit F**

6. Petitioner had a hearing before Judge Zito and with numerous violations daily given by Bethlehem Chief Inspector Craig Hynes who has now retired, thus complicating getting testimony. **Exhibit G**

7. Chief Inspector Hynes had no records of earlier repairs and work on building which resulted in the City allowing occupancy by Kanofsky back in 2008. It was remarkable in that these records were entirely missing from his files.

Exhibit H

8. The Conservator case was already in process when the trial before Judge Zito was held, since the calls for proposals had already gone out in September, 2016, with the Conservator papers issued in October.

Exhibit I

9. The city acted to block and delay the broken front window case, finally held before Judge Murray. The city delayed any appearance on the resurrected case before a Judge for several months, as can be seen from the Docket on the case. In any event, the court's all agree that Petitioner should be

allowed to file a civil lawsuit on the case as a response. **Exhibit I**

10. The Zito Commonwealth Case was handed over to the Bethlehem City lawyer, Matthew Deschler, rather than, as usual, being tried by the State District Attorney of Northampton County, John Morganelli. Morganelli is now running for the United States House of Representatives, with the motto, "District Attorney with a heart." **Exhibit K**

11. There was repeated False testimony by all of the city witnesses, including Redevelopment Director, Tony Hanna, Police Officer Hackett, Chief City Code Director, Craig Hynes, and Development Director Alicia Karner.

There are numerous examples of Fraud and Corruption in the City of Bethlehem and the Lehigh Valley. Recently, the Allentown Mayor, Ed Pawlowski, was convicted of 47 counts of Fraud and Corruption in a case prosecuted by the Philadelphia office of the FBI, headed by Director Louis Lappen. Attorney Lappen is also representing the United States of America, with the Petitioners' Conservator Proceedings.

Some entities involved with Pawlowski are the Chamber of Commerce, the Economic Development Corporation, Community Development Corporation, etc., where these entities represent and serve for the City of Bethlehem, Easton, and Allentown. **Exhibit L**

12. The case before Judge Murray dealt

exclusively with the window

crack, but has a major bearing on the Zito Case since the crack and stucco violations issued were due to the damage by the city's front loader removing snow from the city street and lot after the record breaking 32 inch snowfall of January 22, 2016, and shoving and piling it against the building wall.

Subsequent removal of the stucco wall, as revealed in later pictures demonstrate that it served merely a cosmetic function and provided no support or protection for the underlying wall, as seemingly claimed by the violation notices. **Exhibit M**

13. As well, the files on an earlier building inspection and clean out where allowance of storage of were allowed, as evidenced by the notification from the city, were claimed by Chief inspector, Mr. Craig Hynes to be totally non-existent, as for example the agreement that Kanofsky could store his personal items in the building.

The Petitioner has just learned that Mr. Craig Hynes, the chief City Inspector who issued all the citations retired from his city position the beginning of March 2018. Conveniently, he joins the prior inspector for the City, Mike Palos, with no longer working for the city, thus making it more difficult for the Petitioner to have them as witnesses in court proceedings. **Exhibit N**

13. Judge BROBSON, of Commonwealth Court, has repeatedly ruled against Kanofsky, even ruling adversely on an earlier case in the Seizure of Petitioner's building in Philadelphia. His claim in the Commonwealth Court Opinion that the recent version of Kanofsky can not be accepted by the court, has no basis in reality and evidence, as shown by the letter from the city, recent discussions with Mr. John Rohal, the Director of Re-development at the time, and numerous pictures and court documents of the of the building clean out, bills charged, court litigation, etc. etc. for the work done on the building roof and walls in 2007, 2008, and allowances by the City, Building inspector Mr. Michael Palos, and Magistrate Nancy Matos for occupancy by Kanofsky at the time. **Exhibit O**

14. The courts have begun to rule in favor of the Petitioner as the become familiar with the case, with numerous another travesties of Justice.

The Petitioner begs this court to continue in reversing earlier erroneous decisions based on corrupt and conspiring actions, and provide just compensation for pain and suffering inflicted on the Petitioner.

Respectfully Submitted,

April 30, 2018

Alvin S. Kanofsky

EXHIBITS

EXHIBIT A

**BUILDING DAMAGE FROM FRONT
LOADER**

**EXHIBIT B
ZITO ORDER FROM CITATIONS**

**EXHIBIT C
CONSERVATOR PROCEEDINGS**

**EXHIBIT D
CITY ATTEMPT TO SHUT DOWN PETITIONER'S
OPPOSITION**

**EXHIBIT E
JUDGE BELTRAMI TRAVESTY OF JUSTICE CASE AS GIVEN IN
UNIVERSITY OF MICHIGAN INNOCENCE PROJECT**

**EXHIBIT F
CONFLICTS OF INTEREST**

**EXHIBIT G
VIOLATIONS ISSUED BY INSPECTOR CRAIG
HYNES**

**EXHIBIT H
REQUEST FOR PROPOSALS**

**EXHIBIT I
VIOLATIONS ON CRACKED WINDOW GLASS**

**EXHIBIT J
BROKEN WINDOW CASE - JUDGE MURRAY DECISION AND DOCKET
SHOWING DELAY.**

**EXHIBIT K
JUDGE ZITO COMMONWEALTH CASE DOCKET SHOWING TRANSFER
OF CASE FROM D.A. JOHN MORGANELLI TO CITY ATTORNEY
DESCHLER**

**EXHIBIT L
FALSE TESTIMONY - PAWLOWSKI
ALLENTOWN CASE**

**EXHIBIT M
PAWLOWSKI ALLENTOWN CASE**

EXHIBIT N

CERTIFICATE OF OCCUPANCY
ALLOWANCE
EXHIBIT O

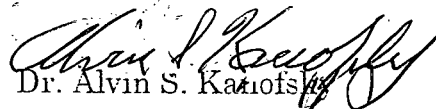
IN JUDGE BROBSON RULING INCLUDED IN THIS SUBMISSION , JUDGE BROBSON CLAIMED VIOLATIONS WERE MAINLY FOR A LEAKING ROOF AND LACK OF CERTIFICATE OF OCCUPANCY, WHEREAS THEY WERE ACTUALLY MAINLY FOR A BROKEN WINDOW AND STUCCO DAMAGE – BOTH OF WHICH PETITIONER CLAIMS WERE CAUSED BY CITY FRONT LOADER HITTING WALL DURING SNOW REMOVAL ONTO PETITIONERS LOT AND AGAINST HIS BUILDING WALL. ACTUALLY, AS WELL, THE LEAKING ROOF WOULD MOST LIKELY HAVE BEEN MAINLY CAUSED BY THE COLLAPSE OF THE ROOF STRUT DUE TO IMPACT OF THE CITY FRONT LOADER ON THE WALL.

CONCLUSION

The petitioner hereby requests that the court grant a hearing in the Supreme Court of the United States of America on this case which has resulted in considerable pain and suffering and loss of income over many years.

Respectfully Submitted

MAR. 11, 2019


Dr. Alvin S. Kaniolsky