

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FLAVA WORKS, INC.,

Plaintiff,

v.

No. 11 C 6306

Judge Milton Shadur

LEE MOMIENT,

Defendant.

Special Matter Rule 9(b)

Now Comes Lee Momient, Pro Se, pursuant to Rule 9(b) in his pleading of special matters of fraud and in support of which he states as follows:

1. Flava Works, by its attorney Meanith Huon (“Huon”) has filed a forgery with this court in order that the court rely on the forgery to limit Momient’s standing in the copyright case and counter.
2. Momient brought to the courts attention that the signature had been forged with a detailed exhibit.
3. This court found that there was a, “most egregious fraud committed”
4. This court has asked that Momient bring any information that Momient has with respect to Huon’s involvement with the Fraud.
5. Momient understands the courts instruction to mean information relative to Huon’s complicity in the fraud both before and after-the-fact.

6. On April 17, 2013 During a meeting with Momient, Phillip Bleicher and Huon; Momient asked Bleicher where and how he obtained the document.
7. Bleicher told both his attorney and Momient that, "You [Momient] signed the document in our [Flava Works'] office".
8. Huon interjected and said to Bleicher, "You mean he brought a singed copy to you. Don't you?"
9. Blicher then updated his answer with, "Yeah, we'll just say that you gave it to us like that, and get an expert to prove it."
10. It is important to note that Bleicher and other members of Flava Works have gone out of their way to authenticate the very document containing the fraudulent signature, even testifying, while under oath, to witnessing the signing of the document by Momient.
11. Momient has become aware of Flava's intention via News Media reports of Flava Works' strategy with respect to the forgery.
12. Upon information and belief, Flava, via its members and its CEO Phillip Bleicher, will now commit perjury, again, in an attempt make and end-run around the fraud Flava Works has committed on the Court.
13. Upon information and belief, Huon has shown that he will suborn perjury of Flava Employee's and Phillip Blicher with regard to the forgery.
14. Upon information and belief, this matter reveals that Phillip Bleicher and Meanith Huon intend to act with malice and willful intent to further frustrate the functions of the Court with regard to the fraudulent Forged documentation submitted to the Court.
15. This motion is to serve as notice to the court in compliance with the court's in-court statements regarding Huon and the Forgery and the order of 4-16-2013.

Wherefore Momient request that this court take notice of the matters herein with respect to any pleading concerning the forgery of Flava Works', Filed by Huon or another attorney, alleging that Momient was the originator of the document, and order that;

- a) Flava Works' is required to present to the court;
 - i. any documentation of testimony given under oath, by any Flava Works employee, or other witness, including Phillip Bleicher; and
 - ii. which was recorded by any court reporter, or submitted in response to any written discovery, in any proceeding; and
 - iii. that directly relates to the authenticity of the Forged Document; and

- b) For any other relief this court deems fair just and equitable.

Respectfully Submitted,

/s/ Lee Momient

04-23-2013