

**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)	
)	

SEVENTEENTH AFFIDAVIT OF WILLIAM M. WINDSOR

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

1. My name is William M. Windsor.
2. I am over the age of 21 and am competent to testify.
3. This Affidavit is based upon my personal knowledge.
4. The nature of the particular proceeding at issue is the right of citizens

to present criminal charges to grand juries. This is of significant importance to citizens in Georgia and nationwide. People would like to see and hear the proceedings. I believe the evidence to be presented will show that citizens have been regularly denied their Constitutional rights. I believe the general public has the right to learn about allegations of corruption and dishonesty of their elected and

appointed officials and their staffs and the Defendants' response to the allegations. I have become one of the leading authorities in the country on judicial corruption, and he has absolute, undeniable, overwhelming proof of corruption in the federal judiciary in Georgia. I will prove corruption by the Defendants as well.

5. I have consented to the recording. None of the other parties or witnesses have objected. There are no sworn affidavits filed, so this Court must assume that there are no objections.

6. The proposed coverage will promote increased public access to the courts and openness of judicial proceedings. Most people never get to see a real court proceeding; this will give them the chance. It will also give many a relatively unique opportunity to see someone with whom they can relate, a non-attorney representing himself in court.

7. The impact upon the integrity and dignity of the court will be negligible. There will be one fixed-location camera.

8. The impact upon the administration of the court should be equally negligible. The Court must enter an order, and then the cameraman will present the order to security and bring his camera in and plug it in.

9. The impact upon due process and the truth finding function of the judicial proceeding is that there will be greater honesty among those testifying and

participating in the proceedings. I know from experience that people are much more likely to be honest when they know they are being recorded.

10. The proposed coverage will contribute to the enhancement of the ends of justice. There's no way it could detract from anything. In fact, the broadcast coverage could cause other people to be reached who have experienced the same types of corruption, and more witnesses are likely to come forward.

11. There are no special circumstances of the parties, victims, witnesses, or other participants. This is a civil case. There are no juveniles involved. There is no one involved whose identity needs to be kept secret. The County employees involved are public figures known to the general public. There are no jurors involved.

12. Recording will be done only in the courtroom while the court is in session for the hearing. There will be no recording in any other part of the Courthouse.

13. All audible electronic devices will be turned off when they are in the courtroom. There will be no recording of conferences between an attorney and a client, witness, or aide. There will be no recording of conferences between attorneys. There will be no recording of conferences between counsel and the judge at the bench ("sidebars"). There will be no recording of proceedings held in

chambers. There will be no recording of anything that the judge asks not to be recorded during the hearing.

14. On October 5, 2011, the Defendants filed an opposition to my motion seeking to have the October 7 Hearing recorded.

15. I ask the Court to strike Footnotes 1, 2, and 3; the so-called “Factual Background” on Pages 2-3; the last sentence on Page 4, and all of Page 5. This content is false and/or deceptive, and it is not admissible evidence that may be considered by this Court. 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 sixteen sworn affidavits under penalty of perjury.

16. Footnote 1 is false. The County was properly served according to O.C.G.A. 9-11-4, which states: “If against a county, municipality, city, or town, to the chairman of the board of commissioners, president of the council of trustees, mayor or city manager of the city or to an agent authorized by appointment to receive service of process. If against any other public body or organization subject to an action, to the chief executive officer or clerk thereof.” I served the person the County indicates was authorized to accept service of process for the County, Ms. Ardelia Hunter. I called Fulton County himself, was directed to Ardelia Hunter,

and she confirmed to him by telephone that she is the authorized agent for service of process. Exhibit 70 hereto is the Affidavit of Service to Ms. Ardelia Hunter. Exhibit 71 hereto is a true and correct copy of an email to the Attorneys for the Defendants confirming this.

17. Footnote 2 is false.

18. Footnote 3 is incorrect and reflects perjury and/or obstruction of justice by Judge Thomas Woodrow Thrash and the Eleventh Circuit. I have never filed anything frivolous. I am not litigious. I am not fond of lawsuits, the *Black's Dictionary* definition of "litigious." I have lawsuits. But I despise liars and dishonest people who commit crimes to damage others, and he will do anything he 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.

19. The so-called "Factual Background" on Pages 2-3 of the Defendants' Opposition is totally unsubstantiated. First, 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 hereto is the Motion for Remand; note that Defendants’ Attorney, Ms. Lanna Hill, was served with a copy. Exhibit 73 hereto is the cover letter sent with the Motion to the Clerk of the Court. Exhibit 74 hereto is a true and correct copy of the letter hand-delivered to Judge Thrash upon the filing of the Motion for Remand. Exhibit 75 hereto is the courier confirmation of signed receipt by the Clerk of the Court, and receipt is filing in the federal courts. Exhibit 76 hereto 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.

20. 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 hereto 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. This Civil Action was submitted to the federal court for approval for filing on September 6, 2011. Exhibit 78 hereto is a true and correct copy of the letter to Judge Charles Pannell that was sent with the complaint 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 hereto is a true and correct copy of the order of Judge Thrash authorizing this lawsuit against Mr. Howard and others dated October 3, 2011.

21. County Attorney Ms. Lanna Hill claims in the Defendants' Opposition: "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 hereto proves this is false. The only regurgitation going on is when reading the lies and distortions of Ms. Lanna Hill. Exhibit 80 hereto 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.]**

22. 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.

23. 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 hereto is a true and correct copy of my motion advising Judge Thrash that I planned to subpoena federal judges, and

Exhibit 82 thereto is Judge Thrash's order in response. Exhibit 83 hereto is a true and correct copy of my emergency motion 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 hereto is a true and correct copy of the cover letter sent to the Clerk of the Court with the motion. Exhibit 85 hereto is a true and correct copy of the courier confirmation proving the motion was received, and receipt constitutes filing in the federal courts. Exhibit 86 hereto 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.

24. 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. They have already embarrassed themselves with what they have done as detailed in the First Amended Verified Complaint. At the Hearing, they may admit or deny what has happened. Any denials will be recorded. Ms. Hill's lame justification for why the hearing should not be recorded is just that, a weak, lame attempt to avoid the cold,


hard truth. The Defendants are as guilty as any have ever been, and the truth should be embarrassing.

25. This Court has an obligation to deal with the facts and nothing but the facts. I have now filed 17 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.

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.

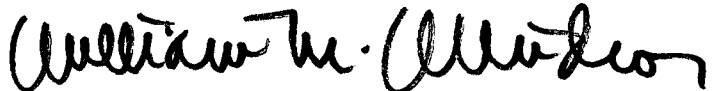

William M. Windsor

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.



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Pro Se

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