

Exhibit I

**Edward Riley
Conflict**

Michael D Markham, MD

1010 Front Street B101
Lahaina, Hawaii 96761
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MichaelMarkhamMD@Gmail.com
Re: Markham V Markham index #2015/09826

21 September 2018

Edward W Riley, Esq

25 Market Street
Brockport, NY 14420

Mr Riley:

I am writing to officially demand the return of the retainer money you were paid to represent my children in acting as the Court appointed AFC in our matrimonial litigation and again demand that you recuse yourself from any further participation in this case.

Mr Riley I allege that you **willfully misrepresented** yourself to my children as a Court appointed 'AFC' when you knew that you were not qualified to represent their interests based on your undisclosed personal conflicts resulting from a nearly lifelong personal relationship with the children's grandfather David Markham. Section 7.2 (b) *Function of the attorney for the child* states that 'The attorney for the child is subject to all the ethical requirements applicable to all lawyers including conflicts of interest'. Likewise, according to rule 1.7 (3) on Client-Lawyer Relationships / Conflict of Interests states 'A conflict of interest may exist before representation is undertaken, in which event the representation must be declined unless the lawyer obtains informed consent to represent the child'. An overwhelming conflict clearly exists and no consent was ever obtained from either the children, or myself their parent. As a result of you being appointed (in an obviously corrupted process) my children have been materially harmed by your representation due to your willful and deceitful failure to disclose your highly conflicting lifelong relationship with their grandfather David Markham. As a result of this non-disclosure and willful misrepresentation, my children have without good reason been deprived of any meaningful access to their loving father for nearly a year now.

At the time of your appointment I felt it very suspicious and knew that you had significant ties to the Village of Brockport and Town of Sweden (where I grew up) but I was unaware of the highly personal lifelong relationship that you had with David Markham, the grandfather of my children, Rowan and Rory Markham. I now know Mr Riley, from discussions with my siblings that you are the childhood friend of the children's grandfather David Markham, and remain very close friends with him to this day. I also know from speaking with your other childhood friend in common, Fred Webster that not only are you longtime personal friends but you have professional offices within sight distance of one another on Market Street in Brockport and are often seen around Brockport attending men's groups and sharing meals together.

At first glance this lifelong friendship may appear trivial and insignificant (as I'm certain you will allege) until it's revealed that David Markham remains close with the Plaintiff Diane Markham and is estranged from both his son - Defendant and his disabled ex-wife Angela whom the Defendant is very close with. Out of bitterness and spite David Markham will and would do anything to keep his ex-wife Angela from seeing her grandchildren and his estranged son from seeing his children.... including enlisting the help of you Mr Riley....his good friend and old childhood buddy. To be very clear Mr Riley, I know as fact, from speaking with my siblings, that you and David Markham (your lifelong friend) schemed to be appointed AFC for my children in what has turned out to be a very successful attempt to deprive Angela Markham of any access to her grandchildren and deny my children any access to their loving father.

The highly curious and suspicious circumstances surrounding your assignment to this case have yet to be fully discovered and I have asked Cynthia Snodgrass for a detailed accounting of exactly how you came to be assigned. I'm confident that in time, this corruption too will come to light and I am certain we will discover that your appointment to this case was not by coincidence

alone. The chances of your assignment being random (the purported system of assignment) is mathematically extremely unlikely and defies any reasonable measure of judgement. What is known is that as a result of your corrupted representation, my children have had no meaningful contact with their father whom I'm certain they miss terribly. . Contrary to New York State Law, you have done everything to deprive my children of any relationship with their father. As you well know, the law states that all parents have a right to have a relationship with their children and the Monroe County Court mission statement says that all children deserve the love and support of two parents whenever possible...Yet you Mr Riley acting solely in the interests of your friend David Markham and not the interests of my children, have done everything in your power to prevent us from realizing those clearly articulated sentiments of the Court including insisting that my children never 'engage' in any capacity with the Court to conveniently attempt to hide your corruption. I should note for the record that David Markham is a Clinical Social Worker with almost 50 years of experience in Monroe County and is very knowledgeable and savvy at manipulating the Court for his own motives in family matters.

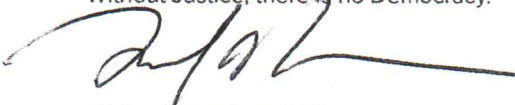
For the record, I also know that you are aware Mr Riley, that your colleague Lisa Morris the former AFC and Judge Fisher, the former Judge on this case faked the existence of the children's Lincoln Hearings and Default Trial and there is no record of them ever being done in spite of fabricated testimony from them to the contrary. No one has ever been able to produce them or even show evidence that they took place for discovery to the Defendant's attorneys. Further, Mark Bezinque, the former Attorney for Plaintiff has admitted to Mr Mott (Attorney for Defendant) that the Lincoln Hearings and Default Trial never happened.... yet in your conspicuous and transparent corruption you fail to bring this to the attention of the Dollinger Court....conveniently leaving you as the sole arbiter and reporter to the Court of my children's wishes and best interests? I don't think so Mr Riley. Your overtly corrupted representation of my children will not stand. I will do everything **LEGALLY** in my power to see that you are removed and my children receive the unbiased representation that they are legally entitled to. Your fraud upon this court vitiates everything before it and for want of a small modicum of oversight and justice, any further litigation in this case is now mute and inadmissible (U.S. V Throckmorton).

Your willful actions construe overt unethical misconduct and breach the rules of professional conduct for all New York State Licensed attorneys (22 NYCRR 1240 and 1020). Based on this irrefutable evidence regarding these now exposed conflicts and your conspicuous willful misrepresentation of my children, I have referred this matter to the Supreme Court of the State of New York Appellate Division Fourth Judicial Department, Seventh Judicial District, Attorney Grievance Committee for correction and disciplinary action. You should be hearing from them shortly.

To prevent any further harm from your unlawful actions I demand that you immediately recuse yourself and return all retained monies that were obtained through your deliberate fraud perpetrated on this Court. If you arrogantly choose not to voluntarily recuse yourself as requested, I will file a *Motion to Disqualify* in the New York State Supreme Court to have you forcefully removed from this case. If that motion is unsuccessful in the Supreme Court, I will continue my tireless campaign to expose your extrinsic fraud and use your willful misrepresentation as the basis for an appeal in the Appellate Court that will follow.

This injustice to my children by way of your unethical corruption will not stand Mr Riley. Less I again be falsely accused by this Court of abandoning my children, I will use all of the resources at my disposal to see that you are held accountable and my children are finally reunited with their loving father.

Without Justice, there is no Democracy.



Michael Markham, MD

cc: Greg Mott, Esq., Sharon Sayers, Esq., Joel Edelman, Esq.,(Hawaii). Maureen Pineau, Esq., Diane Markham (Plaintiff), Hon. Richard A. Dollinger, NYS Commission on Judicial Conduct