

**IN THE UNITED STATES COURT OF APPEALS FOR THE FIRST CIRCUIT**

CASE NO. 23-8011  
FORMERLY: DOCKET NUMBER: 2201CR002384  
BMC TRIAL COURT 5  
COMMONWEALTH vs. Nicholas J. Fiorillo

**DEFENDANT NICHOLAS FIORILLO'S RESPONSE TO SHOW CAUSE ORDER**

Defendant/Respondent Nicholas Fiorillo hereby submits this response ("Response") to the Order to Show Cause entered by the Court on March 10, 2023, directing that Defendant/Appellant show cause in writing, as to why his appeal of the January 11, 2023 order of remand entered in civil action no. 1:22-cv-12182-DJC, (D. Mass.), remanding the case back to the State court from which it was removed.

The Order of March 10, 2023 states that the Court "may not have jurisdiction" to consider Defendant's appeal of the remand order. However, since Nicholas Fiorillo has steadfastly maintained the non-applicability of 28 USC §1447(d) with regard to any "time barring" of removal, he equally maintains the existence of applicable exception thereunder, based upon removal of this instant action and the inextricably interrelated actions, based upon violations of his Civil Rights.

This matter was timely removed from the BMC on 12/21/2022, with the BMC duly noticed immediately thereafter. This removal completely divested the BMC of all jurisdiction as of the morning of December 21st, removing the contrived incident resulting in this trumped up charge against private citizen Fiorillo, from the control of embattled District Attorney Hayden, allowing Fiorillo the opportunity to defend against unlawful attempts to grossly violate his civil rights, by way of what was a set up in the Municipal Court in order to incarcerate a private citizen, based upon fraudulently alleged assault charges, wholly lacking in merit.

It was this very lack of remedy, redress or recourse this self-represented litigant has in any of the Massachusetts State Courts which triggered his timely removal to Federal District Court, most notably the lack of remedy in the BMC where the fix was in to bring about the false arrest and imprisonment of Nicholas Fiorillo, which could then be leveraged against him to coerce settlement of a civil action constituting fraud on the Court.

### **FACTUAL BACKGROUND**

On or about June 6, 2022, during a deposition of Defendant's wife conducted by attorney Kevin T. Peters at his Boston law office, a proceeding at which Mrs. Fiorillo *was denied counsel representation*, based upon repeated threats by Peters to incarcerate her should she be unable to answer a question, Mrs. Fiorillo, suffering from *a pre-existing heart condition which both Mr. Peters and the Suffolk Superior Court had been previously made aware of*, suffered a cardiac incident resulting in her transportation to the hospital, where she spent four days in the cardiac care unit.

Knowing that Defendant made repeated attempts in Superior Court to adjourn the scheduled deposition until such time that Mrs. Fiorillo had counsel representation, and also knowing full well that an attorney would not have allowed the assaulting line of questioning which caused Mrs. Fiorillo's collapse, Mr. Peters knew that he was in serious trouble. Making matters worse was the fact that as Defendant rushed to his wife's aid, Mr. Peters made physical contact with him. Peters grabbed Mr. Fiorillo by his jacket in an attempt to prevent him from getting to his wife, making the audacious claim that Mrs. Fiorillo was "faking." Four days in a cardiac unit isn't faking, nor is being currently evaluated for a pacemaker.

When Boston Police officers responded to the scene prior to Paramedic transport of Mrs. Fiorillo to the hospital, Mr. Peters fraudulently told the Police that Defendant had assaulted him, and that the mild mannered, affable Nicholas Fiorillo, without a violent bone in his body, had struck a man of his age with a closed fist. An incident which *plain and simply did not take place*, but one well known to Peters, would bring heightened charges due to his age. Although

Peters would later admit that he was not assaulted by Defendant and wished that the entire incident would just go away, a combination of Police and clerical “assists” resulted in criminal charges being filed against Defendant, instead of Mr. Peters, the actual aggressor. While this would have been conscience-shocking in any other Municipality, in a City where a homeless man had recently been charged with assault upon a Police Officer when it was that Boston Police Officer who assaulted the victim, it was just another day at the Precinct.

The resolution of this issue does not depend on any facts to be developed at trial, since the fact of the matter is that this action must be dismissed by the Trial Court, since no trial of Nicholas Fiorillo on trumped up charges, is warranted. This would be little more than malicious abuse of criminal process, likely due to the fact that Nicholas Fiorillo has taken a possibly unprecedented, courageous step, by turning a glaring spotlight up full blast on the systemic corruption within the Courts of the Commonwealth, mirroring that of the Boston Police Department and current District Attorney’s Office. A true swamp in need of draining, starting with the undoing of a clear cut conspiracy resulting in the deprivation of citizen-Defendant Nicholas Fiorillo’s civil rights.

Starting at the end of 2021, the first of what would be the start of a series of frivolous civil actions little more than iterations of the same unlawful debt collection action by associates-in-fact involved in a racketeering scheme involving predatory, hard money lending by fraud in the inducement, was filed. The objective of these enterprising racketeers was to expropriate the real property and business interests of Nicholas Fiorillo, and his Ocean Development and GotSPACE business entities. As to the latter, recent contractual agreements for the purchase of land in the State of Connecticut for the development of critically needed data storage facilities, put the potential value of GotSPACE Data Partners at or over one billion dollars.

Engaging in a close to two year pattern of “bait and switch” “loan-to-own” tactics, in order to fraudulently induce Nicholas Fiorillo into pledging personal assets by way of “guarantees” to “notes” originally presented to him by commercial brokers as “investments,” these racketeering,

would be Plaintiffs then leveraged these “debt obligations” against Fiorillo, in order to extort monetary payment and transfer of significant percentages of company stock under threats made against his personal safety, the safety of his family, and threats to foreclose on his family home.

Such extortion was facilitated by the use of criminal cyber-spying by the Spitalny family, the Patriarch of which was a convicted tax evader who served time in Federal prison. Samuel B. Spitalny was discovered through investigation, to be the mastermind of the wiretapping of Fiorillo’s iPhone, iPad and other electronic devices, and it was discovered that Fiorillo and his family were being tracked by GPS locators. In light of the threats to life and limb which had been relayed to Fiorillo as having come from the Spitalnys and others, this put the entire Fiorillo family in fear of imminent harm. In the civil action filed against Nicholas Fiorillo by the Spitalnys, they were represented by attorney Kevin T. Peters of the Gesmer Updegrave law firm.

In their fraudulent and frivolous civil action, the Spitalny’s claimed with knowing falsity that they were entitled to payment of millions of dollars from Nicholas Fiorillo, that they were not entitled to. The Spitalnys, reputed Boston loan shark Raymond Green and former GotSPACE principal Thomas Quinn, among others, strategized that multiple civil actions filed against Fiorillo would be sufficient to coerce him into settlement, in the face of mounting legal expenses. After previous attempts to extort payment from Fiorillo on the eve(s) of attempted foreclosures on his home failed, attorney Peters decided to take this Enterprise’s corruption to a higher level.

The plan concocted by Peters, with a little help from friends Powers and Dugal of BPD Precinct I, which Fiorillo learned “off the record” had been dubbed “Operation Schoolhouse,” involved using Mrs. Fiorillo, a special needs school teacher, as “bait” during a deposition at Peters’ office at which Peters would ensure she would not be accompanied by counsel. Both Peters and Suffolk Superior Court Judge Peter Krupp, before whom Fiorillo tried in vain to have the deposition rescheduled so that his wife, who had no involvement with GotSPACE or Ocean Development, could have counsel representation, had been made aware of Mrs. Fiorillo’s pre-existing heart condition, and the understandable anxiety she was experiencing after being

deposed to give testimony as to matters she knew nothing about. Despite this advisement, Judge Krupp orders Mrs. Fiorillo to appear at the scheduled deposition unrepresented by counsel.

The best laid plans of Peters and Police-men went awry, after Mrs. Fiorillo collapsed to the ground in his office, withering under his threats to have her removed and taken to jail, something he told Mrs. Fiorillo that “the Judge had given him permission to do.” A series of rapidly moving incidents after that involved Defendant rushing to his wife’s aid while shouting to office staff to call 911, Peters grabbing Defendant by his jacket, and a secretary yelling “Kevin, what are you doing?” Operation Schoolhouse had failed miserably, and now Mr. Peters was facing serious trouble.

As “luck would have it,” Officers Powers and Dugal just so happened to be nearby. As in *already at the office location when the call came in*, nearby. While other officers may have taken Mr. Peters out in handcuffs once learning what transpired, Peters and Dugal, as part of their pre-planned conspiracy with attorney Peters, facilitated charges being sworn out against Defendant for assault. Even after Peters admitted under oath that he had not been assaulted by Nicholas Fiorillo, that he regretted the entire incident and wished that it would all go away, criminal charges still came forth *against the victim*. This by intent, in order to leverage the prospect of criminal prosecution against Defendant, in order to force him into civil settlement with Peters’ clients, the Spitalnys.

By way of a conspiracy by and between attorney Peters and two Boston Police Officers, the unlawful prosecution of Nicholas Fiorillo was ultimately aided and abetted by Clerks Hogan, Lawless and Miller, as well as Judge Coffey, no stranger to overstepping when it came to criminal prosecutions. As a Prosecutor himself, Judge Coffey was known to have “used hideous, derogatory, anti-transgender language to invalidate a potential juror. Partway through Coffey’s transphobic ranting, the judge cut him off.”

Attorney Peters, therefore, was able to put all of the proper players into place, against the grossly disadvantaged Defendant, Nicholas Fiorillo. Exacerbating matters *to the point of criminality on the part of the BMC*, is the issuance of a warrant by Judge Coffey against Nicholas Fiorillo. Upon information and belief, a retaliatory reaction by a Judge completely overstepping his bounds may have been “triggered,” after the matter was properly removed to District Court, pursuant to Fiorillo’s efforts to have the false criminal charges against him dismissed.

While the duly noticed removal on December 21, 2022 required that *all hearings scheduled in Municipal Court be canceled*, Judge Coffey took both extraordinary and extra-jurisdictional action, by having a “failure to appear” warrant issued for Nicholas Fiorillo, under completely false pretenses. Abuse of judicial discretion, taken to an entirely new level, which was an egregious affront to Mr. Fiorillo’s freedom. Mr. Fiorillo was to be unlawfully arraigned and incarcerated last December, over Christmas weekend no less, for an alleged assault and battery which never took place. Instead, this fabricated incident was a “frame up” by BPD Detective Michael Powers, stemming from the June 6, 2022, botched BPD District 1 and Suffolk County DA Hayden’s “Operation Schoolhouse.” Named for the profession of Fiorillo’s wife, who ended up in the ICU for 3 nights and is now suffering for the rest of her life with a compressed heart, and other serious life threatening medical conditions.

As previously well-established by Mr. Fiorillo, in his Notice of Appeal, Fiorillo succinctly parallels his case to a previous incident, by which a man was fraudulently charged with assault by the Boston Police Department, which was then covered up by the District Attorney’s Office. The fact that this conduct is more so “routine” than an outlier when it comes to the current “officials” involved, is beyond indicative that the most prudent and exigent course of action at this time, is to ensure that “damage control” is thorough. It looks like heads have already started to roll, as BMC Clerk Lawlor is nowhere to be found, and ADA Frieman has been forced from the DA’s Office. A great deal of attention has been brought to this situation and to the gross

violation of the civil rights of Nicholas Fiorillo, against whom there is an “outstanding warrant” in the system. It goes without saying that immediate cancellation of this fraudulent warrant is in order, concurrent with the with prejudice dismissal of all criminal charges, which stem from a “crime” which never took place.

The errors here are glaring, the bias blatant and the deprivation of civil rights shocking to the conscience, given the inherent conflict of interest previously raised by Mr. Fiorillo, which should have kept any and all matters involving him in the District Court, from being “randomly assigned” by the Clerks, to Judge Denise Casper. Judge Casper was the Judge who issued the erroneous District Court remand order. This Judge should have recused herself, once it was brought to her attention that the Company that her husband, Mark N. Casper is the President and CEO of, Thermo Fisher Scientific, has not only been represented in the past by the law firm of Gesmer Updegrave, the *same firm that employs Kevin T. Peters*, the Complainant in the fraudulent BMC action, there is a mutual exchange of employees between this law firm and Company, giving Peters a direct conduit to the Judge’s husband. Accordingly, recusal should have been automatic.

While in the ruling pursuant to remand of the subject action, Judge Casper asserted that “Fiorillo's allegations do not provide the Court any basis to believe that he cannot enforce his federal rights in a state forum.” This was not an accurate assessment. Whether in recusal motions or removal pleadings, Nicholas Fiorillo has repeatedly pointed out the fact that by virtue of common attorney representation of Fiorillo and an unrelated pro se litigant, whose prolific filings have resulted in complaints and investigation of both State and Federal Court Judges, Mr. Mohan Harihar, Fiorillo has been deemed to be a “Harihar redux,” and the judicial bias against him prevents any remedy, redress and recourse in the State courts.

No Commonwealth citizen should endure what Nicholas Fiorillo has been subjected to. Relief must be swift, by way of the immediate extinguishing of this egregious threat to Fiorillo’s personal freedom. That this “criminal” matter should be dismissed in light of the information

succinctly presented in this petition, is a foregone conclusion. As is the conclusion that the Remand Order issued by Judge Casper with bias in the aftermath of Fiorillo's recusal motion, was also an error. A matter that should have never been brought in the BMC Trial Court, most certainly should not be returned there.

Civil rights are personal rights guaranteed and protected by the U.S. Constitution and federal laws enacted by Congress. The right to due process under the law to a free and fair hearing, and the right to be free from false imprisonment are just two such rights that Nicholas Fiorillo was safeguarding, when he removed actions from State to Federal Court, upon the realization that there would be no remedy, redress or recourse there. Accordingly, this was not a time barred removal, and the unequivocal Federal questions raised by the entirety of this action merit addressing by the Federal Court.

The motives of individuals like attorney Kevin Peters and the judicial officers of the Secret Court rendering aid to him, cannot be overstated. The duty of any State Court, subsequent to removal to Federal Court, was to proceed no further. A hard stop with no further action, pending complete adjudication in the Federal Court. There has been a clear and transparent conspiracy between judicial officers, judges, and law enforcement, to upend this pro se litigant's constitutional rights to a free and fair hearing process, unlawfully jail him, almost murder his wife, and deprive him and his family of the protections of the United States judicial system. A clear act of treason and weaponization of the Secret Courts of Boston, working diligently with the Boston Police and certain SSC Judges and the Powers family, to forward the criminal objectives of the NE Edge Criminal Enterprise, individuals who are now defendants in the District of Rhode Island. The weaponization of the Secret Courts of the Commonwealth is clear, and this presents extreme danger to this litigant and every other potentially similarly situated citizen of the United States.



Pro se litigant Nicholas Firorillo has been repeatedly denied an evidentiary hearing, denied the opportunity to present evidence to indicate that many rulings against him in the State court were outright forgeries, fabricated documents signed by certain Clerks including Clerk Steve Powers. Both Judge Ricciuti and Krupp, on numerous occasions from the bench, have outright stated on the record, with regard to multiple suspect orders from cases against Fiorillo: "This is not my signature," "I did not sign this order," "I do not conduct business this way," "I would have never ruled like this," and "I am befuddled at that order." The corruption at the Secret Courts is alive and running hog wild, and will stop at nothing absent the unlawful incarceration and financial ruin of this litigant.

It is abundantly clear that the Judicial Officers, Judges and Law Enforcement, will stop at nothing, continue to repeat their unlawful and sinister collection schemes and present their completely and categorically false claims against the defendants, unless intervention by the Inspector General and Attorney General from another State, properly charges and prosecutes this criminal group, under RICO Section 18 USC, and sanctions them for their misrepresentations to the Court. It was the realization that for this pro se Defendant, there would be no remedy, redress or recourse in the secret courts of Boston, and therefore, preservation of his Constitutional, civil rights to due process under the law would be served only by removing matters to the Federal Court.

Declining review without making express findings of fact, as was done repeatedly here by citing an inapplicable statute as grounds to uphold remand as "time barred," without fact-finding, does a gross disservice to the movant, bordering upon abuse of discretion. Express findings are required to ensure that the reviewing court provides due and just consideration, to the extent that a statute is susceptible to more than one interpretation.

The court has historically stated that when the removal statute speaks of "any law providing for equal rights," it refers to laws which are couched in terms of equality, laws of which include the due process clause and 42 U.S.C. § 1983, and confer equal rights in the sense,

*bestowing them upon all.* Such laws were intended, by adding the word "equal" to the term "rights," to include thereby all statutes having an equalitarian purpose. Trying to limit claims to civil rights by race was found to be a "formidable" burden upon the courts, and drawing a demarcation line to include only one class of people would be all but impossible. In short, the removal of cases to Federal Court for civil rights violations, is not a race-restricted right which excludes individuals not members of minority races or ethnicities.

The guarantee of liberty found in the due process clause is a law providing for equal rights within the removal statute, and where it gives 'color of authority' for one type of protest, it does so for all. The terms under Title VII are not limited to discrimination against members of any particular race, nor are restricted to employment issues only, and prohibit racial discrimination against white persons upon the same standards as racial discrimination against nonwhites. McDonald v. Santa Fe Trail Transp. Co., 427 U.S. 273 (1976).

Accordingly, the Court should consider such matters equally, rather than compartmentalize the Due Process and Equal Protection Clauses as being race-restrictive, realizing that they are both part of the same constitutional amendment. The most basic of all laws are laws which provide for equal rights, and the aforementioned clauses often intersect. To dismiss or otherwise decline to review a case based solely on "time barring" factors, continues to unduly punish a self-represented litigant by espousing a policy that a Court should not wish to promote. Section 1981 of the Civil Rights Act prohibits racial discrimination against white persons as well as nonwhites, and this conclusion is supported both by the statute's language, which explicitly applies to "all persons," and by its legislative history. Federal removal statutes, therefore, are not restricted to nonwhites, but applicable to all persons whose civil rights have been violated, as this Defendant's rights to due process have been.

Utmost caution must be exercised by federal courts in processing removal petitions so that equal protection claims are afforded to all, as a basis for removal under civil rights jurisdiction statutes, codified as 28 U.S.C. § 1442 and § 1443, as federal courts are increasingly

confronted with the question of how to evaluate cases under current discrimination law. Accordingly, a defendant who has removed a civil rights case to federal court can appeal the order to remand, as Defendant has done. The Supreme Court, in a 7-1 decision, previously held that the word "order" in § 1447(d), gives the appellate court the right to review every ground for removal, when one of the grounds was pursuant to federal officer or civil rights jurisdiction statutes.

Here, Defendant maintains that the text of 28 U.S.C. § 1443 contains no language whatsoever mandating a racial litmus test, and therefore, he should not be required to meet this prong. A removal statute which makes reference to any law providing for equal rights, refers to laws which are couched in terms of equality. The due process clause as well as provisions under 42 U.S.C. § 1983 are sufficient examples of laws which confer equal rights to all United States citizens.

In this instant action, if the federal court does not intervene, Defendant will continue to be subjected to continually egregious denials and an ongoing inability to enforce in said state court, his Constitutional, civil rights to due process, and will continue to suffer manifestly irreparable harm and due process injuries therein. Defendant steadfastly maintains that key protections granted by the 14th and 15th amendments to the Constitution the constitution requires race neutrality, and that his appeals should not be summarily disregarded with the seemingly knee-jerk application of § 1447(d) relative to "time barring." Instead, just and due consideration should be given to the denial of a self-represented litigant's rights to due process under the law, rights conveyed to all citizens under the Constitution in a nation providing liberty and justice for all, not just some.

Under the second prong of § 1443(1), the removing party must prove that he has been "denied or cannot enforce" the specified federal rights, in the courts of the State, which is precisely what Defendant has maintained. Defendant also maintains that the Court is mindful of the procedural obstacles to removal which provide increased opportunities for plaintiffs to

manipulate federal jurisdiction in arbitrary ways, as is the case here. Accordingly, plaintiffs often successfully prevent removal through various forms of gamesmanship, the type that Defendant has consistently been subjected to. By encouraging the type of procedural gamesmanship engaged in by Plaintiffs in this instant action as well as the interrelated actions via their attorneys, such judicially created obstacles to removal serve to undermine respect for both the courts and for the rule of law.

The Framers intended that the rights conferred by the Constitution which included the right to litigate certain disputes in a federal forum, be rights which would be equally available to all citizens. Removal of cases to a federal forum by a defendant does not deprive plaintiffs of any "right," but merely affords the removing defendant an equal opportunity to litigate in federal court. Therefore, a defendant's removal right is constitutionally based, and must be viewed as no less important, than a plaintiff's "right" to select the initial forum. Plaintiffs in the instant as well as the interrelated actions sought to avoid the Federal court system, since the very basis of their actions was the collection of an unlawful debt, in violation of federal law. The outcome in that forum was clear.

The Supreme Court has made clear that the original act intended to secure to "those persons who are denied or cannot enforce in the courts or judicial tribunals of the state or locality where they may be," that the rights protected included and conferred full and equal benefit of all laws and proceedings, for the security of persons and property, to be enjoyed by all citizens. To justify removals, there must be a factual showing that a defendant cannot enforce his federal rights, and legislative history specifically calls for the courts to redetermine the scope of the right to remove cases, under section 1443.

An order remanding a case to the State court from which it was removed is reviewable on appeal, pursuant to section 1442 or 1443, and shall be reviewable by appeal. Under 42 U.S. Code § 1983 - Civil action for deprivation of rights, any person, who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia,

subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law. Defendant, as a United States citizen, was subjected by the State Superior Courts, including the County of Suffolk and others, to the deprivation of rights, privileges, or immunities secured by the Constitution, including his right to due process under the law to a free and fair hearing.

The basis of this instant action and the inextricably interrelated actions, is the Federal question surrounding attempts to collect unlawful debt. Section 893 prohibits the willful advancement of money or property to any person "with reasonable grounds to believe that it is the intention of that person to use the money or property so advanced directly or indirectly for the purpose of making extortionate extensions of credit." Section 894 prohibits the "use of an extortionate means . . . to collect or attempt to collect any extension of credit, or to punish any person for the non repayment thereof."

Whereas all of these vexatious cases commenced against Nicholas Fiorillo are inextricably related, fraudulent, and clear cut abuses of both civil and criminal process. Accordingly, consolidation at Federal level pending just and proper adjudication, is the only just and sound relief against the despicable, systemic pattern of Grand Corruption within the secret courts of the Commonwealth. For the public good, we must see that our bright beacon of Justice shines once again, since it is crystal clear that there has been a systemic, deep rooted, Grand Corruption Scheme within the Massachusetts judicial court system since the early nineteenth Century, which is still alive and well today.

As brought to light and fully adjudicated in the Roman Catholic Church clergy sex abuse scandal and cover up, there continues to be a judicial political pattern of corruption within the secret courts of the Commonwealth of Massachusetts. As thoroughly detailed in the Wall Report, the systemic pattern of nepotism hires and quid pro quo, pay to play manipulation of laws within our judicial system, in return for political contributions, merits remedy, given the totality of the

inextricably interrelated, unlawful debt collection cases filed by a criminal Enterprise known as NE Edge, responsible for the fraudulent criminal charges brought in Boston Municipal Court. There is no plausible justification for what this pro se litigant has been subjected to within the judicial system of Massachusetts, other than being the latest victim of this racketeering Enterprise and a victim of grand corruption of the secret courts, and of the judicial insiders who unlawfully continue to pull its strings.

As set down by the First Circuit Court in Boston Globe Media Partners, LLC v. Chief Justice of the Trial Court, the interests of justice require that the spotlight continue to shine brightly upon these secret courts. Public policy dictates under the First Amendment of the Constitution provide for removal of this action to this Court, under Under 28 U.S. Code § 1441, 28 U.S. Code § 1443, 28 U.S. Code § 1446, 42 U.S.C. § 1983, 42 U.S.C. § 1985, U.S. Const. Ann. Article III, Section 2, Clause 1. This self-represented litigant never stood a chance to have his civil rights to a fair and just hearing upheld in the lower courts, and each of the Federal questions set forth within must be addressed for the benefit of the basic rights and civil liberties afforded to all Americans, found under the United States Constitution of America.

### CONCLUSION

Defendant Nicholas Fiorillo remains mindful of the Court's responsibility to independently determine whether the issues presented in a case are in the public interest and why the removal from a State Court where due process rights were dismantled and any chance of remedy, recourse and redress non-existent, meets the requisite standards for removal. In the interim, the Defendant asks the Court to stay any and all remand and rescript.

Dated: April 10, 2023

Respectfully submitted,

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