IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE
DIVISION I

2005 MAR -7 AM 11:27
DAVID S. ... CLERK
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STATE OF TENNESSEE	)	
	)	
	)	
VS.	)	CASE NO: 99-B-1290
	)	
	)	
PERRY AVRAM MARCH	)	

NOTICE OF IMPEACHMENT PURSUANT TO RULE 608 OF THE TENNESSEE RULES OF EVIDENCE

Comes now the State of Tennessee and gives notice of its intent to use the following bad acts for impeachment pursuant to Rule 608 of the Tennessee Rules of Evidence. The acts are as follows:

1. The defendant was disbarred by the Tennessee Supreme Court on August 20, 2000, for the following:
    - A. Embezzlement of law firm funds.
    - B. Making false statement to a court in a frivolous lawsuit.
    - C. Failing to advise client, Ester Epstein he was under suspension.
    - D. Being held in contempt of court.
    - E. Misappropriations of client funds.
    - F. Failing to return client records.
2. The defendant was deported from Mexico in 2005 for the following acts:
    - A. Held himself out as a legal representative of Kato Inc. when he was not authorized to do so.
    - B. Lied to Mexican officials about where he lived.

C. Forged the signature of Dan Logan on a document.

3. The defendant was held in criminal contempt by the Circuit Court of Cook County, Illinois in August 1999.

4. The defendant was held in criminal contempt by the Seventh Circuit Court of Davidson County, Tennessee in March 2000.

5. The defendant lied to attorney Bill Ozier about sending letters to a paralegal at Bass, Berry and Sims. (1991)

6. The defendant lied to members of the firm of Levine, Mattson, Orr and Geracioti about the reason he left Bass, Berry and Sims. (1991)

7. The defendant filed forged pleading in the Seventh Circuit Court for Davidson County, Tennessee. (1999-2000)

8. The defendant represented himself to be a lawyer in Mexico but was not licensed in Mexico. (1999)

9. The defendant used false information about his parents on a Mexican marriage certificate. (2000)

10. The defendant misappropriated money from the Belize bank account of Robert Duncan. (1999-2000)

11. The defendant defrauded Gayle Boozer Cancienne out of proceeds from the sale of real estate. (2000)

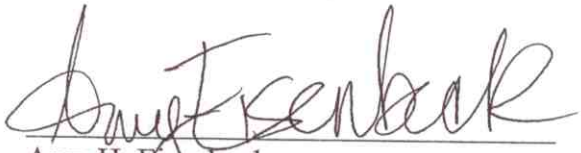
12. The defendant attempted to sell real property belonging to Gayle Boozer Cancienne without her permission. (2001)

13. The defendant presented a forged receipt for rental payment to Mr. madrigal in Mexico. (2004)

14. The defendant misappropriated more than one hundred thousand dollars from the sale of real estate belonging to Ted Axton in Mexico. (2003)

15. The defendant defrauded Mrs. Helen Speak out of four thousand dollars in Mexico. (2000)

Respectfully submitted,



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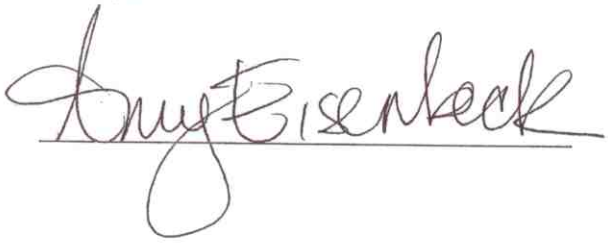
CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been mailed to Ed Fowlkes, 172 2nd Avenue North, Suite 218,

Nashville, TN 37201, on this the 6 day of March, 2006.