

1 MICHAEL J. MANDELBROT ESQ. CASB# 172626
2 MARK ABBEY SLOTKIN IN PRO PER
3 7111 Santa Monica Blvd. SUITE B
4 West Hollywood, California 90046-3458
5 PO Box 401

6 **UNITED STATES BANKRUPTCY COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

8 **In Re:**

9 **MARK ABBEY SLOTKIN,**
10
11 **Debtor.**

12 **ELISSA D. MILLER, CHAPTER 7**
13 **TRUSTEE,**
14 **Plaintiff,**

15 **vs.**

16 **SLOTKIN DEFECTIVE TRUST OF**
17 **DECEMBER 14, 2012; SLOTKIN**
18 **DEFECTIVE TRUST OF APRIL 12, 2010;**
19 **INTENTIONALLY DEFECTIVE**
20 **SLOTKIN FAMILY CHILDREN'S**
21 **TRUST DATED JANUARY 1, 1997 ET**
22 **AL.**

23 **Defendants.**

BANKRUPTCY COURT CASE
NUMBER: 2:20-bk-12042

ADVERSARY CASE NUMBER:
2:20-ap-01672

CHAPTER: 7

RELATED CASES:

CHAPTER: 11

Case No. 02-14216-BB (J.T. THORPE)
Adversary Case No. 2:12-ap-02182-BB
Case No. 07-19271-BB (THORPE INSULATION)
Adversary Case No. 2:12-ap-02183-BB
Case No. 02:07-bk-20016-BB

(Jointly Administered with Case No. 2:07-19721-BB)

Case No. 2:07-19721-BB

DECLARATION OF ATTORNEY
MICHAEL J. MANDELBROT IN
SUPPORT OF VERIFIED STATEMENT
OBJECTING TO HEARINGS OR
TRIAL BEFORE JUDGE SHERI
BLUEBOND

Hearing Date:
Time:
Ctrm: 1539

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27 **DECLARATION OF ATTORNEY MICHAEL J. MANDELBROT IN SUPPORT OF**
28 **VERIFIED STATEMENT OF MARK A. SLOTKIN OBJECTING TO HEARINGS OR**
TRIAL BEFORE JUDGE SHERI BLUEBOND

1
2 I, Michael J. Mandelbrot, declare the following under penalty of perjury:

3 1. I am an attorney licensed to practice before all courts in the State of California and
4 make this Declaration in support of the Verified Statement of Mark A. Slotkin Objecting to
5 Hearings or Trial Before Judge Sheri Bluebond. I possess extensive information and facts
6 supporting the recusal and disqualification of Judge Sheri Bluebond in *In Re Slotkin*.

7 2. I have appeared before Judge Sheri Bluebond at least ten times from 2012 to
8 Present and Judge Sheri Bluebond presided over the entire case in the above entitled “Related
9 Cases” in which I was a Defendant (hereinafter the “*Thorpe Trusts or Thorpe Trusts v.*
10 *Mandelbrot*”).

11 3. Similar (nearly identical) facts of Judge Sheri Bluebond’s bad faith, undisclosed ex
12 parte communications with litigants, impartial treatment, bias, unethical treatment of litigants,
13 and Judicial Misconduct exist in both *In Re: Slotkin* and *Thorpe Trusts v. Mandelbrot*.

14 4. However, unlike Mr. Slotkin in the present case, I made a grave mistake in the
15 *Thorpe* cases -- I did not file a Motion to Recuse Judge Sheri Bluebond for cause and bias despite
16 having extensive information (like in *Slotkin*) of undisclosed ex parte communications with
17 litigants, impartial treatment, bias, unethical treatment of litigants, and Judicial Misconduct by
18 Bluebond in *Thorpe Trusts v. Mandelbrot*. I believed that Judge Bluebond would rule with
19 impartiality and/or would fulfill *her* “duty” to Recuse herself in *Thorpe Trusts v. Mandelbrot*.
20 Despite her duty Recuse herself (due to bias etc...) in *Thorpe Trusts v. Mandelbrot*, Judge
21 Bluebond did not recuse herself *specifically so she could rule with bias and in bad faith for her*
22 *avored party*.

23 5. In *Thorpe Trusts v. Mandelbrot*, Judge Sheri Bluebond *improperly ruled* against me
24 and my office (due to bias), the Mandelbrot Law Firm, *on every Motion and every Objection*
25 before Trial of January 21, 2014 (including one successful Appeal by Mandelbrot). Even worse,
26 at Trial in *Thorpe Trusts v. Mandelbrot* (as in the *Slotkin* matters), Judge Sheri Bluebond
27 excluded ALL of my evidence, ruled against my office on *every Motion*, and placed me under
28 duress by falsely threatening me with jail time (just as she is doing in *Slotkin*). Judge Bluebond

1 (despite extensive opposition) ruled for her ‘favored party’ (her close friends Eve Karasik and
2 Daniel J. Bussell) the attorneys for the Thorpe Trusts at Trial, thus destroying by successful Law
3 Practice. Judge Bluebond then improperly denied every post Trial Motion I filed in in the Thorpe
4 cases.

5 6. I *successfully* Appealed Judge Bluebond’s corrupt “Judgment” in the Thorpe cases
6 before the 9th Circuit Court of Appeal and the Appellate Court sent the case back to decide one
7 “simple” issue – “Did Bluebond’s Judgment against me and my office *restrict* my Law Practice
8 in ANY way” (emphasis added) in violation of various Business & Professions Codes.
9 Bluebond’s Judgment in Thorpe Trusts v. Mandelbrot **banned** me and my office from ANY
10 involvement in Four (4) Asbestos Trust Funds. This represented 90% of my practice and was
11 unquestionably a “restriction” on my practice.

12 **JUDGE SHERI BLUEBOND IMPROPERLY EXCLUDES EVIDENCE AND CREATES**
13 **‘BAD LAW’**

14 7. Following my successful Appeal, Judge Sheri Bluebond not only (again) excluded
15 all of my properly submitted evidence but had her “favored party” -- with whom Bluebond had
16 given partial and biased treatment throughout the case -- write an incomprehensible “Order”
17 WEEKS in advance of the hearing -- thus providing Bluebond a roadmap of “bad law”, and also
18 ensuring Bluebond could rule against me and my office (and in favor of her friends).

19 8. At that hearing following my successful Appeal, Bluebond, who read word for
20 word from her close personal friend’s improperly filed Order in Thorpe Trusts v. Mandelbrot,
21 ruled *exactly* as the unethically filed Order requested, and again for the Thorpe Trusts. Judge
22 Bluebond’s “judgment” following appeal (which prohibited my filing with Four Asbestos Trusts),
23 was that the prohibition was NOT a restriction on my business. A completely incomprehensible
24 and biased ruling for her friends despite overwhelming facts and law supporting my position.

25 9. I filed multiple Judicial Complaints with the Judicial Council against Sheri
26 Bluebond for her unethical conduct in Thorpe Trusts v. Mandelbrot.

27 10. Judge Bluebond, in retaliation, filed a State Bar Complaint against me and my
28

1 office which was subsequently “closed” by the State Bar as having no merit.

2 **SIMILARITIES IN JUDGE SHERI BLUEBOND’S UNETHICAL CONDUCT IN RE**
3 **SLOTKIN AND THORPE TRUSTS V. MANDELBROT**

4
5 11. There are similar facts Judge Bluebond’s gross misconduct in In Re Slotkin and in
6 Thorpe Trusts v. Mandelbrot . Similarities in Thorpe, and In Re Slotkin are as follows:

- 7 a. In both the Thorpe cases and In Re Slotkin, Judge Sheri Bluebond had ex parte
8 communications with her favored party during litigation and failed to disclose to
9 these communications to her non-favored party.
- 10 b. In both the Thorpe cases and In Re Slotkin, Judge Sheri Bluebond failed to disclose
11 and actively concealed that she was acting as the “keynote” speaker and/or panelist
12 at events, during litigation, where Judge Bluebond was specifically invited by her
13 favored litigants.
- 14 c. In both the Thorpe cases and In Re Slotkin, Judge Sheri Bluebond ruled for her
15 favored litigants on every Motion, Briefing or Hearing such that non-favored
16 litigants have zero likelihood of a fair hearing or trial.
- 17 d. In both the Thorpe cases and In Re Slotkin, Judge Sheri Bluebond improperly and
18 falsely threatened non-favored litigants with unprecedented “jail time” as a way to
19 force non-favored litigants resolve litigation on unfavorable terms.
- 20 e. In both the Thorpe cases and In Re Slotkin, Judge Sheri Bluebond improperly
21 excluded ALL evidence of her non-favored litigants thus “handcuffing” non-
22 favored litigants at every hearing and every Trial.
- 23 f. In both the Thorpe cases and In Re Slotkin, Judge Sheri Bluebond received
24 “Orders” from her favored Party far in advance of hearings, solely so she could rule
25 exactly as her favored party desires.
- 26 g. In both the Thorpe cases and In Re Slotkin, Judge Sheri Bluebond committed
27 Judicial perjury when questioned about her connections to certain litigants in her
28 Courtroom, her motives, her Reappointment assistance from her “favored litigants”.

1 Judge Sheri Bluebond stated that she has “never” served as a keynote speaker (a lie)
2 and has never spoken at a for profit event (another lie). From my experience, Judge
3 Sheri Bluebond is a pathological liar.

- 4 h. In both the *Thorpe* cases and *In Re Slotkin*, Judge Sheri Bluebond forced her non-
5 favored party to costly and time-consuming Appeals of her bad faith, biased, and
6 undeniably corrupt rulings. I successfully Appealed Bluebond’s rulings twice and
7 now Mr. Slotkin has 2 Appeals pending.
- 8 i. In both the *Thorpe* cases and *In Re Slotkin*, Judge Sheri Bluebond retaliated against
9 litigants for the filing of a Judicial Complaint (both me and my office and Mr.
10 Slotkin). In *Thorpe*, Bluebond filed a State Bar Complaint against my office and
11 created bad law. In *Slotkin*, Bluebond has (through bias) found Mr. Slotkin in
12 contempt and ordered him to jail.
- 13 j. In both the *Thorpe* cases and *In Re Slotkin*, Judge Bluebond simultaneously served
14 on Boards of Directors with favored litigants, was a guest speaker/panelist at
15 fundraising events with favored litigants, and had extensive “ex parte”
16 communications with (favored) litigants – all while litigation was ongoing.
- 17 k. In both the *Thorpe* cases and *In Re Slotkin*, Bluebond had a “close and personal”
18 connection with opposing Counsel (Robyn Sokol, Eve Karasik, Daniel Bissell)
19 dating back *decades* so that her impartiality was questioned.
- 20 l. In both the *Thorpe* cases and *In Re Slotkin*, Judge Bluebond and opposing counsel
21 never notified Mandelbrot or Slotkin of this close and personal connection or the
22 friendships.
- 23 m. In both the *Thorpe* cases and *In Re Slotkin*, Judge Bluebond had a bias for her
24 favored party (her buddies in the L.A. Bankruptcy scene) and a strong unethical
25 prejudice against the non-favored party (the “outsiders” Mr. Mandelbrot and Mr.
26 Slotkin).
- 27 n. In both the *Thorpe* cases and *In Re Slotkin*, Bluebond had a financial interest in the
28 outcome of the case – her Reappointment. Bluebond “knew” that ruling for her

1 favored parties in *Thorpe* and *Slotkin* guaranteed that her favored parties would
2 provide her with extremely valuable “Recommendations” for the Bench. As such,
3 in both case, Judge Bluebond traded (her) rulings for (favored party)
4 recommendations.

- 5 o. In both the *Thorpe* cases and *In Re Slotkin*, recusal/disqualification of Judge
6 Bluebond was appropriate due to bias’s and Bluebond’s close and personal
7 connection with favored Counsel, and the appearance of bias. Nonetheless, in both
8 cases, Bluebond refused recusal.
- 9 p. In both the *Thorpe* cases and *In Re Slotkin*, litigants Civil Rights were violated and
10 they were given no Due Process.

11 **JUDGE SHERI BLUEBOND HAS BEEN ON “NOTICE” OF CRIMINAL CONDUCT AT**
12 **THE THORPE TRUSTS SINCE 2014 AND HAD DONE NOTHING BUT ENABLE**
13 **ADDITIONAL CRIMINAL THEFT**

14 12. Since 2014, on at least a dozen occasions, I have provided Judge Sheri Bluebond
15 with irrefutable evidence of criminal conduct among Fiduciaries and Counsel (Bluebond’s
16 favored counsel) at the J.T. Thorpe and Thorpe Insulation Settlement Trusts. The included an
17 *actual Trust* check and Invoice where Asbestos Victim’s Trust Funds were used Bluebond’s
18 favored counsel’s *wedding!* (See Exhibits below). The Trust Fund also paid for her favored
19 parties to attend, the flights and accommodations for this wedding (a criminal theft of Trust
20 funds).

21 13. Since 2014, Judge Sheri Bluebond has actively concealed this irrefutable document
22 exposing Trust Fund theft and has continued to enable criminal conduct by her “favored” party,
23 Bluebond’s friends at the Thorpe Trusts by ‘rubber stamping’ Asbestos Trust Annual Reports
24 filed by these same individuals.

25 14. In both the *Thorpe* cases and *In Re Slotkin*, the implementation of Judgments and
26 Rulings by Judge Sheri Bluebond are retaliatory, in bad faith, bias’, fraudulent, and causes
27 irreparable harm to the beneficiaries and (non-favored) litigants.

1 15. In my 28 years as a licensed California attorney, I have interacted with thousands of
2 attorneys and dozens of Judges. I have never personally encountered or dealt with a Judge, like
3 Bluebond, who is willing and content to commit perjury, who supports the known subornation of
4 perjury, who unabashedly rules with a bias, who allows the criminal misappropriation of funds,
5 and who commits fraud. I have no doubt that Judge Sheri Bluebond has engaged in a criminally
6 unethical pattern of fraud, bad faith, and biased treatment that Mark Slotkin cannot have a fair
7 trial or hearings before Judge Sheri Bluebond. Mark Slotkin and I are aware of facts that cast
8 doubt on Judge’s ability to be impartial.

9 16. I am attaching documents to this Declaration which in part, shed light on Judge
10 Bluebond’s Fraud. Each Exhibit is reliable, properly executed and provide evidence of Judge
11 Sheri Bluebond’s knowledge and complete ignorance of criminal conduct (including her own) for
12 the past 20 years. Documents attached include:

- 13 a. **Exhibit A** – Irrefutable Evidence of Criminal Theft (stolen funds) at Trust Funds by
14 Judge Bluebond’s friends (ignored by Bluebond).
- 15 b. **Exhibit B** – Mandelbrot response to Judge Sheri Bluebond’s sham State Bar
16 Complaint filed against Mandelbrot (State Bar closed the case, took no action).
- 17 c. **Exhibit C** – Compilation of letters mailed to Judge Sheri Bluebond detailing bias,
18 criminal conduct, theft of Trust funds.
- 19 d. **Exhibit D** – Declaration of Michael J. Mandelbrot dated March 12, 2014 re:
20 Bluebond Misconduct.
- 21 e. **Exhibit E** – Declaration of Michael J. Mandelbrot dated June 6, 2014 re:
22 Bluebond’s Conflict of Interest.
- 23 f. **Exhibit F** – Financial Lawyers Conference, January 10, 2013 (during
24 Reappointment and *Thorpe* trial) – Judge Bluebond keynote speaker and a for profit
25 event (held by her buddies). Undisclosed to litigants.

26 17. On October 13, 2022, I specially appeared before Judge Sheri Bluebond on behalf of Mark
27 Slotkin to argue his disqualification Motion. Judge Sheri Bluebond, on the record, lied
28 under oath by indicating that she has “never” been a keynote speaker at an event for profit.

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18. Once Judge Bluebond was caught in her web of lies, she slandered Mr. Slotkin and I by insinuating that we have each, individually threatened her, and that she would “fear for her safety” (if invited to events by Mandelbrot or Slotkin). This perjury and slander by Judge Sheri Bluebond is additional evidence of her bias and bad faith.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to my own knowledge, except as to those matters which are herein alleged on information and belief, and as to those matters, I believe them to be true.

M. Mandelbrot

Michael J. Mandelbrot Date: 10/22/2022

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Dated: October 2022

/s/
MICHAEL J. MANDELBROT
Attorney – Specially Appearing for Mark Slotkin

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