

USGS_Supp Decl_CEP re Prelim Inj Dr02_012519.doc

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
CARL E. PERSON,	:	
	:	Civil Action No.
	:	
Plaintiff,	:	19 Civ. 154 (LGS)(SDA)
	:	
-against-	:	
	:	SUPPORTING
UNITED STATES OF AMERICA (Executive	:	DECLARATION OF
Branch, Article II of U.S. Constitution),	:	CARL E. PERSON
STEVEN MNUCHIN, Secretary of the	:	
Department of the Treasury, in His Official Capacity,	:	
KIRSTJEN NIELSEN, Secretary of	:	
Homeland Security, in Her Official Capacity,	:	
ANDREW WHEELER, Acting Administrator of	:	
Environmental Protection Agency, in His Official	:	
Capacity,	:	
THE BOARD OF GOVERNORS OF THE FEDERAL	:	
RESERVE SYSTEM a/k/a the Federal Reserve, and	:	
JEROME POWELL, Chairman, The Board	:	
of Governors of the Federal Reserve System,	:	
a/k/a the Federal Reserve, in His Official Capacity,	:	
	:	
Defendants.	:	
	:	
-----X		

I, **Carl E. Person**, under the penalty of perjury, declare that the following facts are true and correct:

1. I am the Plaintiff in this action, am fully aware of the facts stated herein, and make this declaration in support of my motion for a preliminary injunction ordering (i) an end to the governmental shutdown threatened to begin on or after 3 weeks from January 25, 2019, and (ii) the Defendants not to create or participate in any other shutdowns during the pendency of this action.

2. Any non-judicial resumption of the pre-shutdown governmental services (the “Pre-Shutdown Services”), by reason of the appropriations statute enacted January 25, 2019 or otherwise, does not moot this action. Plaintiff is entitled to the mandamus and injunctive relief to prevent any further shutdowns and prevent shutdown extortion as a frequently used political tool.

3. I am an 82-year old citizen of the United States by birth, a resident of New York, NY, licensed to practice law in New York since 1962, and a federal practitioner in the SDNY since November, 1970.

4. I and some of my clients in federal court actions are not being provided with the federal Court services that have been curtailed or eliminated by reason of the partial shutdown of governmental services (“Governmental Shutdown”), described further at ¶¶ 11-13 below, causing various types of actual and threatened injury which I describe below.

5. The Pre-Shutdown Services have been classified by one or more Defendants as “non-essential”, and some then reclassified as “essential”, and the “essential” services are being performed by unpaid employees, many of whom are unable to pay for food or their mortgage or rent and other expenses, and are increasingly not showing up for essential work and instead are looking for other employment. This is part of the adverse effect that the initial shutdown is having, not capable of being restored to original condition, if at all, except in a much longer period.

6. I personally see that the initial shutdown has expanded prior to January 25, 2019 to the federal Courts, including the SDNY (see ¶¶ 12-13 below).

7. The Federal Reserve Board is privately owned by banks, under the Federal Reserve Act of 1913, and creates the nation’s money supply. My research has demonstrated to me that the United States no longer requires itself by statute to maintain any amount of gold,

silver or other item in support of issuance of additional money, and that no treaty exists requiring the United States to provide backing to the dollar.

8. Chairman Jerome Powell (“Powell”) and the Federal Reserve Board have the power to issue or make available the dollars or credits needed to make payment to the 800,000 furloughed governmental employees but has chosen not to do so during the shutdown (prior to the newly-enacted 3-week hiatus).

9. *The New York Times* reported on January 2, 2019 that

In all, about 800,000 government employees are feeling the effects, with just under half sent home on unpaid leave and just over half working without pay. * * *

10. The effect of the shutdown is to create a partial shutdown of (a) the nation’s federal court system, which has already adversely affected this lawsuit and which threatens to create irreparable injury to Plaintiff’s law practice; and (b) the nation’s economy, which reduces the ability of most persons in the United States to pay for goods and services, and therefore adversely affects and threatens the economic and business (i.e., law-practice) interests of the Plaintiff.

Standing of the Plaintiff

11. I have standing to commence this action by

(a) having been deprived of my right as a federal-court litigant to have this case handled in the way that cases are ordinarily handled prior to the Governmental Shutdown;

(b) the reduction in federal court services is adversely affecting and threatening my law practice in which I am admitted to practice in the SDNY, EDNY, NDNY, 2nd, 3rd, 4th, 5th, 9th and

Federal Courts of Appeals, and the United States Supreme Court (in spite of the newly-enacted 3-week hiatus commencing on or about January 25, 2019);

(c) the threatened destruction of the economy over time is a threat to the existence of my law practice by causing my clients to be unable to pay for my services, and before any collapse will cause a slowing down and reduction in payment to me. The Governmental Shutdown unless ended (and/or any future shutdowns) will necessarily wind up with a loss of my law practice because of insufficient income;

(d) the Court should take judicial notice that if the Governmental Shutdown is not ended the U.S. economy will collapse, air travel will be unsafe and subject to increased terrorist activities, law enforcement will suffer, the United States will be in a depression requiring years to overcome; millions of citizens and other residents will become unemployed; terrorism will substantially increase; chaos will result; shortages of water, food, housing, transportation, education, sanitary facilities will become routine; the United States could be taken over by another country or be a battleground by other countries for taking over the United States;

(e) the threatened collapse of the economy would cause my law practice built over 50+ years (starting in 1968) to go out of business, and I am at an age (82) where I probably would not be able to have the time, money, physical endurance or inclination to attempt to build another law practice;

(f) the loss of other governmental services that support my law practice (such as availability of governmental officials to be reached by telephone, delays in responding to emails, inability to handle matters as required by the court rules) have already resulted in short cuts which deprived and continue to deprive Plaintiff of due process in this action, and threaten to do the same for me and my clients in other actions;

(g) nobody else has filed an action requesting injunctive relief to end the Governmental Shutdown so that there is no threatened duplication of action, which enhances the threatened injury to me;

(h) nobody else has filed an action requesting injunctive relief to end the Governmental Shutdown based on his/her activities as a federal court practitioner, which enhances the threatened injury to me;

(i) the reduction in safety by non-payment of, and resulting decrease in the number of, air controllers reporting for duty, as to air travel I need to have on behalf of my clients (the most recent being on January 7, 2019 from LaGuardia to Rochester, NY and on January 8, 2019 from Rochester, NY to LaGuardia;

(j) the reduction in safety by non-payment of, and resulting decrease in the number of Transportation Security Administration security officers, inspectors, air marshals and managers who protect the nation's transportation systems by screening for explosives at airport checkpoints;

(k) the reduction in safety by non-payment of, and resulting decrease in the number of other law enforcement officials, such as personnel of the Federal Bureau of Investigation (including paid informants) and Central Intelligence Agency who also protect the nation (and from my standpoint, especially New York, NY) from actual and threatened terrorist attacks;

(l) the increase in time (which as an attorney I am trying to sell but wind up losing) required for flights I have to make for clients, including a wait of 3 hours at Rochester International Airport on Wednesday, January 8, 2019, as to my reservation on Delta Flight 3342 scheduled to depart at 2:36 p.m., but which departed instead at about 5:30 p.m.;

(m) the threatened collapse of the economy which would end most of the governmental services, including arresting, trying and incarcerating criminals, and result in total chaos unable to be regulated by the three branches of government under the U.S. Constitution;

(n) the Governmental Shutdown is longer than the United States has ever experienced and (assuming the 3-week hiatus starting January 25, 2019 is followed by another shutdown) unless the Courts grant a preliminary and permanent injunction the possibility exists that the shutdown will continue or become recurring, with ever-increasing, irreparable injury to me or, if ended by non-judicial means, would be used again by the President and/or Congress to achieve some other political objective, with additional threatened irreparable injury to me; and

(o) President Trump, at the end of his national speech on January 25, 2019, made the following threat to renew the shutdown on February 15th, as follows:

So let me be very clear: We really have no choice but to build a powerful wall or steel barrier. If we don't get a fair deal from Congress, the government will either shut down on February 15th, again, or I will use the powers afforded to me under the laws and the Constitution of the United States to address this emergency.

**Shutdown Caused
Me and This Action
To Be Denied Due Process**

12. By reason of the failure to fully fund the SDNY's and local DOJ's operations, I and this action have not received the full benefits of the adversarial system reflected in the Federal Rules of Civil Procedure. The following activities occurred which had the effect of denying me due process in the consideration of my action prior to this amendment:

A. I filed my motion (by proposed order to show cause for a TRO and preliminary injunction) in the Pro Se Office, Room 104, 40 Center Street, on January 11, 2019 and was told by the attending Pro Se Clerk that the Court would efile the moving papers, and after that

occurred the Judge would contact me about my proposed Order to Show Cause. This prevented me from giving notice to opposing counsel about the date and time for any appearance before the Court as to the proposed Order to Show Cause (seeking a temporary restraining order).

B. In spite of this known obstacle, and prior to filing the proposed Order to Show Cause) on Friday morning, January 11, 2019 I looked up and called various telephone numbers for each of the individual defendants, the Federal Reserve Board, and the Washington, D.C. and SDNY Department of Justice to try to advise them that I was going to file a proposed Order to Show Cause at the Pro Se Office in the SDNY (but could not provide them with an appearance date or time before any court judge or other official), with the following results:

1. I left a message with the Department of Justice in the SDNY (Civil Division, 212-637-2800) and was told that somebody would contact me by the end of the day;

2. I gave the same information to a telephone receptionist in Office of the General Counsel for the Federal Reserve and Jerome Powell (202-452-3000, Office of Mark Van Der Weide);

3. I was unable to reach anyone at the 3 agencies (Treasury, 202-622-2000 – “too busy, call back later”; Homeland Security – 202-282-8000; 202-443-4389 x 30098 “please wait” but nobody answered; and EPA -- 202-564-8040 – “no one available to take call”).

C. Thereafter, Assistant United States Attorney Peter Max Aronoff, who is not getting paid (“current lapse in Department of Justice appropriations”, according to footnote 2 in his letter to the Court dated January 17, 2019, Doc. No. 17), efiled a Notice of Appearance on behalf of all Defendants on January 14, 2019.

D. I called Peter Aronoff and we reached an agreement pursuant to the Court’s Individual Practices (Rule III-B-4 Rules and Procedures for Civil Cases, dated November 9,

2019, at page 9) and, by the consent letter dated January 17, 2019 (Doc. No. 17) efiled by Peter Aronoff, we proposed a conference for the following week (any of the 4 days after the Martin Luther King, Jr. holiday on Monday) for the purpose of setting up a Scheduling Order and briefing schedule for the action.

E. Meanwhile, instead of allowing the parties to present their arguments (opposition papers by Peter Aronoff and a reply memorandum by me), the Court *sua sponte* efiled its Memorandum and Order dated January 18, 2019 (Doc. No. 18), thereby precluding the parties from their intended activities as to my motion.

13. The foregoing treatment of this civil case was a denial of due process and was caused by the Shutdown, as to the persons I could not reach by telephone, as to the DOJ's 2-page opposition to my motion (Doc. No. 11); as to the Court's decision not to have a jointly-requested conference to set up a briefing schedule; as to the denial of my right to respond to the DOJ's 2-page letter dated January 11, 2019 (Doc. No. 11) or a more formal response to my motion; as to the denial of my right to prepare and file reply papers to the non-existing papers by the DOJ in opposition to the Plaintiff's motion; and finally for the DOJ's representation of two non-governmental defendants (the Federal Reserve Board and Chairman Jerome Powell) with the result that a decision was made before all defendants had appeared properly; the rendering of the decision when there may have been no valid Notice of Appearance for the 2 Federal Reserve Defendants; and the failure to dismiss the action for lack of standing thereby preventing an immediate appeal (to reduce the impact upon the 2nd Circuit, which is similarly adversely affected by the shutdown).

**Effect of Shutdown
On the SDNY – Judicial
Notice Should Be Taken**

14. The Southern District of New York is aware that it is running out of money and should take judicial notice of the events described in the WYNC article by Beth Fertig published on January 21, 2019 (and applicable to any renewed or further shutdowns) at <https://www.wnyc.org/story/federal-courts-brace-full-force-shutdown/> which states:

If the shutdown drags on after Friday, the nation's federal courts will run out of money. But they must stay open. So the U.S. District Court in Manhattan is dusting off an emergency plan it prepared in the event of a pandemic.

Edward Friedland, district executive for the U.S. District Court of the Southern District, said hundreds of judiciary branch employees would get their last paycheck on Feb. 8. These include law clerks, probation officers, IT staffers and even the AV staff who make courtroom presentations. "Everybody," he said.

There's one exception: judges. The Constitution requires them to be paid.

Friedland predicts some court employees will stay home if they can't pay for childcare or need to find other work. U.S. Attorneys and staffers from the U.S. Marshals and Bureau of Prisons who also work in the courts have been going without pay since December if they're considered essential. The same is true for the other U.S. court in Brooklyn, the Eastern District.

The partial shutdown has already resulted in a slowdown in the courts, said Friedland. Most civil cases that require U.S. government attorneys (such as someone suing for their Social Security payments) don't have to proceed as scheduled, in order to conserve resources. And because of limited staffing, first court appearances for a defendant in custody have been stopping at 2:45 p.m. and are not held on Saturdays and Sundays. There have also been complaints that staffing shortages exacerbated by the shutdown have made it more difficult for attorneys to visit their clients.

Government workers can expect to get the money they're owed whenever the shutdown is over. But there's another category of court workers: contractors. Friedland said these include court interpreters, building engineers, maintenance workers and security guards. "There will be an understanding that they will be paid

eventually," he said. But not until there's a new appropriation, making that the equivalent of an IOU.

Friedland expects the budget for contractors to run out by March. And that's a huge problem. "We can't occupy a building without fire safety directors and building engineers," he said, referring to the contractors who might not feel an obligation to work.

In that worst case scenario, he said, the courts can keep running even if the Southern District's buildings at Foley Square and the one in White Plains are all closed.

"We have an old plan that we'll dust off that was put in place many years ago with the bird flu," he said. That pandemic, thankfully, never happened. But if the courts can't open, they can still conduct important business as they would in a pandemic.

"Judges would stay home, court staff would stay home, attorneys would stay home," Friedland said. "But when somebody's arrested they need to be seen for a bail hearing in a certain amount of time."

The backup plan: hearings by video. Friedland said this system is tested annually, but will get a thorough workout this week. Prosecutors and marshals accompanying defendants to hearings would all participate with a camera link, as well as the judges, lawyers and prosecutors.

If the buildings do remain open, there might also be an impact on jurors, because they'll have to wait for payment until after an appropriation is passed. Friedland said this could deter some people from wanting to serve if they need the cash immediately after a trial. Jurors make \$50 a day, or \$65 a day if they're serving on a grand jury that lasts more than 45 days.

The district executive for the Eastern District, in Brooklyn, would not comment on security plans.

Public defenders aren't exactly government workers but they depend on the Judiciary for their funding. That would stop after Jan. 25, though David Patton, Executive Director of Federal Defenders of New York, said some grants may last a bit longer.

"We're only surviving by stretching every penny," he said, adding that payments to outside vendors and case experts have been delayed.

Private attorneys who represent indigent clients have already gone without pay since December, because they're funded through the Criminal Justice Act. Likewise, Patton said the investigators and experts they hire have also taken a hit.

And any impact on the defense bar could have repercussions.

"Any motion or application that comes before a judge that they're not able to provide an adequate defense is something a judge would have to consider," said Friedland.

15. The Court should take judicial notice that civil cases (the type of cases handled by me) are given less attention by the federal Court than criminal cases, and that the problems for civil litigation in the federal courts is more severe than for criminal cases.

16. Judicial notice should also be taken of a *New York Times* article entitled "Federal Courts, Running Out of Money, Brace for Shutdown's Pain" by Thomas Kaplan published January 18, 2019, to the extent it stated:

The federal courts are running out of money as the partial government shutdown continues with no end in sight, raising concerns that the legal system will be significantly hobbled if the standoff is not resolved soon.

Judges and court officials around the country are bracing for the likelihood that the federal judiciary will be unable to maintain its current operations within the next two weeks, once it exhausts the money it has been relying on since the shutdown began last month.

Already, courts have been cutting down on expenses like travel and new hiring. Court-appointed private lawyers who represent indigent defendants have been working without pay since late December, according to the Administrative Office of the United States Courts, which provides support for the court system.

There have been other disruptions. The Justice Department is among the executive branch agencies whose funding has lapsed, and at the department's request, some federal courts have issued orders postponing civil cases in which the Justice Department is a party while the shutdown continues, according to the administrative office.

If the judiciary runs out of money, courts around the country will pare down their work to "mission critical" operations, officials said. Thousands of court employees will stop receiving paychecks, some workers are expected to be furloughed and more civil cases could grind to a halt. Jurors may have to wait to be paid until the shutdown is over.

* * *

But the courts present an area in which the damage from the shutdown is expected to worsen considerably. A crippled judiciary, with all the consequences that would entail for businesses and citizens alike who come

before its courts, would only add to the pressure on President Trump and lawmakers to find a way to reopen the government.

* * *

.... The courts are now expected to be able to continue funded operations through at least Jan. 25, and possibly until Feb. 1, the administrative office said.

When the courts run out of money, they will essentially have to react much the way that executive branch agencies did in December, limiting work to certain essential activities.

* * *

.... Court employees, like executive branch employees affected by the shutdown, would work without pay or be furloughed.

* * *

Court officials are grappling with all sorts of complications that could arise, including the possible effects on court reporters and court interpreters, as well as on jurors who are supposed to be paid for their service and reimbursed for transportation expenses.

* * *

Then there is the issue of keeping the courthouse doors open.

Mr. Friedland said it was unclear if contracted building workers who handle areas like fire safety as well as heating, ventilation and air conditioning would be paid beyond February, raising the possibility that the Southern District's courthouses might not be able to stay open.

That uncertainty has prompted the court to turn to its pandemic plan — which was prepared for a situation in which judges and other court personnel would not be able to leave their homes because of a disease outbreak, but essential work like determining bail for defendants still needed to take place.

* * *

In Chicago, Judge Castillo worried that there would be longer-term ramifications, such as veteran employees deciding to call it quits, and young people being turned off from pursuing federal jobs.

* * *

Given that his court is already understaffed, he said he was not planning furloughs. But he said that civil trials would be “shut down,” * * *

* * *

“The dilemma that creates is then you have jurors who are making big decisions and may be unhappy about the circumstances of their jury service,” Judge Castillo said. “I was a defense attorney. I would not want to

proceed to trial under those circumstances because those circumstances can lead to rushed judgments on the part of jurors that just want to get this done and over with. That's not fair.”

Source: <https://www.nytimes.com/2019/01/18/us/politics/courts-money-government-shutdown.html>

17. The Pre-Shutdown Services have been duly authorized by statutes, rules and regulations; the Defendants have the authority to print or otherwise create the money or credits needed for payment; payment for the shutdown services (the “**Shutdown Services**”) is impliedly included in any existing debt ceiling announced by Congress and/or the President; and there is no limitation on the amount of money that can be created by the Defendants because the Defendants are no longer prohibited from their Constitutional duty and right as a nation to create money by any gold or silver standard (see footnote 2 in the Amended Complaint, **Exhibit A** hereto).

18. Judicial notice should also be taken of a Bloomberg online article by Erik Larsen published January 4, 2019 entitled “Courts Run Out of Cash Next Friday. Here’s What Happens Then”, to the extent that it stated:

The system has enough money left over from fees and other sources to run through Jan. 11, according to the Administrative Office of the U.S. Courts, which supports the judiciary. After that, nonessential workers at the 94 federal district courts, and at higher courts across the country, may have to stay home even as skeleton crews show up -- without pay -- to handle matters deemed essential under U.S. law, including many criminal cases.

Individual courts and judges will then decide how to fulfill those critical functions, said David Sellers, a spokesman for U.S. Courts. He pointed to earlier shutdowns, the longest of which was the 21-day furlough that started in December 1995 and ended in January 1996. A shutdown beyond Jan. 11 would break that record.

19. “Non-essential services” does not apply to all that has been shut down. The governmental agencies including the Courts appear to be including essential services within “non-essential services” to appear as if there is no reduction in essential services (see footnote number 3 in my Amended Complaint).

20. By not paying jurors, jurors are more apt to want to reach a quick decision, which probably is a denial of due process to one or more of the parties and a partial destruction of the law practice of one or more of the attorneys involved.

21. A substantial amount of the Shutdown Services has or will become essential, with the consequence that the shutdown (the “**Shutdown**”) whether intentional or not necessarily includes essential governmental services, which is another reason that a partial shutdown of governmental services is unconstitutional and must be ended by the Courts.

22. Judicial Notice should be taken of a *Washington Post* online article by Damian Paletta and Erica Werner, entitled “Millions face delayed tax refunds, cuts to food stamps as White House scrambles to deal with shutdown’s consequences”, published on January 4, 2019, to the extent it states:

Food stamps for 38 million low-income Americans would face severe reductions

The Trump administration, which had not anticipated a long-term shutdown, recognized only this week the breadth of the potential impact, several senior administration officials said. The officials said they were focused now on understanding the scope of the consequences and determining whether there is anything they can do to intervene.

Thousands of federal programs are affected by the shutdown, but few intersect with the public as much as ... the Department of Agriculture’s Supplemental Nutrition Assistance Program, the current version of food stamps.

The partial shutdown has cut off new funding to ... the USDA, leaving them largely unstaffed and crippling both departments' ability to fulfill core functions.

The potential cuts to food stamps ... illustrate the compounding consequences of leaving large parts of the federal government unfunded indefinitely — a -scenario that became more likely Friday when President Trump said he would leave the government shut down for months or even years

The SNAP program is rare among federal initiatives because it requires annual funding from Congress, even though its existence is automatically renewed.

23. At the filing of the Complaint and this Amended Complaint this action is the only action seeking to enjoin the shutdown, as well as any future shutdowns.

24. The U.S. economy necessarily will get worse as the length of the shutdown increases, and the economic devastation to about 99% of the individuals in the United States will necessarily take place, unless the shutdown is ended, and the length of time it will take to restore the economy, if it capable of being restored, will be many times longer than the length of the shutdown. The Court needs to take judicial notice of this.

Background

25. Congress and the President of the United States were unable to enact a law or resolution providing for funding of the government (both as to “essential” and “non-essential” services of various agencies of the Defendant) starting on Friday, December 21, 2018 (the “Failure to Finance”).

26. On January 25, 2019 funding for a 3-week period was enacted, with the threat by President Trump that if wall issues were not resolved to his satisfaction, there would be a renewed shutdown.

27. By reason of the Failure to Finance, the Defendants shut down (i.e., furloughed all governmental employees and required “essential” employees to work without any paychecks during the shutdown) starting on or about December 22, 2018 (the “Shutdown”).

28. All of the governmental services that were shut down as described in the preceding paragraph had been, prior to the Shutdown, duly authorized services of the Defendants and/or their agencies.

29. On August 15, 1971, President Richard M. Nixon eliminated the last restriction on issuance of money when he signed a bill which no longer required United States money to have any backing such as gold or silver. At the time, foreign governments flush with money were demanding payment in gold, which was draining the already diminished supply of gold held by the U.S. government.

30. During the period from 1879 to 1971, any money issued by the United States could only be issued if there was the required amount of gold. As a practical matter, the U.S. went off the gold standard in 1933, and President Nixon ended what little remained in 1971 (see footnote 5 in my Amended Complaint).

31. As a result, starting on August 15, 1971, money could be printed by the Defendant United States or its agents without regard to any gold, silver or other backing, and was limited only by lawful acts of Congress and the President, through statutory enactments.

32. The governmental activities were lawfully created by the Defendants and the Defendants are not required to have any further authorization to pay for what already has been authorized, because issuance of money by the Defendant United States or its agents no longer requires any gold, silver or other backing.

33. My damages cannot be calculated because they are macro-economic in nature, rather than derived from a lease, note or other contract, and because the shutdown and/or any future shutdowns threaten to put me out of my law-practice business.

34. I have no way enforce the duty of the Defendants (to make payment to the 800,000 governmental employees so that the shutdown or threatened renewed shutdown is ended) other than by obtaining a writ of mandamus or injunction (and preliminary injunction) compelling the Defendants to pay (or participate in payment) the 800,000 federal employees so that the pre-shutdown governmental services may resume.

**Prior Motion for
Preliminary Injunction**

35. On January 11, 2019 I filed a motion (by way of order to show cause) for a temporary restraining order and preliminary injunction. The motion was denied because of lack of standing.

36. On January 23, 2019 I filed my Amended Complaint, which substantially supplements my allegations relating to my standing.

37. The standing issue raised in the Amended Complaint is substantially different from the standing issue raised in the original Complaint.

**Executed in New York, New York
this 26th day of January, 2019.**



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