

No.

In The
Supreme Court of the United States

Gregorio Igartua, et. al.
Petitioners

v
U.S. GOVERNMENT
DONAL J TRUMP
PRESIDENT
OF THE UNITED STATES OF AMERICA
WILBUR L. ROSS JR.
U.S. SECRETARY OF COMMERCE
KAREN L. HAAS CLERK OF THE
US HOUSE OF REPRESENTATIVES
Respondents

Petition for a Writ of Certiorari to the
U.S. Court of Appeals “en banc”
For the First Circuit

PETITION FOR A WRIT OF CERTIORARI

GREGORIO IGARTUA
Attorney for Petitioners
P.O. Box 3911
Aguadilla, PR 00605
(787)891-9040 / Fax (787)882-3011
bufeteigartua@yahoo.com
U.S. Supreme Court Bar Number 120890

QUESTION PRESENTED FOR REVIEW

Whether Petitioners' request to vote in elections for Representatives to the U.S. House of Representatives under Apportionment, under the Constitution of the United States of America, U.S. Treaty law, U.S. legislated provisions, and under U.S. judicial interpretations, should be judicially disposed of by a Three Judge Court (28 USCA A2284)

THE PARTIES

GREGORIO IGARTUA, CARLOS
MENDEZ-MARTINEZ, JORGE LUIS PEREZ-DIAZ,
PEDRO MENDEZ-SOTO, JOSÉ ERNESTO GARCÍA
SEGARRA, IRIS Y. GARCÍA CAMACHO

PETITIONERS

U.S. GOVERNMENT
DONALD J. TRUMP
PRESIDENT
OF THE UNITED STATES OF AMERICA
WILBUR L. ROSS JR.
U.S. SECRETARY OF COMMERCE
KAREN L. HAAS CLERK OF THE
US HOUSE OF REPRESENTATIVES

RESPONDENTS

TABLE OF CONTENTS

	Page
QUESTIONS PRESENTED FOR REVIEW.....	i
THE PARTIES	ii
TABLE OF CONTENTS	iii
TABLE OF AUTHORITIES.....	iv
STATEMENT OF JURISDICTION.....	1
NATURE OF THE CASE	1
CONSTITUTIONAL STATUTORY AND TREATY PROVISIONS.....	2
PROCEEDINGS BELOW	2
STATEMENT OF FACTS AND REASONS FOR GRANTING THE WRIT.....	3
ARGUMENT	9
CONCLUSION	15

TABLE OF AUTHORITIES

Constitutional Provisions	Page
---------------------------	------

United States Constitution:

Article I Section 2	1, 2, 6
Article III	1, 2
Article IV	1, 2, 6
Section 2.....	1
Section 3.....	1
Section 4	6
Article VI	1, 2
Amendment I	1, 2
Amendment V	1, 2
Amendment XIII	1, 2
Amendment XIV.....	1, 2
Amendment XV	1, 2
Amendment XIX.....	1, 2
Amendment XXIV	1, 2
Amendment XXVI	1, 2

Puerto Rico Constitution:

<i>Preamble</i>	6
<i>Art. VII</i>	6

II. Statutory Provisions

28 USCA 1331.....	2
28 USCA 1343 (a) 4,	1, 2
28 USCA 1350.....	1
28 USCA 1651 (a).....	1, 2
28 USCA 2201 (a).....	2, 15
28 USCA 2284.....	2, 3, 9, 10, 11, 12, 14, 15
48 U.S.C.A. 731-916	1, 2

III. Treaty Provisions

Treaty Covenant of Civil and Political Rights – 999 UNTS 171	
Article 2, 25 and 2.....	6
American Declaration of the Right and Duties of Man	
Individuals - Article 9	1
Treaty of Paris 30 States 1754	8
UN Human Rights Declaration	
(G.A. Res 217 A III A/810, 1948	
Article 21	1
Democratic Charter of the	1
Organization of American States (OAS Doc OEZ/SerP/AG/Res/2001)	

IV. Regulations

U.S. Supreme Court Rules1
Cir. 1 Appellate Rule 35 (a) (2).....16

IV. Jurisprudence

Adams v. Clinton 26 FS 2d 156 (531 US 941)....7, 10
Aetna Casualty v. Quailles, 92 F3d. 321 4th Cir15
Brown v. Board of Education,
347 U.S. 483, (1954)14
Boumediene v. Bush, 553 US 723.....8
“CE Design Ltd. v. Amer. Econ. Ins.Co.,
755 F.3d 39, 46 (1st Cir. 2014)13
Consejo de Salud Playa de Ponce v. Rullan
586 FS 2nd 22 (2008)8
Downes v. Bidwell, 182 US 244.....8
González v. William, 24 Sup. Ct.4
Rep. 177.....5
Igartua v. U.S., 626 F3d. at 598 N. 6.....11, 12
Igartua v. U.S.,417 F3d. 1457
Igartua v. U.S., 229 F3d 8011
Massachusetts v. United States Veterans Admin.,
541 F.2d 119 (1st Cir. 1976).....13
Plessy v. Fergusson, 163 US 53 7.....14
PR Consumer Affirs v. Isla Pretroleum
485 US 495 (1988).....6
Steel Co. v. Citizens for a Better Env't,
523 U.S. 83, 91 (1998)13
Slaughter House Cases – 83 US 36.....8

<u>U.S. v. Laboy</u> 553 F3d 715	5
<u>U.S. v. Lucienne D Hotelle de</u> <u>Rexach et., al</u> 558 F 2 nd 37.....	5
<u>U.S. v Rexach</u> 185 Fs 465	5

VI. Other Authority

Bayron Toro, Elecciones y Partidos de Puerto Rico 108, 2003.....	5
G. Igartua, The de Facto Incorporated Territory of Puerto Rico (2017).....	8

STATEMENT OF JURISDICTION

Action arises in accordance with the provisions of: 28 USCA 1651 (a); 28 USCA 1343 (a)4, and 2201, 48 USCA 731-916; under the U.S. Constitution, Articles I- Section 2, III, IV Sections 2 and 3, Article VI, Amendments I, V, XIII, XIV, XV, XIX, XXIV, and XXVI; under Treaty Covenant of Political and Civil Rights (999 UNTS 171) (hereinafter cited as ICCPR); under UN Human Rights Declaration (G.A. Res. 217 A III A(December 10, 1948), hereinafter cited as UN Declaration HR; American Declaration of Rights and Duties of Man, OAS Res XXX (1948); and, under the Inter American Democratic Charter of the Organization of American States (OAS Doc OEA/Ser.L/V/II.89 Doc. 10 at 11 (1989)).

NATURE OF THE CASE

This is an action for declaratory and injunctive relief to redress the deprivation of rights and privileges secured Petitioners, and all other American citizens residents of Puerto Rico, (3.5 million American citizens by birth), to vote in elections for Representatives to the U.S. House of Representatives, (five representatives under Apportionment), under the Constitution of the United States of America, U.S. Treaty law, U.S. legislated provisions, and under U.S. judicial interpretations.

CONSTITUTIONAL STATUTORY AND TREATY PROVISIONS

- US – Constitution Art. I, III, IV, and VI – Amendments I, V, XIII, XIV, XV, XIX, XXIV and XXVI;
- 28 USCA 2201 (a), 2284, 1651 (a), 1343 (a)4, and 2201, 48 USCA 731-916;
- Treaty International Covenant of Civil and Political Rights Articles 2 and 25.

PROCEEDINGS BELOW

Petitioners submitted their complaint in the U.S. District Court for Puerto Rico. Jurisdiction in this Court of first instance was supported by: 28 USCA 1331 which provides for all civil actions arising under the Constitution, laws, or treaties of the United States; U.S. Constitution Art. I – Section 2; Art. IV; Article VI; Amendments I, XIII, XIV, XV, XIX, XXIV and XXVI. Petitioners request for a Three Judge Court (28 USCA 2284) was denied by the U.S. District Court for Puerto Rico. (See, Appendix C). Petitioners filed notice of appeal to First Circuit. Petitioners filed Brief to the Appeals Court Panel (1st. Cir.), and Respondents filed opposition. The Three Judges of the Panel would refer case to Three Judge Court as the law requires but two members of the Panel, Judges Lipez and Thompson, decided notwithstanding case was more proper for judicial disposition by the Court *en banc*. (Judge Torruella dissented) (Appendix B), as these felt bounded by a prior *en banc* opinion in *Igartua IV* (626 F3d at. 598 n.6).

Petitioners requested petition for reconsideration and/or rehearing *en banc*. The Petition did not address the merits of the issues of the case, as stated in the Complaint and/or Briefs, but rather the lack of jurisdiction of the Court en banc to dispose of this case as it should be judicially disposed of by a Three Judge Court as the law requires for cases of apportionment. (28 USCA 2284) The Petition was denied (Appendix A) on a four to three decision, (August 4, 2017). (Appendix A) Judges Torruella, Lipez, and Thompson dissented. From this judgment Petitioners request this Supreme Court to determine that the judgment of the Appeals Court en banc was disposed judicially without jurisdiction and contrary to the requirements of the law for cases of apportionment, (28USCA2284) and request that the Court remands the case to the Federal District Court of Puerto Rico to be dispose of by a Three Judge Court. The 3.5 million American citizens residents of Puerto Rico have a right to equal protection of the law and to due process.

STATEMENT OF THE CASE AND REASONS FOR GRANTING THE WRIT

Although this Petition does not address the merits of the legal issues as stated in the complaint, a statement of the case is pertinent.

This is an action by Petitioners requesting their right to have government by consent, to vote in federal elections for Representatives to the U.S.

House of Representatives (five Representatives under apportionment) It affects the democratic rights of 3.5 American Citizens residing in Puerto Rico. Furthermore, the Petitioners argue that this denial of representation in their country's government

through freely-elected representatives is contrary to domestic and international law, as they have no meaningful representation in the federal House of Representatives. As a result, Petitioners claim that they are excluded discriminatorily from participating in national and international policy-making decisions and cannot vote through their representatives on issues of national and local concern. (Such as matters of national security concern, tax policies, economic plans and health care legislation, and others). Presently all laws are applied by Respondents without Petitioners' consent. In Petitioners' view, congressional representation is a requisite for participation in the national government of the United States, and this has been denied to them.

The concept of the power of the federal government emanating from the People exists since the birth of our Great Nation. Our Declaration of Independence reads:

“We hold these Truths to be self-evident, that all Men are created equal, that they are endowed by their Creator with certain unalienable Rights, that amongst these are Life, Liberty, and the Pursuit of happiness. That to secure these Rights, Governments are instituted among Men, deriving their Powers from the Consent of the Governed....”

At the point in time before the acquisition of Puerto Rico by the U.S. in 1898 the inhabitants of Puerto Rico had full rights as Spanish citizens. This included the right to elect sixteen deputies and three senators, with full voting rights, to the Spanish Parliament. (Bayron Toro, Elecciones y Partidos de Puerto Rico 108, 2003). Since the acquisition of Puerto Rico by the United States in 1898 the American citizens residents of Puerto Rico have been denied the right to vote for Representatives to Congress.

Since 1898 Puerto Rico has been gradually moved and treated by Congress, by the Executive Branch, and by the Federal Courts to be “like a state”, to such an extent that today it is a de facto incorporated territory of the United States. Puerto Rico’s citizens are 4th, 5th, and 6th generation American citizens. (See e.g., *González v. Williams*, 24 Sup. Ct. Rep. 177; (3d Cir. 2009); 39 Stat. 953 & 64 Stat. 319; *US v. Lucienne D’Hotelle De Rexach et. Al*, 558 F 2nd 37; *U.S. v. Laboy* 553 F3d 715.

The American citizens of Puerto Rico contribute more than three billion dollars a year to the U.S. Treasury and defend the United States democratic policies in times of war, yet are denied any vote in the Congress that levies those taxes and declares those wars. (See, *U.S. v Rexach* 185 FS 465). All Federal Laws, except those locally inapplicable, apply in Puerto Rico. This contravenes a fundamental tenet of our nation: “that government “deriv[e] their just powers from the consent of the governed.”

Petitioners contend in the Complaint that the denial of their right to vote violates the U.S. Constitution, which provides that the members of the House shall be “elected by the People.” (Article I Section 2). Petitioners contend it also violates Article VI of the U.S. Constitution by denying applicability of the Treaty ICCPR- Articles 2 and 25, providing for the participation in free elections of all citizens of signatory countries. The complaint names as Defendants: the President, the Secretary of Commerce, the Clerk of the House of Representatives, and the United States Government.

The Puerto Rico Constitution was adopted in 1952 by direct vote of the citizens, and was ratified by Congress. (In accordance with U.S. Const. Art. IV – Sec. 4.) In the Preamble the citizens swear loyalty to their American citizenship and to its democratic commitments, to the U.S. Constitution, and accept to be under the Supremacy Clause of the U.S. Constitution, as are citizens of states. (P.R. Const Art. VII). (See, *P.R. Consumer affairs v. Isla Pretroleum* 485 U.S. 495 (1988). Puerto Rico is the only U.S. Territory not ruled by an Organic Act., and which qualifies for the minimum population applicable to the apportionment formula assigning representatives. (Moreover, PR qualifies for five representatives under apportionment). The U.S. Census includes Puerto Rico’s population.

Petitioners expose that this case involves federal questions of exceptional legal importance, and that there is sufficient controlling legal authority that offers this Court sound reason to reverse the judgments of the District Court, and of the Appeals Court *en banc*, and to remand the case to the Federal District Court of Puerto Rico to be disposed of by a Three Judge Court, as the law requires.

Moreover, in a similar case the American citizens of DC were granted disposition by a Three Judge Court. (*Adams v Clinton* 26 FS 2d 156, 531 US 941). Under what legal basis can Respondents justify the unequal treatment or denial of due process to the American Citizens residents of Puerto Rico on this jurisdictional issue?

The dismissal of the case by the U.S. District Court for Puerto Rico but supporting in part Petitioners' complaint (Appendix C); the 3-3 Opinion of the Appeals Court Panel, supporting Petitioners request for a Three Judge Court (Appendix B); the four to three Resolution of the Appeals Court denying Petitioners request for reconsideration and/or rehearing *en banc* (Appendix A); Judge Howard's contradictory reversal in the *en banc* opinion of his previous stance (*Igartua v U.S.* 417 F 3d 145, 1st Cir. 2005) on the applicability of ICCPR to the voting rights requests; warrant this Court to revoke the opinion of the *en banc* Court of the First Circuit and remand the case to a Three Judge Court.

By denying Petitioners' judicial disposition of this case by a Three Judge Court, these have been left without due process and equal protection of the laws as disposed by the U.S. Constitution. Petitioners have been left confined to a state of servitude by disenfranchisement with respect to the Federal Government, and in a way inconsistent and contrary to interpretations of this Court. The denial of the right to vote in such elections is a condition of servitude upon all the American citizens of Puerto Rico (Servants), because all are compelled to accept the applicability of government without their consent from the Federal Government (Master). (Compare to the Slaughter House Cases – 83 US 36.)

This Honorable Court must reverse the Judgment of the Federal Appeals Court en banc below. If not reversed, the American citizens of Puerto Rico will continue in a the dead end situation that the dismissal of their Complaint provokes. This condition of servitude has endured for 119 years, since 1898, when the United States on its own political initiative decided to acquire Puerto Rico as a result of the Spanish-American War by the Treaty of Paris (30 Stat 1754), and was heightened by the opinions in the Insular Cases, decided on racial and geographical discrimination (e.g. *Downes v. Bidwell*, 182 US 244, 1901). (No longer applicable. See *Boumediene v. Bush*; *Consejo de Salud Playa de Ponce v. Rullan* 586 FS 2nd 22 (2008). (See also, G. IGARTUA, *The de Facto Incorporated, Incorporated Territory of Puerto Rico*).

Moreover, denial of the vote for representation is contrary to Respondents policies granting voting rights to American Citizens residing in foreign countries, and of its policies of defending democratic rights of citizens of foreign countries (Iraq, Afghanistan) . Petitioners' rights under treaty obligations of the United States, in this case under the ICCPR, are also discriminatorily denied. These contradictions warrants review by a Three Judge Court.

ARGUMENT I

The Complaint filed by Petitioners in the Puerto Rico Federal District Court included a request for the appointment of a District Court of Three-Judges pursuant to 28 U.S.C. A. § 2284. (Complaint pg.73-B). The aforementioned Section provides that:

"[a] district court of three judges shall be convened when otherwise required by Act of Congress, or when an action is filed challenging the constitutionality of the apportionment of congressional districts, or the apportionment of any statewide legislative body". Furthermore, it stipulates that: "[u]pon the filing of a request for three judges, the judge to whom the request is presented shall, unless he determines that three judges are not required, immediately notify the chief judge of the circuit, who shall designate two other judges, at least one of whom shall be a circuit judge. The judges so designated, and the judge to whom the request was presented, shall serve as members of the court to hear and determine the action or proceeding....".

Therefore a request for the appointment of a Three Judge Federal District Court to judicially dispose of this case involving the 3.5 million American Citizens residents of Puerto Rico related to the vote by the process of apportionment is neither

pretentious or unprecedented. A Report by the Senate Judiciary Committee regarding the amendment of the Three-Judge Court Act stresses that challenges to apportionment issues "are of such importance that they ought to be heard by a Three-Judge Court." (S. Rep. No. 94-204, at 9 (1975). In Adams v. Clinton, 26 F. Supp. 2d 156 (D.C.D.C. 1998), the District Court granted the citizens of the District of Columbia, a territory, the right to have their complaint (similar to this one) heard by a Three Judge Court and was affirmed by this Honorable Court (531 US 941). Moreover, Congress itself established the jurisdictional rule that these cases of apportionment must be judicially disposed of by a Three Judge Court, (28 U.S.C.A 2284). This legislation deserves the utmost deference from the Federal Courts.

Notwithstanding, the District Court dismissed the Complaint without transferring the case to a Three Judge Court. (Appendix C). The Court's disposition regarding this matter was limited to stating that similar requests by Petitioners had been previously denied. In doing so, the Court avoided addressing the legal basis for the establishment of such special procedures by Congress, and omitted what legal basis requires affording Petitioners treatment that differs from that afforded to the residents of the District of Columbia. (Id. Adams). The denial of Petitioners right to a Three Judge Court lacerated their rights to due process and equal protection, and adopted and furthered the discriminatory practice of granting the least amount of rights possible to the American citizens of Puerto Rico, a lowest common denominator approach to human and fundamental rights.

This case is of great interest and importance to the 3.5 million American citizens residents of Puerto Rico, all whom have been denied the right to vote for five representatives to the U.S. Congress since Puerto Rico was acquired by the United State in 1898. At the outset, consider Hon. Judge Kayatta opinion in his first statement:“The prolonged inability of our fellow citizens to vote for certain federal officials is certainly a matter of legitimate concern....”

Notwithstanding, such opinion contradicts the finding of the Court with respect to the element of “substantiality.” It ignores not only the element involved of the democratic right related to the request of the complaint, but the fact that a constitutional claim may arise from the government’s failure to abide by the obligations imposed to Respondent as signatory to the International Covenant On Civil and Political Rights (ICCPR), as invoked by Petitioners. Moreover, the Court en banc did not consider that even if this Petition ultimately fails on the merits of the case, Section 28 USCA 2284 entitles these to have the case be heard by a Three Judge Court.

The Court en banc considered this case to be similar to a previous case referred to as *Igartua IV*. (626 F3d 592, 1st Circuit 2010). In that case the Panel en banc also dismissed a request for a Three Judge Court in a footnote. There the Court stated:

“...We also reject the argument made by Igartúa, but not made by the government, that this case must be heard by a three-judge district court under 28 U.S.C. § 2284(a). That statute provides that a "district court of three judges shall be convened when . . . an action is filed

challenging the constitutionality of the apportionment of congressional districts." Id. That is not the issue in this case... Igartúa IV, 626 F.3d at 598 n.6.

Regarding the referred footnote, it is pertinent for this Honorable Court to consider that Hon. Judge Torruella stated as follows:

“ ... Accordingly, it seems that only one member of the panel (Judge Lynch) subscribed to footnote 6, which would be insufficient to constitute a holding of the Court and, instead, makes it nothing other than dicta. Because the footnote lacked the necessary support to become a determination of this Court, it does not bind this Court or any other court. A mere footnote, bereft of reasoning or analysis, should not foreclose the voting rights of close to four million United States citizens. I would reverse the judgment of the district court refusing to convene a Three-Judge Court and remand the case to that court for further proceedings consistent with all other aspects of the majority opinion...” (Judgment page 31).

Indeed, Igartúa IV's footnote is the kind of "drive-by jurisdictional ruling" that the Supreme Court has instructed has 'no precedential effect. “CE Design Ltd. v. Amer. Econ. Ins.Co., 755 F.3d 39, 46 (1st Cir. 2014) (“[T]he brief discussion in the Massachusetts v. United States Veterans Admin., 541 F.2d 119 (1st Cir. 1976)]

footnote is arguably the sort of 'drive-by jurisdictional ruling' that the Supreme Court has instructed has 'no precedential effect.'" (quoting Steel Co. v. Citizens for a Better Env't, 523 U.S. 83, 91 (1998))). (Appendix B - Judgment page 28).

Hon. Judge Torruella averred that this case should be disposed of judicially by a Three Judge Court at the District level, as the law requires for cases of apportionment, without further intervention from the Appeals Court in reconsideration and/or rehearing en banc, and as Petitioners propose.

Therefore, Petitioners request that this Honorable Court remand this case to a Three Judge Federal District Court Panel Judge in Puerto Rico, in protection of their constitutional right to due process and equal rights, and in compliance with what the law provides, and without entering in the consideration of the merits of this case which should be dispose of by a Three Judge Court. This case involves substantial questions of law and the requested relief has merits. If the Petition is not granted, Petitioners will be left out without a day in Court since any judicial disposition of their substantive arguments under the requirement that should be processed by a Three Judge Court would be null and void. The disposition of this Petition by this Honorable Court should be limited to the legal technicality involved in this case, a judicial procedure (the request of apportionment of representatives) for which the law clearly requires a Three Judge District Court. (28 USCA 2284)). It entitles Petitioners to make their case before a Three- Judge District Court.

Petitioners refer their arguments also to those found in the legally sound and carefully elaborated arguments set forth in the majority opinion of the Panel of the Appeal's Court (3-3), (Appendix B) and in their dissenting opinions in the denial for reconsideration en banc (4-3 – Appendix A).

The Appeals Court Denial of the en banc reconsideration follows the more than a century of a policy applicable to Puerto Rico of a discriminatory treatment of separate and unequal for the purpose of federal voting rights, which has been to the American citizens residents of Puerto Rico what the Plessy v. Ferguson U.S. Supreme Court decision was to African-Americans prior to the Brown v. Board of Education (163 U.S. 537, and 347 US 483 respectively) U.S. Supreme Court decision. The American citizens residents of Puerto Rico continue to be arbitrarily segregated as far as federal voting rights is concerned from the rest of the American Family, and/or from the class of American Citizens who can vote absentee from foreign countries. As stated, this discrimination has lasted for more than one century notwithstanding the domestic and international legal policies of Respondent in the area of voting rights.

CONCLUSION

WHEREFORE, in light of the above, it is very respectfully requested from this Honorable Court that it grants this Petition of Certiorari, revoke the en banc Court opinion of the First Circuit (4-3) and remand the case to the Puerto Rico Federal District Court for assignment and referral to a Three Judge Court pursuant to 28 USC 2284, for it to dispose of the merits of the substantial questions of law concerning the right to vote for five representatives. Denial of this request would severely and irremediably affect Petitioners' constitutional, due process and equal protection rights.

It is the Federal Courts who have the authority to interpret the Constitution, and Congress is bound by such interpretations. The Federal Courts have jurisdiction to protect the voting rights of all the American citizens residing in Puerto Rico. Declaratory Relief is provided under section 28 U.S.C.A. § 2201 (a) which states:

“(a) In a case of actual controversy within its jurisdiction... any court of the United States, upon the filing of an appropriate pleading, may declare the rights and other legal relations of any interested party seeking such declaration, whether or not further relief is or could be sought.” (See *Aetna Casualty v. Quailles*, 92 F3d 321, 4th. Cir.)

Moreover, in cases of apportionment Congress has deferred any controversy to the Federal Courts. (28 USCA 2284), Thus, it is likely that Congress would abide by a Declaratory Relief

for Petitioners in this case if judicially dispose of by a Three Judge Court.

The en banc opinion of the First Circuit Court of Appeals should be revoked and this action should be remanded to a Three Judge Court in the Federal District of Puerto Rico for judicial disposition of the merits of this case.

“Most governments have been based,
practically on the denial of the equal
rights of men...
Ours began by affirming those rights-
Abraham Lincoln”

RESPECTFULLY SUBMITTED,

GREGORIO IGARTUA

Attorney Pro Se and For Petitioners

Comercio St. #52, Aguadilla, PR

Box 3911, Aguadilla, PR 00605

TEL (787)891-9040;

FAX (787) 882-3011

bufeteigartua@yahoo.com

U.S. Supreme Court Bar Number 120890