

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)	
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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. This Affidavit is offered in support of my Motion for Temporary Restraining Order and Preliminary Injunction and for all purposes in this and any other civil action.
3. I am the Plaintiff in this action, and I am representing myself pro se.
4. I am not an attorney. I cannot find an attorney who will sue judges and fight the legal system, 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.

5. 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.

6. My attempts to present evidence of corruption to the Fulton County Grand Jury have been met with a variety of actions and inaction designed to damage me and deny my legal rights.

7. In 2008, I called the Fulton County District Attorney’s Office with a criminal complaint. I was told to call the U.S. Attorney as the Fulton County District Attorney did not have jurisdiction over federal judges. Two years later, I discovered this was not true.

8. In 2010, I presented a criminal complaint to Mr. Paul Howard (“Mr. Howard”), the Fulton County District Attorney. Neither Mr. Howard nor anyone on his staff even extended the courtesy of a response.

9. 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 to the First Amended Verified Complaint as Exhibit 1.)

10. 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 to the First Amended Verified Complaint as Exhibit 2.)

11. 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 to the First Amended Verified Complaint as Exhibit 3.)

12. On March 29, 2011, I sent a letter to Assistant Fulton County District Attorney Mrs. Rebecca Keel ("Mrs. Keel") stating that I needed to meet with the Grand Jury. Mrs. Keel did not respond. (A true and correct copy of this letter is attached to the First Amended Verified Complaint as Exhibit 4.)

13. On March 30, 2011, I sent another letter to Mrs. Keel stating that 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 to the First Amended Verified Complaint as Exhibit 5.)

14. 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 to the First Amended Verified Complaint as Exhibit 6.)

15. On May 6, 2011, I sent a letter by courier to the receptionist of the Fulton County District Attorney's Office ("FCDA") 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 to the First Amended Verified Complaint as Exhibit 7.)

16. On May 6, 2011, I sent a letter by courier to Mr. Howard to advise him not to interfere with letters that I was having 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 to the First Amended Verified Complaint as Exhibit 8.)

17. 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 to the First Amended Verified Complaint as Exhibit 9.)

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

19. 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 to the First Amended Verified Complaint as Exhibit 10.)

20. I heard nothing from the Grand Jury for over a month. On June 7, 2011, I received a letter from Herbert J. Bridgewater, Jr., Foreman of the May/June 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 to the First Amended Verified Complaint as Exhibit 12.) Upon information and belief, the Fulton County District Attorney's Office gave this false information to Mr. Bridgewater.

21. 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 to the First Amended Verified Complaint as Exhibit 13.)

22. 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.

23. I arrived on July 22, 2011 with sealed confidential envelopes with evidence for the Grand Jury, and Ms. Fudge said the Grand Jury didn't want to speak with me. I asked how she could possibly know that, and she did not respond. (A true and correct copy of this letter is attached to the First Amended Verified Complaint as Exhibit 14.)

24. Deputy Sheriff Betts and Deputy Sheriff Roye appeared a few minutes later on July 22, 2011, 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 to me. Deputy Betts demanded my driver's license and disappeared with it for about 10 minutes.

25. 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 20-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."

26. Deputy Betts appeared again on July 22, 2011 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 was a clear violation of my First Amendment Constitutional rights in a public lobby in a government building.

27. A female assistant district attorney passed by at this point on July 22, 2011, 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.

28. Throughout the day on July 22, 2011, various employees of the Fulton County District Attorney's Office passed by me, and no one offered to help.

29. After Deputy Betts left on July 22, 2011, 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."

30. Several Sheriff's deputies showed up a short while later on July 22, 2011. Lieutenant English asked what I wanted to accomplish. I said I wanted to speak to the Grand Jury and present evidence of many crimes. Lieutenant 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. Lieutenant English repeated “that will not happen.”

31. I expressed that I would simply wait in the lobby with my sign and envelopes until grand jurors passed by. Lieutenant English told me that I would be arrested for “jury tampering” if I spoke to a grand juror in the lobby. Witnesses present on July 22, 2011 include Cynthia Nwokocha (“Ms. Nwokocha”), Deputy Betts, Lieutenant English, and Deputy Roye, as well as citizens Kia’Vonne Ginton and Venoya Sims, and me.

32. I asked to speak to Lieutenant English’s supervisor on July 22, 2011, and he told me that he was the most senior person. I called the Fulton County Sheriff’s Department and learned that was not true.

33. I told Lieutenant English on July 22, 2011 that speaking to a grand juror would not constitute jury tampering. I told Lieutenant English that refusing to allow me to speak was a violation of my First Amendment Constitutional right to freedom of speech. Lieutenant English said: “If you speak to a grand juror, I will arrest you.”

34. Additional Deputy Sheriffs arrived a short while later on July 22, 2011, and Lieutenant English asked if he could photograph my sign. I declined. Lieutenant English then had one of the deputies take my photograph.

35. After the group of deputies left on July 22, 2011, Ms. Nwokocha told me that she would give the envelopes to the grand jurors. I do not know if she did.

36. On July 22, 2011, 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.

37. On July 22, 2011, 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. This continued for over a month.

38. On July 22, 2011, I returned home and researched jury tampering. I discovered that what Lieutenant 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 to the First Amended Verified Complaint as Exhibit 15.)

39. 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.

40. On July 23, 2011, I sent a fax to Ms. Nwokocha, Mrs. 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 to the First Amended Verified Complaint as Exhibit 16.)

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

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

43. Mid-afternoon on July 25, 2011, I sent a fax to Ms. Nwokocha, Mrs. 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 to the First Amended Verified Complaint as Exhibit 17.)

44. On July 25, 2011, I sent 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. (A true and correct copy of these complaints is attached to the First Amended Verified Complaint as Exhibit 18.) Nothing was done.

45. I was told that the Fulton County Georgia Grand Jury voted on August 9, 2011 to consider my evidence of hundreds of crimes and criminal racketeering by federal judges in Atlanta, Georgia.

46. As requested by letter, I hand-delivered my evidence to the Grand Jury at 10:00 am on August 12, 2011. (A true and correct copy of this evidence is attached to the First Amended Verified Complaint as Exhibit 19.) I was immediately notified by Assistant District Attorney Mrs. Keel, the woman who claimed to be in charge of the Grand Jury, that I had been scheduled to testify before the Grand Jury on Friday, August 19, 2011.

47. I worked at least 12-hours-a-day for close to a week preparing my presentation and a binder for each Grand Juror.

48. On August 19, 2011, I met with the Fulton County Grand Jury to provide an introduction to my criminal charges. At about 11:30 am, an Assistant District Attorney (“ADA”) waved to me to enter the Grand Jury Room. He did not introduce himself. He told me that I would not be allowed to distribute my binders. I learned that the ADA was Waverly Settles (“Mr. Settles”), the ADA who presents indictment charges to the grand juries.

49. Mr. Settles began by saying I didn't have the right to be there, but the District Attorney, Mr. Paul Howard, and Mrs. Keel were "doing me a favor to allow me to speak for five minutes." He said that I didn't have the right to speak to the Grand Jury. He told the Grand Jurors that the correct procedure is to get elected officials to sign a petition that goes to the Chief Judge and then a decision is made whether to impanel a special grand jury.

50. When Mr. Settles came up for air, I said, "Respectfully, what you have just said is incorrect. In Tab 3 of these binders, the statutes are provided, and it is clear that the Grand Jurors have a duty to investigate any crimes that come to your attention...and that has now happened." I explained that there is a procedure for a petition, but none of the Fulton County elected officials had extended the courtesy of a response. Mr. Settles then had the binders passed out as I believe he knew it would be wrong to hide them since I said they contained proof.

51. At that point, the Foreman spoke. Mr. Steve Broadbent ("Mr. Broadbent") said that he could find no evidence in the information that I provided to him, and he indicated that I had no credibility. He said that I had claimed to have been the President of Goldman Sachs and CEO of Bain Capital. He said he checked, and neither of those statements was true. He was as totally rude. He asked me to take 30 seconds and explain what he had evidence of.

52. I had to start by saying to him that I have never in my life claimed to have been the President of Goldman Sachs or the CEO of Bain Capital. I told him that my bio said I was President of a Goldman Sachs Company and CEO of a Bain Capital company. Both Goldman and Bain own hundreds of companies.

53. The page from my letters to Mr. Broadbent and the Grand Jury of July 19 and August 5 actually state very clearly: "From 1992 to 1996, I was President of Advanstar Expositions, a company owned at the time by Goldman Sachs. Advanstar was one of the largest producers of trade shows and conferences in the world. From 1996 to 2001, I was CEO of 1st Communications, a company owned by Bain Capital, Triumph Capital Group, and me." (A true and correct copy of these letters is attached to the First Amended Verified Complaint as Exhibit 20.)

54. That could not be any clearer! This was also provided on Page 1 of Tab 2 of the binder that had been distributed to each Grand Juror. Mr. Broadbent

just grunted. It was my strong impression that his role was to attempt to discredit me and turn the Grand Jurors against me. Mr. Broadbent was negative and disruptive throughout.

55. I spoke for less than 30 seconds of my planned presentation when jurors started raising their hands or just speaking. I stopped and responded to questions and comments and was never able to give my carefully-prepared and timed presentation that had been submitted to Mrs. Keel in advance.

56. One man said if I could show him proof that Judge Orinda D. Evans did what I said and did not find that I violated any statute but awarded massive legal fees against me, he said he believed the Grand Jury must pursue it and 60 Minutes should do a story. He mentioned several pages in my binder and asked that I return with a slam bam thank you ma'am, just-the-facts narrative of no more than 20 pages with the evidence to prove things. Several other jurors asked for that as well, and I told them I would be happy to. I explained that all I had been asked to do that day was to come and present a short overview and bring evidence, which I had done.

57. The woman seated closest to me was the most negative. She said she refused to believe that judges are not honest, or words to that effect. She said that I file frivolous lawsuits. I asked who told her that I file frivolous lawsuits because it

is absolutely false. She looked toward Mr. Broadbent and stuttered without giving a response.

58. At that point, it was painfully clear to me that the jury had been tampered with. They had been told disparaging things about me that clearly are not true.

59. A man seated next to Mr. Broadbent said words to the effect that I had provided information to them that I knew was false. He claimed I said Maid of the Mist had a 40-year federal government contract. He said he has worked with the federal government, and he knows they do not do 40-year contracts.

60. I never said any such thing. Page 3 of Tab 4 of the binder that he was alluding to says quite clearly: "...fraud in obtaining no-bid 40-year government contracts...."

61. I politely explained to him that the document says GOVERNMENT contracts and that they are with the State of New York and the Province of Ontario, and I held up the two contracts. On the CD-ROM provided in the binders, a file included copies of both contracts. New York State is 40 years, issued in clear violation of New York law. I also provided dozens of newspaper articles about these, and all of this as well as an affidavit from the newspaper reporter who exposed a lot of this on the CD-ROM in the binders. These contracts have been

front page news in Canada. The Province of Ontario voided the contract, tendered it for competitive bids for the first time in 160 years, and fired many people involved. The New York contract should be voided in the next two months; it is in default now. The man just grunted when I explained.

62. I advised the Grand Jurors that this was not just about me. I identified the affidavits provided from people who wish they could testify, and I informed them that there were at least two people in the lobby hoping to speak to them. Mr. Broadbent said only I could speak.

63. One lady juror said I should just forget about what happened to me. I told her that I appreciated her advice, but I was committed to this for the rest of my life.

64. This lady juror also suggested that I get an attorney to handle this. I told her that I had spoken with as many as 24 attorneys, and no one would handle it. Mr. Broadbent said "well that tells us something right there." I wasn't turned down because of content; every attorney told me right up front that they could not risk their careers going against judges. Mr. Broadbent is a politician, very much part of the establishment, in my opinion. I was not surprised to find that he was out to damage me. I was surprised with how overt he was.

65. Mr. Settles called my time to a close a little after noon. I confirmed that my “take-away” from the meeting was that I was to prepare no more than 20 pages and bring the specific evidence. That was confirmed. One man said “no more than 20 pages.” I said I would back on Tuesday with the 20-pages and evidence.

66. When I spoke with Scott Hintz in the lobby afterwards, he said two sheriff's deputies were speaking with Ms. Naomi Fudge (“Ms. Fudge”) calling me a lunatic.

67. Scott Hintz said that he heard someone say that the Grand Jury was meeting down on the second floor. Once all the other witnesses testifying before the Grand Jury had finished and gone and I was alone in the waiting room, I overheard a woman who works for the District Attorney's Office commenting to Ms. Fudge that she was surprised to see the Grand Jury had ended already. I figured she was confused, but she was at the other end of the room from me, and she was peering into the Grand Jury Room when she said this. Now putting that together with the comment about the second floor, I think they took all of the Grand Jurors down to the second floor to disparage me. I believe they then came back upstairs and called me in. I believe that explains why the questions were negative from the get-go.

68. Improper information has been 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 was 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.

69. Mr. Broadbent made false, slanderous statements about me to the Grand Jury.

70. As soon as I returned home on Friday August 19, 2011, I sent a fax to Assistant District Attorney Mrs. Keel to confirm my scheduled appointment with the Fulton County Grand Jury for Tuesday August 23, 2011 and to cover some procedural issues for the presentation, such as format and use of a laptop to project images. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 21.) I also called and left a voice mail asking Mrs. Keel to call. She did not return my call...ever. The letter said: "It wasn't a warm reception, but I have been invited back on Tuesday with 20 pages of specific proof. Can you tell me what time I can speak on Tuesday?"

71. On August 19, 2011. I also sent a Mr. Settles. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 22.) The last paragraph of this letter says: "When I return on Tuesday with my 20-page

or less document and proof, I would like to actually be able to speak. I was not allowed to give my carefully-planned presentation today. But thanks so much for the invitation to return."

72. On August 21, 2011, a news report came out that the Atlanta Office of the FBI had created a special task force to investigate judicial corruption. I sent a fax to Mrs. Keel with a copy of the article and several comments about the jury tampering that I observed during my time with the Fulton County Grand Jury. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 23.)

73. On Monday August 22, 2011, I sent a fax to Mrs. Keel advising her that I had been working around the clock and that I would be there on Tuesday at 9 am. I made several specific requests about my testimony. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 24.)

74. So, Mrs. Keel received three faxes and a voice mail from me from Friday through Monday -- all in regard to my Tuesday testimony before the Fulton County Grand Jury. And Mr. Broadbent and Mr. Settles received one fax. My presentation to the Fulton County Grand Jury for August 23 was confirmed again and again and again.

75. When I returned on August 23, 2011 to testify after being invited back after my meeting with the Grand Jurors on Friday, I was denied my audience with the Fulton County Grand Jury.

76. I arrived at the Fulton County District Attorney's Office at 9:10 am on August 23, 2011. Seven local victims of judicial, prosecutorial, and attorney corruption showed up. Sabrina Felton, Ed Dort, Scott Hintz, Mark Skeete, Barbara Rose, Lisa, and I got acquainted, shared stories, and made a pact that we will all work together and get others to work with us to root out the corruption and seek justice. We were joined by a reporter from CBS Atlanta. He asked a lot of questions and listened to each of us. The group sat and talked for two hours, and nobody said boo to us.

77. At 11 am on August 23, 2011, Ed Dort followed me to Ms. Fudge's window to be a witness. I asked to see Mrs. Keel, and Ms. Fudge rudely told me to sit down. Ed Dort asked whether I was always treated that way, and I told him no, it's usually worse.

78. At 11:30 or so on August 23, 2011, Deputy Sheriff Royce came by. She said she would check on my appearance with the Grand Jury, but she was never seen again.

79. At noon on August 23, 2011, I saw several Grand Jurors leaving; I assumed for lunch. They never returned.

80. At about 12:45 pm on August 23, 2011, Mr. Settles waved me in from the outer door to the Fulton County District Attorney's Office. I grabbed my dolly holding two jam-packed paper cases containing my evidence -- 164 exhibits to go with the 20-page Complaint that I was told to prepare. Mr. Settles would not allow my evidence to be brought in to the DA's Office. I grabbed my iPhone and note pad, and I asked if my friends could come, and Mr. Settles said no. I went in alone. Mr. Settles took me into the Grand Jury Room where Mr. Broadbent was seated at a small conference table. The room was otherwise empty.

81. Mr. Settles and Mr. Broadbent told me they did not know where I got the idea that I had been invited to come back to present on August 23, 2011. I recounted the exact discussion that was held in front of the entire Fulton County Grand Jury. They had all of my letters in front of them with yellow highlighter over select sentences. I reminded Mr. Settles that as I left the Grand Jury Room on the 19th, my last words to him as I exited were: "I'll be back with the 20-pages and my evidence on Tuesday."

82. Mr. Settles threatened me with a lawsuit for defamation on August 23, 2011. He said a letter that I faxed to Mrs. Keel saying I suspected that Mr. Settles

and Mr. Broadbent slandered me to the Grand Jurors constituted defamation. Mr. Settles said that if he saw his name in print again, he would sue me.

83. On August 23, 2011, I asked Mr. Broadbent for an apology for the lies that he told the Fulton County Grand Jury about me. He refused to do so. He said he didn't lie. I told him he most certainly did. He claimed he had letters from me that say he was the President of Goldman Sachs and the CEO of Bain Capital. I told him to produce the letters then. I told him no such letters exist. I told Mr. Broadbent that he is a liar.

84. As I got up to leave on August 23, 2011, Mr. Settles told me to be careful what I said about the meeting because there was a reason there were two of them in the room and only me. Upon information and belief, they planned to lie about what happened and it would be two against one.

85. Their actions are jury tampering, obstruction of justice, violation of their oaths of office, and more. I sent a fax to Mrs. Keel and District Attorney Paul Howard on August 23, 2011 advising them that I wished to file criminal charges for jury tampering. (Exhibit 37 to the First Amended Verified Complaint is a true and correct copy of this letter.) There was no response.

86. On August 24, 2011, I sent a fax to Mrs. Keel saying there had been no response and demanding to meet with the grand jury. (Exhibit 38 to the First

Amended Verified Complaint is a true and correct copy of this letter.) There was no response.

87. On August 24, 2011, I sent a fax to Mr. Howard saying there had been no response and demanding to meet with the grand jury. (Exhibit 39 to the First Amended Verified Complaint is a true and correct copy of this letter.) There was no response.

88. On Thursday, August 25, 2011, I mailed certified mail return receipt letters to each member of the Fulton County Grand Jury. They were personally addressed Grand Juror #1 to #23 and Alternate 1, 2, and 3. The letters were the same with only changes of name. Each envelope was marked "Personal and Confidential." Interfering with the U.S. Mail is a federal crime. So, if the Fulton County District Attorney's Office interfered with the mail, additional criminal charges need to be filed -- 36 counts. (A true and correct copy of the letter is attached to the First Amended Verified Complaint as Exhibit 25.) (Exhibit 26 to the First Amended Verified Complaint is a true and correct copy of the certified mail receipts.)

89. The letters have been returned to me marked "refused." Upon information and belief, the letters were intercepted and were never presented to the

addressees. (Exhibit 27 to the First Amended Verified Complaint is a true and correct copy of the front of one of the returned letters.)

90. The mailing cost \$203.58 for the postage alone. (Exhibit 28 to the First Amended Verified Complaint is a true and correct copy of the front of the receipt from the United States Post Office.)

91. Letters and evidence hand-delivered to Fulton County have also been refused. (Exhibit 29 to the First Amended Verified Complaint is a true and correct copy of the front of one of the refused evidence envelopes.) Upon information and belief, faxed letters sent the FCDA have not been delivered to the addressees.

92. On Friday, August 26, 2011, I spent three hours at the Fulton County District Attorney's Office. My two cases of evidence were parked on a dolly right next to the door. I changed my sign to read: "EVIDENCE OF GRAND JURY TAMPERING -- Act or be an Accessory."

93. At 9:45 am on August 26, 2011, receptionist Ms. Fudge refused to accept my evidence and deliver it to the Fulton County Grand Jury. Deputy Sheriff L. Bailey was my witness to this.

94. At about 10:20 am on August 26, 2011, Senior Chief Assistant District Attorney Gabe Banks walked into the lobby with a half dozen high-powered people from the police and FBI. They had just been in a meeting with the

Fulton County District Attorney. I hopped up and said: "I need to report jury tampering with this Grand Jury. Will one of you help me? No one moved or said a word. The silence was deafening. Finally, Mr. Banks said, "I will get someone to speak with you." He went inside, and when he came back out, he said, someone will be with you in just a few minutes. Two hours and ten minutes later, no one ever came.

95. At 10:50 am on August 26, 2011, Deputy Sheriff Betts came by, refused to take my evidence to the Grand Jury, and made various threats to me.

96. At 11:05 am on August 26, 2011, Deputy Sheriff Roye walked by. She refused to deliver my evidence to the Fulton County Grand Jury. Officer Bailey of the Atlanta Police Department was witness to that. Deputy Roye said I needed to talk to Mr. Settles, and I told her that's impossible because I was bringing charges against him. She just walked away.

97. At 11:14 am on August 26, 2011, Deputy Sheriff Betts came by again and sneered that "no one is coming out to see you." I was on the telephone with Scott Hintz, and he heard the conversation.

98. At 11:18 am on August 26, 2011, I told Ms. Fudge that I needed to see Fulton County District Attorney Paul Howard, Jr. She told me he wasn't in.

99. At 11:45 am on August 26, 2011, a Grand Juror who knows one of the people who was there to testify with me the previous Friday passed by and said hi. I asked if she would take my envelope of evidence, and she said she didn't know if she could. I never saw her again.

100. At 11:52 am on August 26, 2011, a group of people came to the elevator. They told me they had just finished a meeting with District Attorney Paul Howard. I said "that's not possible; the receptionist told me he wasn't in." I went over to Ms. Fudge and again demanded a meeting with District Attorney Howard, and she even more rudely told me to sit down.

101. At 12:15 pm on August 26, 2011, Mrs. Keel walked to the elevator. She ignored my evidence. I told her I was going to file criminal charges against her, and she said "do what you gotta do."

102. At 12:20 pm on August 26, 2011, Mr. Broadbent and another man left. They ignored me.

103. At 12:30 pm on August 26, 2011, the Grand Juror who was supportive at the August 19 session came to the elevator. I asked if he would accept my envelope of evidence for the Grand Jury. I told him the envelope contained the evidence that he specifically requested last week. He took the envelope and was opening it as he got on the elevator. He had proof of the crime that he requested,

and he had my charges of jury tampering by Mr. Broadbent, Mr. Settles, or whoever lied to the Grand Jury and then blocked my scheduled August 23, 2011 meeting.

104. I packed up my stuff and headed for the Fulton County Criminal Warrants Desk on August 26, 2011 to make application for arrest warrants for six people. I was in line behind people getting them for an abusive husband, a rowdy neighbor, a restraining order on an ex-husband, and the like. All submitted their form, paid their \$10, and got their court date.

105. It took me about an hour to fill out my six complaints on August 26, 2011. I proudly took them to the window with \$60 in hand, and the minute the clerk saw who I was charging, she left to speak to a supervisor. She returned to tell me that she was unable to process them because her supervisor said to hold them until they could get clearance from some unknown power.

106. I asked to speak to her supervisor, and Ms. Asby came out and spoke with me in a jam-packed reception area on August 26, 2011. I told her that if a woman can file a request for a warrant over a noisy neighbor, then I can certainly file warrant applications against people committing serious felonies to protect a criminal racketeering enterprise. She didn't budge. She said I could see the State

Court Administrator, Ms. Cicely Barber ("Ms. Barber"). So, I rolled my dolly of evidence to Ms. Barber's office.

107. I spoke to Ms. Barber for about 10 minutes on August 26, 2011. She said "these people were acting in their official duty when they did this." I said, "yes, they were, but that is irrelevant. They committed crimes, and there is no immunity -- never has been -- for any government official who commits crimes." She said she would discuss it with her boss, but she said she didn't believe they would let me file them. I told her that I didn't believe they had any option.

108. I sent an email to Ms. Barber and her boss, Mark N. Harper, Chief Clerk of the Superior Court of Fulton County on August 26, 2011. (A true and correct copy of the email is attached to the First Amended Verified Complaint as Exhibit 30.)

109. On August 27, 2011, I sent a fax to the Fulton County District Attorney stating that I wanted to press criminal charges against Mr. Broadbent, Mrs. Keel, Mr. Settles, and Ms. Fudge. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 31.)

110. On August 28, 2011, I sent a fax to each member of the Fulton County Grand Jury. (A true and correct copy of one of the faxes is attached to the First Amended Verified Complaint as Exhibit 32.)

111. On August 28, 2011, I sent a fax to many employees of the Fulton County District Attorney's Office, including Mr. Howard, Ms. Nwokocha, Gabe Banks, Jill (last name unknown), Nicole Vaughn, Cheveda McCamy, Yvette Brown, Josh Blakeley, Jacoby Hudson, Pat Dutcher, Stephanie Graham, Bernadette Hernandez, Kip Young, Pete Johnson, Shondeana Morris, Lenny Krick, Vance Williams, Melissa Redmon, JaDawnya Butler, Cindy Williamson, Olyempmy Huff, Fani Willis, Public Integrity Unit, Brett Pinion, Ramona Toole, Shepard Orlow, Yolanda Mack, David Studdard, Steve Dimasi, Raquel Stokes, Daysha Young, Michael Green, John Williams, Clint Rucker, Geraldine Carawan, Johnna Griffin, Paul Camarillo, Sonya Brown, Lance Cross, Ernest Nesmith, David White, Leif Howard, Frank Lupo, Cameron Crandall, Hannah Chung, Scott Clemens, Ashley Culberson, Michael Bernard, Tanya Miller, Lee Williams, Kelvin Roberts, Sheila Ross, Tonya Boykin, Kamilah Miller, Genard Tindal, Claire Farley, Michele McCutcheon, Greg Patterson, Chris Lacock, Linda Dunikoski, George Jenkins, Alex brown, William Miles, Jimmy Kim, Kellie Hill, Jason Park, Dwayne brown, Patricia Jackson, Bobby Wolf, Jill Holander, Jehan Luqman, Steven Jones, Marshall English, Angela Lowe, John Caldwell, Dalia Racine, Christina Sears, Charissa Henrich, Lawanda Hodges, Josh Geller, Jameekia Davis, Steve Barresi, Antonio Long, Shireen Hormozdi, Chuck Boring, Walter

Yarbrough, and Eleanor Ross. The letter enclosed My charges against Mr. Broadbent, Mr. Settles, Mrs. Keel, and Ms. Fudge. I stated that I believed it was now their legal and ethical responsibility to see that these charges are presented to the Grand Jury. I demanded to be allowed to present my criminal charges to the Grand Jury on August 30. (A true and correct copy of one of the faxes is attached to the First Amended Verified Complaint as Exhibit 40.) There was no response.

112. On August 28, 2011, I sent a fax to the Fulton County Sheriff stating that I wanted to press criminal charges against Mr. Broadbent, Mrs. Keel, Mr. Settles, and Ms. Fudge. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 41.)

113. On August 29, 2011, I sent a Freedom of Information Act and Georgia Open Records Act request to the Fulton County Superior Court Jury Clerk. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 42.) There was no response.

114. On August 29, 2011, I sent a Freedom of Information Act and Georgia Open Records Act request to the Fulton County District Attorney. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 43.) There was no response.

115. On August 30, 2011, I arrived at the Fulton County Courthouse and the public lobby outside the Fulton County District Attorney's Office at 9:15 am.

116. On August 30, 2011, I went to the reception window and told Ms. Fudge that I needed to see "any Grand Juror except Steve Broadbent or Waverly Settles" to present evidence. She barked "sit down." I sat down.

117. At 9:35 am on August 30, 2011, Senior Chief Assistant District Attorney Gabe Banks walked to the elevator. He made eye contact with me and said "You're back." I told him that no one ever came to help me as Mr. Banks promised on Friday. He got on the elevator and was gone.

118. Mr. Banks came back at 9:52 am on August 30, 2011. I asked him for help, and he said "That's over my pay grade." As he is one of the most senior people, I believe the directions to deny my evidence going to the Grand Jury came from Fulton County District Attorney, Paul Howard, Jr.

119. At 10 am on August 30, 2011, Assistant District Attorney Jill (last name unknown) came by. I had spoken to her on several occasions. She smiled and seemed a little surprised that I was back. I asked if she had received my letter, and she said no. On August 29, 2011, I had a courier deliver over 100 personally-addressed envelopes marked "Personal & Confidential" to every employee that I could identify in the Office of the Fulton County District Attorney. The letters put

them on notice that Steve Broadbent, Waverly Settles, Rebecca Keel, and Naomi Fudge had committed crimes and that I needed to present those crimes to the Grand Jury. In the letter, I stated that failure to do so would be, in my opinion, a violation of the law. No one did a thing.

120. At 10:05 am on August 30, 2011, Mrs. Keel saw three people to the door. I heard her say she was sorry she was such a witch. She said she had just gotten into a fight with her boss.

121. At 10:16 am on August 30, 2011, Deputy Sheriff Roye said "good morning." I asked her if she would take my evidence to the Grand Jury, and she refused. She refused again at 11:20 am.

122. At 11:40 am on August 30, 2011, Deputy Sheriff Roye passed again, and I asked her to stop and sign a document that stated she had refused to accept the evidence and give it to the Grand Jury. She refused.

123. At 11:55 am on August 30, 2011, Sabrina Felton ("Sabrina") appeared. Sabrina was one of the witnesses in the elevator lobby outside the DA's Office on August 19, 2011 when I was allowed in to speak to the Grand Jury. Sabrina had come with her own CONFIDENTIAL envelope of evidence and information to have delivered to the Grand Jury. I walked over to the

receptionist's window with her, and Sabrina asked Ms. Fudge to give her evidence and information to the Grand Jury. Ms. Fudge refused.

124. A few minutes later on August 30, 2011, Ms. Cynthia Nwokocha, Chief Investigator for the Fulton County District Attorney, appeared. I said to Sabrina that Ms. Nwokocha was a woman who would give her evidence to the Grand Jury. Ms. Nwokocha was immediately combative with Sabrina, and Sabrina stood toe-to-toe with her and demanded her rights. Ms. Nwokocha told her that a citizen has no rights to present evidence to a grand jury. I was standing just a few feet away as the two stood toe-to-toe. When she gave this false information, I said, it was not true. There is nothing in the Georgia statutes that prohibits a citizen from presenting information to a grand jury. Ms. Nwokocha looked at me with a look that could kill, and she told me to get out of the conversation. I did. There were many people in the lobby.

125. Ms. Nwokocha ordered Sabrina from the building, and then she ordered me to leave as well. I told her that I was not going anywhere. She then said she was issuing a Criminal Trespass Warning. She called for Sheriff's deputies, and Sergeant Gates and Sergeant McKinnon showed up. They told me they were waiting for Lieutenant English. In July, Lieutenant English threatened to arrest me if I even spoke to a Grand Juror. I had filed criminal charges against

Lieutenant English for that. (A true and correct copy of the Affidavit of Sabrina Felton is attached to the First Amended Verified Complaint as Exhibit 33.)

126. Ms. Nwokocha came over to me with a crazed look on her face and said she was issuing a Criminal Trespass Warning to me. She presented the document and asked me to sign. (Exhibit 34 to the First Amended Verified Complaint is a true and correct copy of the Criminal Trespass Warning.) I refused. Ms. Nwokocha said I would be arrested if he ever again returned to the public lobby outside the District Attorney's Office.

127. One Fulton law enforcement officer, Officer Lemke, chuckled at the concept, and two men with him who appeared to be attorneys said "you can't criminally trespass in a government building."

128. An Assistant District Attorney named Horace witnessed all of this. I confirmed with him that he heard Ms. Nwokocha refuse to give Sabrina's evidence and my evidence to the Grand Jury. Deputy Sheriff Roye was also there, and I asked her again to give my evidence to the Grand Jury, and she refused again.

129. At 12:10 pm on August 30, 2011, Lieutenant English of the Fulton County Sheriff's Department showed up, and he, Nwokocha, Gates, and McKinnon stood over me as I sat politely in a chair against the wall. Lieutenant English ordered me to leave the building immediately. I asked Lieutenant English

to give my evidence to the Grand Jury, and he refused. Photographs of the envelopes containing evidence that Ms. Nwokocha and others refused to give to the Grand Jury are Exhibits 35 and 36 to the First Amended Verified Complaint. Lieutenant English, Gates, and McKinnon kept their guns in their holsters, but they surrounded me and moved me to the elevator. They took me down to the main floor of the courthouse.

130. On August 30, 2011, I was denied the opportunity to speak with the Fulton County Grand Jury on the last day of their two-month session after the Grand Jury had requested that I return with evidence for their consideration.

131. On August 31, 2011, I called Ms. Nwokocha at 404-612-7733 as per the second paragraph of the "Criminal Trespass Warning." It says that if you have questions or need to request permission to enter, you must call. I called twice, and Ms. Nwokocha hung up within seconds. The second time, she said she would file charges against me for harassment if I called again.

132. On August 30, 2011, I sent a fax to Mr. Howard expressing that additional criminal charges needed to be filed against Ms. Nwokocha, Deputy Roye, Lieutenant English, and Ms. Fudge. Mr. Howard was asked to contact me for the details and the evidence. I asked Mr. Howard to withdraw the "Criminal Trespass Warning" immediately. (A true and correct copy of the fax is attached to

the First Amended Verified Complaint as Exhibit 44.) No one ever responded.

133. On August 31, 2011, I sent a fax to Mr. Howard about the latest development with the "Criminal Trespass Warning." (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 45.) There was no response.

134. On September 1, 2011, Ms. Barber said the criminal warrants applications had been referred to Magistrate Judge Stephanie Davis.

135. On September 1, 2011, I began attempting to reach Judge Davis. I faxed a letter requesting the opportunity to come and speak with her as soon as possible. I explained that I would like the opportunity to explain the issues. I stressed that this was an extremely serious matter.

136. On September 1, 2011, I visited the Office of the Fulton County Sheriff's Department where I met with Major McKee and Captain Wingfield. They are the chain of command above Lieutenant English, responsible for the DA's Office and Grand Jury sheriff duties. I explained what all had happened with the threats from two of their deputies, jury tampering by three of their deputies and the District Attorney and a host of FCDA employees. They said they would get back to me, but they never did. I told them my first priority was to make the "Criminal Trespass Warning" disappear.

137. On September 1, 2011, I attempted to meet with Judge Kelly Amanda Lee ("Judge Lee"). I was referred to Judge Lee by Judge Constance Russell, the Presiding judge for the week. Judge Russell told me that he should take the jury tampering and Criminal Trespass Warning issue to the judge who was responsible for the July/August Grand Jury, and that was Judge Lee. Judge Lee would not meet with me on September 1.

138. On September 1, 2011, I sent another request under the Freedom of Information Act and the Georgia Open Records Act to the Fulton County District Attorney. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 46.) There was no response.

139. I wrote Judge Lee again on September 1, 2011 attempting to get a meeting. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 47.)

140. I wrote Judge Lee again on September 5, 2011 attempting to get a meeting. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 48.)

141. On September 6, 2011, I sent a letter to the Fulton County Board of Commissioners regarding Georgia State Law (O.C.G.A. § 15-12-60 to 15-12-102), the District Attorney, and the grand juries. I demanded changes in Fulton County.

(A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 49.) There was no response.

142. On September 9, 2011, I received a letter from Judge Lee dated September 6 by fax. Judge Lee said she couldn't meet with me. (A true and correct copy of the letter is attached to the First Amended Verified Complaint as Exhibit 50.)

143. I immediately faxed a response to Judge Lee on September 9, 2011 explaining the urgency of the matter. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 51.) Judge Lee did not respond.

144. On September 26, 2011, I again attempted to meet with Judge Lee. There was no response.

145. On September 26, 2011, I again attempted to reach Judge Davis. I stated in a fax that my Criminal Warrant Applications were passed to her for review a month ago, and no one had extended the courtesy of returning my many phone messages, emails, and visits to the office of the Court Administrator. (A true and correct copy of the fax is attached to the First Amended Verified Complaint as Exhibit 52.) There was no response.

146. On September 28, 2011, I went to the courtroom of Judge Davis,

advised a case Manager why I was there, and waited until all other matters had been handled. Judge Davis refused to meet with me. I have not received any word from Judge Davis.

147. I have a clear right to submit evidence to the Grand Jury. There is nothing in the Georgia Statutes that prohibits a citizen from presenting evidence of crimes to the grand jury.

148. The Georgia Statutes do not have any provisions whatsoever giving district attorneys any authority over grand juries. The Georgia Statutes do not contain any provisions that would allow any other entity or person to give district attorneys any authority over grand juries.

149. I am asking this Court to declare that the Georgia Statutes do not give Georgia district attorneys any authority over grand juries.

150. I am asking this Court declare that citizens have the right to present evidence of criminal acts to a grand jury for consideration.

151. I am asking this Court declare that citizens have the right to speak to a grand jury to present information regarding alleged criminal acts for consideration by the grand jury.

152. I am asking this Court declare that a district attorney may never interfere with a citizen's right to present evidence of alleged criminal acts to a

grand jury for consideration.

153. I am asking this Court declare that no one has the right to speak to a grand jury other than under oath in an official session of the grand jury to present information regarding any witness or potential witness or regarding any matter that may come before the grand jury. I am asking this Court declare that anyone who speaks to a grand jury, other than under oath in an official session of the grand jury, with information regarding any witness, potential witness, or potential matter to be considered by the grand jury is guilty of jury tampering.

154. Paul Howard, Jr., Cynthia Nwokocha, Rebecca keel, and Waverly Settles (“DA DEFENDANTS”), Lieutenant English, Deputy Betts, and Deputy Roye (“SHERIFF DEFENDANTS”), and Defendant MR. BROADBENT proximately caused a deprivation of my rights protected by the Constitution and created by federal statute.

155. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT acted under color of state law. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT acted improperly using and ignoring the laws of the State of Georgia to deprive me of federally-protected rights. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT exercised power possessed by state law (citing O.C.G.A. § 16-7-21 and others) and made

possible only because they were clothed with the authority of state law. Ms. Nwokocha acted within the scope of her employment when she expelled me from the courthouse and issued the “Criminal Trespass Warning.”

156. The analysis of whether a defendant acted under color of law is based on the totality of the circumstances. Factors a court will consider include: whether the defendant was on duty/off duty (and Ms. Nwokocha was on duty); whether departmental issued or approved equipment was involved (she used a Fulton County form); whether the defendant identified herself as an official or invoked the authority of her office (she had introduced herself as Chief Investigator for the Fulton County District Attorney). Mr. Howard was on duty; he used departmental issued or approved equipment; he was identified by Ms. Fudge as an official (she indicated he was the only manager for the Fulton County District Attorney’s Office). Ms. Fudge was on duty; she used departmental issued equipment; she invoked her authority as an official of the Fulton County District Attorney’s Office). Mrs. Keel was on duty; she used departmental issued equipment; she identified herself as an official (she indicated he was an Assistant District Attorney with the Fulton County District Attorney’s Office); she met with me in her office inside the Fulton County District Attorney’s Office. Mr. Settles was on duty; he used departmental issued or approved equipment; he identified himself as an

official (he indicated he was an Assistant District Attorney with the Fulton County District Attorney's Office). Lieutenant English was on duty; he used departmental issued or approved equipment; he wore a Fulton County Deputy Sheriff's uniform and was armed; he identified himself as an official (he indicated he was a Fulton County Deputy Sheriff and a senior supervisor). Deputy Betts was on duty; he used departmental issued or approved equipment; he wore a Fulton County Deputy Sheriff's uniform and was armed; he identified himself as an official (he indicated he was a Fulton County Deputy Sheriff). Deputy Royce was on duty; she used departmental issued or approved equipment; she wore a Fulton County Deputy Sheriff's uniform and was armed; she identified herself as an official (she indicated he was a Fulton County Deputy Sheriff). Mr. Broadbent was on duty; he used departmental issued or approved equipment; he identified himself as an official (he indicated he was Foreman of the Fulton County Grand Jury); he wrote me a letter on Fulton County District Attorney's Office letterhead.

157. Violations were proximately caused by DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT.

158. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT are persons who committed conduct. The deprivation represents an

abuse of authority and/or lies outside the authority of DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT.

159. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT violated my Constitutional rights. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT did affirmative acts and failed to perform acts that they were legally required to do that caused the deprivation of my Constitutional rights. I believe DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT have no right to immunity for their actions. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT violated clearly established statutory or Constitutional rights of which a reasonable person would have known.

160. I have the right to petition the government for redress of grievances, and that right has been denied. I have the right to freedom of speech, and that right has been denied. I have the right to be presumed innocent until proven guilty, and that right has been denied.

161. My rights to personal liberty have been violated. Ms. Nwokocha deprived me of my personal liberty by denying access to the courthouse and by denying access to the Grand Jury. DA DEFENDANTS, SHERIFF

DEFENDANTS, and MR. BROADBENT deprived me of my personal liberty by denying access to the courthouse and by denying access to the Grand Jury.

162. The conduct of DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT denied the rights to property without due process of law. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT ignored me when I 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 my civil rights.

163. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT committed affirmative acts in denying my Constitutional rights. Others participated in the affirmative acts.

164. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT have denied my access to the Grand Jury and to the courts and have effectively denied my ability to petition the Government for a redress of grievances.

165. I have been damaged.

166. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR.

BROADBENT violated my Constitutional and First Amendment rights to freedom of speech. I had the most legitimate of reasons to be in the elevator lobby outside the Fulton County District Attorney's Office. First Amendment rights are liberty interests protected by the Constitution.

167. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR.

BROADBENT ignored my pleas and claims of violations of Constitutional rights, criminal activity, and more.

168. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR.

BROADBENT violated my Fifth and Fourteenth Amendment rights to due process. I was denied the rights to present charges to the Grand Jury as allowed by O.C.G.A. § 15-12-67 and O.C.G.A. § 15-12-74. I was denied the right to have my charges considered by the Fulton County District Attorney. I was denied protection from abuse by DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT, and employees of the Fulton County District Attorney's Office. I was not treated fairly, and I was denied all rights to due process.

169. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR.

BROADBENT have not respected my legal rights. The government has all but ignored my rights.

170. Inherent in the expectation of due process is that law enforcement personnel will abide by the rules. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT violated criminal statutes, and the attorneys violated rules in the State Bar of Georgia Code of Professional Conduct.

171. The Fourteenth Amendment provides the right to due process. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT had a Constitutional duty to me. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT breached their Constitutional duties to me through action and inaction. The action and inaction of DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT in violating my Constitutional rights under color of law caused damage to me.

172. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT have shown absolutely no respect for my legal rights.

173. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT violated my substantive and procedural due process rights, the equal protection of the laws, and those rights from the Bill of Rights incorporated by the Due Process Clause of the Fourteenth Amendment. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT deprived me of those rights in the Bill of Rights made applicable to the states through incorporation; claims under

the substantive component of the Due Process Clause that bar certain arbitrary, wrongful government actions, regardless of the fairness of the procedures used to implement them; and claims under the procedural component of the Due Process Clause that prohibits the deprivation of life, liberty, or property without fair procedure.

174. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT violated my Fourteenth Amendment rights to equal protection. As a pro se party, I am a minority who is part of a protected class. I was treated differently than an attorney or law enforcement personal are treated.

175. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT have ignored the law and the rules. There has been no fundamental fairness.

176. I have been denied the right to be heard, and DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT have been totally biased against me.

177. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT have no supportable reason for infringing on my fundamental rights.

178. The action and inaction of DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT in violating my Constitutional rights under color of law caused damage to me.

179. DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT have committed obstruction of justice.

180. The violation of Constitutional rights is the product of the customs of Fulton County ("COUNTY"), Fulton County District Attorney's Office ("FCDA"), and the Fulton County Sheriff's Department.

181. The Constitutional violations may also be the result of a failure of these government agencies to properly train their employees. The training program seems to be inadequate in relation to the tasks the particular employees must perform; the county officials seem to have been deliberately indifferent to the rights of persons with whom the employees come into contact; and the inadequacy of the training seems to have caused some of the Constitutional deprivations at issue. In light of the duties assigned to specific employees, the need for more or different training seems obvious, and the inadequacy so likely to result in the violation of Constitutional rights, that the policymakers of the county can reasonably be said to have been deliberately indifferent to the need.

182. The deprivation of rights is the product of a policy or custom of COUNTY, FCDA, and the Fulton County Sheriff's Department.

183. Mr. Howard was well aware of at least the potential for a violation of Constitutional rights, and he either authorized it, approved it, or condoned it.

184. COUNTY was well aware of at least the potential for a violation of Constitutional rights as the result of communication to the Fulton County Board of Commissioners, and they either authorized it, approved it, or condoned it.

185. Each of the Defendants conspired for the purpose of impeding, hindering, obstructing, and/or defeating the due course of justice with intent to deny to me the equal protection of the laws and to injure me while I was attempting to enforce my rights, and this violated the equal protection of the laws.

186. 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 my Constitutional rights. I 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.

187. Each of the Defendants conspired for the purpose of impeding, hindering, obstructing, and/or defeating me by force, intimidation, and/or threats

from attending grand jury sessions and testifying freely in a pending matter. This resulted in injury to me. Each of the Defendants worked to impede, hinder, and obstruct me from attending grand jury sessions and testifying. Ms. Fudge, Mrs. Keel, Mr. Settles, Ms. Nwokocha, Mr. Howard, Lieutenant English, Deputy Betts and Mr. Broadbent worked very hard to impede, hinder, and obstruct me from attending grand jury sessions and testifying. Mr. Settles and Mr. Broadbent impeded, hindered, and obstructed my efforts to testify when I appeared before the grand jury. After I appeared before the grand jury and was invited back to present specific information and evidence that the grand jury requested, each of the Defendants further conspired to injure me because I had attended the grand jury session and was returning with evidence that they wanted to keep from the grand jury.

188. Lieutenant English, Deputy Betts, and Ms. Nwokocha threatened me and used intimidation with me.

189. Defendants and unknown Does acted in furtherance of the conspiracy. I suffered an injury and/or deprivation resulting therefrom.

190. Fair procedures were not used to prevent the wrongful deprivation of interests. I did not receive a guarantee of basic fairness.

191. Defendants have conspired to interfere with my civil rights.

192. I have been denied the equal protection of the laws. The Defendants have participated in a conspiracy for the purpose of depriving me, other people who are not represented by legal counsel, and people ignored by law enforcement and the FCDA of the equal protection of the laws and equal privileges under the laws. Each of the Defendants committed acts in furtherance of this conspiracy. I and others were injured in their person or property and/or deprived of rights and privileges of a citizen of the United States.

193. Upon information and belief, some have been deprived of rights due to racial animus. I was definitely discriminated against as a person who has represented himself and does not have an attorney. I was definitely discriminated against because I am not an attorney, and specifically because I am not an attorney with the Fulton County District Attorney's Office. I believe those who are not represented by attorneys in legal matters in the United States are victims of serious class-based, invidiously discriminatory animus.

194. If an attorney had approached the FCDA, I believe he or she probably would have been extended the appropriate courtesies. Upon information and belief, if an attorney had been approached by Ms. Nwokocha in the elevator lobby outside the FCDA Office, he or she would not have been threatened with arrest for criminal trespassing. Upon information and belief, if an attorney had been seeking

to make contact with a grand juror in the elevator lobby outside the FCDA Office, he or she would not have been threatened with arrest for jury tampering or denied freedom of speech as the SHERIFF DEFENDANTS did to me. Upon information and belief, if an attorney had contacted Mr. Howard, he or she would not have been deprived of rights. Upon information and belief, if an attorney had been seeking to present criminal charges to the grand jury, he or she would not have been denied a proper hearing and the legal right as all of the Defendants did to me.

195. I believe each of the Defendants had actual knowledge of the conspiracy. Each of the Defendants was aware of plans to deny me a proper hearing and the legal right to present charges to the grand jury. Each of the Defendants was aware of plans to deny my First Amendment rights. Each of the Defendants was aware of plans to deny my Due Process rights.

196. Each of the Defendants had the power to prevent or aid in preventing the conspiracy that was a violation of 42 U.S.C. § 1985 (3).

197. Each of the Defendants neglected or refused to prevent the conspiracy that was a violation of 42 U.S.C. § 1985 (3).

198. Wrongful acts were committed by each of the Defendants.

199. Discovery is expected to identify many other COUNTY employees who should be held liable for violating 42 U.S.C. § 1986.

200. The nature of conspiracy typically precludes direct evidence or a "blueprint" of the conspiratorial plan, and firsthand knowledge is not required under 42 U.S.C. § 1986.

201. The Defendants are guilty of neglect to prevent wrongs. Upon information and belief, there are other COUNTY employees who neglected or refused to prevent the conspiracy.

202. I have charged that the conduct of Defendants violates the Georgia Racketeer Influenced and Corrupt Organizations Act.

203. Defendants knowingly devised or participated in a scheme to defraud me and commit obstruction of justice. They did so willingly with an intent to defraud.

204. The activity engaged in by Defendants consists of two or more predicate acts of racketeering activity, the most recent of which occurred within four years after the commission of a prior act of racketeering activity.

205. The activity engaged in by Defendants had the same or similar purposes, results, participants, victims, or methods of commission, or is otherwise interrelated by distinguishing characteristics and are not isolated events.

206. For purposes of Georgia RICO, the racketeering activity of the Defendants includes a pattern of violations of Tampering with Evidence pursuant

to O.C.G.A. 16-10-94; Obstruction of Justice and Witness Tampering pursuant to 18 U.S.C. § 1503; and more. Racketeering activity is described above and includes ignoring valid criminal charges against state and federal government employees in Fulton County; blocking access to the Grand jury for me, Sabrina Felton, and others; threatening and intimidating me; making unfounded criminal accusations against me; refusing to present evidence to the Grand jury that was delivered in various forms to the FCDA's Office addressed to the Grand Jurors; destroying or concealing evidence for the Grand jury; defaming me so the Grand Jury would not properly consider my charges and evidence; interfering with my presentation to the Grand Jury; using the Fulton County Sheriff's department to interfere with my rights; interfering with the U.S. mail and other communication to the Grand Jury; denying me the right to submit Criminal Warrant Applications; ignoring my requests for information; falsely accusing me of criminal trespassing and denying my access to the Grand jury area and FCDA's Office under threat of arrest; participating in and ignoring jury tampering; failing to take prompt action on matters presented by me.

207. I charge that DA DEFENDANTS, SHERIFF DEFENDANTS, and MR. BROADBENT are guilty of obstruction of justice and violation of O.C.G.A. 16-10-93(b)(1) and (c). I charge that Ms. Nwokocha, Lieutenant English, Deputy Betts,

and unknown DOES are guilty of obstruction of justice and violation of O.C.G.A. 16-10-93(a), (b)), and (c), and some of the Defendants and unknown DOES are guilty of violation of O.C.G.A. § 16-10-94:

208. The "pattern of racketeering activity" consists of many incidents of racketeering activity that have the same or similar intents, results, accomplices, victims, and methods of commission and are interrelated by distinguishing characteristics. The acts of racketeering activity committed by Defendants have the same or similar methods of commission in that they involve the various aspects of obstruction of justice by denying consideration of valid criminal charges against judges, district attorneys, and law enforcement personnel and interfering with efforts to provide evidence to the Fulton County Grand Jury.

209. The acts of racketeering activity committed by Defendants have the same or similar objective: protect favored people and groups and violate the legal rights of others. The acts of racketeering activity committed by Defendants have the same or similar victims, including William M. Windsor, Sabrina Felton, and other pro se litigants. The acts of racketeering activity committed by Defendants are otherwise related by distinguishing characteristics including, but not limited to, the involvement of lies, threats, and obstruction of justice.

210. The racketeering acts are related. The racketeering acts have the same or similar purposes, results, participants, victims, and/or methods of commission and are otherwise interrelated by distinguishing characteristics and are not isolated events. The acts have been a regular occurrence with me for many months.

211. Defendants committed active misrepresentation as well as material omissions intended to create a false impression.

212. Defendants' acts of racketeering activity involve a distinct threat of long-term racketeering activity. This activity has continued for years, is ongoing at the present time, and will continue into the future with a threat of repetition unless halted by judicial intervention. Defendants' actions appear to be part of a regular way of conducting business. Upon information and belief, the acts of racketeering activity have affected not only me, but others who have attempted to present charges to the District Attorney or provide evidence to the Grand Jury.

213. Defendants have committed numerous violations of predicate acts as part of the pattern of racketeering activity.

214. Defendants were aware of the general existence and nature of the enterprise, that it extended beyond each person's individual role, and with that awareness participated in, aided, or furthered the enterprise's activities or had an ownership interest in the enterprise. Each Defendant has participated in the

operation and/or management of the affairs of an enterprise.

215. Defendants were involved with Does in the operation and management of the affairs of the enterprise, which exists for the benefit of judges, personnel of the District Attorney's Office, attorneys, and law enforcement personnel.

216. The association of the Defendants constitutes an enterprise. The enterprise is composed of groups of individuals and entities associated in fact although not a legal entity. The enterprise was established and maintained for the purpose of committing illegal acts.

217. Defendants' violations of the Georgia RICO Act proximately have caused me to suffer injury. The injuries suffered by me were proximately caused by Defendants. There is a direct relationship between the injuries suffered and the injurious conduct.

218. Defendants' actions showed willful misconduct, malice, fraud, wantonness, oppression and an entire want of care that raises the presumption of conscious indifference to consequences and specific intent to cause harm.

219. Defendants intentionally participated in a scheme to damage me.

220. I was damaged due to Defendants' misrepresentations and illegal activity.

221. The tortious conduct of Defendants demonstrated an indifference to and a reckless disregard for me. The conduct involved repeated actions. The harm was the result of intentional malice, trickery, and deceit.

222. Additional facts and evidence regarding RICO violations will be obtained in discovery.

223. The legal and judicial systems have been grossly abused to damage me and shield judges from conviction and disbarment. There has been a perversion of the process. I have been so abused that I have had to spend a fortune and devote most of my time in seeking justice.

224. The Defendants perverted the legal process by engaging in an intentional effort to obstruct justice and hide critical facts and evidence from reaching the grand jury.

225. The Defendants had a Constitutional duty to me. The Defendants breached their Constitutional duties to me through action and inaction.

226. The action and inaction of the Defendants in violating my Constitutional rights under color of law caused damage to me.

227. Defendants have violated my rights under the Constitution. Defendants have violated ARTICLE I SECTION I of the BILL OF RIGHTS of the Georgia Constitution, Paragraphs I, II, V, and IX.

228. The whole idea of justice requires fairness, honesty, and impartiality. The citizens of Georgia must have some means for corruption and wrongdoing such as that described above to be dealt with so those involved may be held accountable. The District Attorney's Office in Fulton County is corrupt and will not police itself. The Fulton County Sheriff's Department will not police the District Attorney's Office, and the Sheriff's Department aids and abets the DA's Office in its wrongdoing. The Fulton County Superior Court employees will not take action to deal with the corruption and wrongdoing.

229. This refusal to act must be considered a significant violation of the rights of citizens of the State of Georgia.

230. Mr. Broadbent made charges against me in reference to my profession that were false and were calculated to injure me.

231. Mr. Broadbent made false and disparaging comments about me that were designed to prevent me from receiving a favorable response when I presented criminal charges to the Fulton County Grand Jury. Mr. Broadbent told the grand jurors that I had no credibility and that I had lied in letters. This was false. Mr. Broadbent told the grand jurors that I had provided no evidence of my charges, but this was false as Mr. Broadbent received a CD-ROM with massive evidence.

232. Mr. Broadbent's statements harmed my reputation as to lower me in the estimation of the community and to deter third persons from associating with me.

233. Mr. Broadbent knew the statements he made were false.

234. Mr. Broadbent made unprivileged publication of the comments to third parties.

235. Mr. Broadbent acted negligently in making the false statements.

236. Mr. Broadbent made the statements with malice to damage me.

237. I was damaged. I suffered mental anguish. My reputation was damaged.

238. Upon information and belief, other Defendants, including Mr. Settles, committed slander. Discovery is expected to reveal many other slanderous and defamatory statements that Mr. Broadbent and others made to the grand jurors and others.

239. I have no adequate remedy at law and will suffer immediate and irreparable harm if interlocutory relief is not granted restraining the Defendant from denying me the ability to provide evidence to the Fulton County Grand Jury.

240. Unless Defendants are enjoined from certain acts, I will continue to suffer immediate and irreparable harm. The harm suffered by me far exceeds any

inconvenience that would be caused on these Defendants. The equities clearly balance in my favor.

241. The “Criminal Trespass Warning” provides that I may never return to the elevator lobby outside the Fulton County District Attorney’s Office. So, the Constitutional violation is ongoing. I was told that I will be arrested if I ever return.

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.

Executed this 3rd day of October, 2011.

A handwritten signature in black ink, appearing to read "William M. Windsor", written over a horizontal line.

William M. Windsor