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December 13, 2019

Honorable Sheri Bluebond, Chief Judge
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1534 / Courtroom 1539
Los Angeles, CA 90012

Re: State Bar Complaint - Case No. 02-14216-BB – J.T. THORPE, INC/THORPE INSULATION
Adversary Case No. 2:12-ap-02182-BB (closed case)

Dear Judge Bluebond,

I am writing regarding the State Bar Complaint you filed against me and my office. As I'm sure you recall, following the improper exclusion of Mandelbrot evidence in the Thorpe cases referenced above, you filed a California State Bar Complaint against me and my office.¹ In that Complaint, you made numerous (false) accusations regarding me and my office. You also accused my office of making improper filings in your Court. I have now spoken with Jay Buteyn, Investigator for the California State Bar.

Why haven't you updated that Complaint with pertinent facts? You are no doubt keenly aware of the critical facts related to your State Bar Complaint such as the recent removal of Gary Fergus as a Thorpe Futures Representative Attorney. In addition, you are well aware of the (completely sham) retirements of Managing Trustee Steven Snyder and Executive Director Sara Beth Brown just as the Department of Justice began investigating the Trusts. Why haven't you updated your Complaint against me and my office with these critical facts. Any 'honest' Judge would have updated their Complaint. Why didn't you?

In addition, why didn't update your State Bar Complaint regarding the Department of Justice investigations into the Trusts? You were put on "Notice" of collusion, fraud, misappropriation of Trust funds, and other criminal conduct at the Trusts over a decade ago. But as a biased, abhorrent Judge, you ignored the criminal conduct to protect your buddies. Now that the Department of Justice is investigating the Trusts. Don't you think you should update your State Bar Complaint?

¹ In the underlying Thorpe cases, you improperly excluded evidence solely so you could rule for your 'buddies', created 'bad' law, and were incapable of impartiality.

In addition, you were provided undisputed and incontrovertible evidence of the actual theft of Trust funds by Trust Fiduciary Alan Brayton (attached). Brayton used Trust funds to *pay for the catering bill at his wedding*. You were provided with the actual check (signed by the now also retired Sara Beth Brown), confirming e-mails from Brayton's wife and the actual invoice (matching the amount of the check). Undeniable CRIMINAL conduct by same Fiduciaries discussed in my filings. Why didn't you update your State Bar Complaint to include this critical information?

Ms. Bluebond, you have filed a Complaint against me, yet your history in overseeing Asbestos Trusts has resulted in the following:

- 1) "Interested Parties" (your buddies) misappropriating approximately \$300,000,000 in Thorpe Beneficiary Funds-- "Interested Parties" who should be excluded from receiving Trust funds (Gary Fergus, Steven Snyder) per Department of Justice Chapter 11 Rules; These are the *exact same individuals* discussed in Mandelbrot filings;
- 2) Improper Rulings in the adversary proceeding above negatively impacting *thousands* of Present and Future Thorpe Trust Beneficiaries -- solely to benefit your buddies who filed sham lawsuits against my office;
- 3) Alan Brayton (Brayton Purcell) -- the Chairman of the Trusts above -- misappropriating hundreds of millions of dollars from the Trust funds *as his personal piggy bank*. **You've done nothing** (despite having uncontroverted evidence);
- 4) Treating litigants in a demonstrably egregious manner; On multiple occasions, you engaged in extensive Ex Parte communications with litigants (your buddies), consulted with them on various Orders (long before the hearings) and ruled for your 'buddies' on *every occasion* -- *including the improper exclusion of evidence in order to rule for your buddies*.
- 5) Creating "Bad Law" on multiple occasions (having been reversed on Appeal many times) *solely so you could rule for your 'buddies'*;
- 6) Retaliating against me and my office for my participation in the Judicial Complaint process.

Simply put, you are a disgrace to the Judiciary. The Beneficiaries of the J.T. Thorpe and Thorpe Insulation Settlement Trust deserve better. You are a Judge *proven incapable* of impartial rulings (the essence of being a Judge), good faith, and promoting "justice". And you question my sanity?

Regards,

Michael J. Mandelbrot, Attorney

Cc: Jay Buteyn -- State Bar Investigation