

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

Frank L. Amodeo,

Movant,

-vs-

6-12 -cv-00641-28DAB  
Case No. ~~00641~~

United States of America,

Respondent.

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**A Timeline of Frank L. Amodeo's Bipolar History**

The following statements arise from my personal knowledge. The statements are true and correct to the best of that knowledge.

**The 1980's**

1. In 1982, in order to assist me with my asthma condition, an Orlando doctor prescribed a drug known as Isoclur. (Unknown to both of us at the time is the side-effect Isoclur might have on a bipolar's condition).
2. In 1983, after a couple of weeks in bed, because of what I believed was a "cold", I suddenly woke up feeling much better and promptly decided to get married, leave my established business, and go to law school.
3. In 1984, I was married, moved to Atlanta, and entered Emory University's College of Law.
4. In 1985, I separated from my first wife. Then I became bored with law school, so I began pursuing an additional degree; I enrolled in Georgia State University's graduate business school.
5. From 1985 through 1987, I was in the unique position of being enrolled in two doctoral programs at two different universities. Something I now realize is more a symptom of my bipolar disorder than a sign of my brilliance. Just as I now realize the two week "cold" (in 1983) was depression, not a virus or bacteria.
6. In 1988, my father developed cancer and this caused me to stop pursuing the finance doctorate and to take the Georgia bar exam, so I could help my family financially.

7. In 1988, I met my current wife, **Claire Holland**, and at about the same time, Emory University Medical Services informed me that the Food and Drug Administration had declared Isoclur unsafe and thus the clinic would no longer prescribe it for me.
8. As an alternative treatment, I began to take the over-the-counter medication, Sudafed. I do not remember why I thought this a viable substitute. But ultimately it seemed to work because I felt better and I gained the added benefit of not having to return to the Emory University clinic regularly.
9. Prior to my wife becoming an attorney, Claire was a pharmaceutical sales representative. So, I often asked her for information about medical matters. One day she made an off-the-cuff remark that over-the-counter medication is usually half the strength of prescription drugs. From that single comment, I embarked on a decade long habit of taking 16 sudafed tablets virtually every day. (Bipolars often hear or see things that are meant to be insignificant, but for the bipolar these things become gospel truth).

#### The 1990's

10. In early 1990's my law practice followed the classic meteoric path, both the rise and the crash. During this time, Claire became certain that I was sick. She clearly recalls events where I was delusional: seeing and hearing things which were not present and saying things that were not merely untrue, but impossible.
11. In 1993, Claire tried to get me psychiatric care, but I would not cooperate, partly because of my paternal family's distaste for mental illness. Also because the tendency of my ethnic and cultural groups to doubt that mental illness existed at all; and finally, my colleagues discounted any such concerns as spousal overanxiety. As a result of the foregoing, I never went to get treatment.
12. In 1995, I moved to Orlando in an attempt to start my life over again. I finally acquiesced to my wife's demands, and went to see a private mental health expert, who recommended that I receive intensive in-patient treatment. Of course, I could not afford the care, which (as I remembered) would have cost \$7,000 every week or two.
13. I did however agree to seek an evaluation from Social Security because if I was as sick as Claire believed—which I did not believe—then I should be considered disabled.
14. In 1995, Dr. Cyndey Yerushalmi, on behalf of the Social Security Administration, conducted a disability examination of me. She concluded I was the most manic person she ever examined, but she did not inform me of her conclusion about my mania, because I failed the income portion of the SSI test.

15. After apparently passing the Social Security evaluation, I spent the next few years reestablishing myself. Claire still regularly expressed concerns about my health although it seemed to have stabilized. So until 1997, she did not press me to get treatment.
16. In 1998, Dr. Phillip Tell, a mental health therapist in Orlando, began treating me as a result of my wife's insistence. My treatment was interrupted by my first criminal prosecution.
17. In 1998, I pleaded guilty to a single count of mail fraud arising from a 1993 event. During the presentence investigation the probation officer suggested to my federal defender that a psychiatric evaluation be conducted. Dr. Stephen O'Hagan conducted the evaluation, but the results of the evaluation have never been disclosed. Nevertheless, the court sentenced me to the Shock Incarceration Program at the Lewisberg, Pennsylvania prison complex.
18. In January 1999, I began the boot camp program. In a manner typical of my life (and certainly augmented by the hypomanic cycle of my disease) I became the elected captain of Delta team. An unusual step for a prison program, but one consented to by the program's director Steve Wagner.
19. That position, however, highlighted my naivete; I did not realize the position made me vulnerable to both inmates and staff.  
So, the camp's physician assistant (sympathetic to me since he was a former JAG colonel and a master chess player), called me into his office to inform me that I would no longer be provided the generic version of Sudafed that I was then taking. He said that if I had the medication, then other inmates would expect me to share the medication. And if I did not, then they would become offended. But if I did share the medication with the other inmates, then the staff would "gig" me. Many of the staff were not happy that Mr. Wagner allowed me this position. Thus, from that time on, I no longer took any oral medication. Surprisingly (not so much now) within a few weeks, the boot-camp exercise regimen made me healthy enough that I did not need my inhaler either.
20. In August 1999, after completing the boot camp program, I went to an Orlando halfway house. Of course, I immediately began to use Sudafed to help "treat" my suddenly recurring asthma condition.

#### The 2000's

21. In early 2000, after I brought \$20,000 in cash to the halfway house, the halfway house staff caused me to be (unfairly) violated; I was sent to the prison camp in Pensacola, Florida.

22. Even before the violation, my wife desperately attempted to inform every person in authority that I was sick, but no one would listen. It seems every one in authority believed I was either too smart, too intelligent, or too charismatic to be considered mentally ill.
23. In or about **March 2000**, when I got to the camp, someone finally listened to Claire. That person was **Dr. Janet Lewis**, a Bureau of Prisons psychiatrist, who diagnosed me as having Cyclothymic, experiencing caffeine psychosis, and abusing psuedophedrine primarily in the form Sudafed. And for the next six months, Dr. Lewis helped me begin to understand my disease.
24. She explained to me that I had, at least, a mild form of the bipolar disease (Cyclothymic). A condition that had been exacerbated by my addiction to caffeine and Sudafed. Further, she explained that I likely had experienced a phenomenon known as caffeine psychosis and would remain susceptible to that condition permanently. Also, she said that the effects of a 16 pill a day Sudafed habit were unquantifiable.
25. Finally, Dr. Lewis said that the Bureau lacked the resources to provide me comprehensive or complete treatment, but that she would do what she could while I was there.
26. Since Dr. Lewis's warning, except for the occasional aspirin or pain reliever, I never again used Sudafed or any other unprescribed medication.<sup>1/</sup> In order to treat my condition, I began a systematic reduction in caffeine consumption and ran four miles or more per day; the bipolar symptoms receded.
27. In **September 2000**, I was placed on supervised release. Shortly thereafter, I sought out a doctor to provide continued treatment. While searching, I continued regular (often weekly) therapy.
28. In early **2001**, **Dr. Joseph Trim** began treating me on a regular basis; and continued to treat me through the end of my supervised release. Thus, for this period I had regular mental health care.
29. Sometime in **2002**, when my financial circumstances made it impossible for me to afford the private rates, my U.S. Probation Officer, **Scott Fanelli**, interceded. He convinced the government, and me, to permit a modification of the supervised-release terms to include mandatory treatment, thereby allowing the government to pay.
30. In **2003**, **Diane Shuker**, a mental health specialist chosen by Mr. Fanelli, began treating me after the district court modified the criminal judgment to permit Probation to pay for the care.

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<sup>1/</sup>. I recall perhaps four times where non-psuedophedrine based products were placed on the market. Under the watchful eye of my wife. I tried them. But quickly realized I was better off treating the medicine like I did alcohol or cigarettes, never using any medicine at all.

31. In September 2003, my supervised release ended and I continued treatment until my financial situation worsened, and I was unable to continue the regular therapy.
32. I now realize that "lack of money" may have been just an excuse to stop what I then may have perceived as unneeded treatments. "Being unaware of the illness" is common among bipolars, especially when cycling manic. Thus, I cannot tell exactly what caused me to stop the treatment, but lack of money was my rationalization.
33. Sometime in 2004, a period that overlapped with continuing treatment, I became involved with Robert Pollock M.D. as a business associate. Dr. Pollock, is a reasonably well-renowned, highly intelligent psychiatrist. He became an "officer" of Matrix Network Orlando, LLC and Mirabilis Ventures Inc.,.
34. And, although Dr. Pollock never assumed a formal role as a treating doctor, except for prescribing certain medicines (not antipsychotics or mood control drugs), however, he was suppose to ensure that I did not get too "far afield". At the Mirabilis 2005 omnibus meeting, he told the audience that he was "to keep an eye on Frank" to make sure he does not get too crazy.
35. In between 2004-2006, while operating AQMI Strategy Corporation (a threat neutralization consultant), conducting several acquisition and turnaround projects, and nurturing Mirabilis Ventures, I resumed the caffeine consumption (I never went back to Sudafed or cold medications). But because of the insistent (and persistent) advice of my wife, in late 2005 I switched to caffeine-free ice tea and began a rigorous physical training program. Otherwise, I was untreated from 2004-2006.
36. In May 2006, literally right in the middle of proving to my personal trainer (SWAT, Special Forces) that I was capable and dedicated enough to receive specialized training, the Congolese military kidnapped Kevin Billings, Joe Robinson, Seth Taylor, and 18 non-U.S. citizens. These men were employed by me to assist and protect Dr. Oscar Kashala in his attempt to become the first fairly elected president of the Democratic Republic of the Congo (DRC).
37. Immediately the training ended and my hypomanic personality kicked in; I needed this heightened state of consciousness (and intelligence) to both save the lives of my employees and friends, and to ensure the safety of Dr. Kashala and the rest of the campaign staff remaining in the DRC.
38. By June 2006, my men had been released and I began discussions with the DRC's government in an attempt to mend fences and assure the presence of my commercial allies in the country's reconstruction regardless of the presidential election's outcome.

39. The hypomanic state makes me exceptionally charismatic and heightens the intellect, but the danger is that it crosses over the line into mania.
40. During the next few months (June 2006 to November 2006), I arranged to provide soybean seeds to the Afghan farmers, even though the Pentagon could not; I attended a joint session of the U.S. Congress; I visited the White House to discuss NATO's involvement in Afghanistan; I played basketball on the third floor of the Supreme Court building; I sent agents to infiltrate Middle Eastern terrorist groups; I received an offer from the Hunan Province in China to become "King" in order to implement my Economic Genesis Theory; and I cosponsored the bi-annual summit of NATO's heads of state, etc....
41. At the same time (June 2006), I decided that the Mirabilis professionals were not moving rapidly enough to complete the Presidion—AEM reorganization. Including the selling of the AEM book-of-business to a public entity in order to pay off the IRS debts and capitalize on future PEO (Professional Employer Organization) acquisitions.
42. Therefore, I asked Dan Myers, CPA, to arrange a meeting with the IRS in Plantation, Florida, and to please let them know I would be coming to develop a process to permit the sale of Mirabilis while securing the IRS's preferred claim on the proceeds. The meetings occurred in July 2006 where I discussed with IRS counsel (John Lordi) how to place the equity shares of Gevity (a New York Stock Exchange company) either in the United States's name or in a trust under an IRS designated security interest.
43. In August 2006, at the suggestion of Chad Walters, Esq., I conducted a townhall-like meeting meant to explain to the "new guys" the history of the Presidion reorganization and to make a marketing video for the tax deferment strategy. More than 50 professionals or executives attended the meeting including my personal attorney Mr. Slaughter.
44. To sum up, I was on a manic run that rivals the "best" of any manic streak ever.
45. In November 2006, while I was in route from the NATO summit in Riga, Latvia, the United States began issuing grand jury subpoenas to Presidion's former customers.
46. Immediately upon landing, I called Harrison Slaughter asking him to call AUSA Randy Gold and tell him to stop issuing those subpoenas. If not, then they would destroy AEIM's business and neither the IRS nor anyone else would benefit from the previous efforts. Mr. Slaughter did and Mr. Gold stopped the subpoenas. (Only now do I understand what kind of relationship Mr. Slaughter and Mr. Gold must have had, in order for Mr. Gold to have pulled the grand jury investigation up short based on Mr. Slaughter's word).

47. In December 2006, Mr. Slaughter made a series of decisions, those decisions proceeded from certain mistaken beliefs. But despite the misconceptions, those decisions dictated or guided the subsequent course of events.
48. Mr. Slaughter's choices and misassumptions were: (1) He believed I was guilty, although I did not admit it, and he did not say it; (2) relatedly, he did not really believe that bipolar was as dangerous a disease as it is; and (3) he saw an opportunity to make millions of dollars in fees. Thus, he went to his friend Randy Gold and made a deal. He would get me to cooperate and plead guilty in exchange for Mr. Gold's promise that the government would not seize his or his colleague's fees. Mr. Slaughter never told me he had done this, but snippets of the event have been discovered during the subsequent seven years.
49. In February 2007, the United States Attorney's Office and the interagency investigatory team (Susan Gill, Randy Gold, Rick Smith, et. al.) observed first hand both my bipolar condition and the rapid cycling dimension of that disease.
50. In March 2007, Mr. Slaughter (also having witnessed the rapid cycling) began to read books concerning bipolar disorder and asked his chosen forensic expert, Jeffery Danzinger M.D., to review certain tapes and documents that Mr. Slaughter thought might show and represent diseased behavior.
51. Thus, after being hired by Mr. Slaughter to conduct the forensic examination, Dr. Danzinger decided I needed treatment. But Dr. Danzinger's status as Mr. Slaughter's forensic expert ethically prevented Dr. Danzinger from establishing a treatment relationship with me, thus Dr. Danzinger referred me to Dr. Jeffery Krotenberg D.D.O..
52. In November 2007, Dr. Krotenberg concluded I was an Axis-I bipolar with psychotic features, and that I needed antipsychotic medication to help make me compliant and susceptible to cognitive treatment. Additionally, he prescribed a significant quantity of Depakote to stabilize the mood swings.
53. In or about February 2008, I received from Mr. Slaughter a proposed plea agreement. I looked at it, and said "what is this?" I have not agreed to any plea; plus "these facts are a lie." I took the plea agreement to Aaron Bates, Esq., and Matt Mokwa, Esq., and ask them to correct the facts.
54. After trying to red-line the document, Aaron said it was so wrong it was impossible, so he had Matt rewrite it, and returned it to Mr. Slaughter.

55. In April 2008, I went to Mr. Slaughter's office supposedly to take polygraph examine. When I got there I was presented with another plea agreement and the e-mail from Mr. Gold threatening Mr. Slaughter et. al., that if within four days, I did not sign the plea agreement and sign it without making changes, then the government would seize the fees of Mr. Slaughter, et. al.
56. I promptly said the "United States has declared war on the Empire." I will sign the document, and I cannot wait to tell the court about how corrupt and hypocritical these supposed good guys are. I then signed it, apologized to God for the lie, making sure He knew this was not an oath before Him.
57. Immediately after that proclamation, I went into the office next door and spoke with Richard Kiefer about the polygraph examination.
58. During April 2008, to Mr. Slaughter's surprise, I passed the first polygraph test. He asked Mr. Kiefer to conduct another test. I passed that test, despite Mr. Kiefer's concerns about a false positive. I took another test and passed once again.
59. In May 2008, I passed a fourth polygraph examination. That created a problem for Mr. Slaughter because in order pacify Mr. Gold, Mr. Slaughter had had me sign the false plea agreement and yet it now appeared I was not guilty and I was going to the court and newspapers about the coercion. (Notably, Mr. Slaughter also verified the false document; and Mr. Gold used the false document to circumvent Department of Justice rules on indictment and increase the agents budget).
60. Mr. Slaughter came to my office to speak with me about how to use the polygraph results, and found me asleep in my chair drooling on myself; when I awakened, I was slurring my words. Mr. Slaughter asked my staff if they knew what was wrong. They told him it happens often now, and always happens right after he (Amodeo) takes his medicine.
61. In the next week, Mr. Slaughter searched out my wife and my father in order to get one or both to have me declared incompetent. They refused.
62. In June 2008, Mr. Slaughter convinced Dr. Danzinger to petition for me to be declared incompetent. A couple of days later, a bunch of people, including James Luesner of the Orlando Sentinel, were inside Judge Belvin Perry's chambers while I was slobbering all over myself, dozing off, and slurring my words. (At least according to Mr. Luesner, as I have very little memory of the event). Judge Perry declared me incompetent and appointed a plenary guardian.



63. Judge Perry also appointed a three-person psychiatric committee to confirm that I was incompetent and required a guardian. I was then given an evaluation by Dr. Darlene Antonio, the head of the psychiatric committee, and her findings were, that I have bipolar disease, that I am incapable of managing my own affairs, and that a plenary guardianship was required.
64. In July 2008, Dr. Danzinger and Dr. Krotenberg (both Harvard alumni) pulled some strings to get me into the Pavillion at McLean Hospital in Belmont, Massachusetts. (Arguably, the elite mental health clinic in the world.)
65. In August 2008, I was admitted for inpatient treatment at McLean Hospital. The evaluation and treatment took a month. There I was examined by many psychologists, psychiatrists, and mental health professionals: Dr. Evan Murray, Dr. Susan Parks, Dr. Peter Choras, Dr. Jennifer Taylor, Specialist Andrea O'Rourke, Dr. Alexander Vukovic, etc. Initially, they thought I might be malingering, but after 24 hour observation for a couple of days, the doctors concluded that I actually had an extreme and somewhat unusual variant of the rapid-cycling bipolar condition. Moreover, soon after reaching that conclusion they decided that my unique set of delusions appeared to be a form of self-treatment to avoid chronic depression.
66. McLean's assessment was Axis-I bipolar with psychotic features and persistent delusions. They prescribed new medications, an 18 to 24 month therapy plan, and a 72-hour decision-making lag-time, etc....
67. In September 2008, I returned to Orlando and promptly discovered that I could not get any of the recommended doctors or mental health specialists to treat me. I was too "high risk" of a patient, because of the criminal action and the publicity. I could get neither my prescription medicine nor the cognitive therapy that the medication was meant to facilitate.
68. In late October or early November 2008, a workaround was put into place. Dr. Peter Choras would counsel me by telephone; and because Dr. Choras was not licensed in Florida he could not prescribe the medication, therefore Dr. Danzinger would issue the prescription.
69. In or about November of 2008, Dr. Choras commenced treatment of me via telephone. Although Dr. Danzinger was still a little uncomfortable with prescribing me the medication, he needed to do so since Magistrate Kelly had ordered continued use of the medicine as a condition of bond.
70. In or about May 2009, Dr. Danzinger contacted probation officer Donna Weebe and told her to find me immediately, because blood tests revealed the court mandated medicine had reached toxic levels and "could kill Frank" if he did not stop taking the medication.

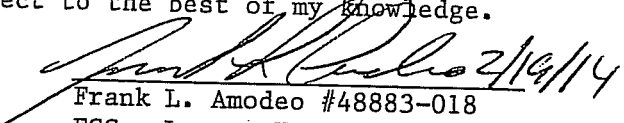
71. On May 26, 2009, immediately after sentencing, Orange County Jail Psychology Department, on behalf of the United States Marshal Service, placed me in the Acute Mental Health Unit of the Orange County jail.
72. While in the Acute Mental Health Ward, I was forced to take the debilitating, life-treatening drug cocktail once more.

#### July 2009 To The Present

73. In July 2009, I was transferred to the Federal Correctional Complex in Coleman, Florida. I was immediately sent to both health services and the psychology department.
74. In July 2009, Dr. P. V. Davilla of Coleman (Low) Health Services put me on chronic care and prescribed the medication as recommended by the McLean Pavilion. He said I had to remain on the medication regimen until a licensed psychiatrist authorized the medication change.
75. In or about August 2009, since I was representing the corporations pro se, this court brought me back for a hearing in the corporate case. But an error in the process of moving me resulted in a disruption of the medication availability. The sudden withdrawal from the medication, even for three or four days, was shocking. I returned to Coleman and became dedicated to following through the plan formulated at McLean to get me off the drugs (while ensuring my ability to function normally).
76. From 2009 - 2012, consistent with that plan, two different BOP psychiatrists, both named Dr. J. Garcia, counseled me periodically over the next two and a half years. Dr. Davilla continued to see me regularly and to prescribe the psychiatric medications.
77. Sometime in late 2009, I got permission from the BOP doctors to start scaling back the medication. The McLean plan involved eighteen months to two years of counseling and a phased reduction of the medication. Eventually the BOP decided that I was stable and adapting to the prison environment, so the amount of medication was decreased.
78. By February 2012, although unable to replicate the conditions foreseen by McLean, I was at the point where I did not need the medicine any longer. On or about February 10, 2012, Dr. Garcia approved my complete cessation of the medication. But Dr. Davilla suggested I continue to keep some of the Depakote-equivalent available just in case I needed to take it.
79. At that point, I decided to get my competency restored. I tried to get my guardianship records from the Orange County Courthouse. This proved impossible, as the clerks refused to release the sealed files to anyone because of my continued incapacity.

80. So, I started learning about Florida competency law, in order to figure out how to get my records and how to get my rights back. Hopefully, from these records I could sort out what happened, that is, how I ended up spending nearly four years on these mind-numbing, intellect-suppressing drugs.
81. In December 2012, I filed a motion to regain my capacity. A motion that seemed to comport with the Florida statute, which requires the court to make a personal inquiry as to my capacity before restoring my rights.
82. The state court, however, did not pay much attention to the pro se motion from the total incompetent. Therefore, in April 2013, a friend's law partner agreed to represent me in getting my rights restored.
83. In May 2013, after many attempts, the attorney finally got the circuit judge to conduct a hearing; and the judge decided an updated evaluation was required before my capacity could be restored.
84. In September 2013, Dr. Antonio, the head of the State's psychiatric committee received permission from the Bureau of Prisons to come to Coleman and evaluate me. She gave me a series of oral and written tests plus interviewed me for a couple of hours.
85. In November 2013, Dr. Antonio filed her report with the state court. The report concluded that I was improved, but still so impaired that I needed a guardian. Plus, I still could not be allowed either to contract or decide what medical treatment was appropriate.
86. After discussions (debate) with my wife, who believes I am still very ill, I went to the prison's psychology department, to voluntarily submit to regular treatment if they believed I needed it.
87. In December 2013, Dr. Dexter James of the Bureau of Prison's Psychology department conducted some informal interviews.
88. In January 2014, during a formal interview, Dr. James concluded that at least while at Coleman - Low, I did not need treatment. Also, he further he confirmed that, in the Bureau's opinion, I was stable enough to function without medication and treatment as of February 10, 2012.

I declare, under penalty of perjury in accordance with 28 U.S.C. §1746, that the foregoing statement is true and correct to the best of my knowledge.

  
Frank L. Amodeo #48883-018  
FCC - Low Unit B-3  
P.O. Box 1031  
Coleman, Florida 33521-1031

## Treatment Summary

Date	Treating Professional	Agency
1995	Cydney Yerushalmi	Social Security Adm.
1998	Phillip Tell	Private
1998	Stephen O'Hagan	Private
2000	Janet Lewis	Bureau of Prison's
2001	Joseph Trim	Private
2003	Diane Shuker	Probation Office Cont.
2004	Robert Pollock(Informally)	Private
2007	Jeffery Danzinger	Private
2007	Jeffery Krotenberg	Private
2008	Darlene Antonio	State of Florida
2008	Peter Choras	Private
2008	Alexander Vukovic	Private
2008	Susan Parks, et. al.	Private
2009	P. V. Davilla	Bureau of Prisons
2009	J. Garcia	Bureau of Prisons
2012	J. Garcia (Different)	Bureau of Prisons
2013	Darlene Antonio	State of Florida
2014	Dexter James	Bureau of Prisons