

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

William M. Windsor,)
Plaintiff)
) CIVIL ACTION NO.
v.)
) 2011cv206243
Fulton County, Office of the Fulton County)
District Attorney, Paul Howard, Jr., Cynthia)
Nwokocha, Naomi Fudge, Rebecca Keel,)
Waverly Settles, Lieutenant English, Deputy Betts,)
Deputy Roye, Steve Broadbent, and Unknown)
Does,)
Defendants)
_____)

NINETEENTH AFFIDAVIT OF WILLIAM M. WINDSOR

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

1. My name is William M. Windsor (“Windsor”). I am over the age of 21, am competent to testify, and have personal knowledge of the matters stated herein.
2. I am the Plaintiff in this action, and I am representing myself pro se.
3. I am not an attorney. I cannot find an attorney who will sue judges, and I can no longer afford an attorney. All of my money (approximately \$1,500,000.00) has been “stolen” through corrupt litigation in the federal courts in Fulton County, Georgia.

4. In an effort to do the best possible job as a pro se party, I have studied the applicable Federal Rules of Civil Procedure, Local Rules, the Georgia Code of Professional Conduct for Attorneys, the Official Code of Georgia Annotated, certain federal statutes, the Federal Rules of Judicial Procedure, the Federal Rules of Appellate Procedure, the Code of Conduct for United States Judges, the Uniform Rules of the Superior Court, the Procedures of the Fulton County Superior Court, and case law.

5. The County Manager's Motion to Quash should be denied for a variety of reasons.

6. First, the Motion to Quash contains many alleged statements of fact, but these alleged facts certainly are not within the personal knowledge of the County Attorneys, and the Motion to Quash is not verified, and there has been no affidavit filed attesting to any of these alleged facts. Many of the alleged facts are false; most are blatantly incorrect and deceptive.

7. Second, the County Attorneys stalled me from September 29, 2011 until October 4, 2011 and did not advise me until October 4 that the County Attorney would be representing the County employee Defendants. I immediately scheduled a process server, and the subpoenas were served on October 5. If Ms. Lanna Hill had advised me on September 29 or 30 that the County Attorney was the Counsel of record, these subpoenas could have been served on September 30 or

October 3. (See Exhibits 89, 90, 91, and 92 to the Eighteenth Affidavit of William M. Windsor.

8. Third, the County has had weeks to prepare these documents. On August 29, August 29, and September 1, 2011, I sent Georgia Open Record Act Requests to Fulton County and the Fulton County District Attorney. These are Exhibits to the Verified Complaint and First Amended verified Complaint -- Exhibits 42, 43, and 46. These were sent by fax and by certified mail. A true and correct copy of the Certified mail return receipt for Fulton County Jury Clerk is Exhibit 102 to the Nineteenth Affidavit of William M. Windsor, filed contemporaneously herewith. A true and correct copy of the Certified mail return receipt for Fulton County District Attorney is Exhibit 103 to the Nineteenth Affidavit of William M. Windsor. These document requests would encompass most of the documents now being requested by subpoena, so the subpoena isn't oppressive or unreasonable.

9. Fourth, there is nothing harassing about the subpoena. I am currently the victim of extreme denial of Constitutional rights by Fulton County. I have been threatened, intimidated, lied to, cheated, ignored, and deprived of the rights I am supposed to have under the Constitutions of Georgia and the United States. Having to work for a few hours gathering documents pales in comparison on the oppressive scale.

10. On October 6, 2011 AT 12:51 pm, the Defendants filed a Motion to Quash an October 7, 2011 subpoena. I am preparing this response in less than an hour in order to get it to the Clerk of the Court for filing.

11. I ask the Court to strike everything but that portion of the Argument and Authority section that does not mention alleged facts. The Defendants' Response is not verified, and there have been no sworn affidavits filed by any of the Defendants, while every motion filed by me has been verified; the Verified Complaint and the First Amended Verified Complaint were verified; and I have filed nineteen sworn affidavits under penalty of perjury, all notarized.

12. I have never filed anything frivolous. I am not litigious. I am not fond of lawsuits, the *Black's Dictionary* definition of "litigious." I hate lawsuits. But I despise liars and dishonest people who commit crimes to damage others, and I will do anything I can to see those people brought to justice. I have done nothing to undermine the integrity of any judgments and orders. I have never filed any unsubstantiated pleadings. I have never intentionally filed any duplicative pleadings. I have never filed pleadings after a district court denied them. I have never filed repetitive pleadings. The only true burden placed upon the federal courts has been solely due to the corruption of the parties, attorneys, judges, and the judicial personnel.

13. I am not a “serial filer of Complaints against Defendant Fulton County District Attorney Paul Howard.” *Black’s Law Dictionary* does not define ‘serial,’ but the *American Heritage Dictionary* defines serial as a number of events happening in succession. In common usage, “serial” refers to a LOT of events. A “serial killer” is “one who has murdered three or more people over a period of more than a month, with down time between the murders....” I filed one action against Paul Howard, Jr. (2011CV202457) that was illegally removed to federal court. My Motion for Remand was filed, but Judge Thomas Woodrow Thrash never addressed the motion because the motion magically disappeared. Exhibit 72 to the Seventeenth Affidavit of William M. Windsor is the Motion for Remand in 1:11-CV-02326-TWT; note that Defendants’ Attorney, Ms. Lanna Hill, was served with a copy. Exhibit 73 to the Seventeenth Affidavit of William M. Windsor is the cover letter sent with the Motion for Remand in 1:11-CV-02326-TWT to the Clerk of the Court. Exhibit 74 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of the letter hand-delivered to Judge Thrash upon the filing of the Motion for Remand in 1:11-CV-02326-TWT. Exhibit 75 to the Seventeenth Affidavit of William M. Windsor is the courier confirmation of signed receipt by the Clerk of the Court for the Motion for Remand in 1:11-CV-02326-TWT, and receipt is filing in the federal courts. Exhibit 76 to the Seventeenth Affidavit of William M. Windsor is the Docket in 1:11-CV-02326-

TWT, and the Motion for Remand is nowhere to be found. It has vanished into thin air, and Judge Thrash and the Clerk of the Court have ignored all efforts to get the Motion docketed and processed. Mr. Howard did not consent to the removal, and the removal failed for that reason as well as many others.

14. This Civil Action is entirely different from 2011CV202457 (aka 1:11-CV-02326-TWT) and consists primarily of events that took place after 2011CV202457 was filed on June 23, 2011. See paragraphs 37-162 in the First Amended Verified Complaint in this Civil Action. Exhibit 77 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of the Verified Complaint filed in 2011CV202457 (aka 1:11-CV-02326-TWT). The County Attorney has false statements galore in the Defendants' Opposition. The instant Civil Action was submitted to the federal court for approval for filing on September 6, 2011. Exhibit 78 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of the letter to Judge Charles Pannell that was sent with the proposed complaint in 2011CV206243 for approval for filing. September 6 was 15 days before Judge Thrash entered an order dismissing Mr. Howard from 1:11-CV-02326-TWT (an order that is on appeal). Exhibit 79 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of the order of Judge Thrash in 1:11-CV-01923-TWT authorizing this lawsuit against Mr. Howard and others dated October 3, 2011.

15. County Attorney Ms. Lanna Hill claimed in the Defendants' Opposition to Recording: "Displeased with the outcome of that lawsuit, Plaintiff filed the present action in which **he regurgitates many of the allegations previously raised** in and rejected by the federal court." Exhibit 78 to the Seventeenth Affidavit of William M. Windsor proves this is false. The only regurgitation going on is when reading the lies and distortions of Ms. Lanna Hill. Exhibit 80 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of Ms. Lanna Hill's Motion to Dismiss in 1:11-CV-02326-TWT. In it, she states on Page 4:

"Plaintiff makes only a single allegation against District Attorney Howard -- that Plaintiff "presented criminal charges against 11 federal judges in Fulton County to the Fulton County District Attorney, Mr. Howard, and he did nothing and has aided the racketeering enterprise." (Complaint ¶ 95)" **[emphasis added.]**

16. In this Civil Action, "Mr. Howard" is named 29 times, and "Fulton County District Attorney" is named an additional 36 times (excluding anything prior to the Statement of Facts). District Attorney Howard is referenced 56 times in the Causes of Action section of the First Amended Verified Complaint, and he is referenced in 9 of the 11 Causes of Action. There were only four causes of action in 1:11-CV-02326-TWT. There are only two that are used in this Civil Action and 1:11-CV-02326-TWT -- Georgia RICO and Violation of Constitutional Rights.

Ms. Hill has intentionally deceived this Court with her statements in the Defendants' Opposition.

17. As the Motion for Remand proves, Judge Thomas Woodrow Thrash does not have jurisdiction over 1:11-CV-02326-TWT, and his order of September 21, 2011 is void. The September 21, 2011 order denied my request to amend my complaint to provide specifics about Mr. Howard. Nothing that Judge Thrash writes should be believed because he is masquerading as a judge, in a case in which he is a defendant, for the sole purpose of damaging me to protect the criminal racketeering enterprise that is operating at the federal courthouses in Atlanta. If any of the federal judges will testify, I will be delighted to have them. Judge Thrash entered an order denying me the ability to subpoena judges or judicial employees to testify. Exhibit 81 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of Windsor's motion in 1:11-CV-01923-TWT advising Judge Thrash that he planned to subpoena federal judges, and Exhibit 82 thereto is Judge Thrash's order in response in 1:11-CV-01923-TWT permanently enjoining my subpoenas of judges and judicial personnel. Exhibit 83 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of Windsor's emergency motion in 1:11-CV-01923-TWT seeking to subpoena three judges, including Judge Thrash, for the October 7, 2011 Hearing. Judge Thrash has not responded to my emergency motion. Exhibit 84 to the Seventeenth

Affidavit of William M. Windsor is a true and correct copy of the cover letter sent to the Clerk of the Court on October 4, 2011 with the emergency motion to subpoena three judges. Exhibit 85 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of the courier confirmation proving the emergency motion to subpoena three judges was received on October 4, 2011 at 11:30 am, and receipt constitutes filing in the federal courts. Exhibit 86 to the Seventeenth Affidavit of William M. Windsor is a true and correct copy of the Docket in 1:11-CV-01923-TWT showing that the motion has not been docketed or processed, which is a regular corrupt occurrence in the federal courts. This is detailed in the Seventh Affidavit of William M. Windsor, referenced and incorporated herein as if attached hereto.

18. I have never abused the civil process. I have no desire to harass, intimidate, or embarrass Fulton County, the Office of the Fulton County District Attorney, or District Attorney Paul Howard. They've harassed me with threats of arrest for speaking, charges of criminal trespassing, and threats of arrest if I ever step foot on the third, sixth, or seventh floors of the courthouse.

19. This Court has an obligation to deal with the facts and nothing but the facts. I have now filed 19 sworn affidavits with this Court as to the facts. This Court must accept those as the only facts before this Court until or unless any of

the Defendants or others testify or file sworn affidavits and I am given the opportunity to cross-examine.

20. The nature of the evidence sought is to help prove my causes of action in the First Amended Verified Complaint.

a. Entire jury box list that existed from which the July/August 2011 grand jury was selected per O.C.G.A. 15-12-40. This will enable me to determine if statutes were violated in the composition of the Grand Jury.

b. Grand Jury box list as per O.C.G.A. 15-12-62. This will enable me to determine if statutes were violated in the composition of the Grand Jury.

c. Precept containing the names of the persons drawn as July/August 2011 grand jurors that the clerk of the superior court issued and delivered to the sheriff or his or her deputy. This will enable me to determine if statutes were violated in the composition of the Grand Jury, and it will enable me to subpoena some witnesses who can testify to what jury tampering took place behind closed doors.

d. Recording of Fulton County Grand Jury sessions in July and August 2011. This will provide undeniable proof of what happened and when.

e. Copies of all "Criminal Trespass Warnings" issued to anyone by Fulton County and the Fulton County District Attorney's Office or staff. This will

enable me to determine how extensive this practice is, and it will enable others to be contacted to find out what, if anything, they did.

f. Floor plans or architectural drawings or layouts of the third floor of 136 Pryor Street, Atlanta, GA 30303. This will enable the Court to see where there are public and private spaces.

g. Proof of ownership of the elevator lobby on the third floor of 136 Pryor Street, Atlanta, GA 30303. This will provide proof to show that Cynthia Nwokocha did not have the authority to issue a Criminal Trespass Warning.

h. All statutes or other information of any type that gives the Office of the Fulton County District Attorney authority over the Fulton County Grand Jury. Defendants have claimed this right to me and others, but they have no proof. This will prove it.

i. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of Windsor's July 22, 2011 fax to Ms. Nwokocha, Mr. Howard, Sheriff Ted Jackson, and Major Christopher Leighty of the Atlanta Police Department. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when.

j. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of Windsor's July 25, 2011 fax to Ms. Nwokocha, Mrs. Keel, Mr. Howard, Sheriff Ted Jackson, Lieutenant Colonel Graham, and

Major Leighty demanding that he be allowed to speak to the Grand Jury on Tuesday and asking that criminal charges be filed. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when.

k. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of Windsor's July 25, 2011 complaints to the Fulton County District Attorney and the Fulton County Sheriff that Deputy Betts, Lieutenant English, Ms. Fudge, and unknown others are guilty of obstruction of justice and violation of O.C.G.A. § 16-10-93 and O.C.G.A. § 16-10-94. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when.

l. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of investigations and evaluation of the various charges that Windsor has presented to the Fulton County Sheriff's Department. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when.

m. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of investigations and evaluation of the various charges that Windsor has presented to the Fulton County Board of Commissioners. I anticipate that Defendants will deny receiving various documents, and this will

prove what was received and when. This will help establish that Fulton County ignored the issues.

n. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof the names, addresses, telephone numbers, and other contact information for the members of each Grand Jury during 2011. This will enable me to contact other witnesses and subpoena them.

o. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof regarding Windsor's August 25, 2011 certified mail return receipt letters to members of the Fulton County Grand Jury. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when.

p. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof that Windsor's August 25, 2011 certified mail return receipt letters to members of the Fulton County Grand Jury were returned to Windsor marked "refused." I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when.

q. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof that Windsor's August 25, 2011 certified mail return receipt letters to members of the Fulton County Grand Jury were presented to a Fulton County employee by the U.S. Postal Service. I anticipate that

Defendants will deny receiving various documents, and this will prove what was received and when.

r. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof that letters and evidence from Windsor that were delivered to Fulton County at various times have been refused. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when.

s. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof that on August 26, 2011, the Ms. Asby of the Fulton County Criminal Warrants Desk refused to process Windsor's applications. This is yet another form of denial of Constitutional rights, and I need proof of what happened within the County on this.

t. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof that on August 26, 2011, the Ms. Cicely Barber of the State Court of Fulton County refused to authorize processing of Windsor's Criminal Warrant Applications. This is yet another form of denial of Constitutional rights, and I need proof of what happened within the County on this.

u. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of Windsor's an email to Ms. Barber and Mark N.

Harper on August 26, 2011. This is yet another form of denial of Constitutional rights, and I need proof of what happened within the County on this.

v. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of Windsor's August 28, 2011 fax to the Fulton County Sheriff stating that he wanted to press criminal charges against Mr. Broadbent, Mrs. Keel, Mr. Settles, and Ms. Fudge. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when, and whether any action was taken.

w. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of Windsor's August 29, 2011 Freedom of Information Act and Georgia Open Records Act request to the Fulton County Superior Court Jury Clerk. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when, and whether any action was taken.

x. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof of Windsor's August 29, 2011 Freedom of Information Act and Georgia Open Records Act request to the Fulton County District Attorney. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when, and whether any action was taken.

y. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof that a citizen of Fulton County could be guilty of criminal trespassing for being in the elevator lobby outside the Fulton County District Attorney's Office in a public courthouse building owned by the government. This is a major issue in the First Amended Verified Complaint.

z. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof that Windsor's Criminal Warrants Applications were referred to Magistrate Judge Stephanie Davis. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when, and whether any action was taken.

aa. All documents and things relating to, referring to, or evidencing, reflecting, or constituting proof that on September 1, 2011, Windsor sent another request under the Freedom of Information Act and the Georgia Open Records Act to the Fulton County District Attorney. I anticipate that Defendants will deny receiving various documents, and this will prove what was received and when, and whether any action was taken.

bb. All documents relating to, referring to, or evidencing, reflecting, or constituting proof of communication or information regarding Windsor, Barbara Windsor, Alcatraz Media, LLC, or Alcatraz Media, Inc. I need proof of whatever has happened within Fulton County and with others.

cc. All documents relating to, referring to, or evidencing, reflecting, or constituting proof any concerns ever expressed by anyone regarding the operation of the Office of the Fulton County District Attorney. This will identify other witnesses.

dd. All documents relating to, referring to, or evidencing, reflecting, or constituting proof any concerns ever expressed by anyone regarding the operation of the Fulton County Sheriff's Department. This will identify other witnesses.

ee. All documents relating to, referring to, or evidencing, reflecting, or constituting proof of Constitutional training provided for employees of the COUNTY. This is an important issue as to at least two of the Defendants.

ff. All documents relating to, referring to, or evidencing, reflecting, or constituting proof of training regarding Georgia statutes provided for employees of the COUNTY. This is an important issue as to at least two of the defendants.

gg. All documents relating to, referring to, or evidencing, reflecting, or constituting proof of any complaints of any type about judges in Fulton County from October 1, 2007 to the present. This will identify other witnesses.

hh. All documents relating to, referring to, or evidencing, reflecting, or constituting proof of why Civil Action 2011cv202263 was removed to federal court when the case was on appeal to the Court of Appeals of Georgia. There was wrongdoing. This should reveal who was involved and what happened.

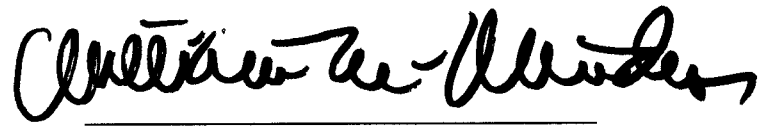
21. All of the documents requested are relevant, as explained above. However, a Plaintiff is under no obligation to explain to the opposing counsel why documents are requested. I have done so here as a courtesy, but I will not make this a practice.

22. The County Manager is the senior operating manager for Fulton County. As such, he is responsible for everything in the County, as far as I can determine. Therefore, he is the appropriate person to ask for these documents. In addition, I sent complaints about these issues to Mr. Williams, and he heard my speech to the Board of Commissioners. He was aware of these issues, and he should have launched a major investigation. We shall see when he takes the witness stand.

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 6th day of October 2011.

A handwritten signature in black ink, appearing to read "William M. Windsor". The signature is written in a cursive style with a horizontal line underneath it.

William M. Windsor

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 6th day of October 2011.

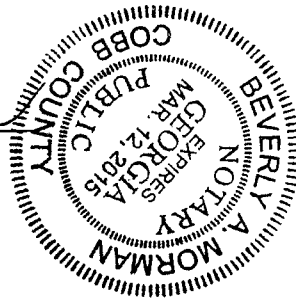
William M. Windsor

William M. Windsor

Sworn to before me, this 6th day of October, 2010. *mm*

Beverly A. Morman

Notary Public

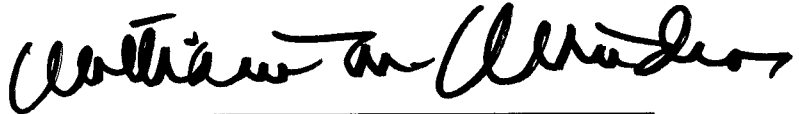


CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing by electronic mail and by depositing a true and correct copy of the same in the United States mail, proper postage affixed thereto, addressed as follows:

Lanna Renee Hill
R. David Ware
Kaye Woodward Burrell
Jerolyn Webb Ferrari
Office of the Fulton County Attorney
141 Pryor Street, Suite 4038 -- Atlanta, GA 30303
404-612-0246 -- Fax: 404-730-6324
Lanna.hill@fultoncountyga.gov

This 6th day of October, 2011.



William M. Windsor
Pro Se

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