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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ANTHONY EDWIN HURLEY,
Plaintiff

vs.

ALBERTO MEDINA LOPEZ,
Defendant

Case No.: 1-23-cv-02994-MJM

370 / OTHER FRAUD
\$4,000,000 DAMAGES
PERSONAL PROPERTY

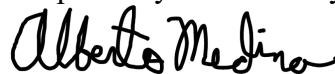
28 U.S.C. § 1332 DIVERSITY-FRAUD
26 U.S.C. 7434 (WRONGLY STATED AS 3474)

MOTION ASKING URGENT CONSOLIDATED SUMMARY JUDGMENT

Pursuant all Federal Rules of Civil Procedure, the Defendant **Alberto Medina Lopez**, appearing *pro se*, comes now before this Honorable Court to submits this Motion, in response to the moving parties' most recent *Motion for Leave*, filing a *Proposed Amendment To Complaint* to include first Plaintiff's spouse, **Mary E. Hicklin-Hurley** as Co-Plaintiff, filed on February 23rd, 2024 [Docket #14]; to ask an **urgent summary judgment** against each one of the Plaintiffs, to finally and totally strike this frivolous civil action, against both of the aforesaid promoters, under the already proven grounds that: **1)** both Plaintiffs (jointly and/or individually) are not entitled to any relief under **26 U.S.C. 7434** (as this case law) due to their failure to prove fraudulent tax information returns filings from the Defendant against them; **2)** the existence of genuine issues of material of facts (already filed) that precludes the entry of a judgment against the Defendant; and **3)** pursuant the law to ask again \$100 billion in damages against each one of the Plaintiffs; based upon and supported by this *Memorandum of Points and Authorities*, the pleadings, and all papers on file and exhibits attached hereto, and any argument that the Honorable Court may allow.

DATED this 29th day of April 2024

Respectfully submitted by:



Alberto Medina López, Defendant, *Pro Se*

MEMORANDUM OF POINTS AND AUTHORITIES

Facts & Defenses / Chronological Chain

NUMBER 1 / TAXABLE MULTIMILLION INITIAL RECEIVED ASSETS

Given the proven fact that: on July 28th, 2004, the Plaintiffs, jointly as a couple, each one at their personal level, received from the Defendant at Baltimore, MD a deeded \$225 million dollars fully **MAI appraised real estate ownership** regarding an inherited Defendant's property of 826 oceanfront prime acres located at Puerto Rico USA in exchange for raising for the Defendant a minimum of \$450 million dollars liquid capital, to be shared in equal parts as business partners.

NUMBER 2 / TAXABLE CONTRACT BREACHING DAMAGES

Given the proven fact that: since the aforesaid conveyance date, the Plaintiffs, jointly as a couple, each one at their personal level, willfully and intentionally, have not delivered for the Defendant the aforesaid multimillion minimum capital liquidity, retaining the ownership during 20 consecutive years, unproductively, breaching the notarized contracting between the parties.

NUMBER 3 / TAXABLE RECEIVED ASSETS APPRECIATION RETENTIONS

Given the proven fact that: during the aforesaid unproductive bi-decades timeframe the Plaintiffs' received real estate ownership current market value has increased to a minimum of \$40 billion dollars, from \$544,794 dollars per acre to \$98 million, according to the principal national real estate MLS comparable-market data sources, used by Corcoran, Sotheby's, and Christie's.

NUMBER 4 / TAXABLE MULTIBILLION CRIMINAL ACTS EARNINGS

Given the proven fact that: during the aforesaid unproductive bi-decades timeframe the Plaintiffs have earned hundreds of billions of dollars from the Defendant's patrimony by virtue of practicing against the Defendant the following illicit and racketeering criminal acts: **1)** contracting breaching; **2)** personal bankruptcy concealment; **3)** tentative of murder conviction criminal past-history concealment; **4)** using and making non-authorized fraudulent land subdivision-surveying-appraisals; **5)** accounting records retentions, concealments and/or destructions; **6)** non-authorized fraudulent unregistered securities offerings, damaging the received Defendant's real estate assets

legitimacy and reputation before the international investments markets and the American Bar Association; 7) selling judicially in Puerto Rico USA the fiduciary-received Defendant's real estate assets at \$2.8 million dollars in a public auction (diminishing 99.9999% of the current value) without the Defendant's consent-authorization, embezzling the Defendant at perpetuity; 8) perjury and concealing before this court's proceedings, by pursuing the violation of 26 U.S.C. 6041 that mandated the Defendant to report to the IRS all fully taxable benefits and compensations payments over \$600 dollars; and 9) transferring to corporate entities the fiduciary-received Defendant's real estate assets ownership without the Defendant's consent-authorization, excluding the Defendant as shareholder, with the purpose to secretly raise capital for their own and solely benefit via offering **fraudulent unregistered securities** in the international markets, using the Defendant's \$40+ billion actual value real estate assets, illegally retained and stolen from the Defendant; all, within and during an accumulated consecutive 20 years term; breaking them down as follow:

\$225 MILLION 2004 ORIGINAL APPRAISED VALUE
REAL ESTATE TRANSFERENCE

If we take in consideration: 1) the aforesaid non-disputable fact that the Plaintiffs received directly from the Defendant a real estate ownership on the year 2004, for which the same Plaintiffs hired the appraisal services before the transference on 2003, discovering a certified value of \$225 million dollars; and, 2) the aforesaid non-disputable fact that the Plaintiffs has been depriving the Defendant of receiving back that personal patrimony multimillion asset during 16 consecutive years on 2020, and 17 consecutive years on 2021, without producing a minimum of \$450 million dollars liquidity for the Defendant, then we will arrive to the conclusions that the Plaintiffs had minimum accumulated fully reportable taxable benefits per calendar tax year from the Defendant by the sum of \$3.6 billion (\$3,600,000,000) on 2020 (\$225 million times 16) and \$3.825 billion (\$3,825,000,000) on 2021 (\$225 million times 17).

TORT, PUNITIVE & COMPENSATORY DAMAGES
BASED ON 2004 APPRAISED VALUES

Now, if we take in consideration all the aforesaid **nine damages** at a minimum rate per year of **\$225 million each**, we will arrive to the conclusions that the Plaintiffs had minimum

1 accumulated fully reportable taxable benefits from the Defendant by the sum of \$2.025 billion
2 (\$2,025,000,000) per calendar year (\$225 million times 9), totaling on 2020 \$32.4 billion
3 [\$32,400,000,000] (\$2.025 billion times 16) and \$34.425 billion (\$34,425,000,000) on 2021
4 (\$2.025 billion times 17). **Defendant's annual losses were the Plaintiffs taxable income.**

5 TRANSFERENCE AND DAMAGES, AT 2004 AND CURRENT VALUES

6 Now, if we sum up all the aforesaid transference and damages at 2004 values, we will
7 arrive at the conclusion that the Defendant reported in the 1099s filings only one small fraction of
8 them. Specifically, for the calendar tax year 2020, just \$250 million, instead of \$36 billion, and,
9 for the calendar tax year 2021, just \$4.5 billion, instead of \$38.25 billion, keeping a minimum
10 balance for future filings against the Plaintiffs of \$33.5 billion dollars at 2004 values, applicable
to the 2023 tax year.

11 Based on the 2020 and 2021 current real estate values rates at \$40 billion the Plaintiffs had
12 accumulated 177.77 times more taxation, specifically, \$640 billion for the tax year 2020 (\$40
13 billion times 16) and \$680 billion for the tax year 2021 (\$40 billion times 17), only regarding the
illegal retention of the now market-super-appreciated 413 acres from the Defendant.

14 On the other hand, at a **\$40 billion rate per year, for each one of the nine damages**, the
15 Plaintiffs had accumulated earnings balance of \$360 billion per calendar year, which generated
16 earnings accumulated balances of \$5.7 trillion for 2020 (\$360 billion times 16) and \$6.12 trillion
for 2021 (\$360 billion times 17); and much more for the 2023 tax year.

17 NUMBER 5 / FEDERAL STATUTES OF LIMITATIONS

18 **Given the proven fact that:** the same original Plaintiff, **Mr. Edwin Anthony Hurley**, clarified
19 to the Honorable Court that pursuant **26 U.S.C. 7434** all the received Defendant's tax information
20 returns older than 6 years cannot be challenged in the present civil action, due to the federal statute
21 of limitations, now being applicable too to the proposed Co-Plaintiff.

22 NUMBER 6 / LACK OF EVIDENCE TO PROVE TAX FILINGS FRAUD

23 **Given the proven fact that:** since the beginning of the present civil action: **1)** the proposed Co-
24 Plaintiff had been mentioned and included in all the applicable Defendant's affirmative defenses
25 and exhibits; **2)** all the applicable Defendant's affirmative defenses and exhibits apply to the
26 proposed Co-Plaintiff as well; and **3)** apart of the general Plaintiffs fraud allegations, that do not
27 constitute evidence, until this day, none of the Plaintiffs have presented proof, neither one piece of

valid evidence, to defeat any of the Defendant's defense filings in **dockets numbers 5, 8, 10, and 12 (containing more than 500 hard and online pages)**, including the following listed exhibits:

Exhibit A / 60 F. 3d 822; 54 F. 3d 773; 91 F. 3d 130 / Anthony Edwin Hurley vs. Lloyd L. Waters, Warden; AG of the State of Maryland / and, PACER Docket Reports.

Exhibit B / U.S. Bankruptcy Court District of Maryland (Greenbelt), petition number 02-20112 / PACER Docket Report.

Exhibit C / Plaintiffs' classified ad from Washington Post newspaper (Section PQ 3).

Exhibit D / Venture Capital Real Estate Collateral Agreement, signed by both parties on December 30th, 2002; and non-exclusive Real Estate Brokerage Contract signed on February 23rd, 2003.

Exhibit E / 2003 MAI Appraisal, pages numbers 1 to 6, 10 to 11, 30 to 33 and 44.

Exhibit F / Meecorp's Final Revised Letter of Interest / Term Sheet, signed on May 23rd, 2003.

Exhibit G / 2011 Title Abstract provided by the company Luis Reyes Vazquez & Associates, located then at Condominio El Centro II Office 254 San Juan PR 00918 Tel (787) 753-1011 Fax (787) 758-4445 & (787) 274-1519 Email lrvttitle@prtc.net.

Exhibit H / One World Investments Management Corporation [Number IBC 12674-2005]'s Certificate of Incorporation from August 25th, 2005.

Exhibit I / International Investments [Holdings], LTD [Number IBC 12672-2005]'s Certificate of Incorporation from August 25th, 2005.

Exhibit J / International Investments [Holdings], LTD [Number IBC 12672-2005]'s Deed from September 23rd, 2005, before Baltimore County Maryland's Public Notary Ann Michele Jenkins.

Exhibit K / Diversified Investments [Holdings], LTD [Number IBC 12673-2005]'s Deed from September 23rd, 2005, before Baltimore County Maryland's Public Notary Ann Michele Jenkins.

Exhibit L / Exclusive brokerage services contract from the company GMAC Real Estate International Properties in New York, from November 13th, 2006.

Exhibit M / 2007 MAI Appraisal, pages numbers 1 to 6, and 14 to 23.

Exhibit N / Plaintiffs' Securities Fraud Order of Cease and Desist, Administrative Order SB-09-01 from the Government of the District of Columbia from May 7th, 2009.

Exhibit O / American Bar Association training material, from September 13th, 2009.

Exhibit P / Puerto Rico's Court Civil Case number CA2020CV01800 from August 27th, 2020.

Exhibit Q (before R) / Puerto Rico's Real Estate Comparable Market; and IRS Multimillion Back Taxes Collection Enforcement Recent Actions

NUMBER 7 / ACCEPTANCE OF DEFENDANT'S DEFENSES AND EVIDENCE

Given the proven fact that: in the **paragraph number 4** of the Plaintiffs' *Proposed Amendment to Complaint* [Docket #14] both Plaintiffs have communicated to the Honorable Court the full acceptance **possibility** of all the already filed Defendant's affirmative defenses and exhibits in

dockets numbers 5, 8, 10, and 12 as valid proof to support the purported reported earnings paid by the Defendant to the Plaintiffs.

NUMBER 8 / FEDERAL MANDATE TO REPORT PLAINTIFFS' INCOME

Given the proven fact that: pursuant **26 U.S.C. 6041** the Defendant has been obligated to report to the IRS all the accumulated taxable earnings over \$600 dollars paid to each one of the Plaintiffs since the year 2011 until present by virtue of fully taxable-reportable conveyances, **illicit retentions, appreciations** and white-collar fully prosecuted-convicted **criminal damages-acts**.

NUMBER 9 / PLAINTIFFS LACK OF REMEDIES UNDER THE LAW

Given the proven fact that: **1)** both Plaintiffs has come to this Honorable Court to lie, conceal and perjuring all the well explained taxable reported earnings from the Defendant since the year 2004; **2)** both Plaintiffs have not proved fraudulent tax filings from the Defendant; and **3)** under **26 U.S.C. 7434** each one of the Plaintiffs are not entitled to any relief.

Certification and Conclusion

For all the reasons stated above, the Honorable Court should deny all pending Plaintiffs motions, therefore granting all pending Defendant's motions; closing and dismissing this frivolous case with prejudice; and, imposing against each Plaintiff \$100 billion in civil damages.

Under all Federal Rules of Civil Procedure, by signing below, I certify under penalty of perjury to the best of my knowledge, information, and belief that this answer: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the answer otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep the current address on file with the Clerk's Office may result in the dismissal of my case.

1
2 Date of Signing: Monday, April; 29th, 2024

3 Alberto Medina Lopez
4 Defendant

5 

6

PO Box 6596 Woodbridge, VA 22195
7 Phone 571-288-7383 / Email: alberto_medina@yahoo.com

8 I certify that I will send copies of this judicial document to the Plaintiff, the U.S.
9 Department of Defense (Office of Inspector General), U.S. Department of Justice (USDOJ), the
10 Federal Bureau of Investigation (FBI) and the Criminal Division of the Internal Revenue Services
11 (IRS) via regular postal mail and/or email.
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**U.S. District Court
District of Maryland (Baltimore)
CIVIL DOCKET FOR CASE #: 1:23-cv-02494-MJM**

Hurley v. Lopez
Assigned to: District Judge Matthew J. Maddox
Demand: \$4,000,000
Cause: 28:1332 Diversity-Fraud

Date Filed: 09/13/2023
Jury Demand: Plaintiff
Nature of Suit: 370 Other Fraud
Jurisdiction: Diversity

Plaintiff**Anthony Edwin Hurley**represented by **Anthony Edwin Hurley**

1401 Shefford Road
Towson, MD 21239
3017854661
PRO SE

V.

Defendant**Alberto Medina Lopez**represented by **Alberto Medina Lopez**

PO Box 6596
Woodbridge, VA 22195-6596
PRO SE

Date Filed	#	Docket Text
09/13/2023	1	COMPLAINT against Alberto Medina Lopez (Filing fee \$ 402 receipt number 5862.), filed by Anthony Edwin Hurley. (Attachments: # 1 Civil Cover Sheet, # 2 Summons)(bw5s, Deputy Clerk) (Entered: 09/14/2023)
09/14/2023	2	New Case Notification Letter sent to Anthony Edwin Hurley. (c/m 09/14/2023 - bw5s, Deputy Clerk) (Entered: 09/14/2023)
10/04/2023	3	ORDER directing Clerk to issue summons. Signed by Judge George Levi Russell, III on 10/4/2023. (c/m 10/04/2023 - bw5s, Deputy Clerk) (Entered: 10/04/2023)
10/04/2023	4	Summons Issued 21 days as to Alberto Medina Lopez.(c/m 10/04/2023 - bw5s, Deputy Clerk) (Entered: 10/04/2023)
11/01/2023	5	ANSWER (and Petition for Dismissal) to 1 Complaint by Alberto Medina Lopez. (Attachments: # 1 Envelope)(bw5s, Deputy Clerk) (Entered: 11/01/2023)
11/15/2023		Case Reassigned to Judge Matthew J. Maddox. Judge George Levi Russell, III no longer assigned to the case. (ols, Deputy Clerk) (Entered: 11/15/2023)
12/12/2023	6	MOTION for Summary Judgment by Anthony Edwin Hurley (Attachments: # 1 Attachment)(bw5s, Deputy Clerk) (Entered: 12/12/2023)
12/13/2023	7	Rule 12/56 notice mailed to Alberto Medina Lopez (c/m 12/13/2023 - bw5s, Deputy Clerk) (Entered: 12/13/2023)
01/05/2024	8	RESPONSE in opposition to 6 MOTION for Summary Judgment; MOTION for Summary Judgment with prejudice and \$100 Billion in Tort, Punitive, and Compensatory Damages by Alberto Medina Lopez (Attachments: # 1 Exhibit List, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit L, # 11 Exhibit M, # 12 Exhibit N, # 13 Exhibit O, # 14 Exhibit P, # 15 Envelope)(bw5s, Deputy Clerk) (Additional attachment(s) added on 1/8/2024: # 16 Exhibit A, # 17 Exhibit J, # 18 Exhibit K) (bw5s, Deputy Clerk). (Entered: 01/08/2024)
01/08/2024	9	Rule 12/56 notice mailed to Anthony Edwin Hurley (c/m 01/08/2024 - bw5s, Deputy Clerk) (Entered: 01/08/2024)
01/12/2024	10	Supplement (Motion Submitting Missing Evidence-Exhibit) to 8 MOTION for Summary Judgment filed by Alberto Medina Lopez (Attachments: # 1 Amended List of Exhibits, # 2 Exhibit Q, # 3 Envelope, # 4 Shipping Label)(bw5s, Deputy Clerk) (Entered: 01/18/2024)
02/01/2024	11	RESPONSE in Opposition re 8 MOTION for Summary Judgment filed by Anthony Edwin Hurley. (Attachments: # 1 Attachment 2, # 2 Attachment 3, # 3 Attachment 4, # 4 Attachment 5, # 5 Attachment 6, # 6 Attachment 7, # 7 Attachment 8)(bw5s, Deputy Clerk) (Additional attachment(s) added on 2/1/2024: # 8 Attachment 1) (bw5s, Deputy Clerk). (Entered: 02/01/2024)
02/09/2024	12	REPLY to Response to Motion re 8 MOTION for Summary Judgment filed by Alberto Medina Lopez. (Attachments: # 1 Envelope)(mg3s, Deputy Clerk) (Entered: 02/12/2024)
04/09/2024	13	RETURN DOCUMENT ORDER. Signed by District Judge Matthew J. Maddox on 4/9/2024. (Attachments: # 1 First Page of Returned Document)(c/m 04/10/2024 - bw5s, Deputy Clerk) (Entered: 04/10/2024)
04/23/2024	14	MOTION to Amend Complaint by Anthony Edwin Hurley (Attachments: # 1 Attachment, # 2 Amended Complaint)(bas, Deputy Clerk) (Entered: 04/23/2024)



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UNITED STATES DISTRICT COURT

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UNITED STATES DISTRICT COURT

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