

JOANNA Canzoneri McCormick Pro Se
2609 East 14th Street
Brooklyn New York 11235

July 19, 2015 Cell 718 690 8124
Email Blonblue1@hotmail.com

Clerk Ruby J. Krajick
United States Federal Court
500 Pearl Street
New York 100 10007

RE: COURT FILING ON Uniform Education

DEAR GENTLEMEN:

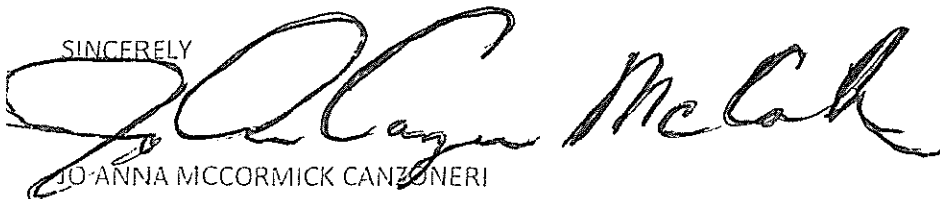
PLEASE FIND ATTACHED AND ENCLOSED FOR DOCUMENTS FOR THE FILLING OF A LAWSUIT THE FOLLOWING DOCUMENTS:

- X CIVIL CASE COVER SHEET
- X SUMMONS
- X COMPLAINT (ATTACHMENTS - BREACH OF CONTRACT,
INTENTIONAL TORT, GENERAL NEGLIGENCE AND FRAUD
- X REQUEST FOR PRODUCTION OF DOCUMENTS
- X TEMPORARY RETAINING ORDER AND MOTION TO STAY
- X AFFIDAVIT IN SUPPORT OF APPLICATION FOR WAIVER OF
FILLING AND SERVICE FEES AND COSTS AND TO PROCEED
AS A POOR PERSON
- PROOF OF SERVICE
- NOTICE OF MOTION FOR EXTENSION OF TIME
- X Request for court to serve Defendants

SHOULD YOU HAVE ANY QUESTIONS, PLEASE CONTACT ME IN WRITING

THANK YOU

SINCERELY



JOANNA MCCORMICK CANZONERI

FOR COURT USE ONLY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Jo Anna Canzoneri McCormick
2609 East 14th Street
Brooklyn New York 11235
TELEPHONE NO.: 718 690 8124 FAX NO.: 718 690 8124

ATTORNEY FOR (Name): TNY DPO SE EMAIL: Blarblue1@hotmail.com

STREET ADDRESS: United States Federal Court
MAILING ADDRESS: 500 Pearl Street
CITY AND ZIP CODE: New York New York 10007
BRANCH NAME:

CASE NAME: JO ANNA CANZONERI McCormick

CIVIL CASE COVER SHEET

Unlimited (Amount demanded exceeds \$25,000) Limited (Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter Joinder
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:

JUDGE:

DEPT.

Items 1-5 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort

Auto (22)
 Uninsured motorist (46)

Contract

Breach of contract/warranty (06)
 Collections (09)
 Insurance coverage (18)
 Other contract (37)

Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)

Antitrust/Trade regulation (03)
 Construction defect (10)
 Mass tort (40)
 Securities litigation (28)
 Environmental/Toxic tort (30)
 Insurance coverage claims arising from the above listed provisionally complex case types (41)

Other PII/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (24)
 Product liability (24)
 Medical malpractice (4)
 Other PII/PD/WD (24)

Real Property

Eminent domain/Inverse condemnation (14)
 Wrongful eviction (33)
 Other real property (26)

Enforcement of Judgment

Enforcement of judgment (20)

Miscellaneous Civil Complaint

RICO (27)
 Other complaint (not specified above) (42)

Non-PII/PD/WD (Other) Tort

Business tort/unfair business practice (07)
 Civil rights (08)
 Defamation (13)
 Fraud (16)
 Intellectual property (19)
 Professional negligence (25)
 Other non-PII/PD/WD tort (35)

Unlawful Detainer

Commercial (31)
 Residential (32)
 Drugs (38)

Miscellaneous Civil Petition

Partnership and corporate governance (21)
 Other petition (not specified above) (43)

Employment

Wrongful termination (36)
 Other employment (15)

Judicial Review

Asset forfeiture (05)
 Petition re: arbitration award (11)
 Writ of mandate (02)
 Other judicial review (39)

Discrimination
 Discrimination on Wages

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a. Large number of separately represented parties
 - b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
 - c. Substantial amount of documentary evidence
 - d. Large number of witnesses
 - e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 - f. Substantial postjudgment judicial supervision

3. Type of remedies sought (check all that apply):

a. monetary b. nonmonetary, declaratory or injunctive relief c. punitive

4. Number of causes of action (specify):

5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related cases. (You may use form CM-015.)

Date: 07/19/2015

JO ANNA CANZONERI McCormick

Jo Anna Canzoneri McCormick

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a complex case, this cover sheet will be used for statistical purposes only.

— THIS FORM MUST BE KEPT CONFIDENTIAL —

FW-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Jo Anna Canzoneri McCormick 2609 East 14th Street Brooklyn New York 11235		FOR COURT USE ONLY
TELEPHONE NO.: 718 690 824 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Prose Email Blonblue1@hotmail.com	NAME OF COURT: clerk STREET ADDRESS: United States Federal Court MAILING ADDRESS: 500 Pearl Street CITY AND ZIP CODE: New York New York 10007 BRANCH NAME:	
PLAINTIFF/ PETITIONER: Jo Anna Canzoneri McCormick DEFENDANT/ RESPONDENT: USA		CASE NUMBER:
APPLICATION FOR WAIVER OF COURT FEES AND COSTS		

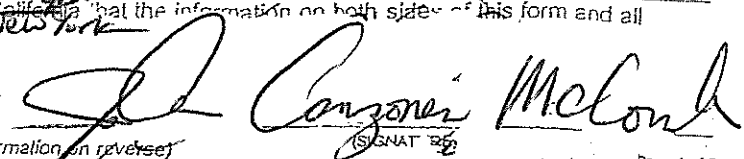
- I request a court order so that I do not have to pay court fees and costs.
- a. I am not able to pay any of the court fees and costs.
 b. I am able to pay only the following court fees and costs (specify):
 - My current street or mailing address is (if applicable, include city or town, apartment no., if any, and zip code):
 - a. My occupation, employer, and employer's address are (specify):
 b. My spouse's occupation, employer, and employer's address are (specify):
 - I am receiving financial assistance under one or more of the following programs:
 - SSI and SSP: Supplemental Security Income and State Supplemental Payments Programs
 - CalWORKs: California Work Opportunity and Responsibility to Kids Act, implementing TANF, Temporary Assistance for Needy Families (formerly AFDC)
 - Food Stamps: The Food Stamp Program
 - County Relief, General Relief (G.R.), or General Assistance (G.A.)
 - If you checked box 4, you must check and complete one of the three boxes below, unless you are a defendant in an unlawful detainer action. Do not check more than one box.
 - (Optional) My Medi-Cal number is (specify):
 - (Optional) My social security number is (specify):
560 - 818 - 6058 and my date of birth is (specify):
[Federal law does not require that you give your social security number. However, if you don't give your social security number, you must check box c and attach documents to verify the benefits checked in item 4.]
 - I am attaching documents to verify receipt of the benefits checked in item 4, if requested by the court.
[See Form FW-001-INFO, Information Sheet on Waiver of Court Fees and Costs, available from the clerk's office, for a list of acceptable documents.]

- [If you checked box 4 above, skip items 6 and 7, and sign at the bottom of this side.]
- My total gross monthly household income is less than the amount shown on the Information Sheet on Waiver of Court Fees and Costs available from the clerk's office.
 [If you checked box 6 above, skip item 7, complete items 8, 9a, 9d, 9f, and 9g on the back of this form, and sign at the bottom of this side.]
 - My income is not enough to pay for the common necessities of life for me and the people in my family whom I support and also pay court fees and costs. [If you check this box, you must complete the back of this form.]

WARNING: You must immediately tell the court if you become able to pay court fees or costs during this action. You may be ordered to appear in court and answer questions about your ability to pay court fees or costs.

I declare under penalty of perjury under the laws of the State of California that the information on both sides of this form and all attachments are true and correct.

Date: **07/19/2015**

Jo Anna Canzoneri McCormick (TYPE OR PRINT NAME)  (SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address) JoAnna Canzoneri McCormick 2609 East 14th Street Brooklyn New York 11235 TELEPHONE NO.: 718 690 8124 FAX NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Pro Se Email: Blonblue1@hotmail.com		FOR COURT USE ONLY
SUPERIOR COURT OF Clerk STREET ADDRESS: United States Federal Court MAILING ADDRESS: 500 Pearl Street CITY AND ZIP CODE: New York New York 10007 BRANCH NAME:		
PLAINTIFF/ PETITIONER: JoAnna Canzoneri McCormick DEFENDANT/ RESPONDENT: USA		CASE NUMBER:
ORDER ON APPLICATION FOR WAIVER OF COURT FEES AND COSTS		

1. The application was filed on (date): A previous order was issued on (date):

2. The application was filed by (name): **JoAnna Canzoneri McCormick**

3. IT IS ORDERED that the application is granted in whole in part (complete item 4 below).

a. No payments. Payment of all the fees and costs listed in California Rules of Court, rule 3.61, is waived.

b. The applicant shall pay all the fees and costs listed in California Rules of Court, rule 3.61, EXCEPT the following:

(1) <input type="checkbox"/> Filing papers.	(6) <input type="checkbox"/> Sheriff and marshal fees.
(2) <input type="checkbox"/> Certification and copying.	(7) <input type="checkbox"/> Reporter's fees* (valid for 60 days).
(3) <input type="checkbox"/> Issuing process and certification.	(8) <input type="checkbox"/> Telephone appearance (Gov. Code, § 68070 .1 (c))
(4) <input type="checkbox"/> Transmittal of papers.	(9) <input type="checkbox"/> Other (specify code section):
(5) <input type="checkbox"/> Court-appointed interpreter.	

Reporter's fees are per diem pursuant to Code Civ. Proc., §§ 269, 274c, and Gov. Code, §§ 69947, 69948, and 72195.

c. Method of payment. The applicant shall pay all the fees and costs when charged, EXCEPT as follows:

(1) Pay (specify): _____ percent. (2) Pay: \$ _____ per month or more until the balance is paid.

d. The clerk of the court, county financial officer, or appropriate county officer is authorized to require the applicant to appear before and be examined by the court no sooner than four months from the date of this order, and not more than once in any four-month period. The applicant is ordered to appear in this court as follows for review of his or her financial status:

Date:	Time:	Dept.:	Div.:	Room:
-------	-------	--------	-------	-------

e. The clerk is directed to mail a copy of this order only to the applicant's attorney or to the applicant if not represented.

f. All unpaid fees and costs shall be deemed to be taxable costs if the applicant is entitled to costs and shall be a lien on any judgment recovered by the applicant and shall be paid directly to the clerk by the judgment debtor or upon such recovery.

4. IT IS ORDERED that the application is denied in whole in part for the following reasons (see Cal. Rules of Court, rules 3.50-3.63):

a. Monthly household income exceeds guidelines (Gov. Code, § 68511.3(a)(6)(B); form FW-001-INFO).

b. Other (Complete line 4b on page 2).

c. The applicant shall pay any fees and costs due in this action within 10 days from the date of service of this order or any paper filed by the applicant with the clerk will be of no effect.

d. The clerk is directed to mail a copy of this order to all parties who have appeared in this action.

5. IT IS ORDERED that a hearing be held.

a. The substantial evidentiary conflict to be resolved by the hearing is (specify):

b. The applicant should appear in this court at the following hearing to help resolve the conflict:

Date:	Time:	Dept.:	Div.:	Room:
-------	-------	--------	-------	-------

c. The address of the court is (specify):

Same as above

d. The clerk is directed to mail a copy of this order only to the applicant's attorney or to the applicant if not represented.

NOTICE: If item 3d or item 5b is filled in and the applicant does not attend the hearing, the court may revoke or change the order or deny the application without considering information the applicant wants the court to consider.

WARNING: The applicant must immediately tell the court if he or she becomes able to pay court fees or costs during this action. The applicant may be ordered to appear in court and answer questions about his or her ability to pay fees or costs.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JoAnna Canzoner McCormick

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

___ Civ. ___ () ()

-against-

**REQUEST TO PROCEED
IN FORMA PAUPERIS**

USA

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

I, JoAnna Canzoner McCormick, (print or type your name) am the plaintiff/petitioner in the above entitled case and I hereby request to proceed *in forma pauperis* and without being required to prepay fees or costs or give security. I state that because of my poverty I am unable to pay the costs of said proceeding or to give security therefor, and that I believe I am entitled to redress.

1. If you are presently employed:
 - a) give the name and address of your employer
 - b) state the amount of your earnings per month

No

2. If you are NOT PRESENTLY EMPLOYED:
 - a) state the date of start and termination of your last employment
 - b) state your earnings per month

YOU MUST ANSWER THIS QUESTION EVEN IF YOU ARE INCARCERATED.

No

3. Have you received, within the past twelve months, any money from any source? If so, name the source and the amount of money you received.

Yes

a) Are you receiving any public benefits? No. Yes, \$ _____.

b) Do you receive any income from any other source? No. Yes, \$ _____.

4. Do you have any money, including any money in a checking or savings account? If so, how much?

No. Yes, \$ _____.

5. Do you own any apartment, house, or building, stock, bonds, notes, automobiles or other property? If the answer is yes, describe the property and state its approximate value.

No. Yes, \$ _____.

6. Do you pay for rent or for a mortgage? If so, how much each month?

No. Yes, _____.

7. List the person(s) that you pay money to support and the amount you pay each month.

None

8. State any special financial circumstances which the Court should consider.

None

I understand that the Court shall dismiss this case if I give a false answer to any questions in this declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 19th day of July 2015
date month year

[Signature]
Signature

United States Federal Court
500 Pearl Street
New York New York 10007

J. Anna Conzoneri McCormick Plaintiff
(Petitioner)

v.

USA Defendant
(Respondent)

AFFIDAVIT IN SUPPORT OF
APPLICATION FOR WAIVER
OF FILING AND SERVICE
FEES AND COSTS AND
TO PROCEED AS A POOR
PERSON

The undersigned, being duly sworn, says:

1. I am the plaintiff or petitioner in this case. This statement is made in support of my request (a) for waiver of the index number fee and/or any other filing and service fees and costs, and (b) to proceed in this case as a poor person.

2. I support myself and NO others in my household.

3. My only source of income is (check one):

Public assistance

Social security/SSI

Other _____

4. The amount of income I receive each month is \$ Estimate 800.00

5. Check one of the items below:

I do not have a bank account.

I have a bank account with approximately \$
in the account.

6. I own the following property which has an estimated value as indicated: [IF NONE, WRITE "NONE"] None

LIST PROPERTY

VALUE

<u>LIST PROPERTY</u>	<u>VALUE</u>
_____	_____
_____	_____
_____	_____

7. I have no other savings, property or assets. None

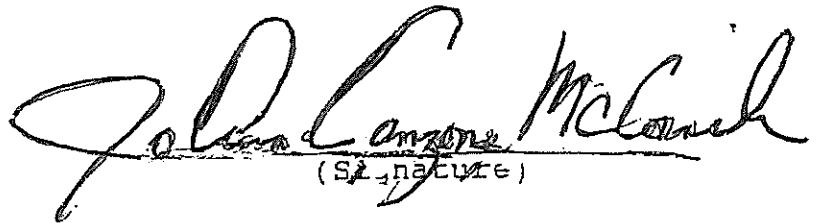
8. I am unable to pay the costs, fees and expenses necessary to assert my rights in this case. None

9. No one else who is able to pay any required costs and fees has a beneficial interest in the results of this case. None

10. The facts of my case are described in my court papers,
which are attached.

11. I have made no prior request for this relief in this case.

WHEREFORE, I request (a) that all fees relating to the
filing and service of this action or proceeding be waived, and
(b) that I be permitted to proceed in this case in all respects
as a poor person.


(Signature)

Jo Anna Canzoneri McCormick
2609 East 14th Street
Brooklyn New York 11235
Cell 718 690 8124
Email Blonblue2@hotmail.com

Summons

Jo Anna Canzoneri, PRO SE

Plaintiffs Attorney IN PRO PER

UNITED STATES FEDERAL COURT
500 Pearl Street
New York New York 10007

PLAINTIFF:

Jo Anna Canzoneri, an individual, et al;
Jo Anna Canzoneri aka Jo Anna
Canzoneri McCormick, an individual, et al;
Jo Anna Canzoneri McCormick, an individual, et al;
John Does 1-1000
Jane Does 1-1000

VS

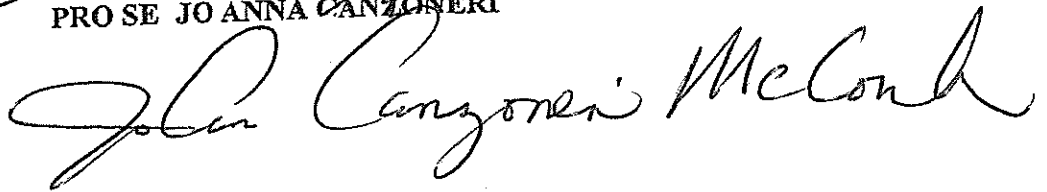
DEFENDANT:

USA, a business entity, et al;

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to

serve a copy of your answer, (if the complaint is not served with this summons, to serve a notice of appearance), on the plaintiff's attorney within 30 of days after the service of this summons, exclusive of the day of service, or within 30 days after the service is complete if this summons is not personally served on you within the STATE OF New York. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint

DATED: 07/19/2015 PRO SE JO ANNA CANZONERI

A handwritten signature in cursive script that reads "John Canzoneri McCoub". The signature is written in black ink and is positioned below the typed name "JO ANNA CANZONERI".

JoAnna Canzoneri McCormick
2609 East 14th Street
Brooklyn New York 11235
Cell 718 690 8124
Email Blonblue1@hotmail.com

Jo Anna Canzoneri, PRO SE

Plaintiffs Attorney IN PRO PER

UNITED STATES FEDERAL COURT
500 Pearl Street
New York New York 10007

Complaint

PLAINTIFF:

Jo Anna Canzoneri, an individual, et al;
Jo Anna Canzoneri aka Jo Anna
Canzoneri McCormick, an individual, et al;
Jo Anna Canzoneri McCormick, an individual, et al;
John Does 1-1000
Jane Does 1-1000

Breach of Contract
General Negligence
Intentional Tort
Fraud

VS

DEFENDANT:

USA, a business entity, et al;

JURISDICTION (CHECK ALL THAT APPLY)

CASE NUMBER

XXX ACTION IS AN UNLIMITED CIVIL CASE (EXCEEDS \$25,000)

1. PLAINTIFF (name or names): JO ANNA CANZONERI McCormick

alleges causes of action against defendant (name or names) USA

2. This pleading, including attachments, and exhibits, consists of the following number of pages

a. Each plaintiff named above is a competent adult

Except plaintiff (name)

- (1) A corporation qualified to do business in
- (2) An unincorporated entity (describe)
- (3) Other (specify)

3. Plaintiff (name)

a. Has complied with the fictitious business name laws and is doing business under the fictitious name (specify)

b. Has complied with all licensing requirements as a licensed (specify)

c. Information about additional plaintiffs who are not competent adults is shown in Attachment 3c

4. Each defendant named above is a natural person

XX Except defendant (name) USA

- (1) A business organization, form unknown
- (2) A corporation
- (3) An unincorporated entity (describe)
- (4) A public entity (describe)
- (5) Other (specify)

XX Except defendant (name)

- (1) A business organization, form unknown
- (2) A corporation
- (3) An unincorporated entity (describe)
- (4) A public entity (describe)
- (5) Other (specify)

(see attached defendants "DOES" defendants "Does" 1-1000 "DOES" attached hereto and made a part hereof)

Except defendant (name)

- (1) A business organization, form unknown
- (2) A corporation
- (3) An unincorporated entity (describe)
- (4) A public entity (describe)
- (5) Other (specify)

Except defendant (name)

- (1) A business organization, form unknown
- (2) A corporation
- (3) An unincorporated entity (describe)
- (4) A public entity (describe)
- (5) Other (specify)

SHORT TITLE: JO ANNA CANZONERI McCormick CASE NUMBER

4. (CONTINUED)

b. The true names of defendants sued as Does are unknown to plaintiff,

(1) Doe Defendants (specify DOE numbers): were the agents or employees of the named defendants and acted within the scope of that agency or employment.

(2) Doe defendants (specify DOE numbers): are persons whose capacities are unknown to Plaintiff.

c. Information about additional defendants who are not natural persons is contained in Attachment

d. Defendants who are joined under Code of Civil Procedure section XXXX are (names)

5. Plaintiff is required to comply with a claims statute, and

a. has complied with applicable claims statutes, or

b. is excused from complying because (specify)

6. This action is subject to Civil Code section XXX Civil Code section XXX

7. This court is the proper court because

a a defendant entered into the contract here.

b a defendant lived here when the contract was entered into.

c. a defendant lives here now

d. the contract was to be performed here.

e. a defendant is a corporation or unincorporated association and its principal place of business is here.

f. real property that is the subject of this action is located here.

g other (specify)

8. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

XXX Breach of Contract

XX GENERAL NEGLIGENCE

XXX Other (specify) FRAUD

XX Discrimination

XXX INTENTIONAL TORT

XX Discrimination of Wages

9. Other allegations

10. Plaintiff prays for judgement for costs of suit; for such relief as is fair, just, and equitable; and for

a. Damages of \$ UNKNOWN AT THIS TIME

b. Interest on the damages UNKNOWN AT THIS TIME

According to proof UNKNOWN AT THIS TIME
At the rate of (specify) percent per year from (date):

c. Attorney fees
(1) Of \$ UNKNOWN AT THIS TIME

(2) According to proof UNKNOWN AT THIS TIME

d.. Other (specify) COMPENSATORY, CONSEQUENTIAL AND PUNITIVE DAMAGES

11. The paragraphs of this pleading alleged on information and belief are as follows (specify paragraph numbers):

DATE 07/19/2015

JO ANNA CANZONERI McCormick

Jo Anna Canzoneri
JO ANNA CANZONERI McCormick

COUNT ONE (1) BREACH OF CONTRACT

Plaintiff JoAnna Canzone McCormick alleges that on or about (date) MAY 01, 2004 and at various times thereafter written and oral agreements was made between the PLAINTIFF AND DEFENDANTS

A copy of the agreement will be provided when requested or suproed

The essential terms of the ORAL AND WRITTEN AGREEMENTS are stated on or about

On or about (dates) May 01, 2004 and at various times Thereafter the Defendants and each one of them breached the ORAL AND WRITTEN AGREEMENTS, Plaintiff has performed all obligations to defendants except those obligations plaintiff was prevented or excused from performing.

Plaintiff suffered damages legally (proximately) caused by defendant's BREACH OF THE ORAL AND WRITTEN AGREEMENTS

Plaintiff is entitled to attorney fees by an agreement or a STATE STATUTE, STATUTE OR STATUE OF FRAUD of \$ UNKNOWN AT THIS TIME AND ACCORDING TO PROOF.

COUNT TWO (2) GENERAL NEGLIGENCE

Plaintiff Alleges that defendants and each one of them was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendants and each one of them negligently caused the damage to plaintiff

On or ABOUT and at various times thereafter

COUNT THREE (3) INTENTIONAL TORT

Plaintiff Joanna Conzoneri McCormick Alleges that defendants and each one of them was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff

On (date): ON OR ABOUT _____ and at various times thereafter

COUNT FOUR (4) FRAUD

Plaintiff Joanna Conzoneri McCormick Alleges that defendants and each one of them

On or about _____ and at various times thereafter defrauded plaintiff as follows:

The Defendants and each one of them Intentional or Negligent Misrepresentation of the material fact. These representations were in fact false and not the truth

When defendants and each one of them made the representations them knew they were false

Defendants and each one of them made the representations with the intent to defraud and induce plaintiff to act at the time plaintiff acted, plaintiff did not know the representations were false and believed they were true. Plaintiff acted in justifiable reliance upon the truth of the representations.

The Defendants and each one of them concealed or suppressed material facts

CONTINUE COUNT FOUR (4) FRAUD

The Defendants and each one of them concealed or suppressed material facts when in fact the

Defendants and each one of them was bound to disclose. By telling plaintiff other facts to mislead plaintiff and prevent plaintiff from discovering the concealed or suppressed facts

Defendants and each one of them concealed or suppressed these facts with the intent to defraud and induce plaintiff to act

At the time plaintiff acted, plaintiff was unaware of the concealed or suppressed facts and would not have taken the action if plaintiff had known the facts.

A PROMISE WITHOUT INTENT TO PERFORM the Defendants and each one of them

Defendants made a promise about a material matter without any intention of performing it

Defendants and each one of them promise without any intention of performance was made with the intent to defraud and induce Plaintiff to rely upon it and to

At the time plaintiff acted, plaintiff was unaware of Defendants and each one of them intention not to perform the promise. Plaintiff acted in justifiable reliance upon the promise.

In justifiable reliance upon defendants and each one of them defendants conduct, plaintiff was induced to act. Because of plaintiff's reliance upon defendants and each one of them conduct, plaintiff has been damaged