

**Joseph Cammarata, Reg. No. 02555-506
Federal Prison Camp Montgomery
1001 Willow Street
Montgomery, AL 36112**

Date: December 5th, 2025

Clerk of the Court
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

**Re: In re Joseph Cammarata, No. 25-6128
Submission of Supplemental Authorities under Rule 15.8**

Dear Clerk:

Enclosed please find a filing submitted on behalf of Petitioner Joseph Cammarata, titled:

"Notice of Supplemental Authorities and Submission of Supplemental Appendices (Rule 15.8)."

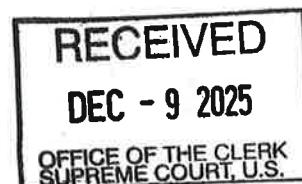
This filing is being mailed on Petitioner's behalf because he is currently incarcerated and cannot personally transmit documents to the Court.

Please docket the enclosed filing under the above-referenced case number. If the Court requires any further information, Petitioner will provide it promptly.

Thank you for your attention to this matter.

Respectfully submitted,

Joseph Cammarata
Petitioner
Reg. No. 02555-506



IN THE SUPREME COURT OF THE UNITED STATES

In re Joseph Cammarata, Petitioner

Case No. 25-6128

NOTICE OF SUPPLEMENTAL AUTHORITIES AND SUBMISSION OF SUPPLEMENTAL APPENDICES

Pursuant to Supreme Court Rule 15.8, Petitioner respectfully submits this Notice of Supplemental Authorities. After the filing of the Petition, the following authorities have become newly relevant and bear directly on the constitutional questions presented:

1. United States v. Comey, ___ F.4th ___ (2025) — clarifying that prosecutors may not rely on testimony that is incomplete, misleading, hearsay-based, or legally inaccurate, and reaffirming the duty to correct such testimony.
2. Sprint v. APCC Services, Inc., 554 U.S. 269 (2008) — controlling authority establishing the legality of claim assignments.
3. Pennsylvania Assignment of Claims Act, 69 P.S. §§ 521–523 — statutory authority confirming the validity of assignments.
4. Due Process Protections Act of 2020 (“DPPA”), Pub. L. 116-182 — requiring district courts to issue written and oral Rule 5(f) orders enforcing Brady obligations.

Petitioner also submits Supplemental Appendices E-1 and E-2, consisting of the grand-jury transcripts from the underlying fraud and tax prosecutions. These transcripts are newly relevant in light of Comey, as they demonstrate that the Government’s indictments were obtained through the precise type of deficient testimony that Comey condemns.

Respectfully submitted,



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ADDENDUM TO NOTICE OF SUPPLEMENTAL AUTHORITIES

I. United States v. Comey Exposes the Constitutional Defects in the Grand Jury Proceedings

The Court's recent decision in *United States v. Comey* condemns the use of incomplete, misleading, or legally inaccurate testimony to secure an indictment, particularly where the case rests on a single witness who relies on hearsay and fails to present controlling law. Comey underscores that such testimony creates a substantial risk of misleading the grand jury as to the legal and factual basis of the charges.

The grand jury transcripts in this case reveal identical, profound defects. In both the fraud and tax proceedings, the Government's entire case was presented through a single witness whose testimony omitted the controlling law of assignments, advanced a legally false theory of criminality, and was insulated from challenge because neither witness testified at trial. This denied Petitioner the constitutional right to confront and cross-examine the architects of the misleading narrative that led to his indictment and conviction.

II. The Fraud Grand Jury Was Misled by Hearsay and Omission of Law

The fraud indictment rested entirely on the testimony of Postal Inspector George Clark. His presentation was defined by reliance on cooperators, a complete omission of controlling law, and material misrepresentations that were never tested at trial.

· Reliance on Cooperators' Conclusions, Not Evidence: Clark grounded his allegation of fraud not in trading records or independent analysis, but in un-cross-examined statements from cooperating defendants:

"They confirmed for us that the claims were fictional, yes—fraudulent." (Fraud Tr. 9).

· Admission That No Trading Occurred: The factual premise of a securities fraud claim was negated by Clark's own testimony:

"Q: As part of your investigation ... did Quartis, Nimello, or Invergasa engage in any trading?
A: No, they did not." (Fraud Tr. 28).

Despite this admission, the grand jury was never informed that, under Sprint and the Pennsylvania Assignment of Claims Act, the assignment of settlement claims is lawful. The jury was left with a narrative of "fictional" claims, without the exculpatory legal context that would have explained the lawfulness of Petitioner's conduct. Critically, Clark never testified at trial. Petitioner was thus forever denied the opportunity to cross-examine him on these material omissions and misrepresentations.

III. The Tax Indictment Violated the Presumption of Innocence and Relied on a Legally False Premise

The tax indictment, secured weeks before the fraud trial began, was constitutionally infirm from its inception. It was predicated entirely on the unproven—and legally invalid—allegation of fraud, violating the bedrock principle that a defendant is presumed innocent.

IRS Special Agent Leo Hughes's testimony demonstrates how the Government bootstrapped this invalid fraud theory into a tax case, creating a circular and unconstitutional foundation.

- The "Stolen Money" Premise: Hughes conceded the tax case depended entirely on the unproven fraud theory, testifying that the funds were "stolen money." (Tax Tr. 42-43). By presenting this conclusion to the grand jury before any adjudication of the fraud charges, the Government subverted the presumption of innocence by presenting allegations as established fact.
- Exclusive Focus on Alleged "False Claims Income": Hughes admitted his tax-loss analysis did not consider legitimate business, reported income, or deductible expenses. His calculations looked only at alleged "false claims income":

"Q: So you're just looking at unreported ... false claims income?

A: Correct." (Tax Tr. 44).

This testimony confirms the tax case was not based on an independent economic analysis, but on the legally flawed premise that all proceeds were fraudulent. The grand jury was never told that the assignments were lawful under Sprint, which would have dismantled the "stolen money" premise. Like Clark, Hughes never testified at trial, denying Petitioner any chance to challenge this circular logic.

IV. The Due Process Protections Act and Rule 5(f) Were Ignored, Compounding the Harm

The constitutional injury was compounded by the district courts' failure to comply with the Due Process Protections Act and Federal Rule of Criminal Procedure 5(f). These provisions require courts to issue orders reminding prosecutors of their continuing duty to seek out and disclose exculpatory evidence, including favorable law.

No such order was issued in either case. Consequently, the prosecution never discharged its duty under Brady and Kyles to provide the grand juries or the defense with the controlling, exculpatory legal authority of Sprint and the Pennsylvania Assignment of Claims Act. This statutory violation permitted the Government to proceed on a legally false theory from the inception of the case through to conviction.

V. Conclusion

In light of Comey, the grand jury presentations in this case are revealed as constitutionally defective. The Government secured indictments by relying on testimony that omitted controlling law, relied on cooperator statements, advanced a legal theory foreclosed by Sprint, and violated the presumption of innocence. The fact that neither witness testified at trial permanently shielded these misrepresentations from cross-examination, denying Petitioner his Sixth Amendment rights and ensuring a trial based on a false legal premise.

When combined with the courts' failure to enforce Rule 5(f), these defects produced a fundamental miscarriage of justice that the Third Circuit has refused to correct. The supplemental transcripts, submitted herewith as Appendices E-1 and E-2, provide the evidentiary basis for this conclusion. Their consideration is necessary for the Court's full and fair review of the Petition.

Respectfully submitted,



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