

IN THE U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

In re Karin Elena Wolf in a matter held against the U.S. Constitution,

Petitioner

PETITIONER’S REQUEST FOR JUDICIAL NOTICE

IN SUPPORT OF PETITION FOR WRIT OF MANDAMUS

Petitioner Karin Elena Wolf, pursuant to *Rule 56* of the *Federal Rules of Civil Procedure* and *Rule 201* of the *Federal Rules of Evidence*, respectfully requests that the Honorable Court take Judicial Notice of the following adjudicative facts and/or public records in support of Karin Elena Wolf’s Petition for Writ of Mandamus. As grounds therefore, Karin Elena Wolf states as follows:

Judicial notice is a means by which adjudicative facts not seriously open to dispute are established as true without the normal requirement of proof by evidence. *Dippin’Dots, Inc. v. Frosty Bites Distribution, LLC*, 369 F.3d 1197, 1204 (11th Cir. 2004); *Fed. R.Evid. 201(a)* and *(b)*; see also *Fed. R. Evid. 201(a)*. Adjudicative facts are facts that are relevant to a determination of the claims presented in a case. *Id.* One category of adjudicative facts subject to judicial notice includes facts that are “generally known within the territorial jurisdiction of the trial court.” *Id.* (quoting *Fed. R. Evid. 201(b)(1)*). Such judicially-noticed facts have been described as being “of breathtaking variety.” *Id.* (collecting cases). Another category includes facts that can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned. *Fed. R. Evid. 201(b)(1)*. A court also may take judicial notice of public records. *Universal Express, Inc. v. U.S. Securities and Exchange Commission*, 177 Fed. Appx. 52, 53 (11th Cir. 2006).

Judicial Notice of appropriate adjudicative facts may be taken at any stage in a proceeding, including at the summary judgment stage. *Dippin' Dots, Inc.*, 369 F.3d at 1204; *Fed. R. Evid. 201(f)*. Courts have wide discretion to take Judicial Notice of facts. *Id.*; *Fed. R. Evid. 201(c)*.

Because the following adjudicative facts and/or public records relevant to a determination of the claims presented in this case are generally known within the territorial jurisdiction of this Court and are not subject to reasonable dispute, judicial notice should be taken of them:

1. On September 24, 2014, Petitioner, without an attorney, filed a complaint in the U.S. District Court, District of New Jersey, *Wolf v. Escala*, 14-cv-05985, under The RICO Act and 42 U.S. Code § 1983 to redress racketeering and Constitutional violations during the pendency of post-judgment child custody proceedings in the Bergen Court, *Wolf (née Crane) v. Crane*, # 02-439-07, and Appellate Court, # A-1813-13.

On May 21, 2015, Judge Madeline Cox Arleo of the U.S. District Court issued an Order stating: a) that it appeared the Bergen Court had dismissed Petitioner's attorney directly before trial (15 minutes prior), b) that parents have a right to custody of their children, c) that children have a right not to be abused, and d) that it appeared the Appellate Court and the Office of the County Counsel in Bergen County blocked Petitioner from receiving free transcripts in *forma pauperis* to appeal the termination of parental rights. Judge Arleo granted Petitioner permission to amend the complaint for deficiencies and Petitioner, without an attorney, filed an amended complaint on July 6, 2015. Petitioner has discovered new evidence in light of those filings, including Title IV discriminatory practices that deprive women of a meaningful opportunity to be heard.

Petitioner filed a subsequent Affidavit of Prejudice on October 1, 2015 and Notice of Discontinuance without prejudice on October 5, 2015, preserving all claims and causes of actions, because Judge Arleo did not disclose her substantial involvement in a criminal reentry program, called ReNew, that receives federal funding pursuant to the Responsible Fatherhood Act under Title IV, which is at issue in Petitioner's Writ of Mandamus.

2. Petition for Writ of Certiorari filed with U.S. Supreme Court on December 8, 2015, *Adkins v. Adkins*, 15-754, which sets forth **strikingly similar** Constitutional violations against the mother and argues *Roe v. Wade* as a continuum of liberty.
<https://drive.google.com/file/d/0B4IHDckCxm5QnA2dzctMX1xSIE/view>.
3. Petition for Writ of Certiorari filed with U.S. Supreme Court, *Grazzini-Rucki, Sandra S. V. Knutson, David, et al.*, 15-220.
4. On January 31, 2011, Judge Donald R. Venezia of the Bergen County Court, declared, **"The Constitution is suspended in this courtroom"** and on a later date, declared Martial Law therein. Petitioner respectfully submits to this Court, that this blatant lack of disrespect for the Federal government has resonated throughout the Bergen County Courthouse and has been at play here in Petitioner's Family Law case.

See 'Constitution' video at: <https://www.youtube.com/watch?v=ZWGIIsfGMfE8>

See 'Martial Law' video at: <https://www.youtube.com/watch?v=oOQp1ILuCEc>
5. *Denike v. Cupo*, 394 N.J. Super. 357 (2007), A-61-07. Judge Gerald C. Escala took a *quid pro quo* kick back from Herten, Burstein, Sheridan, Cervasco, Bottinelli, Litt & Harz to rig case, yet never prosecuted by Bergen County Prosecutor.
6. *Carrascosa v. Mcguire*, 2:07-cv-00355
7. *Carrascosa v. Innis*, 2:06-cv-04648

8. *Carrascosa v. Hauck et al*, 2:12-cv-05173
9. In her Habeas Petition before the U.S. District Court, Maria José Carrascosa details and gives evidence of Peter Van Aulen acting as a witness, perjuring himself; of her being arraigned in absentia, without her attorney present, nor Notice to her; fabrication of a case against her and malicious prosecution in the Bergen Court under Judge Venezia (See above “Constitution is suspended”). As a result, she was segregated from her infant daughter and served 8½ years of a 56-year prison sentence. She was released in July 2014 by Federal mandate from Third Circuit to the Bergen Court; was exonerated by the Hague, the Vatican, and Spanish government, the latter of which is seeking extradition of Peter Innes and Peter Van Aulen for forgery of official Spanish documents.

*Peter Van Aulen submitted “letters certification before the Third Circuit on January 17, 2008 where he **apologizes for entering false representations and evidence to the Court** [Da141-Dal42]” (*Carrascosa v. Hauck et al*, 2:12-cv-05173, p. 19 of Document 1-2, filed August 13, 2012). (Emphasis added)

10. *Carrascosa v. Torack and Molinelli*, 06-cv-3503, filed July 31, 2006.

*On November 13, 2006, Ms. Carrascosa submitted into evidence an audio recording showing Peter Van Aulen, Peter Innes, and Judge Torack, had negotiated a reinstatement of the divorce case of *Innes v. Carrascosa* (after it had been thrown out as polygamy), wherein a *quid pro quo* kick back was arranged where Ms. Carrascosa’s assets would be distributed at 50K per attorney involved and that Ms. Carrascosa would be fined \$500/day since December 9, 2005 until return of child “V” from Spain, and that Judge Torack and Peter Innes would split the proceeds 50/50.

A forensic report by Dr. Stanley J. Brois was also submitted showing that Ms. Carrascosa had been poisoned with tyroxine and recommended that a forensic autopsy be done of Ms. Carrascosa's fetus, as well as Alistair Spencer Innes, and that Peter Innes and his family be deposed. The surviving twin child "V" is blind in one eye from *in utero* poisoning, allegedly by Peter Innes.

11. *Rieger v. Aulen*, No. A-0205-09t2, NJ, c. 2010. Peter Van Aulen is also alleged to have concealed and falsified evidence in a case involving his client David Johanson against Laurie Rieger, *Rieger v. Aulen*, No. A-0205-09t2, NJ, c. 2010. During the *Rieger* proceedings, Peter Van Aulen stated on record that he suffered a "brain hemorrhage" from a skiing accident, which predated Petitioner's child custody case at bar.
12. *Kerwick-Savino v. Savino*, 13-3617 (2nd circuit, 2014), p.6 of Doc #80 - Motion to Recall Mandate and Reinstate Appeal, filed 3/5/2014 by mother Colleen Kerwick under the *rare and exceptional* circumstance that the **legal kidnapping of her child** debilitated her. Doc #99 - Order granting mother's Motion granted by 2nd Circuit on Mar 18, 2014.
13. Amicus Curiae to Court of Appeals of the State of Washington, on behalf of Brenda King, *King v. King*, Wash. App. No. 57831-6-I. Brief located online at:
<http://www.brennancenter.org/sites/default/files/legacy/Justice/King%20v.%20King%20Amicus.pdf>
14. Complaint filed against Judge Lisa Gorcyca of the Michigan Family Court by the Michigan Judicial Tenure Commission on December 14, 2015, Complaint no. 98.
<http://jtc.courts.mi.gov/docs/FC98.Complaint.pdf>.
15. Exposé of family court corruption linked to the murder of Tamara Seidle in New Jersey in June 2015, entitled *Family Court Purgatory* by Joe Mauceri of WPIX News. See:

<http://pix11.com/2015/06/18/pix11-investigates-calls-resound-to-reform-fraud-nj-family-court/>.

16. *Women Wage Campaign to Impeach New Jersey Judge*, by Sarah Wallace. See: <http://www.moremonmouthmusings.net/2013/09/04/petition-for-impeachment-filed-against-judge-paul-escandon/>
17. *Justice for Judges* article, The Rankin File, dated July 29, 2015.
See: <http://www.myajc.com/news/news/local/some-judges-shown-the-door-others-shown-the-cell-d/nm8bZ/>
18. Bergen Dispatch article on recent takeover of Bergen County Prosecutor's Office by the Attorney General of the State of New Jersey. Cover up over a dozen instances of sexual assault of women patients, in exchange for a \$500,000 kickback, by dermatologist Dr. Gangaram Ragi of Teaneck, NJ, now permanently banned from treating women. See: http://www.nj.com/bergen/index.ssf/2015/10/bergen_count_prosecutor_criticized_at_meeting.html
19. Washington Post article, *Pornographic email scandal roils Pennsylvania politics*, by Natalie Pompilio, dated December 26, 2015.
https://www.washingtonpost.com/politics/pornographic-email-scandal-ripples-through-pennsylvania-politics/2015/12/26/fc411a76-a374-11e5-b53d-972e2751f433_story.html
20. 'Kids for Cash' case, *United States v. Ciavarella and Conahan*, U.S.D.C. (MD Penn.), Case No. 3:09-cr-00028 and *H.T. v. Ciavarella*, U.S.D.C. (MD Penn.), Case No. 3:09-cv-00357. An extraordinary amount of juveniles who had appeared before Judge Ciavarella had waived their right to counsel by coercion.

21. RICO suits and Title IV claims filed by parents in the U.S. District Courts. New Jersey Judges named as defendants in those suits either “retired” early, resigned, or were moved, namely Judge William R. DeLorenzo, Judge Gerald C. Escala, Judge Peter Doyne, Judge Victor Ashrafi, Judge Bonnie J. Mizdol, Judge Paul X. Escandon, and Judge Leslie-Ann Justus. The latter two were reportedly investigated by the FBI, involved in a foreclosure racket where Judge Justus signed off on approximately a dozen foreclosure properties subsequently bought by Judge Escandon, which were suspiciously all paid off within one year of Judge Escandon on the bench.
22. Hague cases: Holland granted Holly Collins and her children asylum from the U.S. and a Minnesota Court; Germany stepped in to protect Erin Eddy and her daughter where the Virginia Court not only wouldn’t, but jailed the mother for asking for a welfare check of the child; Spain granted protection and refused to return Maria José Carrascosa’s daughter to the U.S., while the New Jersey Court unjustly sentenced the mother to 56 years in prison; and Spain refused another child’s return on the basis of violating human rights and freedoms where it determined a fleeing mother would be deprived of due process in the courts of the child’s habitual residence, *In Re S.*, Auto de 21 abril de 1997, Audiencia Provincial Barcelona, Sección 1a. See also p. 34-35 of *Adkins v. Adkins*.

Dated: December 29, 2015

Respectfully submitted,

Karin Elena Wolf
ACP 2312
P.O. Box 1110
Albany, NY 12201-1110