

**CRIMINAL CHARGES AGAINST DEPUTY SHERIFF BETTS, DEPUTY
SHERIFF ENGLISH, PAUL HOWARD, JR., AND NAOMI FUDGE FOR
OBSTRUCTION OF JUSTICE AND CONSPIRACY**

I, William M. Windsor, the undersigned, hereby declare under penalty of perjury:

1. Fulton County Deputy Sheriff Betts, Deputy Sheriff English, and Fulton County District Attorney Paul Howard, Jr., receptionist Naomi Fudge, and others have conspired to obstruct justice and deny me due process rights under the Constitution of Georgia and the United States by intentionally and knowingly committing the crimes of obstruction of justice and jury tampering.

2. This is by definition a violation of Obstruction of Justice -- 18 U.S.C. § 1503 and Jury Tampering -- O.C.G.A. 16-10-93 and O.C.G.A. 16-10-94; and as such, said violations also constitute predicate act crimes and prove violation of the RICO statute of the State of Georgia, O.C.G.A. 16-14-1 et seq.

3. I am involved in several civil actions that are about the most fundamental legal issues that exist: justice; honesty; fair play; equal protection; due process; Constitutional protections; the right to a fair trial before an impartial judge; the requirement that witnesses, attorneys, and judges tell the truth; the requirement that witnesses, attorneys, and judges do not violate the laws of the state and the country, abuse litigants, and commit fraud upon the courts.

4. These actions are about dishonest people cloaked in positions of authority, a judicial system that tramples the Constitutional rights of Georgia citizens, and the failure of the various individuals and authorities established to protect citizens to do anything about this.

5. The serious issues presented herein came to my attention through my experience in the United States District Court for the Northern District of Georgia (“N.D.Ga.”) and the United States Court of Appeals for the Eleventh Circuit (“Eleventh Circuit”).

6. Some District Court judges in the United States District Court for the Northern District of Georgia (“N.D.Ga.”) ignore the facts; invent their own facts; ignore the Federal Rules of Civil Procedure (“FRCP”), the Local Rules, and the Federal Rules of Evidence (“FRE”); ignore the law; ignore applicable case law; cite erroneous case law; commit perjury by making statements that they know to be false in their orders; violate parties’ rights in any way they can; commit obstruction of justice; and trample the Constitutional rights of litigants without a thought. They manipulate the judicial system to deprive parties such as me of our legal and Constitutional rights.

7. Appellate Court judges in the United States Court of Appeals for the Eleventh Circuit (“Eleventh Circuit”) ignore the facts; ignore the federal Rules of Appellate Procedure (“FRAP”); ignore the points of error of appellants; ignore the

law; ignore applicable case law; cite erroneous case law; issue short, inadequate decisions; do whatever it takes to support their friends at the District Courts; and trample the Constitutional rights of litigants.

8. The judicial system supports this dishonesty and illegality. The “system” denies any form of valid recourse for an aggrieved citizen.

9. The employees of the Fulton County District Attorney’s Office and the Fulton County Sheriff’s Department support these illegal activities through denying citizens the ability to succeed in getting charges filed or presenting their evidence to a grand jury. Policies or customs of the Fulton County District Attorney’s Office and the Fulton County Sheriff’s Department were the moving force behind the violations. As a result, aggrieved citizens find it next to impossible to take legal action against these evildoers.

10. My undeniable proof of rampant corruption by federal judicial employees operating in Fulton County Georgia has been ignored so that justice will be obstructed and the criminals will be shielded.

11. My attempts to present my evidence to the Fulton County Grand Jury have been met with a variety of actions and inactions designed to damage me and deny my legal rights. Actions were taken by each of the Defendants.

12. In 2010, I presented a criminal complaint to Mr. Howard. Neither Mr. Howard nor anyone on his staff even extended the courtesy of a response. I

believe my first complaint to the Fulton County District Attorney's Office about this was in 2008.

13. On February 10, 2011, I presented a criminal complaint to Mr. Howard. Once again, Mr. Howard's office did not even extend the courtesy of a response. (A true and correct copy of this letter is attached as Exhibit 1.)

14. On February 10, 2011, I wrote to the Fulton County Grand Jury to ask for an investigation of the criminal acts of federal judges in Atlanta. The Grand Jury did not respond. (A true and correct copy of this letter is attached as Exhibit 2.)

15. On March 28, 2011, I again wrote to the Fulton County Grand Jury to ask to speak to the Grand Jury about an investigation of the criminal acts of federal judges in Atlanta. The Grand Jury did not respond. (A true and correct copy of this letter is attached as Exhibit 3.)

16. On March 29, 2011, I sent a letter to Mrs. Rebecca Keel stating he needed to meet with the Grand Jury. Mrs. Keel did not respond. (A true and correct copy of this letter is attached as Exhibit 4.)

17. On March 30, 2011, I sent another letter to Mrs. Keel stating I needed to meet with the Grand Jury. Mrs. Keel did not extend the courtesy of a response. (A true and correct copy of this letter is attached as Exhibit 5.)

18. On March 31, 2011, I sent a letter to many elected Fulton County officials. No one extended the courtesy of a response. (A true and correct copy of this letter is attached as Exhibit 6.)

19. On May 6, 2011, I sent a letter by courier to the receptionist of the Fulton County District Attorney's Office to warn her not to interfere with letters that I had delivered to each grand juror. (A true and correct copy of this letter is attached as Exhibit 7.)

20. On May 6, 2011, I sent a letter by courier to Mr. Howard to advise him not to interfere with letters that I had delivered to each grand juror because the letters included charges against the Office of the District Attorney. (A true and correct copy of this letter is attached as Exhibit 8.)

21. On May 6, 2011, I sent a fax to Mr. Howard when the courier was denied the legal right to present the letters from me to each grand juror. (A true and correct copy of this letter is attached as Exhibit 9.)

22. On May 6, 2011, an hour or so after I sent a fax to Mr. Howard, an assistant district attorney called to say the Deputy Sheriff would accept the letters and deliver them to the Grand Jurors.

23. On May 6, 2011, my letters to the Fulton County Grand Jury asking to speak to the Grand Jury about an investigation of the criminal acts of federal judges in Atlanta were accepted by Deputy Betts. The letters, addressed to each

grand juror by number, were delivered by a courier, and Deputy Betts called me to confirm he was going to give them to each grand juror. (A true and correct copy of this letter is attached as Exhibit 10.)

24. I heard nothing from the Grand Jury.

25. On May 14, 2011, I sent a fax to Mr. Howard to advise him of a reported assassination plot. I was seeking protection and asked what the District Attorney could do. There was no response. (A true and correct copy of this letter is attached as Exhibit 11.)

26. On June 7, 2011, I received a letter from Herbert J. Bridgewater, Jr., Foreman of the Grand Jury, stating that the Fulton County Grand Jury did not have the power to consider my criminal charges. (A true and correct copy of this letter is attached as Exhibit 12.)

27. On June 13, 2011, I wrote to Mr. Bridgewater and the Grand Jury Members to advise them that Mr. Bridgewater's letter was not factual. (A true and correct copy of this letter is attached as Exhibit 13.)

28. On July 22, 2011, I went to the office of the Fulton County District Attorney to deliver letters to the Grand Jurors and to speak to the Grand Jury about criminal charges against Mr. Howard and others in Fulton County.

29. I arrived with sealed confidential envelopes with evidence for the Grand Jury, and Ms. Naomi Fudge said the Grand Jury didn't want to speak with

him. I asked how she could possibly know that, and she did not respond. (A true and correct copy of this letter is attached as Exhibit 14.)

30. Deputy Betts and Deputy Sheriff Roye appeared a few minutes later, and I asked that my evidence of criminal acts be given to each Grand Juror. Deputy Betts refused. He said the Grand Jury didn't want to speak with me. I asked how he could possibly know that, and he repeated almost verbatim what Herbert J. Bridgewater had written in his letter. Betts demanded my driver's license and disappeared with it for about 10 minutes.

31. I decided to sit on the floor so I could be facing the entrance to the District Attorney's Office and the Grand Jury Room. I sat next to a column approximately 15-feet from the entrance doors holding my envelopes in my lap and my sign in my hands. The sign said "Must Speak to Grand Jury."

32. Deputy Betts appeared again and told me that I was not allowed to hold a sign that asked to speak to the Grand Jury. He told me to remove the sign. I told him that this is a clear violation of my First Amendment Constitutional rights in a public lobby in a government building.

33. An attractive female assistant district attorney passed by at this point, and I asked to convey my charges to her, and she listened for a few seconds and then turned her back and walked through the door never looking back.

34. Throughout the day, various employees of the Fulton County District Attorney's Office passed by me, and no one offered to help.

35. Venoya Sims, a visitor to the District Attorney's Office, took a photo of me sitting on the floor with his sign. Her phone had a flash, and seconds later, Deputy Betts appeared to tell her that it is illegal to take photographs in the lobby, and he forced her to delete the photo from her phone. Ms. Sims smiled at me knowing that photos had been taken of him earlier using my phone.

36. After Deputy Betts left, I moved to a chair with my back to the entrance, but I sat sideways so I could see the door. I continued to hold my sign and evidence envelopes. Many people walked in and out and did a double-take when they saw the sign. Several mockingly wished "good luck with that."

37. A slew of Sheriff's deputies showed up a short while later. Deputy English asked what I wanted to accomplish today. I said I wanted to speak to the Grand Jury and present evidence of many crimes. Deputy English said "that will not happen." He asked what else I wanted to do. I said I wanted my evidence to be given to each grand juror, and I wanted to speak to the Grand Jury. Deputy England repeated "that will not happen."

38. I expressed that I would simply wait in the lobby with my sign and envelopes until grand jurors passed by. Deputy English told me that I would be arrested for "jury tampering" if I spoke to a grand juror in the lobby. Witnesses

present include Cynthia Nwokocha, Deputies Betts, English, and Roye, as well as citizens Kia'Vonne Glinton and Venoya Sims, and me.

39. I asked to speak to Deputy English's supervisor, and he told me that he was the most senior person. This is not true.

40. I told Deputy English that speaking to a grand juror would not constitute jury tampering. I told Deputy English that refusing to allow me to speak was a violation of my First Amendment Constitutional right to freedom of speech. Deputy English said: "If you speak to a grand juror, I will arrest you."

41. Additional Deputy Sheriffs arrived a short while later, and Deputy English asked if he could photograph my sign. I declined. Deputy English then had one of the deputies take my photograph.

42. After the group of deputies left, Ms. Cynthia Nwokocha told me that she would give the envelopes to the grand jurors.

43. I noticed that the door to the Grand Jury Room was open at one point about 1:00 pm. I asked Ms. Fudge where the Grand Jury was, and she said she had no idea. The door was closed again a half hour or so later. Then an hour or so after that I asked Ms. Fudge if the Grand Jury was inside, and she said they had gone for the day.

44. It appears that the Grand Jury was ushered out a private entrance to keep them from passing by me when they adjourned for lunch and for the day because they definitely did not pass through the public lobby to the elevators.

45. On July 22, 2011, I returned home and researched jury tampering. I discovered that what Deputy English and the others had done was jury tampering. I sent a fax to Ms. Nwokocha, Mr. Howard, Sheriff Ted Jackson, and Major Christopher Leighty of the Atlanta Police Department detailing the violations and asking that criminal charges be pursued. There was no response. (A true and correct copy of this fax is attached as Exhibit 15.)

46. On July 22, 2011, I called the Atlanta Police Department to file a criminal complaint. My name and number were taken, but no one ever returned the call.

47. On July 23, 2011, I sent a fax to Ms. Nwokocha, Mrs. Rebecca Keel, and Mr. Howard demanding to speak to the Grand Jury on Tuesday, July 26, 2011. There was no response. (A true and correct copy of this fax is attached as Exhibit 16.)

48. On July 24 and 25, 2011, I left voice mails for Mrs. Keel to call. There was no response.

49. I called Sheriff Jackson and was referred to Lieutenant Colonel Graham, Deputy English's ultimate supervisor. I left a voice mail. There was no response.

50. Mid-afternoon on July 25, 2011, I sent a fax to Ms. Nwokocho, Mrs. Rebecca Keel, Mr. Howard, Sheriff Ted Jackson, Lieutenant Colonel Graham, and Major Leighty demanding that I be allowed to speak to the Grand Jury on Tuesday and asking that criminal charges be filed. There was no response. (A true and correct copy of this fax is attached as Exhibit 17.)

51. Deputy Betts, Deputy English, Ms. Naomi Fudge, and unknown others are guilty of obstruction of justice and violation of O.C.G.A. 16-10-93:

“(a) **A person** who, **with intent to deter a witness from testifying** freely, fully, and truthfully **to any matter** pending in any court, in any administrative proceeding, or **before a grand jury, communicates**, directly or indirectly, to such witness **any threat** of injury or damage to the person, property, or employment of the witness or to the person, property, or employment of any relative or associate of the witness or who offers or delivers any benefit, reward, or consideration to such witness or to a relative or associate of the witness **shall, upon conviction thereof, be punished by imprisonment for not less than one nor more than five years.**

(b)(1) **It shall be unlawful for any person knowingly to use intimidation, physical force, or threats;** to persuade another person by means of corruption or to attempt to do so; or **to engage in misleading conduct toward another person with intent to:**

(A) **Influence, delay, or prevent the testimony of any person** in an official proceeding;

(B) **Cause or induce any person to:**

- (i) Withhold testimony or a record, document, or other object from an official proceeding;
 - (ii) Alter, destroy, mutilate, or conceal an object with intent to impair the object's integrity or availability for use in an official proceeding;
 - (iii) Evade legal process summoning that person to appear as a witness or to produce a record, document, or other object in an official proceeding; or
 - (iv) Be absent from an official proceeding to which such person has been summoned by legal process; or
- (C) **Hinder, delay, or prevent the communication to a law enforcement officer, prosecuting attorney, or judge of this state of information relating to the commission or possible commission of a criminal offense** or a violation of conditions of probation, parole, or release pending judicial proceedings.”

52. Deputy Betts, Deputy English, and unknown others are guilty of violation of O.C.G.A. 16-10-94:

“(a) **A person commits the offense of tampering with evidence when, with the intent to** prevent the apprehension or cause the wrongful apprehension of any person or to **obstruct the prosecution or defense of any person, he knowingly destroys, alters, conceals, or disguises physical evidence** or makes, devises, prepares, or plants false evidence.

(b) Nothing in this Code section shall be deemed to abrogate or alter any privilege which any person is entitled to claim under existing laws.

(c) Except as otherwise provided in this subsection, any person who violates subsection (a) of this Code section involving the prosecution or defense of a felony and involving another person shall be guilty of a felony and, upon conviction thereof, shall be punished by imprisonment for not less than one nor more than three years; provided, however, that any person who violates subsection (a) of this Code section involving the prosecution or defense of a serious violent felony as defined in subsection (a) of Code Section 17-10-6.1 and involving another person shall be guilty of a felony and, upon conviction thereof, shall be punished by imprisonment for not less than one nor more

than ten years. Except as otherwise provided in this subsection, any person who violates subsection (a) of this Code section involving the prosecution or defense of a misdemeanor shall be guilty of a misdemeanor.

53. Upon information and belief, improper information was communicated to the Grand Jury by members of the Fulton County District Attorney's Office and the Fulton County Sheriff's Department. The District Attorney's Office is named in my sealed charges presented to the Grand Jury, and Mr. Howard was warned to not interfere in any manner as that would constitute another crime.

54. On additional visits to the Grand Jury area, Ms. Fudge and Deputy Sheriff Betts refused to give my evidence to the Grand Jury.

55. Detailed proof of this wrongdoing is available in copies of documents and my affidavit. A separate Affidavit is available with more detail, and relevant documents are on CD-ROM.

FURTHER SAITH AFFIANT NOT.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

Executed this 12th day of August 2011.



William M. Windsor