

NEW JERSEY
LAWYERS' FUND
FOR CLIENT PROTECTION

(Civil Action – Complaint
Filed against Kenneth Irek,
Superior Court of NJ
Law Division, Mercer County
Docket No. L-5664-94
by Michael T McCormick, Deputy Counsel,
December 29, 1994)

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NEW JERSEY LAWYERS' FUND
FOR
CLIENT PROTECTION.

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RICHARD J. HUGHES JUSTICE COMPLEX
CN-961

TRENTON, NJ 08625-0961

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December 21, 1994

Mercer County Clerk
P.O. Box 8068
Trenton, New Jersey 08625

**Re: New Jersey Lawyers' Fund for Client Protection
v. Kenneth Irek; CPF-520**

Dear Clerk:

Enclosed for filing is the original and two copies of a Complaint in the above matter. Kindly file and return a filed copy of the Complaint to me in the envelope provided.

As a Committee of the Supreme Court, the Fund is exempt from fees in this regard.

Thank you.

Sincerely,

Handwritten signature of Michael T. McCormick in cursive script.
Michael T. McCormick

enclosures
MM/1

FEE PAID
() ACCOUNT () CHECK
() CASH () NO FEE
() MONEY ORDER
ENTERED

DEC 29 1994

ALBERT E. DRIVER, JR.
COUNTY CLERK
DEPUTY CLERK/SUP. CT.
1994 DEC 29 AM 8:01
RECEIVED & FILED
MERCER COUNTY
CLERKS OFFICE

New Jersey Lawyers' Fund for _____
Client Protection AMOUNT _____
Richard J. Hughes Justice Complex OVER _____
CN-961 BY: _____
Trenton, NJ 08625
Michael T. McCormick, Deputy Counsel
(609) 984-7179

NEW JERSEY LAWYERS' FUND FOR : SUPERIOR COURT OF NEW JERSEY
CLIENT PROTECTION : LAW DIVISION
Plaintiff : MERCER COUNTY
v. : DOCKET NO. L-5664-94
KENNETH IREK : Civil Action
Defendant : COMPLAINT

The plaintiff, New Jersey Lawyers' Fund for Client Protection, an entity established by the Supreme Court of New Jersey under R. 1:28-1, et seq., Richard J. Hughes Justice Complex, CN-961, Trenton, New Jersey 08625, complaining against the defendant says:

1. The plaintiff was established to reimburse clients for losses caused by the dishonest conduct of members of the Bar of New Jersey.
2. Defendant maintained offices for the practice of law at 41 Highway 34, Colts Neck, New Jersey 07722.
3. Defendant was disbarred from the practice of law on May 11, 1993.
4. In or about August 1990, while representing Zontan and Cathleen Szatmary, defendant embezzled, misapplied and converted to his own use the sum of \$5,000.00 received by him on behalf of Mr. and Mrs. Szatmary as funds to be held, in a fiduciary capacity,

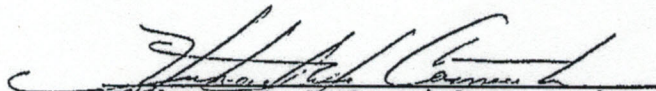
in escrow in connection with a real estate transaction.

5. The individuals named in paragraph four of this complaint filed a claim with plaintiff on account of the dishonest conduct of the defendant.

6. Pursuant to R. 1:28-1, et seq., of the Rules Governing the courts of New Jersey, the plaintiff has paid the claim of the Claimants named in paragraph four and has received an assignment of all their rights, claims and interest against the defendant.

7. To date, defendant has not reimbursed the plaintiff for any of the monies paid on his behalf.

WHEREFORE, plaintiff demands judgment against the defendant for damages in the amount of FIVE THOUSAND DOLLARS (\$5,000.00) plus interest from the date of Complaint and costs of suit.


Michael T. McCormick
Deputy Counsel
Attorney for Plaintiff


Dated: December 21, 1994

CERTIFICATION

I hereby certify pursuant to R. 4:5-1 that, to my knowledge, the matter in controversy is not the subject of any action pending in any court nor is there any pending arbitration proceeding, nor is any such action or arbitration contemplated. I further certify that there are no other parties who should be joined in this

action.

I certify that the foregoing statements made by me are true.
I am aware that if any of the foregoing statements made by me are
wilfully false, I am subject to punishment.


Michael T. McCormick
Deputy Counsel
Attorney for Plaintiff

Dated: December 21, 1994