COMMONWEALTH OF PENNSYLANIA COURT OF JUDICIAL DISCIPLINE

	COMMONWEAL COURT OF JU		2016 JUN - 6	
IN	RE:	:	AN	T
	ANGELES ROCA		PLIN	ដុ
	JUDGE OF THE COURT OF COMMON PLEAS	: NO. 14 JD 15		32
	FIRST JUDICIAL DISTRICT	•	•	
	PHILADELPHIA COUNTY	:		

PRE-TRIAL MEMORANDUM OF JUDGE ANGELES ROCA

Judge Angeles Roca, by her counsel, Samuel C. Stretton, Esquire, hereby files her initial Pre-Trial Memorandum as

follows.

I. List of Fact Witnesses

a.) Judge Angeles Roca 515 W. Girard Avenue Philadelphia, PA 19123

Judge Roca will testify about the events in question.

b.) John Morris, Esquire Kaufman, Coren & Ress, P.C. 2001 Market Street, Suite 3900 Philadelphia, PA 19103

> Judge Morris was Judge Roca's prior attorney and will testify to certain statements made by individuals, and will provide a history of the case.

c.) Municipal Court Judge Bradley K. Moss Criminal Justice Center, Room 1319 1301 Filbert Street Philadelphia, PA 19107

> Judge Moss is the Supervising Municipal Court Judge in Philadelphia and he will be called to testify as to the procedure for reopening, reargument and reconsideration in Municipal Court matters.

d.) President Judge Marsha Neifield Criminal Justice Center, Room 1303 1301 Filbert Street Philadelphia, PA 19107

Judge Neifield is the President Judge and the one who handled this case. She will testify that no one contacted to her.

e.) Ian Rexach 511 West Girard Avenue Philadelphia, PA 19123

Mr. Rexach is the son of Judge Roca and may testify as to the circumstances of his matter.

- f.) The Assistant City Solicitor who handled the tax case may be called, again to show the procedure and how the case was handled.
- g.) Judge Roca reserves the right to call any witnesses referenced by the Judicial Conduct Board.

It must be noted that this case resolved itself for

\$447.00. This was not a criminal case, but a civil case.

Judge Roca reserves the right to call additional witnesses and reserves the right to supplement this Witness List.

II. Character Witnesses at Trial

During the trial, the following character witnesses may be called on the issue of Judge Roca's excellent character and excellent performance as a judge:

- a.) Lee A. Schwartz, Esquire
 1325 Spruce Street
 Philadelphia, PA 19107
- b.) Retired Judge Robert Matthews 8996 Pine Road Philadelphia, PA 19115

- c.) Walter J. McHugh, Esquire McMonagle, Perri, McHugh & Mischak, P.C. One Penn Square West 30 S. 15th St., Suite 701 Philadelphia, PA 19102
- d.) Michael Fenerty, Esquire
 Willig, Williams and Davidson
 1845 Walnut Street
 Philadelphia, PA 19103

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- e.) Ronald F. Abel, Esquire 1706 Race St Ste 402 Philadelphia, PA 19103-1200
- f.) Michael B. Grasso, Esquire 1706 Race St., Suite 406 Philadelphia, PA 19103-1200
- g.) Joseph A. Guinan, Esquire 1706 Race Street, Suite 402 Philadelphia, PA 19103-1200
- h.) Wendy Glazer, Esquire
 2 Penn Center
 Suite 10230
 Philadelphia, PA 19102
- i.) Mark Momjian 2005 Market Street Suite 3510 Philadelphia, PA 19103
- j.) Councilwoman Maria Quinones-Sanchez City Hall, Room 330 Philadelphia, PA 19107-3290
- k.) Oscar Rosado 858 N. Corinthan Street Philadelphia, PA 19130

Mr. Rosado is the Chair of the Hispanic Affairs for the 6 ABC Community Advisory Board

1.) Retired Judge Nelson Diaz Dilworth Paxon 1500 Market Street Suite 3500 Philadelphia, PA 19102

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- m.) James Rocco, Esquire 1515 Market Street, #1801 Philadelphia, PA 19102
- n.) State Representative Angel Cruz 3503 North B Street, Unit 7 Philadelphia, PA 19134
- o.) Lisa Jordan, Esquire 1801 Market Street Suite 1845 Philadelphia, PA 19103
- p.) Iris Violeta Colon 760 S. Sheridan Street Philadelphia, PA 19147
- q.) Stephanie Gonzalez Fernandez, Esquire
 501 E. Cambria Street
 Bensalem, PA 192020
- r.) Mary T. Vidas, Esquire Blank Rome, LLP One Logan Square 130 N. 18th Street Philadelphia, PA 19103-6998

Judge Roca reserves the right to call additional witnesses

and reserves the right to supplement this Witness List.

III. Proposed Trial Exhibits

- a.) 2008 Tax Returns;
- b.) Docket entries concerning the case at issue;
- c.) Motion for Reconsideration;
- d.) Trial exhibits listed by the Judicial Conduct Board

and all exhibits provided in discovery. Attached and marked as Exhibit "A" is the List of Exhibits provided by the Judicial Conduct Board and their letter dated February 16, 2016. All of these exhibits may be referenced or introduced.

e.) Tapes of all telephone conversations;

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f.) All F.B.I. reports that have been provided.

IV. Stipulation

Present counsel is working on stipulations with the Judicial Conduct Board and there will be stipulations. There will be stipulations as to authenticity of all exhibits.

The Respondent, Judge Roca, through her counsel, Samuel C. Stretton, Esquire, certifies that all discovery and exhibits have been provided.

Respectfully submitted,

Samuel C. Stretton, Esquire Attorney for Respondent, Angeles Roca 301 South High Street P.O. Box 3231 West Chester, PA 19381 (610) 696-4243 Attorney I.D. #18491

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IN RE:	:	NO.	14	JD	15
ANGELES ROCA	:				
JUDGE OF THE COURT OF	:				
COMMON PLEAS	:				
FIRST JUDICIAL DISTRICT	:				
PHILADELPHIA COUNTY	:				

CERTIFICATE OF SERVICE

I hereby certify I am this date serving a copy of the Pre-Trial Memorandum of the Respondent, Judge Roca, in the captioned matter upon the following persons in the manner indicated below.

Service by First Class Mail addressed as follows:

- Elizabeth A. Flaherty, Esquire Deputy Counsel Judicial Conduct Board Pennsylvania Judicial Center 601 Commonwealth Ave., Suite 3500 P.O. Box 62525 Harrisburg, PA 17106
- 2. Honorable Angeles Roca 515 W. Girard Avenue Philadelphia, PA 19123

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Respectfully submitted,

Samuel C. Stretton, Esquire Attorney for Respondent, Angeles Roca 301 S. High St., P.O. Box 3231 West Chester, PA 19381-3231 (610) 696-4243 Attorney I.D. No. 18491