

**IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT**

IN RE: THE THIRTY-FIFTH STATEWIDE : No. 197 MM 2014
INVESTIGATING GRAND JURY :
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 :
 PETITION OF: ATTORNEY GENERAL, :
 KATHLEEN G. KANE :
 :

ORDER

PER CURIAM

AND NOW, this 26th day of August, 2015, upon the request of the supervising judge for removal of the seal from all matters involving the 35th Statewide Investigating Grand Jury and the investigation of Attorney General Kathleen Kane which have been lodged in this Court, save for grand jury materials such as testimony, exhibits, and in camera proceedings, and based on the supervising judge's assurance that there are no present grand jury secrecy concerns relative to such unsealing, it is hereby **ORDERED** that the seal is lifted, in part, upon such terms.

IN THE SUPREME COURT OF PENNSYLVANIA **Filed in Supreme Court**
HARRISBURG DISTRICT

FEB 11 2015

IN RE:	:	Middle
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THE THIRTY-FIVE STATEWIDE	:	
INVESTIGATING GRAND JURY	:	
	:	Docket No. 197 MM 2014
SUPREME COURT OF PENNSYLVANIA NO. 176 M.D.	:	
MISC. DKT. 2012	:	
	:	
MONTGOMERY COUNTY COMMON PLEAS	:	
M.D. 2644-2012	:	

MOTION FOR ADMISSION PRO HAC VICE

Amil M. Minora, Esq., counsel for Attorney General Kathleen Kane in the above case, files this motion for the admission of Ross M. Kramer, Esq., averring as follows:

1. This is representation of Attorney General Kathleen Kane before the above-captioned Court and all related matters.
2. I am a member in good standing of the bar of the Commonwealth of Pennsylvania and have been retained to serve as attorney of record and local counsel for Plaintiff in the case at bar.
3. Attached hereto as Exhibit "A" is my affidavit as required of the sponsoring attorney by Pa.R.Civ.P. 1012.1(d)(2).
4. Attached hereto as Exhibit "B" is the affidavit of Ross M. Kramer, Esq. as required by Pa.R.Civ.P. 1020.1(c).
5. Attached is Exhibit "C", Certificate of Good Standing of Ross M. Kramer, Esq.
6. Attached is Exhibit "D", receipt from Pennsylvania Interest on Lawyers Trust Accounts Board.
7. As is more fully set forth in my Affidavit, I am acquainted with Ross M. Kramer, Esq. and can attest to his fitness for admission *pro hac vice*.
8. Good cause exists for admitting Ross M. Kramer, Esq. on a *pro hac vice* basis because Attorney General Kathleen Kane has requested that Ross M. Kramer, Esq. represent her in this case.

Received in Supreme Court

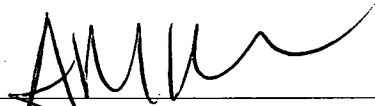
FEB 11 2015

Middle

WHEREFORE, Amil M. Minora, Esquire, respectfully requests that this court enter an order admitting Ross M. Kramer, Esquire pro hac vice on behalf of Atty. General Kathleen Kane.

Respectfully submitted,

MINORA, MINORA, COLBASSANI,
KROWIAK, MATTIOLI & MUNLEY



Amil M. Minora, Esquire
700 Vine Street
Scranton, PA 18510
Attorney I.D.: 22703

**IN THE SUPREME COURT OF PENNSYLVANIA
HARRISBURG DISTRICT**

IN RE:

**THE THIRTY-FIVE STATEWIDE
INVESTIGATING GRAND JURY**

**SUPREME COURT OF PENNSYLVANIA NO. 176 M.D.
MISC. DKT. 2012**

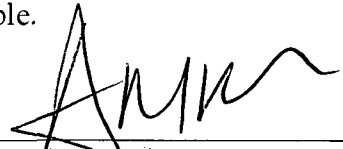
**MONTGOMERY COUNTY COMMON PLEAS
M.D. 2644-2012**

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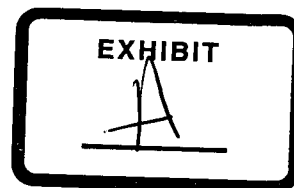
AFFIDAVIT OF AMIL M. MINORA, ESQUIRE

Pursuant to Pennsylvania Rule of Civil Procedure 1012.1(d)(2), I declare that the following facts are true, to the best of my knowledge, information and belief:

1. After reasonable investigation, I believe Ross M. Kramer, Esq. is a reputable and competent attorney and I am in a position to recommend Ross M. Kramer, Esq.'s admission
2. I aver that the information required by Section 81.504 of the IOLTA regulations has been provided to the IOLTA Board.
3. The fee required by Section 81.505(a) of the IOLTA regulations has been paid and a copy of the fee payment certification from the IOLTA Board is attached.
4. I sponsored Gerald L. Shargel's admission *pro hac vice* in a related matter before the Montgomery County, Pennsylvania Court of Common Pleas, captioned M.D. 2644-2012 and in a related matter before the Supreme Court of Pennsylvania Harrisburg District captioned 175 MM 2014.
5. I aver that any proceeds that are received from this representation of Attorney General Kathleen Kane in which Ross M. Kramer, Esq. is granted admission *pro hac vice* shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.



Amil M. Minora, Esquire



COMMONWEALTH OF PENNSYLVANIA :

COUNTY OF LACKAWANNA :

: SS

On this 10th day of February, 2015, before me, a Notary Public, the undersigned officer, personally appeared, Amil M. Minora, Esquire, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledge the same to her act and deed for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and notarial seal.

Nancy M. Haggerty
COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Nancy M. Haggerty, Notary Public
City of Scranton, Lackawanna County
My Commission Expires May 13, 2015
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

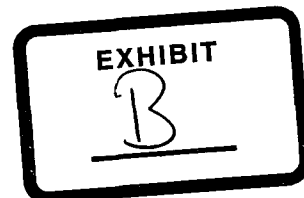
**IN THE SUPREME COURT OF PENNSYLVANIA
HARRISBURG DISTRICT**

IN RE: :
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THE THIRTY-FIVE STATEWIDE :
INVESTIGATING GRAND JURY :
 : **Docket No. 197 MM 2014**
SUPREME COURT OF PENNSYLVANIA NO. 176 M.D. :
MISC. DKT. 2012 :
 :
MONTGOMERY COUNTY COMMON PLEAS :
M.D. 2644-2012 :

AFFIRMATION


Ross M. Kramer, being duly sworn, states under the penalty of perjury that the following is true and correct:

- I. I am an attorney duly licensed to practice in New York State. I was first admitted to the New York State bar on December 12, 2005. My New York State Bar Identification Number is 4368171. I submit this affirmation in support of my application for admission *pro hac vice* in the above captioned matter.
- II. I am also authorized to practice in the following jurisdictions:
 - a. Eastern District of New York (circa 2005)
 - b. Southern District of New York (circa 2005)
- III. I have never been suspended, disbarred, or otherwise disciplined in any jurisdiction.
- IV. I have never been subject to any disciplinary proceedings in any jurisdiction.
- V. I have not applied for admission *pro hac vice* in any other pending actions in Pennsylvania. I have never had an application for admission *pro hac vice* denied.
- VI. I will comply with and be bound by all applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct and will submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance in this matter.



VII. I consent to the appointment of Amil Minora, Esq., 700 Vine Street, Scranton, PA 18510, as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in this matter.

Dated: February 6, 2015
New York, NY



Ross M. Kramer

Appellate Division of the Supreme Court
of the State of New York
First Judicial Department

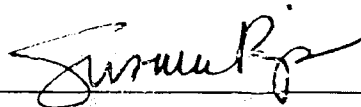
I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

ROSS MITCHELL KRAMER

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on December 12, 2005, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

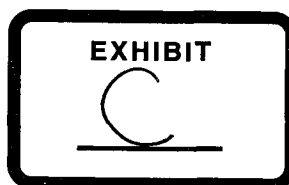
In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on

February 6, 2015



Clerk of the Court

4654





SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

February 09, 2015

ROSS MITCHELL KRAMER, Esq.
WINSTON & STRAWN LLP
200 PARK AVENUE
NEW YORK, NY 10166

SENT TO RACHEL BENJAMIN VIA Email: RBENJAMIN@WINSTON.COM

Dear Attorney KRAMER:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$200.00 fee paid by Check on this date related to your pursuit for admission *pro hac vice* in the case identified as In re: The Thirty-Fifth Statewide Investigating Grand Jury, no. 197 MM 2014, filed in the Supreme Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

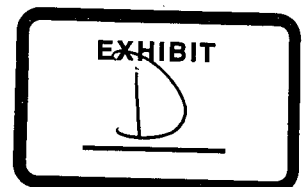
Sincerely,

Stephanie S. Libhart
Executive Director

cc: AMIL MICHAEL MINORA, Esq.
amil.minora@gmail.com

Pennsylvania Judicial Center
601 Commonwealth Ave., Ste. 2400
PO Box 62445, Harrisburg, PA 17106-2445
717/238-2001 · 888/PA-IOLTA (724-6582) · 717/238-2003 FAX
paiolta@pacourts.us · www.paiolta.org

Administering Pennsylvania's Interest On Lawyers Trust Account (IOLTA) Program



**IN THE SUPREME COURT OF PENNSYLVANIA
HARRISBURG DISTRICT**

IN RE: :
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THE THIRTY-FIVE STATEWIDE :
INVESTIGATING GRAND JURY :
 : **Docket No. 197 MM 2014**
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MISC. DKT. 2012 :
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MONTGOMERY COUNTY COMMON PLEAS :
M.D. 2644-2012 :

PROOF OF SERVICE

I hereby certify that I am this day causing the service of the foregoing Motion for Admission *Pro Hac Vice* upon the persons and in the manner indicated below, which satisfies the requirements of Pa. R.A.P. 121:

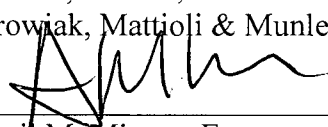
Service by Federal Express addressed as follows:

Thomas E. Carluccio
Special Prosecutor
(484) 674-2899
Law Office of Thomas E. Carluccio
1000 Germantown Pike, Suite D-3
Plymouth Meeting, PA 19462

Hon. William H. Carpenter
Court of Common Pleas
Montgomery County Court House
2 East Airy Street
P.O. Box 311
Norristown, PA 19404

Date: February 10th, 2015

Minora, Minora, Colbassani,
Krowiak, Mattioli & Munley



Ami M. Minora, Esq.
Attorney for Attorney General Kathleen G. Kane
Attorney ID 22703

IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT

UNSEALED PER ORDER OF
THE COURT DATED
AUGUST 26, 2015

IN RE: : SUPREME COURT OF PENNSYLVANIA
THE THIRTY-FIFTH STATEWIDE : NO. 197 MM 2014
INVESTIGATING GRAND JURY :
: :
: :
: :

SEALING ORDER

AND NOW, this 4th day of March, 2015, it is hereby ORDERED, that the attached Opinion be filed under seal with the Supreme Court of Pennsylvania until further Order of this Court.

BY THE COURT:



WILLIAM R. CARPENTER, J.
Supervising Judge

FILED UNDER SEAL

**IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT**

IN RE: THE THIRTY-FIFTH STATEWIDE : NO. 197 MM 2014
INVESTIGATING GRAND JURY :
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PETITION OF: ATTORNEY GENERAL, :
KATHLEEN G. KANE :
:

OPINION

CARPENTER J.

March 4, 2015

I agree with the Special Prosecutor's request that certain materials be unsealed or at a minimum disclosed to the Pennsylvania Supreme Court prior to argument on March 11, 2015.

Disclosure is necessary in order to rebut certain arguments which are not founded on the true facts. Disclosure is necessary out of the fundamental necessity for a fair argument.

BY THE COURT:



WILLIAM R. CARPENTER
SUPERVISING JUDGE OF THE
THIRTY-FIFTH STATEWIDE
INVESTIGATING GRAND JURY

J.

**IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT**

IN RE: : **SUPREME COURT OF PENNSYLVANIA**
: **NO. 197 MM 2014**
THE THIRTY-FIFTH STATEWIDE :
:
INVESTIGATING GRAND JURY :
:

CERTIFICATE OF SERVICE

I, William R. Carpenter, Supervising Judge of the 35th Statewide Investigating Grand Jury, certify that a true and correct copy of the attached Opinion of March 4, 2015 was forwarded to the persons set forth below via Electronic Mail and First Class Mail on March 4, 2015.



WILLIAM R. CARPENTER, J.
Supervising Judge
Montgomery County Court of Common Pleas
P.O. Box 311
Norristown, PA 19404

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