

Questions Presented

1. Has Appellant Moretti Proven Monell Liability in the Respondent, Michael Mordaga, Given the High-Profile Case Which Was Briefed by Deborah Poritz, the New Jersey Attorney General, and Involved The Citibank Bank Robbery, Branch No. 11 In New York City?
2. Has Appellant Moretti Proven Michael Mordaga's Involvement in the Lagano Murder Case and Teterboro Jet Crash Brought Attention To Fact Was Complicit In The Forfeiture of Moretti's Real Estate.
3. Has Appellant Moretti Shown Ambulance Chasing By Mordaga, which Carried Over To Multiple Arson Fires, Including The Fire At 390 Park Street, Hackensack, and The Multiple Jailings of Salvatore Moretti and His Tenants?
4. Has The Failure To Accord Constitutional Rights Interfered With Appellant's Property Ownership, and Political Aspirations in His Home Town, Hackensack, New Jersey?
5. Does The Denial Of Jury Trials By The United States District Court In Newark, New Jersey, And the Failure To Overturn Dismissal By The Court of Appeals, Third Circuit Establish Jurisdiction in the United States Supreme Court?

List of Parties To The Complaint

[X] All parties appear in the caption of the case on the cover page.

[] All parties do not appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is subject of this petition is as follows:

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an unlawful activity, including, but not limited to, conveyances intended to facilitate the perpetration of illegal acts, or buildings or premises maintained for the purpose of committing offenses against the State... (b) Any article subject to forfeiture under this chapter may be seized by the State or any law enforcement officer as evidence pending a criminal prosecution pursuant to section 2C:64-4 or, when no criminal proceeding is instituted, upon process issued by any court of competent jurisdiction over the property, except that seizure ...not inconsistent with the Constitution of this State or the United States... B 8, 13, B 20, 25, 28, 31.

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JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was January 16, 2019.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix ____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. __A_____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**:

The date on which the highest state court decided my case was _____. A copy of that decision appears at Appendix _____.

A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. __A_____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

SALVATORE MORETTI — PETITIONER
(Your Name)

vs.
MICHAEL MORDAGA, JOHN DOE,
JANE DOE, ET AL. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

UNITED STATES COURT OF APPEALS FOR 3rd CIRC. #18-2966
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

SALVATORE MORETTI
(Your Name)

197 ALPINE DIRVE
(Address)

PARAMUS, N. J. 07652
(City, State, Zip Code)

201-314-7255
(Phone Number)

RELEVANT CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

United States Constitutional Fourth Amendment, Fourteenth Amendment

Civil Rights: 42 U.S.C. §§ 1981, 1983, 1985.

U. S. C. § 12101, 3631, etc.

**New Jersey Civil Asset Forfeiture, 2C:64:1-9. [It's Use in Conjunction With
R.I.C.O.]**

**Racketeer Influenced and Corrupt Organizations Act, [RICO]; 18 U.S.C. §§
1961-1968.**

**USA Patriot Act of 2001, Public Law 107-56. October 26, 2001. Uniting and
Strengthening America by Providing Appropriate Tools Required to
Intercept and Obstruct Terrorism**

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A 1-5 to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the United States district court appears at Appendix B 1-9 to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

STATEMENT OF THE CASE

The extensive appendix materials provide a panoramic view of the County of Bergen, State of New Jersey. While the Statue of Liberty beckons Europeans to seek refuge here, the welcome mat extends only to those well sent. A former firemen, William Marcy Tweed, controlled the Tammany organization in the 1860s through patronage and political nominations. Tweed died in prison in 1878, and Boss Richard Croaker continued Tweed's work until Reverend Charles Parkhurst helped drive him out by 1899. Bergen political controls followed Manhattan, but under the guise of crime reporting. News in Bergen was broadly rewritten by the New York Daily's. Borg's Bergen Evening Record was founded in 1907, after Upton Sinclair was burned out of Helicon Hall on March 16, 1907.

Borg was no newspaperman, and his small office across from the Johnson library served his purposes. By the beginnings of WWII, the Appellant was born upon the execution of his mother. The first Social Security check was for \$8 in the months of Sal's first trimester birth. This Certiorari follows Appellant's career, following up his travels through the war zones as Lanny Budd spies on the mysterious origins of Earth's first nuclear war.

Sinclair's Lanny Budd series was reborn in the U.K.'s James Bond movies. Appellant visited Buckingham Palace under King George. Sean Connery as "007" visited Auric Goldfinger's factory in Switzerland. Bond is an MI6 agent, Military Intelligence Foreign. Ian Fleming's books, adapted into movies, grossed over \$7

billion. Michael Mordaga in this suit is comparable to M. I. 5, i.e. Military Intelligence Domestic. Parallels occur, nevertheless.

Bond's brashness is similar to Mordaga's. The budget of the Bond films is over one billion dollars. The budget of the criminal justice system in the New York metropolitan area is about the same. The recent elimination of John L. Molinelli as Bergen Prosecutor is but a temporary setback, evidenced by the resignation of Sheriff Michael Saudino Sept. 21, 2018 along with four under-sheriffs. The sheriff's office conducts Sheriff's sales of foreclosed properties. Appellant contends Mordaga forced foreclosure of Park Street properties at 387-390-391-395 Park St., Hackensack.

Appellant expressed his misgivings to the Bergen County Freeholders. Nietzsche thought that there must be a revaluation of all values. The Bergen Record and N. Y. Daily's thought so, too. They seek a new deal, based on Federal Reserve distributions.

As appellant described the foreclosures orchestrated by the county, Mordaga's counsel abhorred philosophical allusions. Appellant offers the large scale takeovers of 422,000 properties in the United States shown at "usdebtclock.com." These takeovers pale before the chaos in the 1929 Depression. The revaluation of all values in Mordaga involves fires, and demolitions throughout Hackensack, followed by a building boom. It also involves housing bubble bursts. Three bankruptcies unseat C.F.O. James Florio [the former New Jersey governor] at President Trumps' Atlantic City casinos.

Una Storia Segreta: The Secret History of Italian American Evacuation and Internment during World War II describes those Italians who were captured by internment authorities during the war. This story was kept secret. So too Appellant's travels were "top secret." Appellant was adopted by the then affluent Morettis; his government duties were outside their reach.

Domestic family life was ruled by an all-too visible hand. Accordingly, daily life was abysmal. This suited the view of the Manhattan "crime reporting" and propaganda elite. Anyone caught revealing these "secrets" was severely punished. Yet, outside the fold, the in-crowd basked in favored tales. As WWII unfolded, Germans, Italians, and Japanese were excluded from favored treatment.

In 1931, Governor Franklin Delano Roosevelt reviewed Mayor James J. Walker's case, forcing his resignation. Judge Samuel Seabury, a graduate of New York Law School, [as was Walker,] strenuously pursued an investigation leading to Walker's resignation. Vivian Gordon testified that New York police were required to file false charges of prostitution to fatten their paychecks. Vivian Gordon was found strangled to death in the Bronx. Seabury [and the Seabury Commission, also known as the Hofstadter Commission] pursued Walker to Albany and F. D. R.

1931 was the year the Bergen Prosecutor's office became fixated on the Moretti files. The Bergen Evening Record of June 3, 1931 reads as follows:

Habeas Corpus Writ May Free Morretti And Alba, The Bergen Evening Record, June 3, 1931. Habeas Corpus Writ May Free Morretti And Alba. Counsel for Men Indicted for Brady Murder to Apply for Document From Judge Seufert tomorrow.

"Counsel for Salvatore Morretti and Angelo Alba, indicted for the murder of William J. Brady, Hackensack taxi fleet operator, will apply

tomorrow to Judge William M. Seufert in Special Sessions Court, Part 1, for a writ of habeas corpus.

“John E. Selser of Hackensack and John J. Breslin Jr. of Lyndhurst, represent the accused pair. They will demand release of the prisoners in bail and speedy arraignment and trial.

“Joseph “Kid Steech” Bongiorno of Lyndhurst was recently released from the county jail in \$35,000 bail through Breslin’s efforts. Bongiorno was arrested in connection with Brady’s death a few hours after the shooting.

“Selser declared that Morretti, who lives in East Paterson and Alba, who resides in Passaic, were indicted many weeks ago and are entitled to immediate arraignment. The pair surrendered themselves to Sheriff Harold V. Reilly two days ago. County detectives have been searching for them ever since the killing of Brady the night of Jan. 16 in front of his home at 95 Summit avenue, Hackensack.

“Similar proceedings were used to obtain Bongiorno’s release as are now being planned to effect that of Morretti and Alba. Morretti’s brother William and Joseph “Chicago Fat” Szabio of Paterson were also indicted for the murder of Brady.

“The taxi magnate named the five as his assassins as he lay dying in Hackensack hospital. All of the accused men are well known in underworld circles and have criminal records, detectives assert.

“Selser said that if the writ is granted the pair will probably be arraigned tomorrow and bail set. A date for trial will then be fixed, he said.

“Lieutenant Nathan H. Allyn of Special Prosecutor George S. Hobart’s staff of county detectives has interviewed Morretti and Alba but declared that they refused to divulge their whereabouts for the last few months or why they surrendered.

“It is believed they gave themselves up on the theory that the state’s case against them is weak and they expect an acquittal.”

Bergen County’s fixation on “Moretti” has continued uninterrupted for eighty-eight years. When Salvatore Moretti body was removed from the Trenton State Prison in 1952, it had been decapitated. John E. Selser was found guilty of criminal contempt in 1953, In Re Selser, 27 N.J. Super 257, 99 A.2d 313.

When Appellant Moretti stated this to Deborah Poritz, she took the case of Judge Timothy J. Sullivan, Court of Appeals No. 93-5581. The fine for trying to assist the tenant in Apartment 395-D Park Street, Hackensack, N. J. was \$1,000.

Other problems followed, including the bank holdup at the Citibank, [Appendix L] on August 8, 1994. This lead to the filing of bankruptcy, and the shut-down of the Park Court Apartments in April, 1997.

Incidentally, Appellant Salvatore Moretti, standing in the walk in front of his apartments, was slugged several times from behind. Each time he answered the door, or came to turn the porch lights back on, he was slugged from behind. Several visitors banging on Susan Stedtler's front door drew his attention, and he was slugged and beaten up each time. Along with tenant Bernard Fayehun, he was punched on his footstep. The Osuji case was docketed in Bergen Special Civil and Hackensack municipal court. Louis Dinice claimed a conflict of interest, so the case was transferred. Tried in Saddle Brook, it was dismissed upon failure of Fayehun to appear [he was again beaten-up, preventing his appearance.]

When neighbor and bake-shop owner Kathleen Salvo ran her Citizens For Change campaign in May, 2001, she depicted the abandoned apartments at 391-5 Park Street, Hackensack, under the caption "The Wrath of Mayor Zisa."

Frank C. Zisa's campaign manager, Steven Moses, married the Bergen County Assignment Judge, Sylvia. Stephen Moses was a full partner in the Sills Cummis law firm that defended the Citibank in the Aug. 4, 1994 bank robbery case. [The Citibank case # 2727-96 was decided unfavorably to appellant on November 8, 2001].

Appellant was born prematurely in the late 1930's, when his mother was executed at the Bergen County jail. It was Roosevelt's second term in office, and war

was brewing in Europe. F.D.R. lost the 1920 election [and thereafter use of his legs] to Warren G. Harding and Calvin Coolidge. In 1918, Coolidge gained fame by firing 1,000 Boston policemen who sought union membership under the A.F.L. Harding's death brought Coolidge into office. Coolidge's Vice President was General Henry Laurens Dawes, an opponent of Al Capone. Coolidge's resignation in 1928 resulted in Herbert Hoover moving to the presidency. Kansas Senator Charles Curtis became Vice-President. Hoover became enmeshed in the unstoppable 1929 Depression.

Raymond Moley led Columbia professors who wrote F.D.R.'s speeches. F.D.R. attended Peabody's Groton, Harvard College, and Columbia Law School. [He left Columbia early, as Wilson left Virginia Law School early]. F.D.R. married T.R.'s niece, Eleanor. Eleanor was orphaned at 13, and schooled in England. Eleanor's father was placed in a mental institution in France, and upon his demise, T.R. headed the family. T.R. split the Republican ticket in 1912, giving the election to Democrat Wilson. Wilson was in office, in 1913, when the Federal Reserve System was created.

F.D.R.'s political and religious conflicts were revealed in his opposition to Bruce Barton. Barton was the son of a Congregationalist minister. He wrote *The Man Nobody Knows*, [i.e. Jesus Christ.] Since Barton's Republican principle opposed F.D.R.'s New Deal, Barton was forced out of the United States congressional seat in 1941, which he held since 1937. However, F.D.R. befriended Republican Mayor LaGuardia.

Bergen County, N. J. residents view these events as vital concerns. The Third Circuit physically joined the Second Circuit in 1931 upon the completion of the George Washington Bridge. Bergen homes are foreclosed by lawyers obeisant to powerful New York City interests. Bergen incomes are determined by powerful corporations, managed by interlocking directors.

In the matter herein, Bergen home ownership is determined by the training, or lack thereof, of the police. The Bergen County police have been disbanded and merged into the Sheriff's Department. Hence, Michael Mordaga had a field day officiating at the forfeiture of Moretti's real estate apartments in Hackensack, and home in Paramus. Interrogatories served inquiring as to Mordaga's training went unanswered.

When appellant attended Hyde Park meetings in New York, such thoughts were submerged by inhibitions in speech and cultivated intellectual sophistication. Appellant's "sophistication" at Englewood School in 1949 was accompanied by cultivated beatings, culminating in the Kefauver Crime Committee. The precipitate deaths of William Moretti and Salvatore Moretti, Sr. followed.

It is interesting to note that there were two Englewood Schools for Boys, one existed in 1891, and one founded in 1928. ESB I displays a photo of students in 1891 in front of their school building across from the Field Club. [The Book of Englewood, published in 1922, and Know Your Englewood, New Jersey, published 1948.] Appellant attended ESBII in 1948.

The Kefauver Crime Committee findings launched America into its twenty-two trillion dollar National Debt. When Appellant Moretti was before Earl Warren's United States Supreme Court in 1962,[while a student at the George Washington University] he stated the debt would reach \$1 trillion. WWW.usdebtclock.com records the February 5, 2019 figures as follows:

U. S. A. National Debt	\$21,965,655,100,000
Student Loan Debt.	1,592,750,899
Credit Card Debt.	1,057,436,342
Living In Poverty	38,083,537
Not in Labor Force	95,002,127
Median New Home Cost	324,942
Median Income	32,704
Savings Per Family	3,036
Personal Debt Per Citizen	7,519
Total U. S. Population	224,194,047
Food Stamp Recipients	17,985,702
Officially Unemployed	6,282,534
Social Security	\$1,003,302,719,000
Medicare/Medicaid	\$1,085,891,624,000
Foreclosures	422,573
Bankruptcies	801,782
Without Insurance	27,570,884
Prison Inmates	2,150,990
Convicted Felons	20,116,026
World Debt Clock	\$74,450,743,978,000
Japan's National Debt	11,809,819,640,000

While the average U. S. home cost is \$325,000, Mordaga's home is assessed at \$1,300,000. Appellant Moretti confronted then new Hackensack police officer in 1977 on his front lawn when Mordaga pulled up in a police car. Greeting the officer, Mordaga grabbed appellant and tried to wrestle him into submission. Appellant

was subsequently hounded by barking dogs, burning buildings, zoning violations, shootings, and several jailings at Bergen County jails.

Susan Stedtler [Apt. 395-D Park St.] was jailed for three years. The holdup at the Citibank and narcotic raids into many apartments led to the April 1, 1997 shutdown, and loss of the \$4,000,000 apartment buildings. The tiny one bedroom apartments [where appellant was the sole superintendant] miraculously surfaced as condominiums in 2000.

Appellant was evicted from his home at 390 Park Street, Hackensack. Upon filing in Newark Federal District Court, he was jailed in the Bergen County Jail based on failure to maintain his Hackensack apartment house, which was boarded-up. Federal Judge Faith Hochberg held Appellant in contempt due to his inability to attend the Newark motion hearing. The lawsuit dealt with the bonus earned by flipping the 390 Park Street, Hackensack home on July 18, 1999 at a profit of \$109,000, four months after Appellant's eviction. The transfer of title from the Sheriff's Sale by T Performance is recorded at Deed Book 8199, page 629. No wonder Michael Mordaga lives in a \$1,300,000 house in Paramus.

Strangely, the bizarre transfer from Corpus Christi School in Hasbrouck Heights to the Englewood School for Boys, ESBII [now called Dwight-Englewood] followed a macabre sea voyage when the Moretti boat was overtaken by "pirates." [The "pirates" had the Moretti vessels' telephone number.] Young Sal moved from Summit Avenue, Hasbrouck Heights, N.J. to Springfield Avenue, nearby. Upper level supervision became apparent by the Kefauver hearings, which were televised.

The same week William Moretti was murdered, Fort Lee police chief Fred Stengel committed "suicide," on October 7, 1951. It was reported in the N. Y. Times that "the discovery of the body in a wooded area that was made by three boys while officials were still investigating the murder last Thursday of Willie Moretti, a New Jersey gambler, who had been a witness last May before the Grand Jury that was investigating gambling." Salvatore Moretti Sr. died nine months later on June 8, 1952 in Trenton Prison.

Since Appellant was adopted by Roosevelt's New Deal Administration, it is noteworthy that this Certiorari recalls the passage of time. Consider the Times. While the New York Times supported the murder of Italians in 1891 in New Orleans' Parish prison, President Franklin Roosevelt felt responsibility for the entire United States. The N. Y. Times' more parochial responsibility was for its own circulation. The "penny newspaper," losing a thousand dollars a day, was taken over in 1896 by publisher Adolf Ochs from Chattanooga, Tennessee. Ochs coined the phrase, "All The News That's Fit To Print."

Based upon Appellant's attendance at Roosevelt's Hyde Park meetings, he believes the Times fell short of its motto. It chose to print all the news that could safely be reported by its printing press. For example, Andrea Salcedo, the printer, was arrested and thrown out of the Manhattan skyscraper window May 3, 1920. Following their visit to Salsedo, Sacco and Vanzetti were both apprehended. It was following the April 15, 1920 shoe factory [South Braintree, Mass.] paymaster robbery. They were institutionalized, and then executed on August 23, 1927.

That news coverage was contemporaneous to the rewriting of the crime news originating out of Bergen County in January, 1931. The murder of the taxicab fleet owner, William J. Brady occurred on Summit Avenue in Hackensack, New Jersey. Appellant's Park Street Apartments were one block from Brady's taxicabs, which were located on East Railroad Avenue, Hackensack.

The Hasbrouck Heights talk Appellant gave a year ago considered the bombing of King Alfonso XIII of Spain. Two executions took place related to the "child king's" attempted assassination. One was that of Matteu Morral [shortly after the May 31, 1906 bombing of the Spanish king], and the educator Francisco Ferrer (October 13, 1909) connected with the Modern School [Will Durant taught at such a school in Manhattan.] Durant was graduated from the St. Peter's college in New Jersey in 1907, and from Columbia University, Ph. D. in 1917.

Although Salvatore Moretti, is one of the last survivors of the Hyde Park meetings eighty years ago, his property appears to be in foreclosure. It is unusual in that the New Jersey Appellate Division "recorded" the birth of Moretti's Hackensack Apartments at 391-5 Park Street, and his home at 197 Alpine Drive, Paramus in the case entitled *The State of New Jersey v. Gennaro Moretti*, in May, 1958. The Heller & Laiks law firm handled both the Appellate Division matter, and the transfer of title from 355 Hillside Avenue, Demarest to 391-5 Park Street, Hackensack and to 197 Alpine Drive, Paramus.

Following Appellant's graduation from E.S.B.[Englewood School For Boys] in 1958, he attended Fordham College for one year. Uninterested in the R.O.T.C., he

left. After attendance at the Ayn Rand Objectivist lectures in New York City, [given by Nathaniel Branden] he matriculated at the George Washington University in Washington, D.C. There he continued his interest in philosophy and psychology. Appellant met Bertrand Russell at Cambridge in 1941, the psychologist, Dr. Carl Jung in Zurich, Switzerland, and Ezra Pound in the Vatican preparing for his radio broadcasts. Appellant's mere mention of this brought instant retaliation.

Appellant's conversations with Martin Heidegger shaped his recent Hasbrouck Heights lecture on *Philosophy, Physics, and Politics in the Nuclear Era*. Appellant's interest in values undergoing change finds expression in his lengthy treatise on the split between the Anglican Church and the Catholic Church of Rome.

The 1931 murder of William J. Brady should be recalled in terms of the August 23, 1927 executions of Nicola Sacco and Bartolomeo Vanzetti. As Wikipedia notes in the article on Sacco and Vanzetti, "Two days before Sacco and Vanzetti were arrested, a Galleanist named Andrea Salsedo fell to his death from the U. S. Justice Department's Bureau of Investigation (BOI) offices of the 14th floor of 15 Park Row in New York City."

During property class at New York Law School, Appellant was confronted by a mentally ill man who threatened him with defenestration. This was a prelude to the shutdown of Park Court Apartments in Hackensack and the current threatened forfeiture of 197 Alpine Drive, in Paramus, New Jersey.

In the matter at bar, the Newark U. S. District Court affirmed the GRC's denial of discovery request. Since there was no change in the way the state courts

administered justice, the Court of Appeals affirmed. The Federal statistics above show that a \$22 trillion dollar debt imperils economic balance. Values are impaired by lawyers who are fee merchants, and by commitment to suicidal wars.

When appellant was a student at George Washington University (hereafter, G. W. U.), in 1960-1963, he lived three blocks from the White House. He also lived on Connecticut Avenue. On Capitol Hill, he rented next to the Madison room of the Library of Congress.

Point One

Appellant Moretti Entered The WWII Drama Suffused In Propaganda, And International Tensions

Appellant's mother was under threat of execution in a time-driven contest between continental Europe and the Allies. [Russia suffered the revolution that brought into existence the U. S. S. R.] Women's rights had not advanced to embrace the pleadings of Nellie May Madison and Barbara Graham, both condemned to die for murder. Madison was freed, Graham was not. These California cases did not resonate with New York depression legalese. Appellant, an author, was born prematurely in Hackensack.

Incubated for months, he awaited the day to breathe fresh air. When was the birth? The birth certificate should have read Bergen County Jail, Hackensack, November, 1938. Instead it read May 28, 1940, St. Mary's Hospital, Passaic, N. J. The fact that the father was Salvatore John Moretti jars with Salvatore Moretti's death in Trenton State Prison June 11, 1952. Complicating this beginning, William

Moretti was murdered on October 4, 1951. One would think that a *parens patria* action would assure living parents.

In 1948, young Sal, had been transferred from the safety of Hasbrouck Heights, N. J. [where the Morettis were known], to far off Demarest, N. J. A 32 acre estate was paired with an elite preparatory school, Englewood School for Boys [E.S.B.], now called Dwight-Englewood. For Sal, this school was a Borstal School where appellant could be thoroughly trounced. [The school was a resurrection of E.S.B. I in 1891 near the Englewood Field Club]. E.S.B. II, [instituted 1928] now known as Dwight-Englewood, was within feet of Upton Sinclair's Helicon Hall on North Woodland Street, in Englewood, New Jersey.

The Kefauver Crime Committee claimed there was illegal gambling. The years before the telecasts, young Sal had become suspicious at how the 1929 Depression impacted upon Italians. The miraculous birth of infant Sal paralleled Alfonso XIII's, the Spanish King-At-Birth. In fact, after WWII, young Sal was treated to the horse drawn carriage of Alfonso XIII in Madrid, Spain. The Spanish were neutrals during WWII.

When Appellant noted to the Federal District Court that spotlights attract attention, Mordaga's attorney, Raymond Wiss, claimed appellant's complaint was "incomprehensible." Wiss' R. 12(b)(6) action was converted into a motion to dismiss, which was granted. Appellant answered Wiss claim that Moretti was a storied claimant, with the various chapter from the Oxford History of the Prison.

Appellant noted below he was entertained at Hyde Park, New York; his European and Asian missions followed. Comparing himself to twelve year old Clive Graham [U. S. Navy, Guadalcanal, Bronze Star], the Paramus Assessor asked for a DD Form 214 I.D. The Rome Statute on child combatants asserts such service constitutes a "war crime." Only the most backward countries employ children in wars. As *Too Young The Hero* reveals, Clive Graham lost his Bronze Star. Clive Graham joined the U. S. Navy in August 15, 1942 in Houston, Texas. Would Appellant need to lie about his age in Hackensack? On November 14, 1942, his battleship, the U.S.S. South Dakota, was hit during the Battle of Guadalcanal. After WWII, he re-enlisted in the military.

Discovery in jury trials discourages lying. But Wiss moved to dismiss, and no jury was called. No discovery was allowed. A summary judgment dismissal was granted, with not one interrogatory answered. Although motions to dismiss assume the truth of the complaint, Wiss alleged the complaint was "unbelievable."

The complaint alleged that Mordaga received a \$100,000 kickback from Richard Wiener, upon collection of insurance proceeds after the death of James Dinnall, a 66 year old. Dinnall died when his car was hit by a jet upon take-off at Teterboro Airport, February 2, 2005. Eric Kleiner is handling the Frank P. Lagano suit [*Estate of Frank P. Lagano*, U. S. Ct. of Appeals, 3rd Circ., No. 13-3232] after Lagano's April 12, 2017 murder. This mishap followed disappearance of gambling money seized by prosecutors - no receipts had been given.]

Appellant claimed Police Officer Michael Mordaga assaulted him on his front lawn at Park Court Apartments, in Hackensack, N. J. Suspicious blazes followed at five adjacent homes, including the home at 390 Park Street, while Appellant was inside his home. These claims are now before the New Jersey Supreme Court on his Petition for Certiorari.

Point Two

The Court of Appeals Reliance Upon Ricks v. Shover Is Inapposite.

Ricks v. Shover, 891 F. 3d 468 (3d Cir. 2018) concerns Gregory Ricks, an inmate at the Pennsylvania State Correctional facility DCI-Graterford, filing an § 1983 suit against Lieutenant D. Shover, and C/O Kile. Ricks was on the way to the library when he alleges he was sexually fondled and physically injured in the confrontation. An Eighth Amendment violation, cruel and adjust treatment, was filed. The Federal District Court dismissed under R. 12(b)(6), without prejudice, allowing amending the complaint. The complaint was not amended, so the dismissal was final.

The U. S. Court of Appeals claims Moretti's complaint does not suggest "the existence of any plausible claim of relief against the sole named defendant, see Ricks v. Shover, 891 F.3d 468 (3d Cir. 2018).

Point Three

The Court of Appeals Reliance Upon Hoffman v. Nordic Nats., Inc Is Inapposite.

The Court of Appeals decision begins as follows: "Moretti, who claims to be a law school graduate, is a frequent pro se litigant." The Court of Appeals cites to Hoffman. Hoffman v. Nordic Nats., Inc., 837 F.3d 272 (3d Cir. 2016) begins as follows: "Harold M. Hossman is a serial pro se class action litigant from New Jersey who frequently sues under the New Jersey Consumer Fraud Act...an attorney who has made a habit of filing class actions in which he serves as both the sole class representative and sole class counsel...Hoffman has sued nearly 100 defendants in New Jersey state court in a period of less than four years."

Appellant Moretti hired half a dozen attorneys in the period referenced, 1977-2010; one diligent attorney was disbarred, another lost his building. Appellant's certified accountant was sought after by Michael Mordaga for his own corporate accounting - a corporation was developed to be used in Mordaga's police work, presumably aware of the ongoing litigation between Moretti and Mordaga.

The prominent attorney for Appellant's father, and uncle William Moretti, John E. Selser [In Re Selser, 27 N.J. Super 257 (1953)], was brought up on criminal contempt charges by the New Jersey Appellate Court. Appellant noted to Deborah T. Poritz, a New Jersey Attorney General, that the decapitated body of Salvatore Moretti Sr. was removed from the Trenton Hospital in 1952. Poritz claimed Appellant was impertinent. She then penned a decision, Poritz' opinion brought fines on behalf of both Judge Timothy Sullivan and Municipal Judge Louis J. Dinice. Along with the excessive water bills connected with the Citibank robbery on

August, 1994, the shut-down of Park Court Apartments and the 390 Park Street, Hackensack, N.J. house was inevitable by April 1, 1997.

To analogize Appellant's filing with excessive pro se filing by Hoffman, here relied upon by the Court of Appeals, is improper.

Point Four

Appellant Filed in the Federal District Court Against Mordaga and Others Under §1983

The basis of jurisdiction, Appellant claims under 42 U.S.C. §1981, §1983, §1983, 42 U.S.C. §3631, 18 U.S.C. §241, and the Fourth and Fourteenth Amendments of the Constitution.

The case title indicated that unnamed defendants were John Doe, Jane Doe, et als. In fact, it remained for discovery to determine who the additional defendant(s) would turn out to be. Would they include the City of Hackensack, or others? Under discovery, that would have been revealed.

Effect Lake was to be added as a John Doe defendant. Effect Lake sought to transfer title to 197 Alpine Drive, Paramus, N. J. to itself. The District Court rejected that additional named defendant. There was no discovery, nor depositions - only dismissal. This appeal followed.

A similar case involving municipal defendants was Barbara Piotroueski v. City of Houston, 237 F. 3d 567 (5th Cir. 2001). A jury awarded Piotroueski \$20 million. The Court of Appeals decision reads as follows:

Piotroueski was shot and rendered a paraplegic by a hit man procured by her ex-boyfriend, Richard Minns. The evidence connected members of the

Houston police and fire departments to Minns and his hired investigator Dudley Bell in acts that harassed and threatened Piotroueski before the shooting.

Clearly, Appellant's injuries were even more devastating, given the extent of the time during which they occurred. They begin at birth in the Bergen County jail in Hackensack, N.J. They carried over to the WWII battlefields, where young Sal was sent because the United States was losing the war of propaganda. Visits to Hyde Park and F.D.R. confirmed enrollment in the war effort. Naturally, conflicting with General George Patton, whose desire was to win not complicate, a breach with the General Staff was inevitable. Shot in the brain, [like the Polish Catholics officers, at Katyn], Sal was imprisoned by the NKVD. Discovery brought a daring rescue by a military helicopter, and returned to service. Young Sal's service record was secret due to the needs for achieving peace between such diverse disputants throughout the world. Witnessing the deaths of Mussolini and Hitler, young Sal returned to America in 1945-1946.

Young Sal was adopted by the religious Morettis of Hasbrouck Heights, N.J., and thence proceeded even more unsettling events. Both William and Salvatore Moretti Sr. were interrogated before the Kefauver Committee, and both died thereafter. Eight year old Sal transferred from Corpus Christi school, Hasbrouck Heights, N. J., to Englewood School for Boys [now called Dwight-Englewood]. This school was to change Sal's class orientation and affections, facilitating readjustment to civilian life. As noted, the school was similar to an English Borstal disciplinary school, made famous by Brendan Behan.

Mordaga's acts were supported by others, driving Appellant and his tenants into jail and forfeiture. But by whom? The GRC [Government Records Council] requests served upon the Bergen County Prosecutor's Office and the Paramus Police Department were denied, with no discovery forthcoming. A Petition for Certiorari in the *Salvatore Moretti v. Bergen County Prosecutor's Office Appell. Div.* A-2807-16T3, has been served upon the New Jersey Supreme Court, dated January 24, 2019.

What is clear is that Michael Mordaga was motivated by money. He received a \$100,000 kickback from Richard Wiener in the Dinnall's case resulting from the Teterboro jet crash. Bergen Prosecutor John L. Molinelli received Frank Lagano's gambling proceeds in excess of \$250,000, resulting in the Federal District Court filing by the Lagano Estate after Lagano's murder. But without discovery, what other defendants does the Court of Appeals seek included in the caption of the complaint?

In fact, Mordaga worked with the business community fostering large land deals, facilitated by use of John Doyno, C.P.A., formerly employed as a tax consultant by Salvatore Moretti, Appellant within.

Appellant's Park Street Block Association and the Hackensack Apartment Owners Association could not continue, since fear by property owners prevented dues collection.

Point Five

**Moretti's Jury Case Finds support in
the Snyder v. Trepagnier, City of
New Orleans Case**

In James Snyder v. Sidney Trepagnier, et al., City of New Orleans, 143 F3d 791, Snyder was shot in the back by Trepagnier, who was pursuing him through the swamps. The jury awarded Snyder \$1,964,000. Discussing Monell liability, in City of Canton v. Harris, 489 U.S. 378, 109 S. Ct. 1197, 103 L. Ed. 2d. 412 (1989), the Court held that, in limited circumstances, a municipality can be held liable for a failure to train its police officers. "Plaintiffs seeking to win under this theory must first prove a direct causal link between the municipal policy and the constitutional deprivation, they then must establish that the city consciously enacted a policy reflecting deliberate indifference to the constitutional rights of its citizens." Id. At 389, 109 S. ct. at 1205.

Appellant has detailed that after the fight between Michael Mordaga and Appellant, the City of Hackensack allowed entry of a psychiatric halfway house (North Jersey Friendship House, 387 Park Street, Hackensack) and the Multi-Pak Garbage Compactor Factory, abutting the rear of Park Court Apartments. A dog barked non-stop for eighteen months at 111 Passaic Street, 50 feet from 395 Park Street. When the dog died, the house burned down. The house next door was damaged by the fire, and was restored. But it too burned, and was demolished. Appellant's house, 390 Park Street, Hackensack was hit by a fire also. Five additional fires raged through the neighborhood, along with the nearby Ford Dealership on River Street, which claimed five firemen's lives. These are all jury issues, and they are all matters for discovery, not for dismissal under Rule 12(b)(6).

Point Six

The Blabbermouth Film Exemplifies The Extreme Media Bias Towards Italians During WWII, and This Carries Over To Internment Of Italians, in War and Peace.

Appellant has provided Hackensack with notice of the Mr. Blabbermouth film, on the internet, which was shown along with Mrs. Miniver, starring Greer Garson and Walter Pidgeon. It is a 19 minute propaganda film still shown on internet in 2017, though released in 1942. The main character, Blabbermouth, is a look-alike to Frank C. Zisa, against whom Appellant ran for City Council in 1985. Here is the text of the film.

Radio Report: "By order of the coast interceptor command, this station will now leave the air. Put out your lights. This station will now leave the air". The first night we heard that here on the coast, believe me the hair stood right up on our heads. And the lights went out. For the first time in this century, automobiles were gone from the streets, pulled up with the headlamps out. Suddenly Los Angeles was a silent city. And in the quiet we all felt sort of solemn as if we knew for the first time how the man felt who said a generation ago, "the lights are going out all over Europe." Godsend they go on again in our time. But the next day the sound came back like a shout.

News bulletins every few minutes on the radio. Conflicting headlines hitting the streets almost as fast, and we all talked at once. Were there really enemy planes over last night in London. Everybody was hungry for information. Which brings us to the hero of this short picture. Everybody knows him. He belongs to one of the largest families in the land. There are thousands of him springing up like skunk cabbage, shooting off his or her face, in practically everybody's neighborhood. His name is Blabbermouth.

Blabbermouth comes on in various guises, as a Fifth Column person possibly Italian, and pro-German. He undergoes various comic scenes, and finally a barber shoves a shaving cream covered bristle brush into his mouth to shut him up. This was the message for an entire ethnic group in America during WWII.

Point Seven

The U. S. Court of Appeals Fails To Consider That Appellant's Case Was Filed As a Jury Trial; Dismissal Was Therefore Improper.

The Federal District Court in Newark, New Jersey dismissed August 24, 2018. The Sixth and Seventh Amendments to the United States Constitution are among the Bill of Rights. They guarantee trial by jury.

The Court of Appeals opinion relies upon Ricks v. Shover; Ricks was a prisoner in Pennsylvania. Is Moretti a prisoner in Hackensack? Ricks, like Moretti, was given the option to amend, but did not do so. The appeal followed.

Judge Arnold also quotes Alexis de Toqueville as follows:

The institution of the jury, if confined to criminal causes, is always in danger; but when once it is introduced into civil proceedings, it defies the aggression of time and man. The jury, and more especially, the civil jury, serves to communicate the spirit of the judges to the minds of all the citizens; and the spirit, with the habits which attend it, is the soundest preparation for free institution. [Democracy in America, p. 284-85, Alfred A Knopf, 1945]

As Appellant noted to Bergen County officials, during WWII he was delegated to consult with such personages as Bertrand Russell. Russell's Principia Mathematica, written along with Alfred North Whitehead, was well known.

Two philosophy professors retired at City College of New York, from which Upton Sinclair graduated. In Paul Edwards essay entitled, "How Bertrand Russell Was Prevented From Teaching At The College Of The City Of New York," October, 1956, he states that,

When College of the City of New York offered Russell a position in 1940, Bishop Manning of the Protestant Episcopal Church wrote a letter to all New York newspapers in which he denounced the board's action. "What is to be said of colleges and universities," he wrote, "which hold up before our youth as a responsible teacher of philosophy . . . a man who is a recognized propagandist against both religion and morality, and who specifically defends adultery.

Bertrand Russell was to teach the following three courses and no others:

Philosophy 13: A study of modern concepts of logic and of its relation to science, mathematics, and philosophy.

Philosophy 24B: A study of the problems in the foundations of mathematics.

Philosophy 27: The relations of pure to applied sciences and the reciprocal influence of metaphysics and scientific theories.

Russell was allegedly promiscuous, and divorced. Upton Sinclair was burned out of Helicon Hall on North Woodland Street, in Englewood. This failed preparatory school was converted into what was described as a love nest. Sinclair divorced, and remarried. After the March 16, 1907 fire, Upton's wife, Meta Sinclair, was institutionalized. This is the world into which infant Sal was born in 1938.

A complaint was filed in Bertrand Russell's college case, and within three days, a New York judge issued an order overturning Russell's appointment. The denial of academic freedom in 1940 carries over to Englewood School for Boys and the Kefauver Crime Hearings in 1949-1951. Has not this irritated temperament transferred to John E. Selser [27 N. J. Super 257 (1953), 99 A.2d 313] and Robert Hollis?

Point Eight.

Salvatore Moretti's High Profile Image Attracted Mordaga's Ire, Leading To The Real Estate Forfeitures Described.

Mordaga wore multiple hats in the litigation here referenced. He began as a Hackensack police officer in 1977. He became a member of the Bergen County Prosecutor's Office. Then he was Molinelli's Chief Narcotics Detective. Finally, he worked as security consultant to the Hackensack University Medical Center. Finally, he became the head of the Hackensack municipal police department. In that position, he was not the Chief of Police. Rather he was the Civilian Director of the Police Department, distancing himself from former Police Chief Charles "Ken" Zisa, who had been a member of the state legislature.

By contrast, Salvatore Moretti was attempting to be a Hackensack Civic Activist, from the bottom up. He tailored his George Washington University degree in Psychology to the task of bringing dignity to the Bergen County seat, which had too long been over-shadowed by the vast City of New York. N. Y.'s 20,000 member police department compared to Hackensack's 90-man department.

Appellant Moretti worked as chief proper maintenance engineer at Park Court Apartments, 391-5 Park Street, acquiring 390 Park Street (as office and rental property) and 387 Park Street, for parking. Running for City Council in 1981, and graduating from New York Law School in 1985, he was on his way to a career as head of the Hackensack Apartment Owners Association, and Park Street Block Association. That career was short circuited by the Mordaga take-over.

Having studied history at Fordham and the Nation's capital, and having World War II experience, made Appellant acutely aware of the reliance upon New Jersey for the 1912 Presidential Race. Wilson, the President of Princeton University, was drafted by the Democratic Party. The Federal Reserve System [enacted December 23, 1913] was under Wilson, as was the 16th Amendment (the Federal Income Tax) and Prohibition, in 1919.

George Patton received a scholarship to attend Princeton. He chose VMI [Virginia Military Institute] instead. Patton was wounded in WWI after only three days of combat duty. After recovery, he joined the Marine Olympic Team.

The Global Issues engaged in by members of the F.D.R. Hyde Park meetings, carried over to Appellant's view of social responsibility. This was especially important due to birth during the 1929 depression, and the execution of his mother in Hackensack. Had Bertrand Russell and Frank Zisa also been engulfed in the global battles emerging in the 1930's?

Poverty Inc. is an internet posted video dealing with the modern housing bubble, and the repeal of Sections 20 and 32 of the Glass-Steagall Act. World Bank official, Stiglitz noted that this "change[d] the culture of commercial banking to emulate Wall Street's high-risk speculative betting approach." [Source: Robert Weissman, November 12, 2009, Reflections on Glass-Steagall and Maniacal Deregulation.]

Coming out of Washington, D.C. think tanks in the 1960's made Appellant acutely aware of the curtailing of free speech, the right of academic freedom, the right to be

represented by a lawyer, and the right to police protection. In fact, Appellant was urged by the White House staff, to attend U. S. Supreme Court hearings. Appellant roomed at Adams Hall, a G.W.U. dormitory at 19th Street, and Pennsylvania Avenue, Washington, D. C. It was the future home of the World Bank].

Appellant argued his case before the Earl Warren Supreme Court in 1962. Appellant stated to Jacqueline Kennedy, that Rosemarie Kennedy was lobotomized at G.W.U. hospital in November 1941, the same month Abe Reles fell from the Half-Moon House on Long Island.

Appellant had welcomed William Rehnquist in 1953 to the Supreme Court when he drove from California, having graduated from Stanford Law School after service in the military during WWII.

Teaching at New York Law School, New York University Law School, and Rutgers Law School, relied heavily on case law, placing a burden on law school graduates' seeking careers in government.

Having graduated from G.W.U. with a degree in Psychology, Appellant was acutely aware of his training at the Dr. Carl Jung's Zurich, Switzerland institute, and the heavy burdens of the population in Europe and Asia during WWII. Needless to say, this psychological training was interrupted by the NKVD which nearly killed child Sal, making him "compliant to their will."

The Jungian training did not carry over well to the facts in the North Jersey Friendship Psychiatric Half-Way House Case. The Friendship people moved in without zoning protection, and upon suit begun by Hollis, were moved out. Their

home was demolished. Appellant purchased the lot, and this led to Appellant's forfeiture of title to his Hackensack properties upon repeated jailing.

Since that time, Hackensack has gone through a building program which removed the two Main Street banks [Garden State National and Bank of America] Appellant had banked at.

Point Nine
Monell Liability Attaches Due To The Attorney
General's Admission Of Knowledge of the
Peril Created in Park Court Ownership

It is worth noting how closely the Appellant's concerns about his Apartment House property were well known. Although Appellant lived in Hackensack for over ten years, Police Director Michael Mordaga lived in Maywood, and moved to Paramus.

In the matter involving the New Jersey Attorney General, Deborah Poritz' brief in behalf of Judge Timothy J. Sullivan, consider the following: [Brief submitted to the U. S. Court of Appeals, 3d Cir.]

On March 24, 1994, appellant submitted a letter to this Court that was construed as a motion for a stay pending appeal of the District Court's Order establishing the amount of sanctions to be imposed on appellant. On May 9, 1994, Moretti's request for a stay was denied. In addition, the court referred the question of a possible jurisdictional defect to a merits panel.

Appellee Honorable Timothy J. Sullivan is a Judge of the Superior Court of New Jersey. Appellant Salvatore Moretti is the owner of an apartment building in Hackensack. He claims that Judge Sullivan violated 42 U.S.C. §1983 in the course of presiding over a judicial hearing to which appellant was not a party.

Although the complaint is lengthy, the allegations against Judge Sullivan are limited and concern a criminal proceeding brought against

Susan Stedtler, a tenant in the building owned by and managed by appellant. Moretti, who does not allege that he [App. 273] is a member of the bar, believes that because he owns the property on which Ms. Stedtler was arrested on drug charges, he was somehow entitled to act as her counsel in her criminal case. Confusingly, appellant also alleges that by virtue of his property ownership he should have been joined as a party in the criminal proceeding, presumably as a defendant.

In his complaint, Moretti complained of perceived deficiencies in the Stedtler pre-trial hearings presided over by Judge Sullivan. Without explaining how he has standing to raise such issues, appellant first alleged that Judge Sullivan did not give "proper consideration" to a statutory affirmative defense that might have been available to Ms. Stedtler. In addition, Moretti summarized his discontent with Judge Sullivan's management of the Stedtler matter:

"Judge Sullivan simply refused to hear any motion, to provide any discovery, to dismiss [p. 5] the case, to evaluate the nature of the evidence subject to a suppression hearing, to evaluate the quality of Stedtler's court appointed legal counsel [**Ellen Koblitz**], to reduce bail – all, plaintiff alleged, against the law, in sum, an illegal incarceration."

The complaint concludes that "the actions of Judge Timothy J. Sullivan were malicious and were meant to produce loss of business and great humiliation... The acts described within produce an enduring interference with social life and is an important element of the business harassment described with first count." This allegation is expounded upon: "Judge Timothy J. Sullivan in preventing Stedtler from earning a livelihood, and failing to extend her equal protection of the laws to the plaintiff within...simply violated the law."

Portiz' brief concludes as follows:

The patently frivolous allegations against Judge Sullivan contained in the complaint justified the District Court decision to impose sanctions on Moretti. Thus, the District Court decision in that regard should be affirmed."

By: Deborah T. Poritz,
Attorney General of New Jersey
By: (s) Patrick DeAlmeida, Deputy Attorney General.

What is missing is that Appellant resided at 391-B Park Street, Hackensack, and observed the activities at the 395-D second floor apartment of Ms. Stedtler.

Having observed various break-ins at the apartment was part of the job of the superintendant. When appellant responded to banging at Stedtler's door, and confronted unruly uninvited guests, it was his duty to vouch for Mr. Stedtler's safety. In so doing, he was beaten up several times, and jailed several times at the Bergen County jail on River Street, Hackensack. Noting this, he advanced Ms. Stedtler's bail to secure her release from the Bergen County jail. He worked with Ms. Stedtler to coach her in secretarial work as an assistant. She responded well. These factors are all omitted in the attorney general's brief.

Given the events that followed, predictably other violations occurred, resulting in forfeiture of title to three properties worth over \$4,200,000. Why did not the attorney general note these facts?

Salvatore Moretti, v. Citibank, N.A.; CITIBANK BRANCH NO. 11; MARY WING; JOHN DOE, et al., Complaint with Jury Demand, Rico, Assault and Battery, Fraud, Tort, Index No. 2727-96. Filed in Supreme Court: Second Department, Second Judicial District.

This action arises under the Racketeer Influenced and Corrupt Organizations Act of 1970, 18 USCS Section 1961, and the Laws of the State of New York. Plaintiff seeks to recover compensatory and punitive damages sustained, as a result of the conduct Of Citibank, N. A. and Citibank Branch No. 11 (hereafter Citibank), and John Doe, et al. (the thief or thieves), as a result of the Defendants' conduct, along with the costs of this suit, interest and reasonable attorney's fees. The court's jurisdiction is invoked under 28 USC Section 1331, 28 USC Section 1332, 28 USCS Section 1337, 18 USCS Section 1964(c), and the doctrine of pendent jurisdiction.

Parties

2. The Plaintiff, Salvatore Moretti, is a citizen of the State of New Jersey and is engaged in the rental of apartment house property, and other business activities in New Jersey, for profit.

3. The Plaintiff, Salvatore Moretti, who resides at 390 Park Street, Hackensack, New Jersey, is the owner of the apartment house located at 391-7 Park Street, Hackensack, and opened a checking account at Citibank, Branch No. 11 on May 28, 1993, wherein he deposited over \$145,000 of funds from May 28, 1993 to August 8, 1994.

19. Plaintiff filed a complaint (and order to show cause) in the United States District Court in Brooklyn on August 19, 1994, within eleven days of the bank robbery, stating that "Plaintiff was victimized by a well rehearsed grand larceny as a result of frequenting the bank and depositing moneys into the account." Plaintiff demanded copies of the bank videotapes from the bank cameras which were operating during the robbery, in order to apprehend John Doe et al, and to regain possession of his bank deposit. Citibank stated either the cameras were not operating or that tape could be viewed only with an escort. When Plaintiff viewed the videotapes, he was prevented from securing copies of the tapes, despite the equipment being available at the offices of Citibank. The bank security department blanked out the two cameras which were directly aimed at the robbery site in the rear of the bank. The bank has refused to release the film record of this robbery, preferring to claim that the only cameras operating at the time were at the entry to the bank. Plaintiff served a subpoena upon the bank at Citibank, N.A., Subpoena Compliance Unit, 1 Court Square, Forty-First Floor, Long Island City, N. Y. 11120, att: Eileen Clancy. Citibank has refused to produce the subpoenaed videotape. A bank patron standing at an ATM line informed plaintiff what occurred, another patron ran over to assist. The bank manager advised plaintiff that the patron was interrogated, thinking the patron was the robber, erroneously.

20. The police were called from an office at the bank. Despite plaintiff's description of the robbery to the police at 2:30 p.m., one-half hour after it occurred on August 8, 1994, no arrests were made. Complaint no. 9430 was opened by the first precinct police department on August 8, 1994; the chances of getting plaintiff's money back were stated to be "zero". The bank alleged that they were not insured. The police department deferred to the bank which deferred to the police department.

The average deposit made at the bank on each occasion was in excess of \$7,000, so that over twenty deposits were made totaling over \$140,000; this money was the rent collected from Plaintiff's apartment house and real property office located in Hackensack, State of New Jersey.

60. As a result of the high level conspiracy combined with the low level assault and battery and robbery, plaintiff herein sues in the amount of \$150,000 on this count.

CERTIFICATION

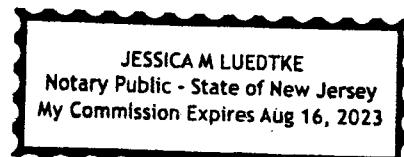
I, Salvatore Moretti, am the plaintiff in this cause of action, and I hereby certify that the foregoing statement made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. Dated: January 25, 1996

CONCLUSION

Despite the Citibank robbery in broad daylight, the New York Suprme Court judge, after three years of filing motions by petitioner within, dismissed the case. Appellant's Brief argues For the Grant of the Petition For Certiorari Within.

Respectfully Submitted: February 11, 2019

By: Salvatore Moretti
Salvatore Moretti, Petitioner Pro Se



A handwritten signature in black ink, appearing to read "Salvatore Moretti".

REASONS FOR GRANTING THE PETITION

The United States Supreme Court should consider whether the innocent owner defense obtains under the facts within. This would resolve the question which divided the U. S. Supreme Court in United States v. Parcel of Rumson, N.J. Land (1993), No. 91-781. The forfeiture of real estate is hazardous to Bergen County where realtors can readily secure new owners. A "ponzi" scheme mentality results, since successive immigrations bring in customers from Manhattan.

The standard of proof is at issue. The government affects living conditions through policing, or failure to police. Political parties use forfeitures as a stepping stone to destroy good government.

When New Jersey Federal District Court Judge Faith S. Hochberg set a hearing date to consider the flip sale of Moretti's house and offices at 390 Park Street, Hackensack, New Jersey, Moretti was jailed for no reason, preventing his attendance at the motion hearing. The Bergen county sheriff, Joseph Ciccone [who refused to hold a sheriff sale listing Moretti's apartments and real estate, he was removed. His family was victimized by a smear campaign about arson and death of a New Jersey resident. The substituted Bergen Sheriff transferred Moretti's realty.

Michael Mordaga was employed in multiple jobs that conflicted with his impartial administration of justice. He was a narcotics expert for Bergen County Prosecutor John Molinelli, and coveted the Sheriff's job based on his experience as a Hackensack police officer.

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Hackensack Assignment Judge Bonnie J. Mizzol recently claimed that Moretti may be incapacitated, so he should be assigned counsel.

Moretti's years of service to his country are ignored, and his reputation is besmirched. Moretti was "drafted" by the Franklin Delano Roosevelt New Deal Administration, due to the glare of publicity. "Too Young The Hero" is a 1988 TV movie about Clive Graham, who was twelve when he was in the Navy, fighting at Guadalcanal. Moretti was even younger when he was in the service. The serial Moretti deaths noted above deprived appellant of family values and a home environment. Home environments are not enhanced under conditions of residential forfeitures.