

12  
6:08-00641-cr-Orl-28-DAB  
\*\*\*\*\*  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION  
\*\*\*\*\*

2013 DEC 11 PM 3:11

FILED

Frank Louis Amodeo,  
movant,  
versus  
United States of America,  
respondent.

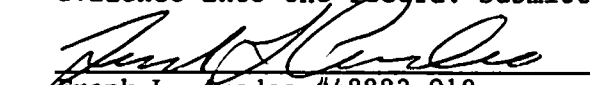
\*\*\*\*\*

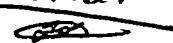
**SIXTH MOTION TO EXPAND THE RECORD UNDER RULE 7  
OF THE RULES GOVERNING §2255 PROCEEDINGS**

A series of recent developments have generated new facts<sup>etc</sup> relevant to or material to the claims, grounds, or issues pending in, and emerging out of my §2255 proceedings.

Accordingly, I am seeking the court's permission to expand the existing section 2255 record to include evidence, which supports my grounds for relief, and proves the allegations composing my claims. Additionally, the evidence demonstrates why the motion and the grounds are timely; and why the government's defenses are meritless. Furthermore, granting the motion shall reduce the amount of resources required both in discovery and at evidentiary hearings for all participants: court, government, taxpayers, witnesses, and I.

I respectfully request the court grant motion and permit the appended evidence into the record. Submitted this 9<sup>th</sup> day of 2013 by:

  
Frank L. Amodeo #48883-019  
FCC - Low Unit B-3  
P.O. Box 1031  
Coleman, Fl 33521-1031

<sup>A</sup>  
December  


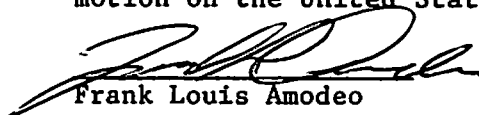
**VERIFICATION**

Under penalty of perjury as authorized in 28 U.S.C. §1746, I declare that the factual allegations and factual statements contained in this document are true and correct to the best of my knowledge.

  
Frank Louis Amodeo

**Certificate of Service**

This motion was delivered in a pre-addressed, postage-prepaid envelope to prison authorities on the same day as signed. The United States of America is represented by counsel who is registered with the CM/ECF docketing system; thus the movant requests that notice of the filing and actual service of the motion on the United States be served through electronic notice.

  
Frank Louis Amodeo

**SUMMARY INDEX OF APPENDICES FILED IN ACCORDANCE  
WITH THE MOTION TO EXPAND RECORD CONTINUED**

**App. 6th Motion To Expand Record**

- 6-A The records of the State of Florida and the Bureau of Prison, which demonstrate my continuing legal incapacity to contract and arguably my legal incompetency to be convicted.
- 6-B The engagement contract between Leventhal and Slaughter and Ian Dunfee. This contract reveals Mr. Slaughter's daily trial fees at the time of my case. Applying those rates to the fees he received supports my assertion that his financial interests required me to plead guilty. Put another way, he did not want to lose cash fees equal to 3 times his normal rate.
- 6-C On September 28, 2011, a letter from Tom Dale relating to the existence of claims involving the inherent conflict of the plea agreement waiver.
- 6-D National Institute of Mental Health explanation of Bipolar disease provides a concise explanation of why the perception of my behavior and statements is different than what I meant to or attempted to convey.
- 6-E Notice from the Bureau of Prisons refused to accept an envelope —by labeling it a package— of my sentencing transcripts.
- 6-F Uniform numbering convention and index for evidentiary exhibits add to the record through Motions to Expand the Record 1 through 6.