

June 17, 2018  
Sunday, Father's Day

Honorable Judge Jose L. Linares  
Chief Judge, United States District Court  
District of New Jersey  
Martin Luther King, Jr.  
Federal Building and Courthouse  
50 Walnut Street, P.O. Box 999  
Newark, New Jersey 07101-0999

Re: United States v. Paul W. Bergin  
Docket No.: 2:16-cv-3040 J.L.L.

Dear Honorable Chief Judge Linares:

I most respectfully implore-plead that This Honorable Court accept this short memorandum, as a supplement to my motion pursuant to 28 U.S.C. § 2255.

It is based pursuant to statements made by the Chief Law Enforcement Officer of the United States and the Director, Supervisor, Administrator and Leader of the Government and prosecutors John Gay, Joseph Minish and Steven Saunders. As this Court is cognizant, the words, admissions and statements of the President must be considered as adopted admissions of the Office of the United States Attorney District of New Jersey and it being spoken out of the mouths of Gay, Minish and Saunders. (Emphasis added).

I file this memorandum at this time and could not have submitted it any sooner, because the "spoken words," "admissions" and statements were all made at or about the same time this memorandum was submitted.

I know you understand the magnitude of

since every material witness who testified against me faced life in prison.

Thank you,  
Most respectfully,

Paul W. Bergin  
PAUL W. BERGIN

Dated: 17 June 2018

P.S. Please note the date I submitted this memorandum - motion for mailing. I know the Government will stymie its submission.

cc: John Gay, A.U.S.A.

June 17, 2018  
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IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY

UNITED STATE OF AMERICA,  
Respondent;

PAUL W. BERGRIN,  
Petitioner

Docket No. 2:16-cv-3040  
J.L.L.

CERTIFICATION OF PAUL W. BERGRIN

1. I, Paul W. Bergin, do hereby submit this Certificate under the penalties of perjury. I make this statement knowingly, voluntarily and intelligently.
2. I am familiar with all the facts contained and personally heard the statements. I am fervently convinced that the government will be compelled to concede the facts contained herein.
3. The government in the above captioned matter is represented by Assistant United States Attorneys, John Gary Joseph Minich and Steven Saunders. All employed by the United States Department of Justice and who carry out the policies of The President of the United States.

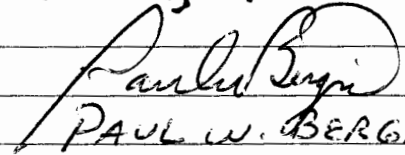
The President is the Chief Law Enforcement Officer and has the discretion to hire and or terminate the United States Attorney General and or any subordinate. He not only sets the policies for the Department of Justice but is the leader, Director and ultimate

same words as if spoken from the mouths of the federal prosecutors, assigned to this captioned matter.

4. The prosecutors assigned to this matter adopt the words, admissions and statements of the President of the United States and their Chief Law Enforcement Officer, in accord with their positions. His words or admissions are their own.
5. During the week of 11 June 2018 and on a multitude of occasions, President Donald J. Trump, and assembled my prosecutors stated, admitted and confirmed ~~that~~: "MOST PEOPLE WILL FLIP IF THE GOVERNMENT LETS THEM OUT OF TROUBLE OR HELPS THEM IN THEIR CASE AND MAKE UP STORIES AND LIE. THIS IS A KNOWN FACT THAT CANNOT BE DENIED. THEY WILL LIE AND LIE, MAKE THINGS UP TO SAVE THEMSELVES." (Emphasis added).
6. The Prosecutors by and through their Boss, President Donald J. Trump also have vociferously accentuated that the Department of Justice and Federal Bureau of Investigation "must not be believed. They are liars and the most dishonest individuals and people," the President has ever known.
7. These confessions by my prosecutors by and through their Boss and Leader is mind boggling and can be considered by This Honorable Court when deciding seminal issues in my case.  
These admissions, confessions and statements cannot be accentuated enough. They prove the arguments I have submitted to This Honorable Court and when considered in conjunction with my other proofs must persuade the Court to decide my motions favorably!
8. The Prosecutors through their spokesman Donald J. Trump

have further admitted that former Federal Bureau of Investigation Director, James Comey, Assistant Director, Andrew McCabe (who was terminated due to lies and misconduct) as well as other members of my investigative team are "incredulous," "dishonest," "liars" and must not be ever believed."

9. I pray that This Most Honorable Court holds the Prosecutors to their burden and new confessions. It materially and substantially (detrimentally) effects the credibility of their witnesses.

  
PAUL W. BERGRIN

Dated: June 17, 2018.

## BRIEF SYNOPSIS

Petitioner has methodically delineated the motives, reasons and evidence adduced for the Respondent - Government witnesses to fabricate and contrive their testimony against Bergin.

The Commander - In - Chief's vociferous statements espoused supra proves to an absolute certainty why Respondent's witnesses must not be believed. Their material witnesses were confronted with life-death consequences if they failed to cooperate and lie.

a) Anthony Young

The sole and exclusive government witness in the Deshawn McCray murder, according to him, executed in cold blood an Federal Bureau of Investigation informant.

Young was a career criminal with felony convictions for the crimes of aggravated assault, robbery, weapons offenses, narcotic trafficking and more.

Young was trafficking as a drug kingpin in crack cocaine, heroin and other drugs and was in charge of the Alexander Street, Newark posse.

Young was arrested in possession of a handgun, was a suspect in an aggravated arson and domestic violence, aggravated assault too.

He faced the death penalty.

### b) Abdul Mutallic Williams

Was under investigation for an Essex County, Newark, New Jersey murder. He trafficked in hundreds of kilograms of both cocaine and heroin while running the Bradley Street Projects, Newark, New Jersey and had serious felony convictions for attempted murder, aggravated assaults, weapons offenses and more.

He was confined and faced life in prison.

(c). Eugene Braswell.

Was a prime suspect and under investigation for the knowing and purposeful murder of a paroled inmate who was incarcerated at the Northern State Prison, Newark, N.J. where Braswell was employed as a Corrections Officer.

Braswell was under State Indictment for cocaine trafficking as a Drug Kingpin and faced a minimum of 25 years imprisonment and up to life on this State, Union County, Indictment alone.

He also had two (emphasis added) open federal indictments where he faced 10 to life on each one.

d). Rondre Kelly.

He was trafficking in thousands of kilograms of high grade heroin and cocaine in New Jersey, New York and Pennsylvania. He faced life in prison in each jurisdiction (all three), but was never charged in New Jersey or New York.

He had prior felony convictions for serious offenses.

e). Richard Pozo

Had a prior second degree State narcotic felony conviction when he was arrested federally.

Pozo ran a 250 million dollar per year narcotic distribution business.

He faced an Union County, New Jersey State Drug Kingpin Indictment and a minimum 25 to life on these charges.

Federally, New Jersey gave him a free ride and never charged him.

He was indicted in Texas on federal narcotics offenses and faced life in prison.

Pozo was also a prime suspect

in the murder of his brother in law, who was a prime witness against him.

f. Vincent Estev

He was under indictment federally for conspiracy to commit murder and other offenses. He faced life in prison. He had a prior second degree felony narcotics conviction.

In Monmouth County State Court he was indicted as a Drug Kingpin for running a multi-million multi-state, international drug distribution network. He faced 25 to life on the State charges.

According to Government witness Oscar Cordova, Estev murdered at least four individuals and contracted Estev to murder more individuals. Estev was never charged nor investigated.

Estev's wife Chantel Estev was intimately involved in Estev's drug business but offered non-custodial probation.

g. Thomas Moran

Was indicted in Hudson County State Court for second degree eluding police, leading them on a high speed chase exceeding over 100 miles per hour, while he was highly intoxicated. He faced ten years in New Jersey State Prison.

He was also charged with four counts of aggravated assault in Monmouth County State Court for the motor vehicle crime that was inflicted against a retired police officer and high three children. While highly intoxicated Moran crashed into the victims motor vehicle causing it to flip over and injury to all occupants.

Federally Moran was indicted for conspiracy to murder a witness and other federal crimes. He faced life in prison.



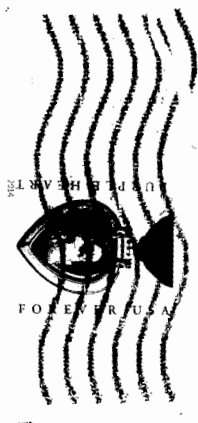
These material and several witnesses against Bergin emulate the admissions, confessions and statements of Our Government. They were confronted and faced life in prison at a minimum and would consequently say or do anything to save their lives. They would lie, ~~create~~ and contrive facts and lie. That is exactly what occurred against Bergin.

Lastly, Oscar Cordova. A career criminal whom confessed to the Drug Enforcement Agency - Administration to have been involved in Lata King murders, rapes and other vicious crimes but was never charged. He perjured himself at trial, he was so desperate. Bergin submits this evidence to support the admissions and concessions of the government's Commander in chief.

Respectfully submitted,  
Paul Bergin

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Honorable Judge José A. Linares  
Chief Judge United States District Court  
District of New Jersey

PAVILLON

Martin Luther King, Jr.  
Federal Building and Court house  
50 Walnut Street, P.O. Box 999  
Newark, New Jersey

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