

Respondent's Motion for Court to Reconsider its Order of 7-17-20 in the Matter re: Feathers 3-15755

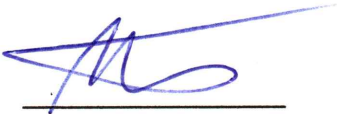
On 7-16-20 Respondent submitted a motion to the Court to terminate proceedings. That motion was based upon the Commission's failure to follow prior court instructions in regards to summary disposition motion filings. On the following day, 7-17-20, the Court ordered against Respondent (Release no. 6777), as to his request to terminate proceedings, but did agree with Respondent that the Commission had made failures in its motion filing, and re-scheduled new submission filing dates on that basis. In its 7-17-20 Order, of substantial import, the Court also noted – apparently based upon its own review of the Commission's summary disposition motion filing and not upon Respondent's 7-16-20 motion filing, that the Commission **had failed to attach a mandatory Statement of Facts to its motion for summary disposition**. Those in the legal community, and even a *pro se* Respondent, are quite aware of what a failure in the practice of administrative, civil, or criminal law it is to not attach a statement of facts in a determinative motion filing. And, the Commission failed to even note their own failure with a simple review of their motion before it was filed, and in that way failed to take notice that there was not even a single reference to the Statement of Facts within the narrative portion of their motion for summary disposition.

Respondent has made it quite clear to this court that he holds in very low regard the Commission's "senior trial counsel", John Bulgozdy, Esq., based upon Respondent's eight+ years of adversarial proceedings between *pro se* Respondent and Bulgozdy while he has represented the Commission in civil proceedings, and now two administrative law proceedings by the Commission against Respondent. In the related civil proceeding, Bulgozdy and Respondent have, in fact, filed motions for sanctions against each other. Why the Commission continues to allow Bulgozdy to represent it can only be a matter of their desiring to overtly antagonize Respondent, in particular, because Bulgozdy has also filed a witness statement in the past which was a factor in the termination of Respondent's bail bond, and after which he was placed into maximum security pre-trial custody for a lengthy period of 14 months, co-habiting with gang bangers, Hells Angels, sex and weapons traffickers, international computer hacking ringleaders, etc. Respondent has even made it clear that he holds belief that Bulgozdy's past actions rise to unconstitutional levels. However, Respondent does not believe that Bulgozdy is so totally incompetent, absent minded, or distracted with his other Commission matters so as to forget to file a Statement of Facts with his summary disposition filing.

There is only one plausible reason that the Commission's senior trial counsel has committed such inexcusable error in the practice of motion filing. That is because the Commission holds anticipation that the outcome of these proceedings is already a foregone conclusion. And, that outcome is an adverse ruling against Respondent. Unfortunately, and a point that Respondent asks this Court to reflect upon, is that the actions of the Court itself have given rise for the Commission to fully anticipate an adverse outcome to Respondent. Those actions now include the act of the Court taking blame for the Commission's own failure, demonstrated by the Court stating in its Order against Respondent "Because I failed to take note of Judge Patil's order...". There is already a long history, of which this Court and Constitutional courts are well aware of, of entities such as the American Bar Association questioning the ability of SEC to administer law in its own tribunal system in a fair and impartial manner. Such arguments are beyond the scope of Respondent's abilities or desire to argue at this point in time. Maybe some party will file an amicus brief about such matters when Respondent has moved onto to circuit court.

This Court, which is a home court for the Commission, has shown for several months now, since the Commission instructed it to change presiding judges, that it is not capable of performing as an independent trier of fact, nor employing logic, or reason. On that basis, Respondent asks this Court to reconsider Respondent's 7-16-20, and terminate these proceedings in their entirety.

Respectfully,



Mark Feathers, *pro se*, Respondent

Dated 7-19-20