

cert

September 19, 2005

Hon. James P. Dawson, Supreme Court Justice, Essex County NY

RE: *Finnan v Finnan*, Index # 403-03, RJI 15-1-03-0167

Hon. Justice Dawson,

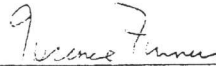
Mr. Asadourian, in an action recorded before you on Sept. 16, 2005, fraudulently claimed to have no knowledge of the attached letters or that "*Mrs. Finnan has no intention of making any further payments for the joint (Health Insurance) plan*". In the second letter Asadourian claims I pocketed the \$250 when the attached letter from Blue Cross/Blue Shield says they hadn't yet sent payment. The same day payment was received, I sent the attached check to the doctor. This is part of the continuing of the other frauds described in this motion and cross motion papers.

Asadourian presented no affidavits opposing the cross motion, nor opposing any facts presented in my papers. Asadourian's argument is not evidence.

I was in court against my doctor's orders, because the plaintiff was asking the court to distribute marital assets (the boat and the house) before trial.

An attached bill for Health Insurance was sent to me by the plaintiff to tell me how much more money I must pay. Since June 30, 2004, I have paid \$12,835.84 for our joint health insurance and the plaintiff has paid nothing.

The Defendant is in ill health (supported by the papers before the court) and the plaintiff is in good health continues to work in our jointly established business. The plaintiff must be ordered to continue to pay the health insurance during the pendency of the divorce action.




Terence Finnan

CC: Ara Asadourian, David Scaglione

State of New York County of Essex ss:

Terence Finnan came before me this 19th day of September 2005, and swore that the contents of the above letter are true under the penalties of perjury in the State of New York


Issued to Clerk
Term by 12/15/07

617711
J. 561-179

E-MAIL: a/asadourian@ymail.com

Asadourian Law Firm, P.C.

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

ARA ASADOURIAN

39 COURT STREET
P. O. BOX 909
PLATTSBURGH, NEW YORK 12901-0909

May 14, 2004

Mr. Terence Finnan
PO Box 239
Keene, New York 12942

Re: Finnan v. Finnan
Index No: 403-2003
RJI No: 15-1-2003-0167

Dear Mr. Finnan:

As you know, both you and your wife have medical coverage through the Plattsburgh Chamber of Commerce at present. Mrs. Finnan wants to obtain her own medical insurance. She cannot do that until such time as the current insurance is terminated. The Chamber of Commerce has indicated that they will not terminate the current policy unless they receive instructions in writing from you indicating that the policy should be terminated at the conclusion of the term which is presently paid for. I believe that payment has been made though June 30, 2004.

Hopefully you will do this on a voluntary basis. I do want you to know, however, that Mrs. Finnan has no intention of making any further payments for the joint plan and will just have to look elsewhere for insurance for herself, if you choose not to terminate the present plan with the Plattsburgh Chamber of Commerce.

Very truly yours,

ASADOURIAN LAW FIRM, P.C.

By: 

Ara Asadourian

AA/ljl

cc: Marsha Finnan

TEL: 518 361-1111
FAX: 518 361-1110

E-MAIL: ASADOURIAN@JST000.CC

Asadourian Law Firm, P.C.
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

ARA ASADOURIAN

July 9, 2004

39 COURT STREET
P. O. BOX 909
PLATTSBURGH, NEW YORK 12001-0909

COPY

Via Facsimile and First Class Mail

David Rudgers, Esq.
102 Montcalm Street
Ticonderoga, NY 12883

RE: *Finnan v. Finnan*
Index No.: 403-2003
RJ No.: 15-1-2003-0167

Dear David:


Mrs. Finnan has been able to obtain health insurance for herself and Vikki effective August 1, 2004 through sources other than the Chamber of Commerce. She has been forced to take this step due to Mr. Finnan's conduct concerning the existing policy which is in his name and therefore puts him in the position of receiving any funds paid by the policy to the policy holder. He simply holds these funds

As an example, to the best of my knowledge the existing policy is in Mr. Finnan's name and he should be able to continue the policy after August 1, 2004 for himself by simply paying his own premium. This is something he can take up with the Chamber of Commerce. Mrs. Finnan has no objection to his dropping her and Vikki from the policy as of August 1, 2004.

Enclosed please find a bill for which Mr. Finnan received \$250.00 from Blue Cross/Blue Shield and did not use to pay the health provider.

Sincerely,

ASADOURIAN LAW FIRM, P.C.

By: 
ARA ASADOURIAN

AA:ch
Enclosure
Cc: Marsha Finnan



Community Blue • Traditional Blue

PO Box 15013 • Albany, New York 12212

July 20, 2004

Terence Finnan
PO Box 239
Keene, NY 12942

Member: Marsha Finnan
Date of Service: 12/22/03
Inquiry Number: 0420202915

Dear Mr. Finnan:

This letter is in reference to a telephone call received on July 20, 2004.

This is just a letter to advise you that you will be receiving a check in the mail in the amount of \$250.00 from Blue Shield of Northeastern New York. Please either deposit that check in your own account and forward a personal check to the provider listed below or endorse that check and forward it to:

Dr. Deonaraya Saha
PO Box 342
Keeseville, NY 12944

If you have any further questions regarding this matter, please contact the Customer Call Center at 1-800-459-7587 or (518)-220-5800. Service hours are Monday through Friday 8:00 a.m. to 5:00 p.m. Please reference the above inquiry number when you call.

Sincerely,

C. Murray
Customer Service Department

CE L. FINNAN
BOX 239
KEENE, NY 12942

Marsha Finnan
Service on 12/22/03

8/4/04

213

Michael R. Ladwig \$250.00

Two hundred fifty

Evergreen Bank
A Division of Banknorth, N.A.
217 Main Street
Keeseville, NY 12944

Terence Finnan

⑆021302567⑆ 6250074241⑆ 0213

Dr. Saha's bill
requested payment
to Dr. Michael R. Ladwig

Plattsburgh-North Country Service Corp.

P.O. Box 310, Plattsburgh, NY 12901 Tel: (518) 563-1000 Fax: (518) 563-1028

Providing Health Insurance Services for:

Plattsburgh-North Country Chamber of Commerce, Lake Placid/Essex County Visitors Bureau,
Ticonderoga Area Chamber of Commerce, Tupper Lake Chamber of Commerce, Essex County Business Council,
Saranac Lake Area Chamber of Commerce, and the North Warren Chamber of Commerce

Marsha Kameron
Specialized Economic Services
33 Liberty Hill Lane, Suite 1
Lake Placid, NY 12946

HEALTH INSURANCE

INVOICE DATE: 05/18/2005

INVOICE #: 19958371

MEMBER #: 9520

COVERAGE PERIOD: 07/01/2005-07/31/2005

NAME	PLAN	CHARGE
FINNAN, TERENCE	PC/Community Blue/FAM/10739000	\$891.76
	Less Credits/Payments	\$813.88
	Total Amount Due	<u>\$77.88</u>
	Date due:	July 15, 2005

Marsha,
I've enclosed a copy of your ledger sheet,
and indicated where the problems lie.
If you have any questions, please give me
a call. Thank you. Julie Caheen

If payment is not received by due date, insurance is subject to cancellation.
If you are doing direct payments, please consider this invoice your receipt.

Please make your checks payable to the Plattsburgh-North Country Service Corp. and
mail to Plattsburgh-North Country Service Corp., P.O. Box 310, Plattsburgh, NY 12901