

Jean Elizabeth Allan Sovik aka Jean Elizabeth Allan fka Jean Vorisek Quinn
Capirita Section El Valle de Anton
Cocle Province
Republic of Panama

Email: jeanasovik@gmail.com

USA Mailing Address
C/O Fritz Edward Vorisek
212 Rancho Drive
Frankfort, KY 06401

October 19, 2013

Melissa Countway Guldbrandsen
County Attorney
Belknap County Attorney's Office
64 Court Street
Laconia, New Hampshire 03246

Joseph A. Foster
State of New Hampshire
Office of Attorney General
33 Capitol Street
Concord, NH 03301

RE: Title X Public Health, Chapter 135, New Hampshire Hospital and Insane
Persons – 12/20/2010 Competency Hearing in State v Jean Allan (450-2009-cr-04147)
Motion for Reconsideration Denied (January 11, 2011) based upon 5/5/10 Order:
“After review of the October 13, 2009 competency evaluation of Dr. Petrou, the Court
finds Ms. Allan not competent to stand trial in this matter”.

Dear County Attorney Guldbrandsen and Attorney General Joseph A. Foster:

**According to New Hampshire Title X, Chapter 135:17-a Competency Hearing;
Commitment for Treatment** – “If, after hearing, the district court or superior court
determines that the defendant is not competent to stand trial, the court shall order
treatment for the restoration of competency unless it determines, by clear and
convincing evidence, that there is no reasonable likelihood that the defendant can be
restored to competency through appropriate treatment within 12 months. If the court
finds, by clear and convincing evidence, that the defendant cannot be restored to
competency within 12 months, the case against the defendant shall be dismissed
without prejudice and the court shall proceed as provided in **paragraph V.**”

On December 20, 2010, and based only upon the written evaluation report that had been faxed to the Laconia District Court on October 13, 2009, and the May 5, 2010 Order of Judge Devries, the Court affirmed the findings of the Order and Evaluation report. Although I asked for the Court's assistance to subpoena duces tecum (see nhjustice.net) all the records that the October 13, 2009 Report relied upon to be presented in person by the supervisor whom then I could cross exam; I was not able to get the subpoena served. Additionally, I wrote to Dr. Petrou and his supervisors, and requested that they appear in Court so that I could cross examine them. They refused to appear. The Court ruled sua sponte from the bench. On December 22, 2010 Defendant Allan filed a Motion to Reconsider with the Court. That Motion was DENIED on January 11, 2011.

Paragraph V of Title X Chapter 135:17-a states in part: "If the court has determined that the defendant has not regained competency, and the court determines that he or she is dangerous to himself or herself or others, the court shall order the person to remain in custody for a reasonable period of time, not to exceed 90 days, to be evaluated for the appropriateness of involuntary treatment pursuant to RSA 135-C or RSA 171-B-2. The court may order the person to submit to examinations by a physician, psychiatrist, or psychologist designated by the state for the purpose of evaluation appropriateness and completing the certificate for involuntary admission into the state mental health services system, the state developmental services delivery system, or the secure psychiatric unit, as the state may be...."

Cruel and unusual punishment is a phrase describing punishment which is considered unacceptable due to the suffering, pain, or humiliation it inflicts on the person subjected to it. I would respectfully suggest that this legal concept fits my complaint that is incorporated in this letter. Clearly, the State of New Hampshire has abrogated its duties to defendant Allan. It is time to stop the suffering, pain, and humiliation.

- I have incorporated, by reference, a link whereby you may access both the October 13, 2009 Report, and my timely written complaint to the New Hampshire Medical Licensing Board and to New Hampshire Board of Mental Health. (<http://www.nhjustice.net/HBOSINTRO.html>)

- The complete Series **No Witness = No Case** can be located at nhjustice.net. I have attempted to the best of my ability to lay out the fulsomeness of my family's complaints there.

The issues in this complex matter that spans decades are many and varied. Therefore, I will attempt to summarize the main **Title X** complaint, and request that the State of New Hampshire take proactive and affirmative steps to correct the 'cruel and unusual punishment' that it has subjected me to since it embraced, and introduced in evidence the October 13, 2009, as its final act on the subject matter. As per **V.** stated above, New Hampshire must not have considered defendant Allan too much of 'a danger to myself and others', because she was not remanded into custody. But, based upon the opinion of Dr. Nicholas Petrou, PhD, Chief Forensic Examiner – Psychology, Laconia District Court did affirm his finding quoted below that:

- “In my clinical opinion, Ms Allan most likely is not restorable to competence within a twelve month period. It is possible with a combination a (sic) psychiatric medication and psychotherapy that she would show some improvement, but Delusional Disorders are often resistant to treatment with medication. Ms Allan also shows no indications of being interested in or willing to pursue the idea that she needs psychiatric assistance, as she is convinced of her ideas and her competence, so it is unlikely that she would agree to engage in a psychiatric treatment regimen.”

However, “unlikely” the response: the question was never posed. Not by Dr. Petrou, nor by the Court. How can the Court accept facts that have not been tested? Is it not highly irregular that the State of New Hampshire can rest upon a question that was never asked? This presumption alone violated defendant Allan's due process rights. She made her objections known that the time that her rights to due process were being violated. However, Attorney Wolpin, her public defender, did not object.

Already incorporated into this letter is the complaint that defendant Allan filed with the New Hampshire Medical Boards. But, subsequent to those complaints filed, at that time, factual issues that Dr. Petrou opined upon, in which defendant Allan must have

been DELUSIONAL to have made, have since come to pass. The summary below incorporates, but a few, of the so called 'delusional thesis' that have now either been proven true, or at least by clear and convincing evidence can be argued as true.

ISSUES RAISED THAT CONTRADICT OCTOBER 13, 2009 FORENSIC EVALUATION REPORT

In the first paragraph of the 10/13/09 Report, Dr. Petrou determined that the information provided to him by Public Defender Attorney Wolpin must make defendant Allan guilty, and/or delusional. Considering it was Attorney Wolpin who filed the Motion for the Evaluation, and that it was he who provided Dr. Petrou with information without the prior knowledge of defendant Allan, one could argue that the State of New Hampshire from the first paragraph onward intended at all times to find defendant Allan not competent. The exact quote from the 10/13/09 first paragraph is:

- “According to Ms Allan, the property was her primary residence and had been owned by her family (Jean Vorisek Family Trust) dating back to approximately 1978. The property reportedly is now owned by Waukewan Holdings LLC, a circumstance which Ms. Allan disputes.”

Correct me if I am wrong, but is not the ownership of the subject property the key charge that the Prosecutor must make using the standard 'beyond a reasonable doubt'? And, if the Prosecutor cannot make such a case then the criminal trespass charges would have to be dismissed. And, if defendant Allan had facts prepared to raise an 'affirmative defense' doesn't due process require that she be allowed to make her defense? But, instead the State hid behind Dr. Petrou's Delusional diagnosis so that it did not have to try a case with facts that it knew to be false on their face. The State knew, or had reason to know, that Attorney Peter Minkow's Affidavit was false. The State knew, or had reason to know, that defendant Allan, in re: 4147 entered the subject property legally with a Court Order that she presented to the Center Harbor Police prior to entering onto the property. It was not until after Prosecutor Libby had an ex parte communication with the judge in the civil matter that she changed her Order. This was after defendant Allan had been arrested.

The legal criteria for determining competence to stand trial is articulated in **RSA 135:17 II (b)**: “Whether the defendant has a rational and factual understanding of the proceedings against him or her, and sufficient present ability to consult with and assist his or her lawyer on the case with a reasonable degree of rational understanding.” Nothing in that above quote was tested by Dr. Petrou during his one and only evaluation proceeding. If he has already concluded in his first paragraph that defendant Allan’s ‘affirmative defense’ facts were not valid, he was already violating his mandate not to insert himself, and make conclusion into the fact issues that have yet to be tried. And, if his defense is that he was solely relying upon the information provided to him by the Public Defender, then yet again defendant Allan’s due process rights have been violated.

SOURCES OF INFORMATION

In the selected Sources of information section of the 10/13/09 Report highlighted below, Dr. Petrou: (see 10/13/09 Report for complete Sources of Information list)

1) States that the interview lasted approximately 2 hours and 15 minutes. He has omitted the fact that much of that time was taken up with someone from the Sheriff’s office attempting to serve defendant Allan a NOTICE that related to another on going civil matter. Again, Public Defender Wolpin, although he voiced a weak objection, did not prevent the interruption, which was a clear violation of defendant Allan’s expectation and right of privacy. One important question is how did the Sheriff even know that defendant Allan was involved in an evaluation, at that location, and at that date and time? Defendant Allan certainly did not inform them. Therefore, the actual time spent on the evaluation discussion was much less than Dr. Petrou has reported . And, the entire session was made much more stressful due to the fact that no one knew why the sheriff needed to intervene in the first place.

4) Additionally, Dr. Petrou claimed that he relied upon work product information that defendant Allan allegedly sent to Public Defender Wolpin. But, at that time, he would not let defendant Allan review what documents he was incorporating into his evaluation. The source of information is at best not admissible due to chain of custody

issues. The entire process was also a violation of attorney - client privilege, especially in light of the fact the PD Wolpin had requested defendant Allan's prior consent.

6) Dr. Petrou used a "January 9, 2009 Case Study" that defendant Allan wrote to the Office of Inspector General, US Securities and Exchange Commission. He quoted the subject of the panel's investigation "Issues to include in sweeping review of SEC investigations practices and procedures". In this case he did not clarify that the subject matter of the investigation in "quotes" was not defendant Allan's title, but the OIG's panel title: Thus potentially creating a prejudice for the Court. Attorney Wolpin did not object, although he knew that the statement was misleading.

10) 11) 12) 13) - Were Affidavits in support of defendant Allan's affirmative defense. They had been signed by Kurt William Vorisek, Bruce Lewis, and W. Kent Martling. In Dr. Petrou's narrative he discounted the Affidavits as if written by groupies.

14) Document titled: "1986-2009 Partial Potential Deposition List – Affirmative Defense". Dr. Petrou identified this document as work product directed to attorney Wolpin from Jean Allan (undated). What could have been Attorney Wolpin's motive for releasing this confidential document? One could surmise that it was to have been leaked, since Dr. Petrou announced that his evaluation would not be confidential to defendant Allan, but would be released to others.

15) Spreadsheet of Lost Water Profits – Future Value Calculation – Through 2007. Here Dr. Petrou mischaracterized the Spreadsheet, and Attorney Wolpin did not object. If the spread sheet was calculated on lost water profits through 2007, how can that, by definition, be characterized as 'future profits'? Dr. Petrou showed unnecessary bias, and again, Attorney Wolpin again did not object.

16) Does the fact that defendant Allan provided to Dr. Petrou the Affidavit of ownership by Waukegan Holdings LLC dated March 29, 2009, really indicate in any way that defendant Allan was DELUSIONAL? Logic would suggest that if Dr. Petrou believed the Affidavit of Attorney Minkow to be then true without hearing defendant Allan's "affirmative defenses", he again was acting as judge and jury: NOT HIS ROLE. (See **AFFIRMATIVE DEFENSE EVIDENCE ATTORNEY WOLPIN FAILED TO SHARE WITH DR. PETROU** incorporated below)

Considering the sources of information supplied by Attorney Wolpin, who at that time was supposed to be defendant Allan's Public Defender, it would appear that on its face, Attorney Wolpin was only working in support of the State's Prosecutor. And the State that was paying his salary. Was it not his duty to defend defendant Allan? (See detail analysis of Attorney Wolpin's acts that has been posted in NO WITNESS = NO CASE- INTRODUCTION-nhjustice.net)

RELEVANT HISTORY

Again, this section of the 10/13/09 Report, according to Dr. Petrou is based upon "documents (i.e. emails, letters, affidavits, etc.) supplied to him by Attorney Wolpin". And, "self reporting by defendant Allan during the interview for the evaluation".

Dr. Petrou's narrative of defendant Allan's childhood, educational, and marriage history for the most part is accurate. (Although I think my father, if he were alive, would object to have been called a 'boat' pilot.)

However, quickly thereafter, Dr. Petrou immediately formed a psychiatric opinion that defendant Allan must be delusional. However, defendant Allan for the most part was merely reciting facts that have been actually proven in a Court of law. Additionally, Dr. Petrou stated that he did no independent research into US v Blondheim, or any of the other issues which were available to him through public sources. Instead, Dr. Petrou's opined:

- "The overarching threat that she maintains through out her story as described by her both during the current interview as well as in the documents she (*read Attorney Wolpin*) provided is held together and supported by an intricate web of complex links including (but not limited to) mobsters, financial schemers, compromised lawyers and judges, compromised agencies at high levels of NH and US government, incompetent or compromised engineers, fraudulent or deceptive loan agreements, sabotage, physical attacks, suspicious incidents and stolen identity."

Since Dr. Petrou admitted that he did not independently fact check any of the issues that he listed in this section to have been DELUSION “rants” by defendant Allan. And, since defendant Allan was not provided with the 10/13/09 Report that was faxed to the court just prior to the judge’s decision to dismiss the case due to the fact that defendant Allan was not competent to stand trial; here’s a short rebuttal to those issues raised by Dr. Petrou.

- **Mobsters** – The fact that defendant Allan had testified for the Prosecution in USA v Rennert, Dr. Petrou had knowledge. He incorporated the January 9, 2009 Case Study 6) into his own sources of information. His denial of his knowledge shows Dr. Petrou’s “mens rea” in writing the above statement. The case in question was prosecuted by the Organized Crime Task Force of the Eastern District of Pennsylvania. The operative phrase here that is a dead give-away that ‘mobsters’ were involved, is “Organized Crime Task Force”. (see Installment #2 NO WITNESS = NO CASE posted on nhjustice.net)
- **Financial schemers** – in USA v Rennert the Organized Criminals were also “financial schemers” that collapsed the insurance industry in the State of Pennsylvania. All six defendants were convicted on all charges. Blondheim “financial schemers” were indicted and sentenced for ‘ponzi schemes’, and the public records show that Mr. David Williams was convicted and sentenced, among others.
- **Compromised lawyers** – Almost too many to really recall herein (see NO WITNESS = NO CASE, Introduction PD Wolpin, #3 and #4 other attorneys.) In one of the civil cases Orr & Reno, upon my Motion, was Ordered by the Court to recuse itself for conflict of interest. Edwin McCabe, another civil lawyer, has since been disbarred in Massachusetts, as has F. Lee Bailey.
- **Compromised Judges** – The facts, if defendant Allan had been allowed to present her ‘affirmative defense’, would show that both Judge McHugh and Judge Edward Fitzgerald should have been recused from hearing certain civil cases due to conflict of interest, or worse. Justice Broderick experienced impeachment issues where the NHSC gagged defendant Allan from testifying.

Please note that during the late 80's Justice Broderick's firm represented me as a client in several litigation matters.

- **Compromised agencies at the highest levels of US and NH government** – The recent trial of Whitey Bulger has proven defendant Allan's statements beyond a reasonable doubt with respect to corruption within the Boston FBI. The testimony of long serving Boston FBI secretary lay to rest any question that the FBI, on numerous occasions, destroyed evidence. And, her testimony went further to prove that there was long term systemic corruption within the FBI, not just the Boston office. As for NH, those facts are still unwinding, but if they were presented today, in a fair and unbiased court of law, they too would be proven beyond a reasonable doubt.
- **Incompetent or compromised engineers** – The fact that on May 2, 1994, the ICIC insurance company, owned by Mr. Warren Buffet, had agreed upon a settlement to pay defendant Allan's companies \$820,000 is public knowledge. Attorney Wolpin, knew, or had reason to know, that Dr. Petrou's claim that defendant Allan was delusional to incorporate Mr. Buffet's name simply was not accurate. Attorney Wolpin did not object.
- **Fraudulent or deceptive loan agreements** – Again, Dr. Petrou opined that defendant Allan's "affirmative defense" is DELUSIONAL. **It was not his job to opine on the facts of the documents that Attorney Wolpin provided to him.** His function was to opine upon whether defendant Allan could assist Attorney Wolpin with an "affirmative defense". What the facts do show here is that PD Attorney Wolpin was not working to assist defendant Allan in the preparation of an "affirmative defense". Attorney Wolpin appears to have been working to insure that defendant Allan's case never came to trial. In that case, Attorney Wolpin committed malpractice in re: defendant Allan.
- **Sabotage** – The fact that the State of NH was required to prepare and implement a Remediation Plan in order to decommission Netmark International Inc's High Birches Water Supply and Distribution System should have been proof enough to Dr. Petrou that defendant Allan's claim of sabotage was not DELUSIONAL. However, it appears that Dr. Petrou was not interested in hearing defendant Allan's reasons why she could assist her attorney in her defense. Why was that?

- **Physical attacks** – On June 14, 2013 Dr. Reginald Danboise, according to the NH AG Homicide Division, brutally stabbed his wife to death and then hanged himself. The majority of defendant Allan's complaints, and her reports that she and her family had been threatened with death all incorporated Dr. Danboise as the major perpetrator. In fact, in March, 1997, the first act of sabotage was committed on Netmark's Water Supply & Distribution System. This criminal act was done within weeks of defendant Allan's testimony for the prosecution in USA v Rennert. But, the initial criminal act where defendant Allan's companies were victimized by Dr. Danboise occurred on November 12, 1996. In that matter, she had filed a criminal complaint with proof beyond a reasonable doubt that Dr. Danboise had physically attacked her and, committed grand theft against her and her family's interests. However, at that time, and up until such time Dr. Danboise showed his true character by killing his wife, he had been, for reasons yet to be discovered, protected by law enforcement authorities. If this were not the case, why was defendant Danboise's probable cause files expunged from the Suffolk County Court in Boston Massachusetts? And, why wasn't Dr. Danboise questioned by the New Hampshire Attorney General Office, in 1997, following the September and October sabotages and contaminations of Netmark's Water Supply and Distribution System?
- **Suspicious incidents** – Again Dr. Petrou never asked defendant Allan for factual proof of any so called suspicious incidents. Defendant Allan is unclear as to what exactly Dr. Petrou means by this vague accusation that these incidents may have been delusional. Nothing in his report shows factual proof that they were not. And, why would Attorney Wolpin provide such information to Dr. Petrou about his client?
- **Stolen Identity** – There is a plethora of facts showing that defendant Allan's identity had been stolen. (see Announcements nhjustice.net) At no time did Dr. Petrou request proof from defendant Allan as a result of his concerns on the stolen identity issue.

If a reasonable investigator would interrogate Dr. Petrou, they would find that he knew that he had filed a false and misleading Evaluation Report with the Laconia

District Court on 10/13/09. Prosecutor Robert Libby knowingly introduced this false and misleading 10/13/09 Report into evidence. Attorney Wolpin, to my knowledge, did not object. He made a point to say to Allan that he was vindicated in the filing of the initial Motion for Competency Evaluation.

NOTE: The first two arrests that occurred in May, 2009 (1293-4) were classified as Misdemeanor A, and entitled the defendant to a Public Defender. Defendant Allan had requested her 1963 Vienna Treaty Rights to a lawyer, but that was denied to her. The court appointed PD Attorney Wolpin. He last represented defendant Allan on 10/13/09.

Subsequently, for no cause that was explained, the Center Harbor Police arrested defendant Allan sometime after Thanksgiving. And, then the Center Harbor Police arrested her again after she allegedly illegally trespassed onto the subject property. That case was (4147) and was determined to be a Misdemeanor B, whereby defendant Allan was not entitled to a public defender. Also, this was the case where defendant Allan had gotten a TRO against Waukegan Holdings, and accordingly then legally entered the subject property in Center Harbor. She did not enter the property before informing the Center Harbor Police that she had a Court Order to do so.

The Orders of NOT COMPETENT were based upon the last arrest – docket # 4147. At that time Attorney Wolpin was not appointed to represent defendant Allan due to the reclassification from Misdemeanor A to B.

MENTAL STATUS AND CURRENT LEVEL OF FUNCTIONING

Dr. Petrou neither provided, nor offered, any cognitive skills test, or standard mental tests during his one and only interview of defendant Allan. Therefore, all of what he has described in this section is only from his own brief personal observations, and the information provided to him by Attorney Wolpin.

After recalling that defendant Allan did not present with a disorganized or schizophrenic demeanor, Dr. Petrou did recount that defendant Allan appeared naïve. But, then he opined that:

- “Ms Allan’s relative lack of overt interactional paranoia also in part may have been due to not being directly challenged or contradicted. I was attempting to solicit her story as completely as possible for evaluation purposes, **but I also would suspect** that in general others get into a pattern of trying to avoid confrontations with her that may elicit paranoid reactions, including at times in hopes of becoming encapsulated as yet another piece of the puzzle within her “story”.

Here again, Attorney Wolpin did not object to this blatant speculation on the part of Dr. Petrou as an expert witness. If Dr. Petrou’s suspicions would have been challenged by Attorney Wolpin, then perhaps Dr. Petrou would have had to rephrase his statement, and admit that he never tested his suspicions in any standardized matter to prove that his theory was correct, or not correct, or that it was merely wild speculation that is inadmissible in court testimony.

On page 12 of the 10/13/09 Report, Dr. Petrou again hedged his opinion with the word “appear”. He states that:

- “...does **appear** to be psychotic, characterized by a web of non-bizarre delusional perceptions and beliefs that is self-justified and self-fueled by its own internal logic. She **appears** to be caught up in a paranoid narrative that also has grandiose and somatic features, as subsequent events as they transpire may become integrated within this narrative. There may be elements of her narrative that have some basis in real events, but the manner in which she has interpreted the events and put them together as intrinsically inter-related is seriously distorted and ultimately deluded.”

The above is based upon subjective conclusions of fact, not evidence. Attorney Wolpin did not object. If the evidence can be decided by Dr. Petrou’s subjected conclusions then why do we have juries? Is not it the function of a trial to test whether

the defendant's "affirmative defense" is believable? It was Dr. Petrou's function to determine whether defendant Allan could assist her attorney in presenting an "affirmative defense" to the Court and jury. What part of Dr. Petrou's function was to be judge and jury? Even if he personally thought the defendant Allan's "affirmative defenses" were, in his words: "the manner in which she has interpreted the events (*read evidence*) and put them together as intrinsically inter-related is seriously distorted and ultimately deluded". Was it not the function of Attorney Wolpin to make the best case for his client? Or, as I have suggested before, likely for some very specific reasons, Attorney Wolpin did not want those facts, however integrated or not, to be introduced into evidence. Therefore, the 10/13/09 Report served its Master (the State) well; but, it woefully violated defendant Allan's due process rights in so doing.

Continuing on page 12, Dr. Petrou concerned himself with issues that are not part of defendant Allan's direct "affirmative defense" to the charge of criminal trespass. He especially pointed out that:

- "In addition to Ms. Allan's most prominent focus on the more overt financial schemes or conspiracies intended to bring her family to ruin, other themes supporting that she is experiencing a delusional disorder with paranoid features, which she suggest with her mother and describes in detail in terms of herself, is a hallmark feature of a delusional disorder, and she clearly suggests that she suffered contamination due to malicious attacks by others".

Nevertheless, since Dr. Petrou has introduced the issue into this case, they say a picture is worth one thousand words. Posted on nhjustice.net are several pictures taken of my Mother, Agnes S. Allan, on St Patrick's Day, 2001, after I had demanded that she be removed to ICU at the Lakes Region General Hospital. I found her in the linen closet. She had been left to die. If someone can take a serious look at this picture, (and Dr. Petrou had access, or should have had access to, it whether or not Attorney Wolpin supplied it to him), and determine that her body had not been contaminated with a poison that caused an allergic reaction, which in turn caused a gangrenous black and dying arm, they are as blind to the facts as Dr. Petrou. (See nhjustice.net Agnes S. Allan; also see Installment #11, which described the torture that both she and defendant Allan had been made to suffer.)

However, not to be deterred, Dr. Petrou, again over stepped his evaluation role. Again, he speculated upon what defendant Allan may have misinterpreted in a situation that was not relevant to the criminal trespass charges. And, yet again Attorney Wolpin did not object, but allowed Dr. Petrou's testimony become part of the record.

Herein, Dr. Petrou describes defendant Allan's DELUSIONS with respect to certain named parties in other matters. The basis for this opinion must have come from Dr. Petrou's communications with Attorney Wolpin, which he cited in his Sources of Information Section:

- "Grandiose features of a delusional disorder also are apparent via the inclusion in her "story" of famous or publicly important figures like Whitey Bulger, F.L Bailey, Warren Buffet, and the Supreme Court Chief Justice, and Governor of NH. In the interview she talked about agencies like the "OIG", "US DOJ" and "SEC with a dizzying familiarity as though they are almost old friends. Her descriptions at time almost sounded like a novel, she has a self-importance in the "story" that is suggestive of a film documentary....Prolific writings and grievances that she has engaged in are a hallmark feature of delusional disorders, and while the content is primarily paranoid, there is certainly a grandiose quality to who she has written and presumed a response, and how far reaching she believes the outcome to be".

With respect to John Iuele, a person whom defendant Allan believes to be an alias for Whitey Bulger, and or F.L Bailey whom John Iuele sent defendant Allan to as a reference: The alias has yet to be proven to be true. However, the facts that defendant Allan has testified to with respect to John Iuele, are true. If at some future date, it is discovered that John Iuele and Whitey Bulger are one and the same person, then perhaps it will become relevant to the complaints that I have filed pursuant to Title 18 and the Hobbs Act violations. Clearly the RED VAN had the Melotone sign on it, and it is public knowledge that the Melotone Company was located in Somerville MA and was at one time associated with the Winter Hill Gang. On 10/13/09 Dr. Petrou's

diagnosis was premature at best, and not material to the fact whether defendant Allan could assist Attorney Wolpin in her defense against criminal trespassing charges.

If Dr. Petrou would have read the prior civil complaint against CLD engineers whereby defendant Allan's companies won an \$820,000 settlement, he would have known that it was Warren Buffet's insurance company that made the pay off through his agent, for the day, Martha HW Crowninshield.

The then sitting NH Supreme Court Chief Justice that Dr. Petrou cited above – please note that his firm is on record as representing me in civil litigation matters.

The January 9, 2009 Case Study that was supplied to Dr. Petrou by Attorney Wolpin names the government agencies. (Perhaps Attorney Wolpin was being 'grandiose' for me.)

If a person risks the diagnosis of being "grandiose" because she/he writes letters to agencies of competent jurisdiction, because he/she has expectations of a reasonable response; then, someone should inform the American Public, sooner rather than later. And, if not written complaints, then what is the suggested (sane) alternative?

ABILITIES RELEVANT TO COMPETENCE TO STAND TRIAL

Dr. Petrou found that defendant Allan "accurately described plea options and potential verdicts. She provided an accurate description of plea bargaining. She clearly was aware that failure to reach a plea agreement could result in proceeding to trial".

Dr. Petrou admits on page 14, of his 10/13/09 Report that defendant Allan raised issued about Attorney Wolpin's filing for a competency evaluation, especially in light of the fact that she had testified for the Prosecution in USA v Rennert was deemed to have been competent in that testimony. Dr. Petrou did not provide an answer to the issue raised. Nor, did Attorney Wolpin make any comment.

CLINICAL IMPRESSIONS REGARDING COMPETENCE TO STAND TRIAL

Right off the bat, Dr. Petrou assumed facts of the matter that have yet to be tried, when he states:

- “At best as I can surmise from the available data (this included for the most part documents that were sent, unbeknownst to defendant Allan, to Dr. Petrou by Attorney Wolpin) it appears she lost what she considers to be her family home as a result of a debt or debts that she has been unable to meet obligations for and/or successfully refinance.”

Clearly, with that statement alone Dr. Petrou has stated his bias of the facts. He has recited what would most likely be the Prosecutor’s opening statement, but with documents provided to him by defendant’s attorney, Wolpin, at the very least a violation of attorney client - privilege, and at the worst; a bias on attorney Wolpin’s part against his appointed client, and /or a breach of an Attorney’s code of ethics.

The above bulleted assumption is not material to whatever ‘clinical impressions’ he may have regarding defendant Allan’s competency to stand trial. Again, Dr. Petrou has taken an improper role of being judge and jury to the facts of the trial, and foreclosed any ability for defendant Allan to ever raise an “affirmative defense” to the State’s case. In this process it can be argued that all of the State’s agents have violated defendant Allan’s due process rights to a fair trial.

And, without further ado, Dr. Petrou finalized his diagnosis. (This summation has to be read to be believed that it was ever written. Please note that these are the actual quotes -

- “Based upon a thorough review of the available data supplied by Ms. Allan and her attorney and the interview for the current evaluation, it is my clinical opinion that Ms. Allan is suffering from a Delusional Disorder, Mixed Type, with paranoid, grandiose, and somatic features. A Delusional Disorder is different from other psychotic disorders in that an individual’s functioning may be relatively normal in many respects with the exception of the delusional

system that may be relatively circumscribed. Delusional ideas or perceptions in Delusional Disorder are non-bizarre and involve situation that could occur in real life, such as being conspired against, followed, deceived, poisoned, or being the holder of a special talent or discovery. The delusional experience often involves the misinterpretation of events or perceptions in situations where the misinterpretation is either untrue or highly exaggerated. Ms. Allan's presentation is replete with the characteristics of Delusional Disorder....Ms. Allan appears to possess no insight into her illness, or even the possibility of having an illness, which is typical, and each new experience or insult therefore become woven into the pre-existing delusional story”.

- “However”, (Dr. Petrou continued) “Ms. Allan's rational understanding of the charges and her abilities to assist her attorney and participate in the proceedings with a reasonable degree of rational understanding are seriously impaired and would be unacceptably compromised by her delusional understanding and overriding mission to use the proceedings in an effort to prove her understanding.”
- “She refused to consider any type of plea bargaining arrangement, no matter how favorable, because she insists on pursuing what she calls an “affirmative defense”.
- “She therefore is essentially looking to use the proceedings as a forum to put to trial her entire **delusional thesis**
- “Indeed, she would like to turn the competency question, about which she had objected, into a full trial of the entire story, and the results of this evaluation may well spur yet another flurry of grievance activity.”
- “In my clinical opinion, based upon severe impairment in her rational understanding, Ms. Allan presently is not competent to stand trial”.

AFFIRMATIVE DEFENSE EVIDENCE ATTORNEY WOLPIN FAILED TO SHARE WITH DR. PETROU

If the function of the psychological evaluation is to ascertain whether a defendant can assist his/her attorney with the defense of the charges in the case criminal trespass on the property located at 309 Waukegan Road, Center Harbor, then what is most

perplexing is why Attorney Wolpin felt the need to selectively share the material that he did without my knowledge or permission, and then omit to share the facts that would prove that defendant Allan was not guilty of the charges?

In the above quotes, Dr. Petrou has chosen to use the term **delusional thesis**: “A trial for her will involve attempting to get even more data to understand the alleged conspiracy better, with more investigation and unearthing of details to provide the conspiratorial links still left uncompleted and/or which she had yet to convince a Court about thus far.” Is not one of the conditions of a fair trial to have a discovery process where evidence is to be produced? And, is it not the burden of the Prosecutor to present his evidence beyond a reasonable doubt that the defendant is guilty as charged? And, if the Prosecutor cannot prove the charges, and the defendant has an ‘affirmative defense’, then that defense may be presented to the Court with a lesser standard of proof.

Consider this:

- Mr. Victor Parisi a now known ROBO Signer was the person that filed the Affidavits in the civil matter that Judge McHugh had originally ruled upon. It was the McLane Law Office that introduced the fraudulent Affidavits of Mr. Parisi. Mr. Parisi swore to Judge McHugh, and later to Judge McAliffé, in NH US District Court, that he was Vice President of SN Servicing, one of Mr. Robin Arkley’s company’s that was allegedly servicing the so called 1989 judgment for another of Mr. Arkley’s companies, Ingomar. However, Judge Shack in a New York court had just called Mr. Parisi out in another matter as a fraud, and a person who had misrepresented his employment status. Mr. Parisi’s Affidavit was ripe for challenge. This newly discovered evidence became known after the two above cited cases in 2006. It is material to the foreclosure and the criminal trespassing charges. (see NO WITNESS = NO CASE and Consider This...posted on nhjustice.net for further details of the fact set for defendant Allan’s “affirmative defense”.)
- Mr. Parisi’s Affidavit was the major piece of evidence that allegedly showed the chain of title to the so called 1989 judgment, which had by the time of the foreclosure of the subject property been transferred multiple times.

- There are strong challenges to be made to the standings of many of the Arkley related parties. Mr. Arkley himself was sued by Bank of America for \$50,000,000 for his involvement in mortgage fraud. He is no stranger to bank fraud. His Bank in Louisiana was shuttered due to violations of banking laws.
- The issue of the 1989 judgment was also ripe for challenge. There was no note, and the mortgage itself was a forgery. This could be proved.
- Interestingly, Dr. Petrou came to the defense of the very lawyers that had committed fraud upon several New Hampshire courts, to include the NH US District Court. Upon what facts that Attorney Wolpin provided, prompted Dr. Petrou to make his conclusions? Perhaps it was Attorney Wolpin who could not assist, and perform his legal responsibilities to, defendant Allan?
- Attorney Wolpin selectively chose information to give to Dr. Petrou. **A reasonable person may even determine that Attorney Wolpin was acting more like a defense attorney for the State Bar, and not as his hired role as a Public Defender for defendant Allan.**

STATUTES OF LIMITATIONS

Title X appears to be silent with respect to the fact set found in the above matter as it relates to a new Forensic Evaluation for defendant Allan. New Hampshire law provides for the Statutes of Limitations to toll (stop) while the defendant is ‘not competent’. They also provide for a tolling while the defendant is out of its jurisdiction. Legally speaking, defendant Allan was illegally evicted from her legal domicile in New Hampshire on May 15, 2009. She was found to be not guilty due to ‘not competency’ on October 13, 2009. On May 5, 2010 she was Ordered ‘not competent’, and the final affirming Order was made on January 11, 2011. The Statutes of limitations should have stopped tolling, on October 13, 2009.

Is it finally NOW time for a re-evaluation of defendant Allan’s competency? And, if she is found at this time to be competent, then it would follow that she would have a trial and the Prosecutor would then have to prove beyond a reasonable doubt that the subject property foreclosure sale was legal, and therefore Mr. Minkow’s Affidavit of ownership was legal? Or, NOT? And, then pursuant to due process, defendant Allan

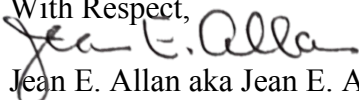
could present her “affirmative defense” evidence showing multiple frauds upon the Courts, and prove that her Trust is the true owner of the subject property located at 309 Waukegan Road, Center Harbor, NH.

Please contact me at your earliest convenience as to how you wish to proceed with a new competency evaluation: Please consider that at present I am living in Panama. Although, Dr. Petrou determined that my stolen identity issues were ‘delusional’, I can assure you they are very real. At this time I am traveling on my Panamanian passport. I have not been able to resolve my stolen identity situation with the US DOJ, the US Social Security Administration, or the US Dept of State. I have found myself in a Catch 22. US Social Security requires that I present a valid US Passport before it can begin the process of solving my social security issues. This has prevented me from receiving my social security benefits. The US Dept. of State requires a valid social security number prior to issuing me a US Passport. I am a dual citizen of both countries due to US and Panama Treaties. My Panamanian name is Jean Elizabeth Allan Sovik. If I were to travel to New Hampshire to be reevaluated, I would need documentation from the State of New Hampshire in order to legally do so.

As I pointed out above: “Cruel and unusual punishment is a phrase describing punishment which is considered unacceptable due to the suffering, pain, or humiliation it inflicts on the person subjected to it.”

It is strongly suggested that a reasonable person after reading the content of this letter would have to concur that the information that has been provided herein is very compelling. It shows that, defendant Allan has suffered more than her share of pain and humiliation at the hands of the State of New Hampshire. It is time for a new direction, and it is over ripe time for a new Forensic Evaluation of defendant Allan.

With Respect,



Jean E. Allan aka Jean E. Allan Sovik fka Jean Vorisek Quinn