

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)
_____)

TWENTY-FIRST 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. On October 6 2011, the Defendants filed a “Notice of Filing of Original Evidence.”

6. 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 to the Twentieth Affidavit of William M. Windsor 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.

7. This Court needs to know that from January 1, 2008 until today, there has not been one single party sign an affidavit of any type in any legal action

involving me in the federal courts in Atlanta as to any fact. I have sworn to everything that he has written with thousands of pages of sworn testimony in the records of the courts. When there is no evidence from the opposing party, a judge cannot make a finding of fact that says anything other than what I have presented. But, the orders of the federal courts from 2008 to the present have claimed there were findings of fact against me. This is outrageous, and it is one of the easiest ways to prove the corruption. This has been done intentionally.

8. The Twelfth Affidavit of William M. Windsor (referenced and incorporated herein as if attached hereto) details the many ways that the federal judges in Atlanta commit crimes and operate a criminal racketeering enterprise.

9. I object to the so-called evidence that the Defendants are attempting to admit and moves that it be stricken. These orders are bogus. They lack legal basis, have no factual basis, and they are the product of many, many violations of the rights to due process.

10. I move to strike anything but citations of statutes and case law in the Defendants' Briefs, motions, and responses as nothing presented is evidence or is admissible. Anything presented is hearsay at best. (O.C.G.A. § 24-1-2, 24-3-1.)

11. 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. (O.C.G.A. § 24-4-7, 24-4-8.)

12. 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.)

13. Defendants have failed to respond to letters from me, and they are therefore presumed to have admitted the acts mentioned in the letters. (See Exhibits 2, 3, 4, 5, 6, 7, 8, 11, 13, 16, 17, 18, 19, 20, 21, 22, 24, 30, 31, 32, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 49, 51, and 52 to the First Amended Verified Complaint and the First Affidavit of William M. Windsor.) (O.C.G.A. § 24-4-23.)

14. 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. (O.C.G.A. § 24-5-1, 24-5-2, 24-5-4, 24-5-31.)

15. 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 complaints and evidence to the Grand Jury.

16. Attachment 1 to the Defendants' Notice of Filing of Original Evidence is a document titled "Case: 1:11-cv-01923-TWT Document 74." This purports to be a Permanent Injunction entered against me. However, this is not a certified copy of this document. It is unsigned. The Office of the Clerk of the Court of Fulton County has refused to accept unsigned orders such as this from me, so this Court certainly may not accept it. The County Attorney was not involved with this document and may not admit it into evidence. Judge Thomas W. Thrash is located just a few blocks away, and if the Defendants want to admit this into the record, they will need Judge Thrash to appear on the witness stand as he is the only person whom can testify as to whether this document was even prepared by him, and I do not believe Judge Thrash will ever put himself in the position to be cross-examined by me because he will be proven to be a criminal. Federal law requires that all valid orders must bear the seal of the Clerk of the Court, and this does not.

17. Attachment 1 to the Defendants' Notice of Filing is a bogus document for many reasons. Exhibit 118 to the Twenty-First Affidavit of William M. Windsor is the Second Amended Notice of Appeal that details much of the wrongdoing by Judge Thrash in this matter. Judge Thrash is a criminal. He has apparently been hand-picked to dispose of all of my civil actions after they were

illegally removed from Fulton County Superior Court. He has violated rules and statutes repeatedly. He has violated every form of due process. This order was issued after I was denied the right to file a response to the Defendant's motion, was denied subpoenas for witnesses, was denied the right to call witnesses, was denied the right to testify myself, was denied the right to present evidence, and had all of my objections ignored. I was afforded 15 minutes to speak at a hearing. I began by asking if an order had already been written before hearing word one from me. Judge Thrash refused to answer, and then a few minutes later, he turned to his left and read from the order that had been written before the hearing began. Kangaroo Court is a polite term for what took place.

18. Attachment 2 to the Defendants' Notice of Filing of Original Evidence is a document titled "Case: 1:09-cv-01543-WSD Document 99." This purports to be an opinion and order. However, this is not a certified copy of this document. The County Attorney was not involved with this document and may not admit it into evidence. Judge William S. Duffey is located just a few blocks away, and if the Defendants want to admit this into the record, they will need Judge Duffey to appear on the witness stand as he is the only person whom can testify as to whether this document was even prepared by him, and I do not believe Judge Duffey will ever put himself in the position to be cross-examined by me

because he will be proven to be a criminal. Federal law requires that all valid orders must bear the seal of the Clerk of the Court, and this does not.

19. Attachment 2 to the Defendants' Notice of Filing is a bogus document for many reasons. Exhibit 108 to the Twenty-First Affidavit of William M. Windsor is Windsor's November 5, 2010 Notice of Appeal that details some of the issues. Judge Duffey is as big a crook as Judge Thrash. This so-called civil action is not even a valid action. It was invented to damage me and shield judge Orinda D. Evans from arrest, indictment, conviction, prison, disgrace, and impeachment. A civil action requires a summons and a complaint, and there were neither. This case just appeared. Judge Duffey acted corruptly from Day One. The Second, Third, Fourth, Fifth, Seventh, and Eleventh Affidavits of William M. Windsor provide evidence of some of Judge Duffey's wrongdoing. Judge Duffey's favorite techniques are to destroy evidence and lie. I filed an Amended Notice of Appeal in this "action" that identified 28 filings that I have proven were filed (by signed receipt by the Clerk of the Court), but none of these were ever docketed or processed. This began on September 24, 2010 and continues to the present. Exhibit 109 to the Twenty-First Affidavit of William M. Windsor is Windsor's Amended Notice of Appeal.

20. Attachment 3 to the Defendants' Notice of Filing of Original Evidence is a document titled "Case: 1:09-CV-01543-WSD Document 52." This

is an order of the Eleventh Circuit. However, this is not a certified copy of this document. It is unsigned. The Office of the Clerk of the Court of Fulton County has refused to accept unsigned orders such as this from me, so this Court certainly may not accept it. The County Attorney was not involved with this document and may not admit it into evidence. Judge William S. Duffey is located just a few blocks away, and if the Defendants want to admit this into the record, they will need Judge Duffey to appear on the witness stand as he is the only person whom can testify as to whether this document was even prepared by him, and I do not believe Judge Duffey will ever put himself in the position to be cross-examined by me because he will be proven to be a criminal.

21. Attachment 3 to the Defendants' Notice of Filing is a bogus document for many reasons. Exhibit 110 to the Twenty-First Affidavit of William M. Windsor is Windsor's Appellant's Brief. Exhibit 111 to the Twenty-First Affidavit of William M. Windsor is Windsor's Motion for Reconsideration. This order had no basis in fact or law. The Eleventh Circuit intentionally denied my rights to damage me.

22. Attachment 4 to the Defendants' Notice of Filing of Original Evidence is a document titled "Case: 1:11-cv-02326-TWT Document 38." This purports to be a Permanent Injunction entered against me. However, this is not a certified copy of this document. It is unsigned. The Office of the Clerk of the

Court of Fulton County has refused to accept unsigned orders such as this from me, so this Court certainly may not accept it. The County Attorney was not involved with this document and may not admit it into evidence. Judge Thomas W. Thrash is located just a few blocks away, and if the Defendants want to admit this into the record, they will need Judge Thrash to appear on the witness stand as he is the only person whom can testify as to whether this document was even prepared by him, and I do not believe Judge Thrash will ever put himself in the position to be cross-examined by me because he will be proven to be a criminal. Federal law requires that all valid orders must bear the seal of the Clerk of the Court, and this does not.

23. Attachment 4 to the Defendants' Notice of Filing is a bogus document for many reasons. Exhibit 112 to the Twenty-First Affidavit of William M. Windsor is the July 20, 2011 Notice of Appeal from Fulton County Superior Court that Judge Thrash that Judge Thrash apparently destroyed because it has never been docketed or processed. Other documents attached to the Twenty-First Affidavit of William M. Windsor include the cover letter that was sent with the Notice to the Clerk of the Court, the courier proof of delivery that proves the Notice was received by the Clerk of the Court, and receipt is filing in the federal court. Exhibit 113 to the Twenty-First Affidavit of William M. Windsor is the Docket in 1:11-CV-02326-TWT which proves that neither of these notices were ever docketed, nor was my Motion for Remand, which was filed on August 8,

2011. Exhibit 114 to the Twenty-First Affidavit of William M. Windsor is the REQUEST FOR CONSENT TO FILE NOTICE OF STATUS OF APPEAL WITH GEORGIA COURT OF APPEALS. This is a notice that Judge Thrash has not allowed to be filed. It details that Civil Action 1:11-CV-02326-TWT is invalid because its predecessor 2011Cv202457 was appealed to the Georgia Court of Appeals several days before an illegal notice of removal was filed to remove the case to federal court. Exhibit 115 to the Twenty-First Affidavit of William M. Windsor is the REQUEST FOR CONSENT TO FILE A RESPONSE TO PAUL HOWARD'S MOTION TO DISMISS. Judge Thrash did not allow it to be filed, and he did not allow my exhibits to be filed. Judge Thrash is a Defendant in this action, and he has ignored motions for recusal, failed to ever consider if he had jurisdiction (which he didn't), has ignored the fact that the matter is on appeal, and has blocked my filing of evidence, affidavits, motions, and more. Judge Thomas W. Thrash is as corrupt as they come. He is a crook.

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.

A handwritten signature in black ink, appearing to read "William M. Windsor", written in a cursive style.

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
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 7th day of October, 2011.



William M. Windsor
Pro Se

PO Box 681236
Marietta, GA 30068
Telephone: 770-578-1094
Facsimile: 770-234-4106
Email: williamwindsor@bellsouth.net