

Ilana Rigwan
v
Jordan Neus et al

SUPREME COURT OF THE UNITED STATES
RULE 44 ON DENIED CERTIORARI
CASE# 19-6695

RECEIVED
FEB 28 2020
OFFICE OF THE CLERK
SUPREME COURT, U.S.

The Original 2003-New York & 2008-Miami UNCONSCIONABLE JUDGEMENTS
WERE MADE-UP, forged (altered) to seize my property. It's incumbent to grant
certiorari since this case affects pending and future cases.

Fact: The 6th Amendment is NOT RELEVANT for some judges. Your earlier decision bears re-examination please, and NOT BY A CLERK (sorry).

This is an easy case, so don't get caught up in the drawn-out related cases. They want you to fall in that trap like I did. The Original Judgement(s) & Deeds were significantly ignored in the trials with intention (keeping it polite).

The system has flaws and you can write the wrong.

Key evidence wasn't considered by the trial courts and omitted for reconsideration because they want you to believe their lies. They made-up so much. Such Judges ignored material facts &, again, made-up facts 1999-2008 (and throughout to 2020, but yet 2 key Judgements are what they fear and would not permit, with photos of the demolition, and a 2017 online article about the hotel conversion). They altered my history. This is serious! WE Need You!!!

So, I Supplemented with Videos to a Rip Off Report <https://www.ripoffreport.com/reports/south-beach-bayside-condominium-association-i/miami-beach-florida-33140/south-beach-bayside-condominium-association-i-fraudulently-on-paper-a-condo-but-they-ar-1470505> as they failed to take evidence into account at trials (in order to get away with Fraud On The Court by the Court & their Associates), for a contractually & illegally transferred *inch-by-inch* construction city deal. It's a prevalent societal re-occurrence to line their pockets. I invested 20-years-of-life (a jail sentence) and finally we can end this (well) with Justice For The People. The videos show the dangling wires, entirely dusty demolished building from within, which was passed-off in a Swamp Deal (at the time aka a technically non-existent art-deco historic building with no condos from within at a *rigged judicial condo* auction)--when (again) no condos or building interiors existed (and there is a Judgement by Judge P. Lopez with a wrong legal description to boot which wasn't corrected, but the title passed with the correct info). The Videos prove they aren't telling the truth, and they show the larger scheme of what they did better than words can express, as to why they wouldn't want the Original Judgements exposed--as They Are Lies On Top Of Lies Literally. These Sociopaths Actually Created Frivolous Cases from Frivolous Judgments from the Get-Go, piggy-backing off of Jordan Neus's lies in his Judgements 1999-2008, which (again) they wouldn't include. Until Now, I Never Had A Chance At Justice.

I lived without water, lights and electricity (bare necessities) and in 3-4 sewage floods for 18 years, (then without mail), when I was paying and had a deed. They controlled everything and I had no choice but to cope and constantly lose in court to their perpetual corruption. Look into the Videos before they destroy them too—because I risked my neck for them. And don't forget they illegally transferred the building. This is why they want me dead, seriously. Don't empower them to continue to alter more Judgements, Orders, and Lives! You don't know what it's like. The People Deserve Fair Trials Always and hopefully, you will agree and safeguard us.

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Please Don't overlook the Videos. I waited 20-years for Justice. Denying my Excellent Case # 2005-018381-CA-01 scares me. They created cases too. And I have witnesses that I lived apart and far away from Jordan Neus for 3+ years in New York upon arrival because he willed that (I was a homeless bride with a fake restraining order in a scam marriage (which can be voided) for my assets). The people deserve a shot at corruption, so grant this one. Rule 44 provides that the Court can rehear cases on the merits. Don't believe their words. The Videos tell the truth. Barry Shevlin Esq. et al Lie To You Too! I previously sent you the motion where Barry Shevlin et al and Jordan Neus ADD THE WORD "Private" Auction--to the already erroneous Judgement requiring a "Public" auction. White Collar Criminals will go to great lengths

My Judgments and Deeds Deserve a Second Look! Critical facts were Overlooked and Misunderstood in reaching your original decision to grant my Great Case Certiorari, as follows:

1) Judges (LC & Appellate) Lied, Overreached AND Altering The Truth. It's the main, serious factor, or reason, for this certiorari. The Judgements are Erroneous & there are Two Different Deed & Quick-Claim-Deed Legal Descriptions (16422 & 16442), which make it defected in addition to the bad-faith intentions by Jordan Neus and his family vs the gift for marriage & children by me and my family. Judges Altered Judgements/Hacked the facts of my case in bad-faith & intent to harm me. They Delayed & Endangered my life and I Trusted Them. There must be a landmark case like mine to prevent such injustice from reoccurring. I've provided enough evidence for you to reverse your decision, respectfully.

2) JORDAN NEUS NEVER BROUGHT ONE CONTRACT, as they (LC, 3DCA, Attorneys, Etc) claim. THEY LIED TO YOU TOO! Your Honors! They continuously confuse and fraud American Values & Systems & the Supreme Court of The United States Of America. My Judgments and Deeds Deserve Justice! The major vein of my certiorari is about The Defected, Clouded Deeds & Altered Judgements In Bad-Faith!

This easy case belongs in your Court. The related cases are run-around noise. Believe me, if Jordan Neus brought a contract, they would have listed by whom & shown proof, and he would have won by now. Imaginary contracts, they can create (I know that well).

3) I Have Res Judicata in Case # 2013-033946-CA-01. I love Judge Bagley. He's a Black Judge. Sadly, he retired and they, sadly, hacked out Original Judgment/Order. I proudly wrote this Now Omitted Order myself. I previously sent you a picture of it, but pictures aren't allowed I was told? Upon certiorari granted, I can try to get a paper copy. They fear the truth. They replaced it with a standard paper, and just added Jordan Neus's name to the case list Post-Certiorari submitted (and on the other past cases I fought alone when I sued them or they sued me). The attorney Candace Solis, who lost to me on this case 2015 re-appeared in point #5 below with a vendetta. This case stopped the first corrupt & fraud building sale to ARIA in 2015--which they don't speak about, and it wasn't upfront either *like this PALIHOTEL SALE* in 2017. With Res Judicata, Judges, Attorneys Etc... tampered with and altered the 'open-ended' lien contract and *falsely won*. See point #4 below.

4) I uploaded an incriminating transcript to expose 'how' this open-ended lien contract was altered-accepted by Judge P. Pedraza in Case # 3DCA-18-1642, 3DCA-18-1235 & 3DCA-18-0811. (They did this same 'how' to me in Case # 2008-041113-CA-01 and also won.) The altered case by Judge Pedraza doesn't represent the truth—with their literally added last-minute itemizations (never seen prior).

The 3DCA horribly re-labeled (on their own) my uploaded transcript & tax documents to confuse all. The Miami Grievance Committee 2019 has the original copies of how *nicely* I labeled them. My lawyer never uploaded this evidence against my will and intentionally not taken into account. He threw away original documents in fact to hurt my life, December 2019.

I uploaded the documents to prove I paid the taxes, and so much more, and not Jordan Neus. The non-trialed foreclosure & partition aren't deemed in sound law - deserve to be reversed.

5) Without-A-Trial in Case # 2016-005009-CC-25, I was Erroneously Foreclosed on Twice by Judge P. Pedraza. My attorney never told me. I learned about what they did while researching & writing the certiorari. They harmed me & Ignored me *in prior* Case # 2008-041113-CA-01 also. I bought my condo free & clear in 1994 and they erroneously labeled this case a "Legacy Mortgage Foreclosure." There's some 2-pronged racket to pay them all off going-on, which may easily be voided. Note: condo was gifted for marriage & children 1999 (another scam).

Candace Solis Esq. re-appeared in this case circa 2018 or 2019. I just saw her name on the case list. Wasn't notified either. She with Barry Shevlin, Gal Betesh, and Andrew Atkins--who represent the condo aka developers aka bidders (all Rory Greenberg et al) with Adam Cervera & Daniel Lopez Esqs. (and others)--apparently got paid for this, to the best of my knowledge.

Post- Cert, Judge P. Lopez educated Adam Cervera and Daniel Lopez Esqs on how to foreclose on me, in front of me, and I told him that's not allowed. He told me the funds were disbursed, and that was a shock too as they kept me from that hearing and information. I had a right to be there and know. Judge P. Lopez didn't know the true purpose of the sanctions on me and I believe they are for my attorney in Case # 3DCA-18-0811, and was told it was for 3DCA-18-1235. The day this atrocity happened, I believed was a trial for the disbursement of funds, which he said were disbursed already. I deserve my Original Judgements & Deeds looked into, which would void all wrong/cover-ups. Judge P. Lopez premised a lot of wrong: i.e. a wrong legal description in his Judgement to destroy my condo for a hotel deal he knew about, and I didn't. He wouldn't hear about the also Erroneous Original Judgement by Judge M. Rodriguez.

6) Refer to Controlling 2019 Florida Statute 718.112 (5)(c)(1); they illegally transferred condo ownership post-Hurricane Irma less than 14-days of its' original cancelled meeting 2017.

They got away with this by Judges Pedraza and P. Lopez. And then they told my post office, preservation league, fire dept, police office, and code compliance that the building was vacant—which wasn't true. This way construction demolition ensued with me in it.

This Court shouldn't overlook this Controlling Statute, the Videos, My Res Judicata, My Defected & Clouded Deeds, And the Unconscionable Judgements.

7) They interjected pre-set points on their own at the pre-determined 3rd District Appellate Oral Arguments (<https://youtu.be/HhpXdoje5Go>) to shift perceptions & justify lies under oath. Everyone on camera, with Gal Betesh, and the et als aligned to present erroneous information about me/the case. They publicly, *falsely* said in that videotaped oral argument that many contracts were brought by Jordan Neus, when zero contracts were brought by Jordan Neus.

They claimed that Jordan Neus was deprived, when Jordan Neus deprived me. All along I wasn't living well and I was fighting alone—but on camera no one mentioned my past cases of how they deprived me to chase me out. Jordan Neus hid himself, and his address, from me and the Mgmt Company, upon corruptly winning the erroneous partition judgement. Jordan Neus wasn't involved on my cases at all and they added his name Post Certiorari to portray a different picture. Rory Greenberg (Bidder, Condo President, Developer, Face for Mayor Levine, Scott Robbins, and Avi Brosh who are all Greenbrier Partners LLC) found Jordan Neus's erroneous winning judgement and Jordan Neus in 2017 and you know the rest. The many related cases prove at large that I was showering with shut-off water for over a decade, close to two, using a bucket and living in their 3-4 sewage floods—even though I paid and paid and there was no trial about that, ONLY last minute itemizations which popped-up; they always wanted to harass me so I would leave so they could sell my unit as they were successfully pushing other young people out and flipping condos feverishly, renting them repeatedly for kick-backs, and more 2004-2017.

Many docket entries Post-Cert were erased outrageously and now say "No Hearings Found".

Judge P. Lopez didn't allow photos of the demolition or an incriminating 2017 online article into the appellate file—which I *previously* submitted to you.

Judge M. Rodriguez, as per Rule 44, also wouldn't let me speak about the previous NY Judgement. I was told to by Judge Thomas Whelan in NY, as per his fraudulent Judgement, to fight it in Miami and then I wasn't allowed to speak about how the property was gifted, my homeless marriage, Jordan Neus's "cruel & inhumane" grounds, and all I invested & lost and how I was abused verbally, spiritually, intellectually, and physically abandoned. The oral argument is a false-display of theatrics for greed. My Deeds and Judgements have Defects And Clouds and Should Count (bottom line).

The 3DCA Judges are 100% involved in this scam, and with bad-intent premised and upheld a forged Swamp Deal, ignored the truth, and made a mockery of my life and the judicial system with their pre-set, pre-determined forged position. The Videos Show The Truth.

Barry Shevlin Esq. discussed the 14 online-bidders with glee. Big Deal! A few random folks could have blindly tried their luck, but there was no condo (that's key). A winner would have won a structure of wires, a pile of dust, and bags of cement. I deserve a granted certiorari for that alone, not a disabling homeless death sentence). They ensured the bidding would succeed in an inside-job with lots of city officials' protection. Also, it isn't hard for them to pay people \$10, or have friends, to falsely bid. Overall, it doesn't matter. It was a dishonest deal like all my Judgements.

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Recall Barry Shevlin Esq et al lied in a motion by adding the word private vs public auction to the already erroneous judgement. I overheard Barry Shevlin and Rory Greenberg many times in the LC, and basically my case is just a real estate deal made to look like I'm the last one standing, a non-payer, a nothing, when the Oral Argument Overlooked All The Evidence In Bad-Faith And My Lawyer Colluded With Them.

The Miami 3DCA in 2019 from All Of the 5 Florida Appellate Courts was the only one who changed the legal description law to appease my hotel developers/ politicians who backed them. I have proven the status of these true clients and, to say the least, and to be clear for you to understand the severity of their 2017 to date ruse of a non-existent-condo for sale (like the ruse of their oral argument) to uphold the ruse of a rigged-auction and erroneous, forged Judgement/s harms the American Judicial System. This is killings the middle-class and our values and they passed the above as though it was me against one guy, Jordan Neus. This is a systematic attack on an innocent person that calls for a safeguard to our cases. Think Miranda Rights Please, and what can you do for us. Sincerely, it would be the greatest gift of the Millennium til Eternity to uphold the 6th Amendment by accepting this Legacy Case, as they deemed it.

Legal Descriptions Are Relevant in Miami. My (destroyed) condo, for example, had a side *street* view, while others faced the pool, and it was built especially apart from the original hotel and there was other street and building construction going on. If this was a true sale, this altered law wouldn't be part of a complete contract to fully advice buyers. This rule should be reversed too as it was done in bad-faith, which hurts the mere purpose of its well-established intent. Don't forget that Judge Lopez created a Judgement with a wrong legal description to sell a non-existent condo and the 3DCA was fine with it. This is not okay.

There Was A Larger Scheme on display in the Oral Argument. Again, the only major significant points are the altered/clouded/defected Deeds, which I tolled on November 1, 2019 & the Original 2-Judgements. **Rule 44 For A Worthy Cause Of National Importance!**

My 'fired' attorney presented in the oral argument *without my knowledge* and has *persistently wronged me* in bad-faith to help them (even asked them to be paid). He wouldn't upload my plumbing report and taxes to lift my image to show proof of my true reality. He failed to say how I was deprived amenity-wise while paying or speak about their demolition hotel ruse AND how we weren't allowed to speak about or deal with the previous judgements as per Judge Peter Lopez. It is significant that I was represented by a guy that is sabotaging me while in the Grievance Committee process. The Judgements Were Forged. Had my evidence for a fair Judgement by fair judges been appreciated decades ago, and not altered for greed, the outcome would be different (or fair).

The Oral Argument (O.A.) was just off. I never rented my condo, as they falsely claimed--(I loved it and never would do that. Jordan Neus rented it, while I was homeless in NY 2000-2003, never told me, and collected the money and the Judge states it in the Judgement. This and the also erroneous assessed value of my condo at \$170K in 2008 is a lie, but it had clues in it about the rise of the market value hence why I realized that Judge Rodriguez delayed his judgement in Bad-Faith to wait for their money to rise. Post Cert they altered the case to seem like he judged

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in 1-year, when in the 4th year I spoke up and now understand what took him so long. The wronged O.A. also tipped me to look at the Original Deed, when I thankfully saw erroneous legal descriptions--like God was there for me all along and wants this.

8) On November 1, 2019, Post-Cert, I tolled the defected deed, Case # 2019-032361-CA-01. Section 15. I had 20 years to do-so and in the last hour almost, upon doing research on another point, I truly miraculously read/learned about this and did it on time. I tolled the defective deed in Good-Faith.

A Judge wasn't assigned to this **Deed Case** for over a month, and upon taking it to the clerks, I was assigned Judge M. Rodriguez all over again. Judge M. Rodriguez forged The Original Judgement 2008, and I recused him. They said it was a **blind pool**, when I don't believe that knowing the clerks Kevin and Rey were retiring 2020. **This is just part of the run-around coming full-circle!** I did copy Barry Shevlin Esq. Honesty doesn't pay in a corrupt system.

9) Also On November 1, 2019, Post Cert, the Appellate Department 2 in Brooklyn NY, Case # 2019-07711, Erroneously Ordered me to basically forfeit my Poor Person's Request and case. They denied me relief intentionally--though I submitted the same information to your office and was granted. I got a loan. They did it on purpose and I proved it, and opposing counsel withdrew.

They saw I was unable to bring my case to Manhattan for this reason (where my case was **frauded by the mail service trick**, enabling them to move the case back to my abusers in Suffolk County LC (sans due process).

The Judges denied me stating that Opposing Counsel Never Responded to my request for Poor Person's Relief, when she sure did (and I added her Opposition in that brief). This is why you must grant me certiorari. They're also lying under oath in NY.

I was going to motion *de novo*--but what good is it--this **vicious cycle**; it's very clear the Brooklyn Appellate panel too is corrupt (Same Issue, Different Judgement). **They also didn't let me fight the Original Judgment by Judge Thomas Whelan of Central Islip, NY.**

I mentally noted that **Judge Alan Scheinkman's** name appeared on my Order online *after* November 1, 2019. So I looked him up and found **epic incriminating article** that I submitted in my brief <http://mountvernonexposed.blogspot.com/2012/04/corrupt-administrative-judge-alan-d.html> by a great group called **Black Westchester**, who represents Black Americans in Westchester, NY. It is awesome! The article says that **Judge Alan Scheinkman** worked with a **Daniel Tartaglia**, a relative of **opposing counsel Bridgette Tartaglia** for **Jordan Neus** NY 2017-2020 (who worked with Barry Shevlin et al on the **mail fraud scheme and more**).

New Yorkers tipped me to Judges Scheinkman 2019 and Whelan 2003 corrupt activity in **Altering Docs in Bad Faith and I'm grateful.** On February 19, 2020, **I receive paperwork that new NY counsel represents Jordan Neus. so I was right!!!!**

I Want To Represent My Country On This Vital Issue. Certiorari must be granted.

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10) Burbrooke Mfg. Co. v St. George Textile Corp, 283 App. Div. 640-644 (1954) Pg 7
“a fraudulent scheme which is greater in scope than the issues that were determined in the action or proceeding may become the basis of an action”.

Domestic Relations Law 7 (4), Pg 9: “a marriage is void ... declared by a court of competent jurisdiction if either party consented to the marriage by reason of ... fraud.” Jordan Neus et al are synonymous with FRAUD. I seek a Fair Trial from a 20-year run-around.

I have found a glitch in the judicial system easily tapped-into by corrupt judges and now that all has played-out, I understand in 2020 what Jordan Neus in 1999 meant by his father taught him to play “the game.” Judge Whelan In NY, for example, changed the residency requirement, which Endangered Me. I Trusted Him.

11) I noted a document in Case # 2018-000137-AP-01 by Judge D. Trawick went missing, Post Cert, 2-weeks before April 5, 2019.

Judge D. Trawick did the Unspeakable: upon his abuse of discretion, in front of me, requested my horrendous lawyer to Give him (c), Michael Gongora, Barry Shevlin, Frank Siam, and Adam Cervera New Grounds To Over-Turn My Winning FL Supreme Court Caselaw based on White v. Marine Transport Lines, Inc., 372 So. 2d 81, which rejected the jurisdiction

My ex-lawyer declared to the Miami Grievance Committee that he never appeared before Judge Trawick (though I showed them proof he sure did).

The significance of not receiving a fair trial in Case # 2018-000137-AP-01 before it begins is significant. I fear and know well there is bias before even meeting Judge Thomas Rebull presiding on this case. I lost to fraud on this case already, which was based on the altered Judgement by Judge Trawick. This is not justice. They’ve trapped me full-circle (again), covered all bases. It’s Always One-Sided. And the 3DCA ruled already. Judge D. Trawick is close with Judge E. Hendon in the 3DCA, who did fabricate that sham, Inside-Job, videoed oral argument with the other Judges to be fair. (I noted articles about them, while writing the Cert, which now has been erased online also).

I am bravely here in the face-of-adversity, to end the cycle. This Is Not A Game. This Is Real, And Lethal. You Are The Only Worthy Court Truly.

12) I noted another document in Case # 2017-020072-CC-05 went missing, but was replaced with an entirely different document with a different argument, also Post Cert, 2-weeks before April 5, 2019. Ignacio Alvarez Esq. didn’t dispute this fact. I wish you would order a forensic audit. Altering documents change the outcome and is unjust.

Lynx Mgmt et al intentionally locked me out of the entire building (not just my condo) for 3-weeks, and lie about it. Lynx was managing the property, gave me the assessed paperwork for \$2M while the building was demolished (which you see in the Video makes me credible). Lynx

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Mgmt Co. is a shell company (for two other fraudulent companies we had since 1999). Lynx Mgmt with Rory Greenberg (as the Condo Association President 2017, The secret Hotel Developer 2017 & Bidder 2018 for the et als) locked-me out (aggressively) 2017 so the magistrate could do a report for Judge Lopez (scam), without an appointment. Zero Respect.

My condo they said, by the way, was in bad shape--which contradicts the Erroneous Oral Argument as well. The magistrate realtor (and her husband lawyer, who wasn't appointed to do anything) got paid on this scheme in bad faith. This magistrate was appointed during the expedite and mail fraud scheme attended by Rory Greenberg and Barry Shevlin. The aforementioned explains why they brutally locked-me out for 3-weeks.

They play dangerously.

I did also handwrite on the complaint (done in an emergency) about the **Controlled Statue They Abused** pertaining to their Illegal Building Transfer.

This case is set for Dismissal in March, 2020. They did the scheduling (again) without me. This case is full of fraud and the conduct by Ignacio Alvarez is abusive, negligent, corrupt, and fraudulent.

They did remove a document. Without fair trials, we have no justice system. I Pray Certiorari Is Granted, So My Original Judgments and Deeds (1994-2003) Will Be Reviewed Fairly.

13) National Importance is most decisive in your decision; therefore, certiorari should be granted. I uploaded Videos, previously attached the Deeds and Judgements, demonstrated their outrageous consistent, persistent, and diabolical schemes done in bad faith to assume a larger scheme. I Proved They Lied To You Too--so, at your mercy--grant this case certiorari.

They fabricated Judgements for their larger scheme to obtain my property. Their bad faith will nullify the fraud marriage & fraud foreclosure. My Judgements & Deeds deserve review to reverse this case. A fair trial is fundamental to justice, Your Honors! Thank-You!

14) In conclusion, this case of overreaching is an interesting one which would distort anyone's judgement. Hacking alters the perception of the innocents' case. Material admissions and, or omissions of the Original Judgements negatively affected the disposition of my case and life making untruths real, delaying this case and my life so I pay them, instead of the truth setting me free—which I deserved long-ago. They tortured me as an innocent person to distort reality to make a buck, take a home and a life. I am not their only victim. Their lies may be deciphered from the Videos. They knew what they were doing and have done it before and will not stop. Every case that ensued was a dead-end with their distorted-truths, which I was banned from discussing, to make me go away, or die off first. This is a strong reason for you to consider this case worthy. I presented in Good-Faith and they Never Did. They delayed life, liberty and the pursuit of justice to a now disabled person, though I am doing my best. I deserve a fair trial on behalf of the public's belief in the Constitution. and those who have fallen for me to get this far, to appeal to you to Change what you can For The Whole to obtain Guaranteed Fair Trials.

Supreme Court of the State of New York
Appellate Division: Second Judicial Department

M267163
kbp/

ALAN D. SCHEINKMAN, P.J.
REINALDO E. RIVERA
JOHN M. LEVENTHAL
LINDA CHRISTOPHER, JJ.

2019-07711

DECISION & ORDER ON MOTION

Ilana Rigwan, etc., appellant,
v Jordan Neus, respondent.

(Index No. 6021/17)

Motion by the appellant pro se, inter alia, for leave to prosecute an appeal from an order of the Supreme Court, Suffolk County, dated April 5, 2019, as a poor person, and for the assignment of counsel.

Upon the papers filed in support of the motion and no papers having been filed in opposition or in relation thereto, it is

ORDERED that the branch of the motion which is for leave to prosecute the appeal on the original papers is granted, and the appeal will be heard on the original papers (including the transcript of the proceedings, if any) and on the briefs of the parties, who are directed to file an original and five duplicate hard copies, and, if represented by counsel, one digital copy, of their respective briefs, and to serve one hard copy on each other (22 NYCRR 1250.5[e], 1250.9[a][4],[c][1],[d],[e]); additionally, the appellant is directed to file proof of service of a subpoena upon the clerk of the court of original instance requiring all documents constituting the record on appeal to be filed in this Court (22 NYCRR 1250.9[a][4][i]); and it is further,

ORDERED that the motion is otherwise denied.

SCHEINKMAN, P.J., RIVERA, LEVENTHAL and CHRISTOPHER, JJ., concur.

ENTER: 

Aprilanne Agostino
Clerk of the Court

November 1, 2019

RIGWAN v NEUS

SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION SECOND DEPARTMENT

ILANA RIGWAN, -----X

Plaintiff-Appellant,

- against-

JORDAN NEUS,

Defendant-Respondent.

STATE OF NEW YORK) -----X

)

)SS.:

COUNTY OF SUFFOLK)

AFFIRMATION
IN OPPOSITION

Index No.: 2019-07711

BRIDGET J. TARTAGLIA, an attorney duly licensed to practice law before the Courts of the State of New York, hereby affirms the following under the penalties of perjury:

1. I am a member of the law firm of JAKUBOWSKI, ROBERTSON, MAFFEI, GOLDSMITH & TARTAGLIA, LLP., attorneys for the Defendant- Respondent herein, and as such, am fully familiar with the circumstances of the above-captioned matter as set forth herein and make this affirmation upon information and belief, the source of said information being the documentary evidence contained within Affirmant's file and in opposition of Plaintiff-Appellant's application.
2. While Appellant's application is nearly impossible to understand, I will attempt to respond to same. Appellant has tried to file numerous applications, all frivolous in nature, resulting in Respondent incurring substantial and unnecessary legal fees. A review of Appellant's current application shows that again, she has no basis for the relief she is seeking. First, there is no appeal pending in the Appellate Division, Second

Department. Appellant incorrectly attempted to file a Notice of Appeal in the First Department.

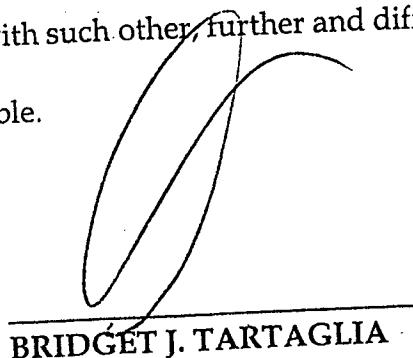
3. By way of history, initially, Appellant filed an application for an annulment in New York County (despite her residence in Florida), despite the fact the parties had been divorced for over fifteen years. Upon application by Respondent, the matter was transferred to Suffolk County, New York and thereafter, dismissed for failure to state a cause of action. Please see a copy of said decisions, dated January 22, 2018 and April 5, 2019, and a copy of the Order of Transfer dated January 22, 2018, annexed hereto collectively as EXHIBIT "A". Thereafter, Respondent has filed numerous applications with no merit, all of which as hard to decipher as her instant application.

4. Furthermore, there is no basis to "grant poor person's relief" or "assign counsel." There is no proper appeal pending to assign counsel for. Furthermore, Appellant is the one who filed this appeal and thus, should not be assigned counsel. Appellant has caused Respondent to incur substantial fees with regard to her numerous applications.

5. There is also no basis to grant "access to the e-portal." There are also no other cases to be consolidated as this is an Appellate Court.

6. It is requested that the relief sought by Appellant is denied in its entirety. WHEREFORE, it is respectfully requested that Plaintiff-Appellant's application be denied and dismissed in all respects, together with such other, further and different relief as this Court may deem just, proper and equitable.

Dated: September 11, 2019
Saint James, New York



BRIDGET J. TARTAGLIA

Fw: Fire Alarm- 3101 Indian Creek Drive 33140

From: Masta Splinta (vidaspice@yahoo.com)
To: vidaspice@yahoo.com
Date: Monday, November 12, 2018, 07:29 PM EST

----- Forwarded Message -----

From: "Meizoso, Juan" <JuanMeizoso@miamibeachfl.gov>
To: "vidaspice@yahoo.com" <vidaspice@yahoo.com>
Cc: "washington.field@ic.fbi.gov" <washington.field@ic.fbi.gov>, "virgilfernandez@miamibeachfl.gov" <virgilfernandez@miamibeachfl.gov>
Sent: Tue, Jul 3, 2018 at 7:26 AM
Subject: Re: Fire Alarm- 3101 Indian Creek Drive 33140

We will be following up, ~~this building should be vacant~~ and under renovation

Sent from my iPad

> On Jun 30, 2018, at 10:04 AM, Masta Splinta <vidaspice@yahoo.com> wrote:
>
>
> They the construction crew for the hoteliers at 3101 Indian Creek Drive in 33140 Miami Beach FL leave the fire alarm on intentionally as they can turn it off.
>
> They have demonstrated that they know how to turn it on and off, but to bully me and hurt my head and ears they leave it on.
>
> There is no fire.
>
> Months of this bad faith behavior is wrong and sick but they hope to turn a profit and this is only one of the frauds unless you find a fire here every day & night and on weekends (now).
>
> Where is the fire marshal?
>
> Sincerely,
> Unit 106

Special Valentine's Day Message from Commissioner Michael Góngora

From: Miami Beach Commissioner Michael Góngora (michael@michaelgongora.com)
 To: vidaspice@yahoo.com
 Date: Friday, February 14, 2020, 06:34 PM EST



Dear Friends,

Happy Valentine's Day! There are many good things happening throughout the City of Miami Beach this month and I hope to see you at one of the many upcoming events. I am thrilled that Grammy-winning artist Jon Secada will serve as our celebrity judge for the "Seniors Got Talent" event I created and sponsored. The event will take place on March 5, 2020 from 6 - 8 PM at the Miami Beach Convention Center. Auditions are fully booked and closed; however, you are welcome to attend and have fun cheering on our finalists and winners. Please find the details below.

Here's the update from our monthly Miami Beach Commission meeting earlier this week.

The health, safety and welfare of our community is the most important consideration when making decisions for our City. The Commission has discussed Spring Break 2020 on numerous occasions over the past year, and prior to our February 2020 meeting had already passed 13 ordinances to help prepare for Spring Break 2020.

As such, I was surprised when Mayor Gelber proposed a halt on alcohol sales at 2 AM for 18 days over three weekends in March, shortly before the February Commission meeting. That proposal failed, however, a modified proposal was approved 5 -2 on first reading to close the area at 3 AM instead of 5 AM over two weekends during Spring Break - March 11 - 22, 2020 only. The second reading on the ordinance will be on Wednesday, February 26, 2020 at 5 PM. Commissioner Ariola and I voted against this revised ordinance on first reading. The three main reasons I voted against this are:

1. I do not believe this watered-down version of the ordinance to stop alcohol sales in certain portions of the city earlier will improve our safety.
2. This ordinance was proposed at the last minute. The Commission has asked the administration for the past year for alternative programming over Spring Break and we did not receive anything until the last meeting and the proposal was incomplete. I believe that had Administration prepared the alternative programming requested by the Commission, we could have considered a better solution.
3. Voters rejected the 2 AM closure in 2017 with approximately 64 percent of Miami Beach residents voting against the rollback of alcohol sales to 2 AM, and I respect the will of the voters. Had the earlier closure been brought up sooner, the Commission could have scheduled public charrettes to gauge the will of the residents.

This week we also took action to protect the City from unnecessary density increases. The City Commission unanimously approved an Ordinance I sponsored to reverse the prior decision of the Board of Adjustment expanding the definition of "floor area ratio" and codifying and re-affirming the City's longstanding calculation of a building's "floor area" as including stairwells, elevator shafts, and mechanical chutes and chases. In order to resolve the litigation with the Developer, the Ordinance included an "applicability clause," to "carve-out" the 500 Alton project from the scope of the Ordinance, provided that there be no change in the previously approved height or floor plate (i.e., massing) for the residential tower for the project. The City Commission also unanimously approved an amendment to the 500 Alton Development Agreement to settle a pending and uncertain appeal with the developer, which includes the following material terms:

- Reduces the density of the tower from 410 residential units to 330 residential units;
- Accelerates the time frames for the conveyance of the 3.0-acre park to the City and for completion of the construction of the park project sooner;
- Secures a contribution from the Developer of approximately \$2 million for completion of the 5th Street Pedestrian Bridge Project, with the design created by world-renowned artist Daniel Buren; and
- Strengthens the guarantees Developer would provide to the City via letters of credit, to back up Developer's financial commitments relating to the park project and bridge project, along with other settlement-related provisions to protect the City's interests.

Since 2018, the City Commission has worked with the developer and community stakeholders to transform this area, which lies at a critical gateway to the City. I understand from the developer that the permitting process is well underway, and I look forward to seeing the development team deliver on its promises to the City and to make the community's vision for this area a reality.

Ilana Rigwan

v

Jordan Neus ET AL

SUPREME COURT OF THE UNITED STATES

OFFICE OF THE CLERK

CASE# 19-6695

WASHINGTON, DC 20543-0001

CERTIFICATION

This certificate for rehearing, based on Rule 44, officially declares the grounds (briefly & distinctly stated) are limited to *intervening circumstances of substantial or controlling effect not previously presented*. The Rip Off Report with Video Proof is *one of many examples* showing Your Honors why **certiorari deserves to be granted**; it displays Jordan Neus Et Als **larger scheme** and reason for **NOT ALLOWING ME to bring up the Intentionally Altered Original Judgments (2003 & 2008) AND Clouded, Defected Deeds (1999)**. Their bad faith multiple actions -- with unclean hands AND under oath -- is of National Importance to our American Judicial System. I was guaranteed a fair trial and never got one. Thank-You Your Honors.

Sincerely,

Ilana Rigwan Ilana Rigwan

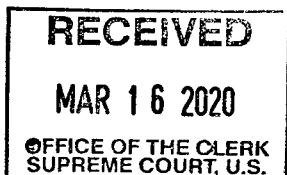
Address Change is as follows:

L Powers
1300 Washington Ave
Miami Beach, FL 33139

VidaSpice@yahoo.com
786-339-6335

I certify I am telling the truth and that a true copy was furnished to opposing counsel Barry Shevlin for all involved on March 6, 2020.

Ilana Rigwan, Pro Se



Ilana Rigwan
v
Jordan Neus et al

SUPREME COURT OF THE UNITED STATES
RULE 44 ON DENIED CERTIORARI
CASE# 19-6695

CERTIFICATION

This certificate for re-hearing, based on Rule 44, was written in Good-Faith And Not For Delay. ✓
Opposing Counsel's Response and *entire fight* in the Justice System was forged and done in bad-faith, so it does not have merit, and it can simply be evidenced by the Original NY & Miami 2003 & 2008 Judgements and Two-Deeds upon being granted certiorari. My certiorari will have merit and national, public importance to uphold fair trials and is a matter of life and death. It will prevent further destruction to our democracy, middle-class, and legal system governed by a Constitution and Our Laws. I certify I am telling the truth and that a true copy was furnished to opposing counsel Barry Shevlin for all involved on February 21, 2020.

I also certify that Michael Gongora is a Miami Beach Commissioner (attorney with a conflict-of-interest) in Candace Solas's firm who overreached as my Miami Beach Commissioner who helped them to evict me while I had the deed and he was in trials in the LC, but his name doesn't appear on my 2005 case or eviction notice intentionally. He appeared before Judges Trawick, Pedraza, Lopez, Murphy and possibly others. He did a lot of underhanded work to secure his future position as Mayor of Miami Beach. I attached a February 14, 2020 e-mail proving he works closely with the developer-mayor duo associated with my case.

**This Case Is Significant, With Merit, Not Baseless Or Frivolous. The Nation Needs You!!!
I Proved They Are Dangerous To Society, And That This Case Is Important Nationally For The Pursuit Of Justice. Thank-You, Your Honors!**

Sincerely,

Ilana Rigwan
19 W. Flagler Street #404
Miami, FL 33130
VidaSpice@yahoo.com
786-339-6335