

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
Green Bay Division

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
GREEN BAY DIV.

'07 AUG -1 A9 :02

IRA B. ROBINS,

Plaintiff,

v.

07 - C - 701 FILED
Case No. _____ ON W. SANFILIPPO
CLERK

DAVID SCHANKER, as successor to
CORNELIA CLARK, Clerk of
the Wisconsin State Supreme Court,
110 East Main Street, Suite 215
Madison, WI 53701

and

CHRISTOPHER PAULSEN, Chief Deputy Clerk
of the Wisconsin State Supreme Court,
110 East Main Street, Suite 215
Madison, WI 53701

and

A. JOHN VOELKER, Acting Clerk of
the Wisconsin State Supreme Court,
110 East Main Street, Suite 215
Madison, WI 53701

Defendants.

COMPLAINT

COMES NOW the plaintiff, Ira B. Robins, and for his Complaint against the
defendants, David Schanker as successor to Cornelia Clark, Clerk of the Wisconsin State
Supreme Court, Christopher Paulsen, Chief Deputy Clerk of the Wisconsin State
Supreme Court, and A. John Voelker, Acting Clerk of the Wisconsin State Supreme
Court, states as follows:

JUDICIAL NOTICE

1. This Court and its officers are hereby placed on notice under authority of the supremacy and equal protection clauses of the United States Constitution and the common law authorities of *Haines v Kerner*, 404 U.S. 519, *Platsky v. C.I.A.* 953 F.2d. 25, and *Anastasoff v. United States*, 223 F.3d 898 (8th Cir. 2000) relying on *Willy v. Coastal Corp.*, 503 U.S. 131, 135 (1992), *United States v. International Business Machines Corp.*, 517 U.S. 843, 856 (1996), quoting *Payne v. Tennessee*, 501 U.S. 808, 842 (1991) (Souter, J., concurring). *Trinsey v. Pagliaro*, D.C. Pa. 1964, 229 F. Supp. 647, *American Red Cross v. Community Blood Center of the Ozarks*, 257 F.3d 859 (8th Cir. 07/25/2001). In re *Haines*: pro se litigants (Plaintiff is a pro se litigant) are held to less stringent pleading standards than BAR registered attorneys. Regardless of the deficiencies in their pleadings, pro se litigants are entitled to the opportunity to submit evidence in support of their claims. In re *Platsky*: court errs if court dismisses the pro se litigant (Plaintiff is a pro se litigant) without instruction of how pleadings are deficient and how to repair pleadings. In re *Anastasoff*: litigants' constitutional rights are violated when courts depart from precedent where parties are similarly situated. All litigants have a constitutional right to have their claims adjudicated according the rule of precedent. See *Anastasoff v. United States*, 223 F.3d 898 (8th Cir. 2000). Statements of counsel, in their briefs or their arguments, are not sufficient for a motion to dismiss or for summary judgment, *Trinsey v. Pagliaro*, D.C. Pa. 1964, 229 F. Supp. 647.

NATURE OF THE CASE

2. This action is brought by the Plaintiff, Ira B. Robins, (hereinafter “Mr. Robins”) to redress unlawful and tortious conduct violative of Mr. Robins’ procedural and substantive due process rights and other unenumerated rights as a citizen of the United States by the Defendants, Cornelia Clark, Clerk of the Wisconsin State Supreme Court (hereinafter “Ms. Clark”) Christopher Paulsen, Chief Deputy Clerk of the Wisconsin State Supreme Court (hereinafter “Mr. Paulsen”) and A. John Voelker, Acting Clerk of the Wisconsin State Supreme Court (hereinafter “Mr. Voelker”) while acting under color of state law in the capacity of their offices with the Supreme Court of the State of Wisconsin.

JURISDICTION

3. Pursuant to 28 U.S.C. §1331, this court has original jurisdiction of this action, which arises under the Ninth and Fourteenth Amendments to the Constitution of the United States, and 42 U.S.C. § 1983.

VENUE

4. Venue is proper because the underlying acts occurred within the Eastern District of Wisconsin, Green Bay Division.

PARTIES

5. Plaintiff, Mr. Robins, is an adult citizen of the United States of America who resides at 9766 West Tower Avenue, Milwaukee, Wisconsin 53224.

6. Defendant David Schanker is successor to Ms. Clark, who is an adult citizen of the United States of America and who, at all times relevant hereto, was the Clerk of the Wisconsin Supreme Court.

7. Defendant Mr. Paulsen is an adult citizen of the United States of American who, at all times relevant hereto, was the Chief Deputy Clerk of the Wisconsin Supreme Court.

8. Defendant Mr. Voelker is an adult citizen of the United States of American who, at all times relevant hereto, was the Acting Clerk of the Wisconsin Supreme Court.

OPERATIVE FACTS

9. Gregory J. Eggum (hereinafter "Mr. Eggum") is an adult citizen of the United States of America who was employed as a criminal investigator by the Wisconsin Department of Justice, Division of Criminal Investigation (hereinafter "DCI") from approximately 1972 until approximately 2000. Since approximately October, 2000, Mr. Eggum has been employed as a fire investigator by EFI Global, Inc., Eden Prairie, Minnesota. Mr. Eggum holds Wisconsin private detective license number 10406.

10. From approximately 1979 to 2000, Mr. Eggum was assigned by DCI to arson investigations and special assignments.

11. In his capacity as an employee and agent of DCI, Mr. Eggum was lead arson investigator of the fire that occurred on or about February 10, 1998 at the residence of Sandra Maloney (hereinafter "Maloney fire") in the City of Green Bay, Brown County, Wisconsin.

12. In his capacity as an employee and agent of DCI, Mr. Eggum was lead arson investigator of the fire that occurred on or about September 17, 1990 at the business and residence owned by Michael Menzer (hereinafter "Menzer fire") in Sheboygan County, Wisconsin.

13. In his capacity as an employee and agent of DCI, Mr. Eggum was special investigator of a police shooting that occurred on or about November 28, 1998 involving Joseph Newton (hereinafter "Newton shooting") in the City of Shawano, Shawano County, Wisconsin.

14. In the course of providing consulting services to John Maloney (hereinafter "Mr. Maloney"), Michael Menzer (hereinafter "Mr. Menzer") and Joseph Newton (hereinafter "Mr. Newton"), Mr. Robins became aware of illegal conduct committed by Mr. Eggum while acting under color of law in his capacity as an employee and agent of the Wisconsin Department of Justice.

Maloney Fire

15. As lead investigator for the State of Wisconsin in connection with the Maloney fire, Mr. Eggum identified "accelerant pour patterns" on the living room floor in front of the sofa to support his finding of arson. Mr. Eggum further reported that he conducted a burn test of the polyurethane foam sofa fill to rule out burning, "running" polyurethane foam as the cause of the "pour patterns." Mr. Eggum's burn test is wholly undocumented [no separate report, no still photographs, no video and no corroborating witness(es)] and reports scientifically impossible results, i.e., that the polyurethane foam "readily supported flame" but "did not 'run'."

16. As lead investigator of the Maloney fire, Mr. Eggum falsely testified on February 9, 1999 that 80-proof vodka “could be consistent” with an accelerant used to start the Maloney fire. Mr. Eggum further falsely testified that he conducted a burn test using 80-proof Aristocrat vodka. Mr. Eggum’s burn test is wholly undocumented [no separate report, no still photographs, no video and no corroborating witness(es)] and reports scientifically impossible results, i.e., that 80-proof vodka, which is 60% water, “burns very, very clean and very hot.”

17. Mr. Eggum’s forensic fraud and false testimony were committed to the detriment of Mr. Maloney, to obtain a criminal conviction against Mr. Maloney of which Mr. Maloney, who was at all times relevant hereto a Green Bay police officer, is actually innocent.

Menzer Fire

18. As lead investigator for the State of Wisconsin in connection with the Menzer fire, Mr. Eggum determined that the fire originated on the west porch of the structure and on the southwest side of the building, around the corner from the west porch. Mr. Eggum determined that the cause of the fire was arson. A window air conditioner (hereinafter “the air conditioner”) was situated in a window immediately adjacent to the entry door and, prior to the fire, the air conditioner had been plugged into a household electrical outlet.

19. Shortly after arriving at the scene of the Menzer fire on September 17, 1990, Mr. Eggum removed the window air conditioner from the west porch to the perimeter of the property and concealed it with tin roofing tiles and other debris. Mr. Eggum then directed that the west porch be swept, and then sprayed with a fire hose. In

directing and carrying out these actions, Mr. Eggum concealed evidence and tampered with evidence.

20. On September 18, 1990, Mr. Eggum asked Mr. Menzer to undergo a polygraph examination. Mr. Menzer agreed, and on September 20, 1990, he underwent a polygraph examination administered by U.S. Department of Alcohol, Tobacco & Firearms (hereinafter "ATF") agent John O'Toole (hereinafter "Mr. O'Toole"). Mr. O'Toole determined that Mr. Menzer showed no deception, that is, that he "passed" the polygraph examination.

21. Mr. Menzer's property and casualty insurance carrier, Heritage Mutual Insurance Company, n/ka Acuity, A Mutual Insurance Company (hereinafter "Acuity"), retained the services of David Bellis (hereinafter "Mr. Bellis"), a fire investigator employed by I.N.S. Investigations, n/ka EFI Global, Inc. Mr. Bellis arrived at the Menzer property on September 18, 1990 and conducted his investigation with the permission and under the direction of Mr. Eggum. As a result of Mr. Eggum's acts of concealment, Mr. Bellis did not see or examine the air conditioner.

22. Mr. Bellis, on behalf of Acuity, retained the services of Paul Hansen (hereinafter "Mr. Hansen"), an electrical engineer employed by Kragh Engineering, Inc. Mr. Hansen arrived at the Menzer property on September 19, 1990 and conducted his investigation with the permission and under the direction of Mr. Eggum on September 19, 1990 and September 24, 1990. Mr. Hansen testified at post-conviction proceedings that he looked for but did not see or examine the air conditioner.

23. Although Mr. Eggum posited that gasoline was used as an accelerant to start the Menzer fire, neither he nor any of the investigators working under his direction

and/or with his permission at the Menzer fire scene took samples of debris for gas schematograph and/or spectrograph testing by the crime lab for the presence of gasoline.

24. Mr. Eggum knew, or should have known, that Mr. Bellis was retained by Pennsylvania Lumbermen's Mutual Insurance Company (hereinafter "Lumbermen's") to investigate a similar fire that had occurred on December 27, 1984 at Upthegrove Hardware, Inc. in Douglas County, Wisconsin. In that case, Mr. Bellis expressed the opinion that the fire had two points of origin, and was therefore arson. When the insured suggested a spot lamp and cord may have caused the fire, Mr. Bellis located the cord in the area where the floor had burned. Mr. Bellis took possession of the cord but did not further analyze it and threw it away. A jury subsequently found that Lumbermen's acted in bad faith in denying Upthegrove's claim, inferring, among other things, that Mr. Bellis had intentionally discarded the cord because it would have exonerated Upthegrove. The jury's verdict of bad faith based on the part of Mr. Bellis was upheld by the Wisconsin Court of Appeals in 1988. (See *Upthegrove Hardware, Inc. v. Pennsylvania Lumbermen's Mutual Insurance Company*, 146 Wis. 2d at 482; 431 N.W. 2d at 694.)

25. The "Criminal Investigation and Physical Evidence Handbook" published by the Wisconsin Department of Justice for use by law enforcement officers, including DCI investigators, states in pertinent part:

The importance of the custodial chain involving physical evidence cannot be overemphasized. Ideally, the chain should include only the investigator(s) who recovers the evidence and who will transmit it to the Laboratory, and the Laboratory specialist(s) who examines the evidence and will give testimony, if required, at the time of the trial. The introduction of personnel not engaged in a specific investigation who take custody of the evidence between its initial recovery and the time it is introduced in court tends to break the continuity of a good custodial chain.

26. Despite Mr. Bellis' documented destruction of potentially exculpatory evidence in the Upthegrove fire, and in direct contravention of the above-referenced guidelines promulgated by the Wisconsin Department of Justice, Mr. Eggum allowed Mr. Bellis to take possession of the physical evidence from that fire scene. Mr. Bellis subsequently destroyed these items of physical evidence.

27. Mr. Bellis is currently the Midwestern Supervisor for EFI Global, Inc., and, as such, he is Mr. Eggum's direct supervisor and close business associate.

28. Mr. Eggum's concealment of exculpatory evidence and destruction of exculpatory evidence were committed to the detriment of Mr. Menzer, to obtain a criminal conviction of arson against Mr. Menzer so that the insurer would not have to pay out loss indemnity proceeds. Mr. Menzer is actually innocent.

Newton Shooting

29. On or about November 28, 1998, Shawano Police Officer Jody Johnson, assisted by Shawano County Sheriff's Deputy Michael Wizner, attempted to serve a traffic related warrant on Mr. Newton, whose car was parked in the driveway at 116 Crestwood Court in the City of Shawano, Wisconsin.

30. When Mr. Newton moved his vehicle onto the lawn, Deputy Wizner drew his weapon and pointed it at Mr. Newton. Deputy Wizner then fired his weapon at the rear tire of Mr. Newton's car. When Mr. Newton's car moved toward the street, both Deputy Wizner and Officer Johnson fired at his car. Deputy Wizner continued to fire at the rear of Mr. Newton's car as it continued down the street.

31. Deputy Wizner and Officer Johnson knew that Mr. Newton's 18-month-old son was in the car. After the pursuit of Mr. Newton was terminated, it was discovered that Mr. Newton's infant son had been shot in the foot.

32. On November 27, 1998, Shawano Police Chief Norman Jahn (hereinafter "Chief Jahn") requested that the Wisconsin Department of Justice assign a DCI agent to conduct an independent investigation of the shooting. Mr. Eggum was assigned to conduct the investigation. Mr. Eggum had never before conducted an investigation of a police shooting.

33. Mr. Eggum was not authorized to review the Shawano City Police policies and procedures regarding use of force and/or high-speed pursuit. He was specifically advised by Chief Jahn that an Administrative Board of Review had been convened to review use of force and high speed pursuit policies and procedures and the application of same in Newton shooting. Mr. Eggum, in contravention of this known administrative procedure already in place, included such a review in his report, regardless of the fact that it was beyond the scope of authority for his investigation.

34. Mr. Newton was tried by a jury in Shawano County Circuit Court on September 22 and September 23, 1999 on charges of eluding, recklessly endangering the safety of an officer, recklessly endangering the safety of his son, Donovan Newton, operating left of center, speeding and operating without a valid driver's license.

35. Mr. Eggum testified as a prosecution witness on September 23, 1999. Mr. Eggum falsely testified that he had three or more years experience investigating police-involved shootings, use of force and high-speed pursuits. In fact, prior to the Newton shooting, Mr. Eggum had never investigated such cases.

36. Mr. Eggum falsely testified that he had been assigned to determine whether the actions of Officer Johnson and Deputy Wizner conformed to agency and state policies regarding use of deadly force and high-speed pursuit. Mr. Eggum knew that such a determination was outside the scope of his investigative assignment, and beyond his expertise, experience and training, and directly contradicted the findings of the Board of Review regarding the police officers' conduct in this incident.

37. On or about September 24, 1999, after learning of his trial testimony, Chief Jahn telephoned Mr. Eggum to verify that Mr. Eggum testified falsely, as set forth above, and find out why he did so. Mr. Eggum stated to Chief Jahn, "I am not going to say something that is going to allow a criminal to go free."

38. Mr. Eggum's false testimony was committed to the detriment of Mr. Newton, to obtain a criminal conviction against Mr. Newton. Mr. Newton is actually innocent.

Petition for Original Action

39. The allegations set forth in paragraphs 1 – 38 are incorporated herein as though fully set forth.

37. Article VII, Section 3 of the Wisconsin Constitution and § 809.70, Wis. Stats., confer upon the Wisconsin Supreme Court jurisdiction to hear original actions and proceedings, and to issue all writs necessary in aid of its jurisdiction.

38. Wisconsin Supreme Court Operating Procedures ("Court Operating Procedures") govern the procedures to be followed in the decisional process of the court. Section II B. 3. specifically governs the process for review of petitions for original action.

3. Original Action. Upon filing in the office of the clerk, a petition requesting the court to take jurisdiction of an original action is assigned to a court commissioner

for analysis prior to the court's consideration of the merits of the matter presented. The commissioner orally reports on the matter to the chief justice as soon as practicable, and the chief justice, or in the absence of the chief justice, the most senior justice present, determines a date on which the matter will be considered by the court at conference. The commissioner reports on the matter at that conference.

. . . If the petition is denied, the commissioner prepares an order setting forth that decision and arranges for its issuance through the office of the clerk . . .

Section II B. 3., Wisconsin Supreme Court Operating Procedures.

39. On August 29, 2006, plaintiff filed a Petition for Original Action (hereinafter "Petition") with the Wisconsin Supreme Court. A copy of the Petition is attached hereto as Exhibit "A" and incorporated herein as though fully set forth.

40. Mr. Robins filed the Petition in order to correct manifest injustice and conflicts of interest within the Wisconsin Department of Justice. Mr. Robins' Petition sought the appointment of a special prosecutor to investigate and prosecute criminal acts committed by DCI Agent Gregory J. Eggum, to-wit, forensic fraud and perjury, while acting under color of law in his capacity as an employee and agent of the Wisconsin Department of Justice, or in the alternative, to refer the matter to the United States Attorney General for investigation and prosecution.

41. As a private detective and fire investigator employed by EFI Global, Inc., Mr. Eggum continues to investigate fires in Wisconsin on behalf of fire and casualty insurers. Mr. Eggum has the same incentive to find arson and other crimes where they do not exist to enable client-insurers to deny valid claims as he had to find arson and other crimes where they did not exist to obtain criminal convictions.

42. In filing the Petition, Mr. Robins strictly complied with all procedures and requirements set forth in § 809.81, Wisconsin Statutes, as to the form of papers filed in the Wisconsin Supreme Court. Mr. Robins paid the \$195.00 filing fee.

43. On or about September 5, 2006, contrary to Court Operating Procedures, defendant Clark converted plaintiff's Petition to an appeal of the conviction of John R. Maloney, and added the Wisconsin Department of Justice and Gregory J. Eggum as respondents. A copy of the Notification of Amended Caption issued in the name of Ms. Clark is attached hereto as Exhibit "B-1" and incorporated herein as though fully set forth. A copy of the pertinent portion of the court record in *State of Wisconsin v. John R. Maloney*, Brown County Case No. 1998CF000693, reflecting the conversion of plaintiff's Petition to an appeal in that case, is attached hereto as Exhibit "B-2" and incorporated herein as though fully set forth.

44. Ms. Clark's action in converting the Petition to an appeal of Mr. Maloney's conviction placed Mr. Robins, who is not a lawyer, in the position of acting as attorney for Mr. Maloney, and exposed Mr. Robins to legal liability for practicing law without a license.

45. In correspondence to Ms. Clark dated September 6, 2006, Mr. Robins objected to the amended caption, to the inclusion of Mr. Eggum and the Wisconsin Department of Justice (hereinafter "WDOJ") as respondents, and to the conversion of his Petition to an appeal of a criminal conviction. A copy of Mr. Robins' letter is attached hereto as Exhibit "C" and incorporated herein as though fully set forth.

46. On or about October 10, 2006, Ms. Clark issued a Notice that Mr. Robins' Petition for Original Action was dismissed *ex parte*, and that his motion opposing the

addition of Mr. Eggum and WDOJ and conversion of the Petition to a criminal appeal was denied as moot. A copy of Ms. Clark's Notice is attached hereto as Exhibit "D" and incorporated herein as though fully set forth.

47. In correspondence to Ms. Clark dated October 15, 2006, pursuant to the Wisconsin Open Meetings and Records Act, § 19.35, *et seq.*, Wisconsin Statutes, Mr. Robins requested documents and information that would indicate Ms. Clark had complied with Court Operating Procedures in the handling of his Petition, including but not limited to the name of the court commissioner appointed pursuant to Section II B. 3. of the Court Operating Procedures to analyze the merits of his Petition and report on the matter to the court at conference. A copy of Mr. Robins' letter is attached hereto as Exhibit "E" and incorporated herein as though fully set forth.

48. Mr. Robins traveled to the office of the Clerk of the Wisconsin Supreme Court on or about November 2, 2006 and paid for a complete copy of the Clerk's file. The Clerk's file contained no information demonstrating compliance with Section II B. 3. of the Court Operating Procedures. Mr. Robins was advised by Mr. Paulsen that a separate file exists regarding his Petition, but that he is not allowed to see that file. Mr. Robins was further advised that the reason for the *ex parte* denial of the Petition was set forth in the Court's Decision; however, no such basis for the denial is set forth in the Notice, which is the only decisional document issued by the Court. See Exhibit "D."

49. In correspondence to Mr. Robins dated November 8, 2006, Mr. Paulsen advised that "the court does not release such information" [the identity of court commissioners] and that such commissioner's identity is "irrelevant." A copy of Mr.

Paulsen's letter is attached hereto as Exhibit "F" and incorporated herein as though fully set forth.

50. In an informal motion dated January 29, 2007, Mr. Robins requested reconsideration of the Petition, based on the Court's un rebutted failure to follow Court Operating Procedures by appointing a commissioner to review the matter and make recommendations regarding its merits. Mr. Robins' request for reconsideration was also based on the conversion of the Petition to an appeal of Mr. Maloney's conviction, an action that put Mr. Robins in the position of representing Mr. Maloney in a legal action and exposed Mr. Robins to legal liability for practicing law without a license. A copy of Mr. Robins' request for reconsideration is attached hereto as Exhibit "G" and incorporated herein as though fully set forth.

51. Mr. Robins' further based his request for reconsideration on the testimony of Gregory Schmunk, M.D., who was the Brown County, Wisconsin Medical Examiner at the time of the Maloney fire and Sandra Maloney's death. Dr. Schmunk testified that Mr. Eggum, along with DCI special agent Kim Skorlinski (hereinafter "Mr. Skorlinski") withheld and misrepresented key evidence in the case, causing Dr. Schmunk to reach a cause-of-death conclusion that he no longer believes is reliable. A copy of Dr. Schmunk's Affidavit dated November 2, 2006 is attached hereto as Exhibit "H" and incorporated herein as though fully set forth.

52. In a Notice dated February 2, 2007, A. John Voelker, Acting Clerk of the Wisconsin Supreme Court, notified Mr. Robins, along with court officials in Brown County and Assistant Attorneys General Michael R. Bauer, Corey Francis Finkelmeyer and Gregory M. Weber, that the motion for reconsideration was denied. A copy of Mr.

Voelker's Notice is attached hereto as Exhibit "I" and incorporated herein as though fully set forth.

53. No single county in Wisconsin has authority to investigate Mr. Eggum's illegal acts because these acts occurred in several jurisdictions.

54. The Wisconsin Department of Justice has refused to investigate Mr. Eggum's illegal acts, citing a conflict of interest, in that such acts were carried out in the course of Mr. Eggum's employment by the Wisconsin Department of Justice as a DCI investigator. See letter from Assistant Attorney General Roy Korte dated August 7, 2006, attached hereto as Exhibit "J" and incorporated herein as though fully set forth. The Wisconsin Department of Justice, through its agents and employees, has taken actions and continues to take actions to conceal Mr. Eggum's illegal acts.

55. The refusal of the defendants to follow Court Operating Procedures requiring, among other things, appointment of a commissioner to review the Petition on its merits, and their conversion of the Petition to an appeal in Mr. Maloney's case, deprives Mr. Robins of his rights under the Ninth and Fourteenth Amendments to the U.S. Constitution. That same refusal endangers the Constitutional and statutory rights of the public, including both past and future victims of Mr. Eggum's illegal conduct.

WHEREFORE, Plaintiff Ira B. Robins demands injunctive relief as follows:

A. Entry of an Order directing the reinstatement of Mr. Robins' Petition for Original Action by the Wisconsin Supreme Court and strict compliance by the Wisconsin Supreme Court with its own Court Operating Procedures, including but not limited to Section II B. 3, in the review of the Petition;

B. Appointment of a special prosecutor and/or special master to ensure court oversight of issues raised herein;

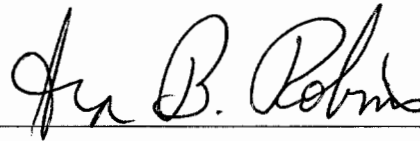
C. In the alternative, entry of an Order directing the U. S. Department of Justice, Public Integrity Division, in Washington, D.C. to undertake an investigation of the illegal conduct of DCI agent Gregory J. Eggum, and the continuing obstruction of justice by agents and employees of the Wisconsin Department of Justice in perpetrating acts designed to conceal Mr. Eggum's illegal conduct;

D. Judgment against the Defendants awarding Mr. Robins' costs and disbursements in prosecuting this action; and

E. Such other and further relief as the Court deems just and equitable.

Dated this 1ST day of AUGUST, 2007.

IRA B. ROBINS, *Pro Se*



Ira B. Robins

Mailing Address:

Post Office Box 302
Milwaukee, WI 53201
(414) 755-0333

