

=====

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

---

BABOUCAR TAAL

Petitioner,

v.

ST MARY'S BANK; RONALD COVEY; GILLIAN ABRAMSON;  
GREGORY ULIASZ

Respondents.

**PETITIONER'S SUPPLEMENTAL BRIEF**

---

Baboucar Taal  
59 essex Road  
Bedford, NH 03110  
(603) 471 9192  
[btaalb@yahoo.com](mailto:btaalb@yahoo.com)  
Pro se Petitioner

September 17, 2018

=====

Pursuant to US Supr Ct R 15(8), this court in this similar recent case of the claim by respondents' of 'qualify immunity', that defense was totally rejected in the affirmation of Constitutional Rights. In Sause v Bauer 17-1742 the US Supreme Court stated "When an officer's order to stop praying is alleged to have occurred during the course of investigative conduct that implicates **Fourth Amendment** rights, the **First and Fourth Amendment** issues may be **Inextricable**." Petitioner's case here on appeal to the highest court in the land for basic [**Due Process**] Rights that the United States Constitution Guarantees and Protects: an **Impartial Tribunal of Facts before an Honest Disinterested Arbiter(s)**, a Provision guaranteed by the **Fifth, Sixth, and Fourteenth Amendments** to the **United States Constitution**, to All without regards to race, color, religion, or national origin.

1. Gillian Abramson worked and donated to the campaigns of Ovide Lamontagne (ex Chairman of St Mary's), as they all worked with federal Judges; CJ Howard, [Abramson and Howard in 'private practice'] CJ Laplante for a Steve Merrill and she with Magistrate J Jonestone, who was picked by CJ LaPlante from the very lawfirm that said Lamontagne bought a major partnership as she left with a severance package to be a federal magistrate and **None** of them see these Conflicts and relationships to Recuse, and the utter disregard to [protect] plaintiff-appellant Constitutional Rights Due Process, guaranteed by the very US Constitution, these very 'federal court officers' (some with personal and pecuniary motives) they have sworn to uphold. It is profoundly disturbing for Chief Judges LaPlante and Howard to Recuse and Unrecuse themselves then wantonly err for St Mary's Bank, Ronald Covey, Gregory Uliasz and Gillian Abramson in light of the Facts, Truth and codified Federal Laws and Statutes in: **28 §455(a), 18 §4, 18§371, 18 §1001, 18 §1346**

2. When then would they abide by our laws? Equally troubling is that defendants all together did what they did at each step of the way; violated the laws (that society rely upon), violated, deny and deprived us of our [federal] rights with impunity, rights Constitutionally protected and provided with the

notion that at the both [federal] District and Circuit, their persons will be there for them to grant them immunity. A civilized modern can Never function or survive, luckily we have our United States Constitution and Judiciary to guarantee and protect those Rights and the Highest Court to Affirm it that No one is above the Law. For here, in essence they Refuse to adhere to 28 USC § 455 (a) to willfully engage in reckless disregard of plaintiff repeated calls and claims that his federal, substantive [Basic Due Process and Equal Protection] Rights Constitutionally Guaranteed are being violated. In Sause v. Bauer reversal order the US Supr. Court stated, “petitioner’s choice to abandon [in my cases I repeatedly stated and quoted **ALL the amendments/Rights wantonly violated to no avail**] her Fourth Amendment claim on appeal **DID NOT OBVIATE** the need to address these matters. For these reasons, we grant the petition for a writ of certiorari; we reverse the judgment of the Tenth Circuit;” Sause.

3. At the time of writing this Supplemental Brief, Gordon MacDonald, the NH Attorney General, and his office failed to provide copy of their filed 8/10 Response and/or Waiver for Gillian Abramson, contrary to US Supr Ct Rules and NH BA & Rules of Professional Conduct. In our case(s) in NH in both in state and federal courts, defendants, their (same) counsel and pointedly the supposed court “honest impartial arbiters”, evidently disregards and usurped well established federal laws and safeguards in federal rules to achieve a certain verdict for St Mary’s Bank et al, again and again as it turns out the bank carries proverbial ‘financial water’ and lots of secrets for the state’s who’s who, from pols to judges. Reminiscence of a racket. RICO was enacted to ‘combat’ these ingrained misconduct, but here the chief enablers are sworn “court officers” who violate the law with impunity, and unfettered access of the justice system from within. Secrets should never be the reason to commit more felonies. This mustn’t be.

4. Defendant Uliasz knowingly filed repeatedly, false fraudulent statements, perjured and suborned perjury, filed frivolous motions to harass, intimidate and coerce plaintiff and his the while plaintiff’s case was repeatedly Denied

Requested Discovery [documentation and depositions] on served subpoenas (state and federal) and each time plaintiffs' case is Dismiss (Abramson twice) as if the US Constitution is for the connected, their {race, ethnicity, religion ...} privileges by the very supposed "honest impartial disinterested arbiters" of facts in law, who all made St Mary's bank et al carries the day.... Case in point, the \$1825 sanction on plaintiff and his family by Gillian Abramson for simply demanding that St Mary's provide us with the payment history and accounting of our mortgage payment we made as they tried to defraud us of house as Illegal Retaliation and in NH (not state or federal court) saw fit to listen/look at Facts for St Mary's is king, from courts to regulators. St Mary's hold a financial secrets for the connected rather than serving many as 'member own' Tax Exempt Entity. Uliasz also file a motion and Abramson ordered a hearing at the very time that my case for violation for my federal rights right was at the US District Court, and after she had dismiss my case the 2nd time [had No jurisdiction] after the NH Supreme Court Reversal. Uliasz motion was when he was being investigated by Bedford Police for his repeated sick obsession with 14 years repeatedly showing up on school camping trips for his wife job.

5. Our country Highest Court, is notice that all these culminate in Conspiracy to defraud petitioner and family, deny and deprive them of their Constitutional Rights and 'fraud on the courts'. St Mary's concoct a scheme to take plaintiff's and his family's homestead by falsely claiming we are late and short fall in our escrow, and the supposed evidence is, well we will not provide the legally Require yearly "Mortgage Accounting and Escrow Projection" for 2+ years as it would interfere with their plan to defraud. Plaintiff filed what any citizen; white black, jew gentile, muslim christian have the constitutional right to do, J Declirico said I have a case at the state court so sorry, [For the Record there was No Case at the state courts, Abramson Dismissed my case] No Injunctive Relief, just to look at the facts and federal rights violated, the very reason for Federal Court. J Declirico wrong stated that US Supreme Court said recently expanded the Younger Doctrine so he uses it to make plaintiff receive No Relieve from this NH

federal court against St Mary's or et al. Plaintiff appeal to the 1st Circuit Court of Appeals, CJ Lynch, Cir. J Tourella and Howard (the later quite aware of his conflict of Interest with esp. Gillian Abramson, St Mary's Bank, its management and witness Lamontagne still failed to recuse. The Circuit court order failed to address the premier issue on the appeal-Due Fair process

6. Respondent Gregory Uliasz, who in both lower federal courts [District and Circuit] under MJ Jonestone, Chief Judge LaPlante and Howard engaged in outright obstruction of Justice, with false and fraudulent and materially misleading unfounded claims yet time and time again I was Denied the basic adjudication of those issues on top of the repeated denial of requested Discovery, a right in an ongoing Civil Case in United States Tribunal. Yet now in the Country's Highest Court able to enforce All Our Laws without regards he/they are All Mute as death. Is it because here at this court it is real, you lie, file, false fraudulent misleading statement, you never practice "law" again or be criminally prosecuted. The Fraud and Conspiracy exception to the lawyer-client privilege is clear yet Ulaisz is here despite plaintiff motion, he is allowed to represent himself as a defendant, with fellow defendants; St Mary's Bank, Ronald Covey, and witnesses to obstruct due course of justice. In state and federal courts Uliasz also filed false, fraudulent and misleading statements in a US tribunal[18 §1001] with impunity.

7. Uliasz didn't stop there, for he also represents witnesses: Rita Emerson-Lamont, Kathleen Marquis, Donald St Germaine and Ovide Lamontagne... In essence anybody who has or may have information on this case. Witness Lamontagne bought a partnership from Magistrate J Jonestone firm as she left with severance package to be the hand pick of J LaPlante none of these are connected or she wasn't of the conflicts as she deny sanctions for failure by defendants St Mary Bank to provide subpoena documentation and subpoena testimony refused and denied by St Mary's et al Respondent Abramson the very state judge with personal relationships with Judges Howard, La Plante, MJ Jonestone and Lamontagne who evidence shows and witnesses indicate that were/are of St Mary's Bank federal violations of law

as 'tax exempt' institution to include campaign finance and tax evasion, made a campaign contribution of a \$1000 at the very time that plaintiff[petitioner] file his civil suit at the NH Superior Court before and state judge Abramson caught the case along with another one of a Jay Niederman she and her family also had a personal/financial conflict of interest. This also when Abramson and her spouse could not even pay their real estate taxes and a tax lien levied on the household for two tax years about to be auction. What are these money buying? If not **Quid pro quo, Bribery, the Corruption** of our institutions. St Mary's scheme include payment to Uliasz excess of \$400K, our mortgage was >\$286K. St Mary's is "Member [us]Own Tax Exempt?"

8. Miraculously Abramson tax issues and her mortgage is paid as she double down on the 'fraud on the court' dismissing plaintiff's case twice preceded by an 'ex parte restraining order' banning plaintiff seeking discovery of any kind from anybody with any information about his "ongoing" civil case in a US Tribunal for benefit of St Mary's Bank, and "interested parties" takes precedence over fact/ law and federal rights. Lamontagne running for Governor, one of 4th or 5th attempts for public office, was the reason for Abramson actions. Failures and wanton errs at the NH-District and 1st Cir Ct of Appeals indicates, Not only was plaintiff/appellant Denied and Deprived and his Constitutional Rights Violated, but the United States was Defrauded. The very real fact that aforementioned defendants /Respondents could never be prosecuted in NH Court(s) is a frightening prospect. St Mary's Bank contribution to the 4 campaigns is subject of a FEC referral. But the question is if violations are true where would those cases ever be file. Fraud vitiates everything it touches. (common law maxim) Nudd v. Burrows (1875) 91 U.S. 416. Federal Circuits Courts are united on 'Fraud on the Court' as; In re Coordinated Pretrial Proceedings in Antibiotic Antitrust Actions, 538 F.2d 180, 195 (8th Cir. 1976) (citations omitted); see also Rozier v. Ford Motor Co., 573 F.2d 1332, 1338 (5th Cir. 1978) "only the most egregious misconduct, such as bribery of a judge or members of a jury, or the fabrication of evidence by a party in which an attorney is implicated, [all occurred here] will constitute a fraud on the court").

9. As evidence indicates, petitioner and his family are/were not the only victims of St Mary's Bank, the only state[NH] chartered financial institution, the very federal government was defrauded, this court is ask to consider just like a simple/ordinary citizen would wonder, Where will those case be file for prosecution for they are federal crimes; at the NH federal District in this 1st Circuit Court of Appeals before the same conflicted Chief judges; LaPlante and Howard, about issues on St Mary's Bank, who knowingly effected the outcome, failed to Recuse for their knowledge of defendants and/or participation on the financial shenanigans; 18 USC §4. In Bulloch v. United States, 763 F.2d 1115, 1121 (10th Cir. 1985), the court stated "Fraud upon the court is fraud which is directed to the **Judicial Machinery itself** and is not fraud between the parties or fraudulent documents, false statements or perjury. ..." Even as Denial and Deprivation of Due Process; **Impartial Tribunal by uninterested unbiased trier of FACTS** in law is violations of law

10. The 9th Circuit noted that "one species of fraud upon the court occurs when an 'officer of the court' perpetrates fraud affecting the ability of the court or jury to **Impartially judge a case.**" Pumphrey v. Thompson Tool Co., 62 F.3d 1128, 1130 (9th Cir. 1995); see also Weese v. Schukman, 98 F.3d 542, 553 (10th Cir. 1996). Jeffrey Sallet, special agent in charge of the FBI's New Orleans field division, said of another Public Corruption investigation that these conducts represents "**the worst form of public corruption, corruption so corrosive that it erodes, and can even destroy, the Citizens' Faith in the Proper and Impartial Administration of JUSTICE.**"

Petitioner prays that the court grant certiorari to affirm Constitutional Rights provided, protected and guarantee to all. To hold conflicts of interest, flouting of statutes as willful wanton misconduct and Violation of federal Law/Rights

Respectfully submitted,

Dated: Sept. 17, 2018



Baboucar Taal, Pro Se petitioner *and family and all similarly situated*