

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)	
)	

TWENTIETH 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 First Amended Verified Complaint provides factual background, and it is referenced and incorporated herein as if attached hereto.

6. Defendants have been served.

7. The County Attorney spends a lot of space claiming none of the Defendants were lawfully served. This is not true. Defendants have been served in compliance with O.C.G.A. § 9-11-4.

8. On September 29, 2011, Fulton County was served with the Summons and Complaint. A true and correct copy of the Affidavit of Service is Exhibit 93 to the Eighteenth Affidavit of William M. Windsor.

9. On September 29, 2011, the Attorney General of Georgia was served with the Summons and Complaint as required by O.C.G.A. § 9-4-7. A true and correct copy of the Affidavit of Service on the Attorney General of Georgia is Exhibit 94 to the Eighteenth Affidavit of William M. Windsor.

10. On October 5, 2011, Defendant Steve Broadbent was served with the Summons and Complaint. A true and correct copy of the Affidavit of Service is Exhibit 107 hereto.

11. The Defendants have failed to properly challenge insufficient service. No affidavits have been provided claiming improper service.

12. Since service of the Summons and Complaint was lawfully perfected on one or more of the Defendants, this Court may proceed to hear Plaintiff's Application for Injunctive Relief.

**THE PURPOSE OF A TEMPORARY RESTRAINING ORDER
OR INTERLOCUTORY INJUNCTION
IS NOT ONLY TO PRESERVE THE STATUS QUO.**

13. The Defendants incorrectly claim the purpose of a Temporary Restraining Order or Interlocutory Injunction is to preserve the status quo.

14. I seek injunctive relief to keep the Defendants in order – to keep them from continued violation of several criminal statutes.

15. Preserving the status quo in this case would mean this Court would have to authorize the Defendants to continue to violate Georgia law and Constitutional rights.

16. This Court has the authority to grant a preliminary injunction in this matter because I am simply asking that the Defendants be restrained from more illegal acts.

17. As usual, the County Attorney lies and lies and distorts the truth in the Defendants' Brief. On Page 7, the County Attorney says there has been no authority cited for why the Grand Jury must entertain me again. I was invited by the Grand Jury to return and present evidence and a 20-page recitation of the charges.

18. The County Attorney claims I was issued a Criminal Trespass Warning for harassing Grand Jurors as they entered and exited the jury room. I never harassed anyone at any time. I will present witnesses to this, and as soon as I get a list of the employees of the Fulton County District Attorney's Office, the Visitor Logs to the District Attorney's Office, and the names and contact information for the grand jurors, I can present hundreds of witnesses. Anyone who claims I ever harassed anyone is a liar. I will be delighted to take a polygraph test about this or anything that I have ever sworn to. Ms. Cynthia Nwokocha and the District Attorney never provided any explanation for the Criminal Trespass Warning. The Grand Jurors did not even use the Third Floor Elevator Lobby for most of July and August. I never at any time spoke with any Grand Juror entering the Grand Jury Room. Other than a brief comment to Steve Broadbent as he left

for the day on August 26, 2011, the only Grand jurors who I spoke with at any time were two who spoke or nodded to me first. One was the Grand Juror who wore suspenders who had specifically requested that I return with a 20-page document and the evidence. After he nodded to me on August 26, 2011, I asked if he would accept the envelope with the information he requested. He said he would, and I handed him the envelope, and he began opening it as he got on the elevator. Nothing else was said. The other was a young woman who passed through the elevator lobby one day. She either said hi or nodded, and I asked if she would deliver an envelope of evidence to the man wearing suspenders on the Grand Jury. She said she didn't know if she could, and she left. Nothing more was said except perhaps that she is a friend of one of the people who was there on August 23, 2011 in hopes of being able to testify as well. I never saw a Grand Juror on August 30, 2011 when I was given a Criminal Trespass Warning.

19. County employees have no right whatsoever to interfere with any citizen's efforts to present evidence to a Grand Jury. The statutory authority for this is O.C.G.A. § 15-12-60 to O.C.G.A. § 15-12-83 and O.C.G.A. § 15-12-100 to O.C.G.A. § 15-12-102. (Exhibit 117 hereto is a true and correct copy of these statutes.) The Defendants can provide no case law and no statute that says the Fulton County District Attorney's Office has any authority WHATSOEVER over the Grand Jury. In fact, the term "District Attorney" appears in the grand jury

statutes only three times: O.C.G.A. § 15-12-71, which calls for the inspection of the office of the district attorney by the grand jury at least once every three years; O.C.G.A. § 15-12-82 regarding a joint decision with the attorney for the accused in a change of venue; and O.C.G.A. § 15-12-83 regarding the hiring of a stenographer. District Attorneys have NO AUTHORITY over grand juries based upon the statutes, and when there is no case law to the contrary, this Court is obligated to strictly construe the statutes.

20. County employees have no right to claim a citizen is trespassing in a public lobby in a government building while bringing an envelope of requested evidence to the Grand Jury.

21. The County Attorney claims this Court is required to focus on the facts in the First Amended Verified Complaint. [Defendants' Brief, P.7.] The County Attorney then claims the facts in the complaint are "that what Plaintiff ultimately seeks is to carry out a personal vendetta against the federal judiciary the Fulton County Grand Jury." First, the sentence makes no sense. Second, there is NOTHING whatsoever in the facts in the complaint that says any such thing. Windsor has no personal vendetta; he has the proof that federal judges in Atlanta are criminals.

22. I am pursuing this action for the reasons expressed in the First Amended Verified Complaint. The Defendants have violated numerous laws,

including criminal statutes, and they are violating the Georgia RICO Act. My efforts to reach the Grand Jury were interfered with repeatedly. I was slandered to the Grand Jurors.

23. The vital necessity for the injunction is that the Defendants must not be allowed to continue to violate the law and deny my Constitutional rights.

24. Unless Defendants are enjoined from committing certain acts, I will suffer irreparable harm. The harm suffered by me far exceeds any inconvenience that would be caused to Defendants. The equities clearly balance in my favor; I have no adequate remedy at law.

25. Defendants must be temporarily restrained and preliminarily and permanently enjoined from violating Georgia law. This motion merely seeks to require that the Defendants abide by the law in the future.

26. Defendants claim I must prove there is a substantial likelihood that he will prevail on the merits. [Defendants' Brief, P.5, 6, 7.] But this is not the requirement in Georgia.

27. I have proven facts necessary to be meritorious in this Civil Action, and the Defendants have not presented one shred of admissible evidence. Detailed evidence has been filed in the First Amended Verified Complaint. I believe a jury is going to throw the book at the Defendants. I am being injured; that injury will

be irreparable if the injunction does not issue; and I have no adequate remedy at law.

28. The balance of harms weighs in my favor.

29. A Temporary Restraining Order and Interlocutory Injunction will prevent additional harm to me and cause no harm to the Defendants.

30. **I AM BEING DENIED THE RIGHT TO FREEDOM OF SPEECH, THE RIGHT TO PETITION THE GOVERNMENT FOR REDRESS OF GRIEVANCES, THE RIGHT TO REPORT CRIMINAL ACTIVITY AND HAVE LAW ENFORCEMENT DO ANYTHING ABOUT IT, AND THE RIGHT TO STEP FOOT ON THREE FLOORS OF THE FULTON COUNTY COURTHOUSE.**

31. Defendants' practices of concealing and possibly destroying evidence will do irreparable harm to me. Deprivation of Constitutional rights is clearly irreparable harm.

32. Deprivation of a Constitutional right is when "a governing body has worked constitutional deprivation of a citizen pursuant to an impermissible or corrupt policy which is intentional and deliberate."

33. I face a substantial threat of *irreparable damage or injury* if the injunction is not granted. This is "the type of harm which no monetary compensation can cure or put conditions back the way they were...." It is harm

where no amount of money can compensate the harm that is being done, or will be done. As the Supreme Court has noted, “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.”

34. I have no adequate remedy at law, and have, and am continuing to suffer irreparable harm.

35. Money damages cannot restore my Constitutional rights and the right to protection by law enforcement authorities.

36. The continued actions of Defendants will be devastating to me.

37. Such imminent harm is impossible to quantify and, thus, would cause irreparable injury and establishes that there is no adequate remedy at law.

38. I have been threatened with criminal trespassing, but Cynthia Nwokocha does not own the third floor elevator lobby in the courthouse, and she has no authority to demand that anyone leave that public space. Ms. Nwokocha violated O.C.G.A. § 16-7-21 by issuing a bogus Criminal Trespass Warning, having no legal basis for issuing it, expressing no basis for issuing it, and for violating the terms of the document she presented to me. The Warning was totally unreasonable under the circumstances. I was never disruptive, was never asked to leave previously, never harassed anyone, and was standing in a public elevator lobby in a government building.

39. I argue that the Fulton County Grand Jury currently is not independent. The involvement of the Office of the Fulton County District Attorney and the improper involvement of the Fulton County Sheriff's Department are what is interfering with the independence of the Grand Jury. This has been thoroughly detailed in the First Amended Verified Complaint. I am requesting no preliminary injunctive relief that would interfere with the independence of the Grand Jury, and the Defendants have failed to identify anything that I have requested that would interfere.

40. The Fulton County Sheriff's Department must ensure the safety of the Grand Jury. I expect nothing less. But the grand jury statutes, O.C.G.A. § 15-12-60 to O.C.G.A. § 15-12-83 and O.C.G.A. § 15-12-100 to O.C.G.A. § 15-12-102, do not specify involvement by the sheriff. Only two of the grand jury statutes even mention the sheriff -- O.C.G.A. § 15-12-66 (disqualification of sheriff or deputies) and O.C.G.A. § 15-12-82 (duties when there is a change of venue in a criminal grand jury investigation). The problem in Fulton County is that Sheriff's Deputies have committed jury tampering, CRIMES for which they should be indicted. They have become agents of the District Attorney in executing jury tampering, violations of Constitutional rights, and more. They have alleged to have been made privy to Grand Jury proceedings, and they have communicated that information to others.

41. Being prohibited from illegal activities will be no burden at all to the Defendants.

42. Being prohibited from destroying evidence will be no valid burden to the Defendants.

43. This Court has the power to restrain by injunction acts that are “illegal or contrary to equity and good conscience and for which no adequate remedy is provided at law.”

44. The sole comment of the Defendants on the issue of public interest is “The public has an interest in the orderly administration of the Grand Jury.”

45. I do not believe the public expects the Grand jury to be “administered.” District Attorneys have no right whatsoever to “administer” grand juries in Georgia. Georgia statutes O.C.G.A. § 15-12-60 to O.C.G.A. § 15-12-83 and O.C.G.A. § 15-12-100 to O.C.G.A. § 15-12-102 do not provide for the District Attorney to have any administrative rights in regard to grand juries.

46. While I believe the public would agree that grand juries should function efficiently, the public must be vitally interested that people involved in the legal process in Georgia must abide by the laws of the state. The public needs to be protected from people like the Defendants. The public will be well-served by restrictions on the acts that the Defendants used to damage me and others. There is

nothing in the relief requested that would harm the public interest in any way. It will accomplish just the opposite.

47. The public interest is "the people's general welfare and well being." Administration of the Grand Jury does not rise to the level of "public interest." Violation of Georgia statutes and Constitutional rights are matters of public interest. Freedom of Speech and the Right to Petition the Government for Redress of Grievances are matters of public interest.

48. The Defendants have failed to properly address this element. They have raised no issue that the injunction will disserve the public interest. Georgia Supreme Court Justice Nahmias recently spelled out that Georgia case law provides that "granting the interlocutory injunction will not disserve the public interest."

49. The Defendants make a big issue out of this on Page 8 of the Defendants' Brief:

"...because Plaintiff's allegations against the federal judiciary are meritless, the relief Plaintiff seeks must be denied. This court must consider the fact that Plaintiff's complaint is utterly devoid of merit."

50. The County Attorney bizarrely claims the complaint is "utterly devoid of merit" as a result. But the allegations against the federal judiciary are not what this Civil Action is about.

51. The federal judiciary is referred to in only 6 of the 312 paragraphs in the First Amended Verified Complaint. These paragraphs are:

- a. Paragraph 25: “On February 10, 2011, Windsor 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.)”
- b. Paragraph 26: “On March 28, 2011, Windsor 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.)”
- c. Paragraph 34: “On May 6, 2011, Windsor’s 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 Windsor 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.)”
- d. Paragraph 61: “Windsor was told that the Fulton County Georgia Grand Jury voted on August 9, 2011 to consider his evidence of hundreds of crimes and criminal racketeering by federal judges in Atlanta, Georgia.”
- e. Paragraph 182: “The conduct of DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT denied the rights to property without due process of law and therefore is in violation of 42 U.S.C. § 1983. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT ignored Windsor when he informed them of the criminal wrongdoing of federal judges, employees of the Office of the District Attorney, and others in Fulton County. The willfulness of DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT, characterized by “open defiance or reckless disregard of a Constitutional requirement” of record establishes a violation of rights under color of law. Failure to follow proper procedure has resulted in a violation of Windsor’s civil rights.”

- f. Paragraph 214: “There was a meeting of the minds by the Defendants and employees of the Fulton County District Attorney’s Office and the Fulton County Sheriff’s Department to violate Windsor’s Constitutional rights. Windsor was systematically denied access to the Fulton County Grand Jury. This was done to shield the COUNTY, the FCDA, and their employees as well as federal judicial personnel operating in Fulton County from criminal liability for their wrongdoing.”

52. That’s it. The Defendants’ claim that the First Amended Verified Complaint is meritless because it is all about the federal judiciary fails due to the false allegation of the County Attorney.

53. While my allegations against the federal judiciary are not the subject of this Civil Action, those allegations are absolutely true, totally documented, and uncontroverted. The Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Twelfth, and Fifteenth Affidavits of William M. Windsor contain sworn evidence. I will admit significant evidence into the record at the Preliminary Injunction Hearing. Exhibit 116 hereto is a true and correct copy of a WSB-TV report on August 21, 2011 about a special FBI squad being established in Atlanta to investigate corruption among judges. So I am far from the only person concerned with judicial corruption in Georgia; it is a focus of the Atlanta office of the FBI.

54. I move to strike anything but citations of statutes and case law in the Defendants’ Brief as it is not evidence, is not admissible, and is hearsay.

55. I have admitted evidence into the record of the Court as to facts, and these facts must be believed absent any sworn testimony to the contrary.

56. The Defendants have failed to produce any evidence to repel claims against them, so this Court must presume that the charges are well-founded.

(O.C.G.A. § 24-4-22.)

57. Defendants have failed to respond to letters from me, and they are therefore presumed to have admitted the acts mentioned in the letters.

58. The only so-called evidence presented by the defendants are four orders from federal court judges. These orders are inadmissible as to any alleged facts stated therein as courts may not accept a court's order as proof of anything but that an order was issued. Certified copies of orders are the best evidence, and the Defendants have failed to introduce certified copies, and the evidence is inadmissible. See my response in Opposition to Defendants' Notice of Filing of Evidence for a variety of reasons why the evidence is inadmissible.

59. Under the *Federal Rules of Evidence* Rule 201(b), A judicially noticed fact must be one not subject to reasonable dispute in that it is either (1) generally known within the territorial jurisdiction of the trial court or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. I assume Georgia has a similar statute. The orders that the Defendants wish to admit as evidence in this case are disputed. They are

inaccurate, and the issuance of these orders is perjury and obstruction of justice that is part of the subject of my evidence to the Grand Jury.

60. I have shown that I will suffer irreparable harm if my request is not granted. I have shown that a grant of his request will not burden the Defendants, that the balance of harms weighs in my favor, and that the public interest is served in a grant of the request. For the foregoing reasons, my Request for Temporary Restraining Order and Preliminary Injunction must be granted.

61. I ask that if a bond is ordered that it be \$1. I do not have the ability to post a bond as all of my money has been “stolen” in the federal courts. Exhibit 104 hereto is my Affidavit filed with the federal court, and Exhibit 105 is my financial statement. I am simply asking that the Defendants be required to abide by the law, and that should not cost me even a dollar. I cannot be charged a fee to regain my Constitutional rights.

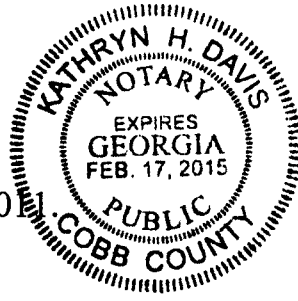
FURTHER SAITH AFFIANT NOT.

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 7th day of October 2011.



William M. Windsor



Sworn to before me, this 7th day of October, 2011.

Kathryn H. Davis


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
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This 7th day of October, 2011.



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