

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 )  
\_\_\_\_\_ )

**TENTH AFFIDAVIT OF WILLIAM M. WINDSOR**

**CHARGES AGAINST THOMAS WOODROW THRASH**

**AND JAMES N. HATTEN RELATING TO**

**OBSTRUCTION OF JUSTICE INVOLVING THE U.S. MAIL**

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. Thomas Woodrow Thrash (“Thrash”) is a federal judge in the United States District Court for the Northern District of Georgia.

6. James N. Hatten (“Hatten”) is the Clerk of the Court for the United States District Court for the Northern District of Georgia.

7. Both Thrash and Hatten are defendants in civil actions filed by me that are now pending in Judge Thrash’s court in the United States District Court for the Northern District of Georgia.

8. On July 19, 2009, I developed a mailing list of federal judicial employees in Atlanta, Georgia. (I have documents that prove this.)

9. On July 19, 2009, I sent personal letters to every person or title on the mailing list. The letters were sent to prospective witnesses who I believed would

have evidence of corruption in the federal judiciary in Fulton County Georgia. The letters were essentially the same with only changes of name and address and reference to his/her, etc. Each envelope was personally addressed, and each envelope had a big bold sticker in the upper left hand corner that said “PERSONAL AND CONFIDENTIAL.” There was nothing on the envelopes to indicate who they were from.

10. I metered each envelope personally and dropped them in the mail slot at the United States Post Office on Lower Roswell Road in Marietta, Georgia. (I have documents that prove this.)

11. On July 21, 2011, I sent personal letters to federal judges with the United States District Court for the Northern District of Georgia. The letters were essentially the same with only changes of name and address and reference to his/her, etc. (I have documents that prove this.)

12. On July 22, 2011, Thrash issued an order in Civil Action No. 1:11-CV-01923-TWT in which he admitted plans to intercept the mail and block it from being distributed to the addressees. (I have documents that prove this.)

13. On July 27, 2011, I learned that at least some of the mail sent on July 19, 2011 did not reach addressees. Upon information and belief, most of the July 19, 2011 letters were intercepted and did not reach the addressees. According to

the July 22, 2011 ORDER, over 100 letters appear to have been intercepted.

(ORDER, P.1, ¶2.)

14. According to the July 22, 2011 ORDER (P.3 ¶1), the mail has been in the possession of Hatten, and he was to decide if it and future mail would be returned, discarded, or otherwise processed.

**COUNTS 1 TO 100**  
**Obstruction of Correspondence – Taking of Mail**  
**18 U.S.C. § 1702**

15. 18 U.S.C. § 1702 provides:

“Whoever takes any letter, postal card, or package out of any postoffice or any authorized depository for mail matter, or from any letter or mail carrier, or which has been in any post-office or authorized depository, or in the custody of any letter or mail carrier, before it has been delivered to the person to whom it was directed, with design to obstruct the correspondence [shall be guilty of an offense against the United States]. Maximum Penalty: Five (5) years imprisonment, applicable fine, or both.”

16. It’s a Federal crime for anyone to obstruct the delivery of mail by taking or removing it from the United States mail.

17. **The Defendant can be found guilty of this crime only if all the following facts are proved beyond a reasonable doubt: (1) the Defendant knowingly took mail** [out of a post-office] [out of an authorized depository for mail matter] [from a letter or mail carrier] [**that had been in the custody of any letter or mail carrier**] **before it was delivered to the person to whom it was**

**addressed; and (2) the Defendant acted knowingly and intended to obstruct delivery.**

18. Mail is in the United States mail if it's in a post-office, in an authorized depository, with a mail carrier, or if it has been in the custody of a mail carrier.

19. A private mail box or receptacle is an "authorized depository for mail matter." Mail hasn't been delivered until it has been taken from the depository by the addressee or someone acting for the addressee.

20. To "obstruct delivery" is to take mail to prevent it from being delivered to the addressee.

21. Thrash and Hatten knowingly took mail that had been in the custody of a letter or mail carrier before it was delivered to the people to whom it was addressed; and (2) Thrash and Hatten acted knowingly and intended to obstruct delivery.

22. Thrash and Hatten are guilty of 100 counts of Obstruction of Correspondence – Taking of Mail, in violation of 18 U.S.C. § 1702.

**COUNTS 101 TO 200**  
**Theft of Mail**  
**18 U.S.C. § 1708**

23. 18 U.S.C. § 1708 (first paragraph) provides:

Whoever steals, takes, or abstracts . . . from or out of any mail, post-office, or station thereof, letter box, mail receptacle, or any mail route or other authorized depository for mail matter, or from a letter or mail carrier, any letter, postal card, package, bag, or mail [shall be guilty of an offense against the United States]. Maximum Penalty: Five (5) years imprisonment, applicable fine, or both.

24. It's a Federal crime to steal mail from the United States mail.

25. **The Defendant can be found guilty of this crime only if all the following facts are proved beyond a reasonable doubt: (1) the [letter] [package] [mail matter] described in the indictment was [in the United States mail] [in a post-office or post-office station] [in a letter box] [in a mail receptacle] [in a mail route] [in an authorized depository for mail matter] [with a letter or mail carrier]; and (2) the Defendant knowingly stole the mail.**

26. Mail is in the United States mail if it's in a post-office, in an authorized depository, with a mail carrier, or if it has been placed in the custody of a mail carrier.

27. A private mail box or mail receptacle is an "authorized depository for mail matter." Mail hasn't been delivered until it has been taken from the depository by the addressee or someone acting for the addressee.

28. The word "steal" includes any act by which a person purposely takes property belonging to someone else without the owner's permission and with the intent to keep the property for that person's own use or for any person other than the true owner.

29. Thrash and Hatten knowingly took mail that had been in the custody of a letter or mail carrier. The mail belonged to others, and it was taken without their permission before it was delivered to the people to whom it was addressed; and (2) Thrash and Hatten knowingly stole the mail.

30. Thrash and Hatten are guilty of 100 counts of Theft of Mail, in violation of 18 U.S.C. § 1708.

**COUNTS 201 TO 300**  
**Possession of Stolen Mail**  
**18 U.S.C. § 1708**

31. 18 U.S.C. § 1708 (third paragraph) provides:

“Whoever . . . unlawfully has in his possession, any letter . . . or mail, or any article or thing contained therein, which has been . . . stolen, taken, embezzled, or abstracted [from or out of any mail, post-office or station thereof, letter box, mail receptacle, or any mail route or other authorized depository for mail matter, or from a letter or mail carrier], knowing the same to have been stolen, taken, embezzled or abstracted [shall be guilty of an offense against the United States]. Maximum Penalty: Five (5) years imprisonment, applicable fine, or both.

32. It’s a Federal crime to possess stolen mail while knowing it is stolen.

33. **The Defendant can be found guilty of this crime only if all the following facts are proved beyond a reasonable doubt: the [letter] [mail matter] described in the indictment was stolen from [the United States mail] [a post-office or post-office station] [a letter box] [a mail receptacle] [a mail route] [an authorized depository for mail matter] [a letter or mail carrier]; the Defendant**

**possessed the [letter] [mail matter] after it was stolen; and the Defendant knew that the [letter] [mail matter] was stolen.**

34. Mail is in the United States mail if it's in a post-office, an authorized depository, with a mail carrier, or if it has been in the custody of a mail carrier.

35. A private mail box or mail receptacle is an "authorized depository for mail." Mail hasn't been delivered until it has been taken from the depository by the addressee or a person acting on behalf of the addressee.

36. Mail matter is "stolen" when it has been purposefully taken from [the United States mail] [a post-office or post-office station] [a letter box] [a mail receptacle] [a mail route] [an authorized depository for mail matter] [a letter or mail carrier] without permission and when the person taking the mail intends to keep it for that person's own use or for any other person other than the mail's addressee.

37. The heart of the crime is the intentional possession of stolen mail. The Government doesn't have to prove who stole the mail. It also doesn't have to prove whether the Defendant knew that the mail was stolen before it was delivered to the addressee. The Government only has to prove that the Defendant possessed the mail and knew it was stolen.

38. Thrash and Hatten knowingly took mail that had been in the custody of a letter or mail carrier. The mail belonged to others, and it was taken without



their permission before it was delivered to the people to whom it was addressed; and (2) Thrash and Hatten knowingly stole the mail. Hatten has possession of the stolen mail, and he knows it was stolen.

39. Hatten is guilty of 100 counts of Possession of Stolen Mail, in violation of 18 U.S.C. § 1708.

**COUNT 301**  
**Obstruction of Justice**  
**18 U.S.C. § 1503**

40. 18 U.S.C. § 1503 provides:

(a) Whoever corruptly, or by threats or force, or by any threatening letter or communication, endeavors to influence, intimidate, or impede any grand or petit juror, or officer in or of any court of the United States, or officer who may be serving at any examination or other proceeding before any United States magistrate judge or other committing magistrate, in the discharge of his duty, or injures any such grand or petit juror in his person or property on account of any verdict or indictment assented to by him, or on account of his being or having been such juror, or injures any such officer, magistrate judge, or other committing magistrate in his person or property on account of the performance of his official duties, or corruptly or by threats or force, or by any threatening letter or communication, influences, obstructs, or impedes, or endeavors to influence, obstruct, or impede, the due administration of justice, shall be punished as provided in subsection (b). If the offense under this section occurs in connection with a trial of a criminal case, and the act in violation of this section involves the threat of physical force or physical force, the maximum term of imprisonment which may be imposed for the offense shall be the higher of that otherwise provided by law or the maximum term that could have been imposed for any offense charged in such case.

(b) The punishment for an offense under this section is— (1) in the case of a killing, the punishment provided in sections 1111 and 1112; (2) in the case of an attempted killing, or a case in which the offense was committed against a petit juror and in which a class A or B felony was charged,

imprisonment for not more than 20 years, a fine under this title, or both; and (3) in any other case, imprisonment for not more than 10 years, a fine under this title, or both.

41. Section 1503 contains the Omnibus Clause, which offers broad protection to the "due administration of justice." Federal courts have read this clause expansively to proscribe any conduct that interferes with the judicial process.

42. To obtain a conviction under section 1503, the government must prove that there was a pending federal judicial proceeding, the defendant knew of the proceeding, and the defendant had corrupt intent to interfere with or attempted to interfere with the proceeding.

43. There are pending federal judicial proceedings in which both Thrash and Hatten are Defendants, and they were well aware of the proceedings. Thrash and Hatten corruptly interfered with the proceeding by corrupting justice and interfering with my legal efforts to contact witnesses with evidence and testimony against Thrash, Hatten, and others.

**COUNT 302**  
**Violation of Georgia RICO Act**  
**O.C.G.A. 16-14-1 et seq**

44. The conduct of Thrash and Hatten violates the Georgia Racketeer Influenced and Corrupt Organizations Act, O.C.G.A. § 16-14-1 et seq ("Georgia

RICO”), as more fully set forth below.

45. At all times relevant to this Charge, many members of the federal judiciary in Fulton County Georgia as well as members of various law enforcement agencies have been members of a corrupt organization (“JAGCO”).

46. At all times relevant to this Charge, the following people were among the members of JAGCO: Thomas Woodrow Thrash and James N. Hatten.

47. Thrash and Hatten have engaged in an ongoing pattern of racketeering activity as defined by O.C.G.A. § 16-14-3.

48. Thrash and Hatten s knowingly devised or participated in a scheme to damage Windsor. They did so willingly with an intent to damage.

49. The activity engaged in by Thrash and Hatten 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.

50. The activity engaged in by Thrash and Hatten 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.

51. O.C.G.A. 16-14-3. "Racketeering activity" means to commit, to attempt to commit, or to solicit, coerce, or intimidate another person to commit any crime which is chargeable by indictment under these and other laws of this state:  
(xvi) Code Section O.C.G.A. 16-10-94, relating to Tampering with Evidence;

(xxix) Any conduct defined as "racketeering activity" under 18 U.S.C. § 1961

(1)(A), (B), (C), and (D). "Racketeering activity" shall also mean any act or threat involving **obstruction of justice**.

52. The racketeering activity of Thrash and Hatten includes a pattern of Obstruction of Justice.

53. Thrash and Hatten and unknown others are guilty of obstruction of justice and violation of O.C.G.A. 16-10-93:

“(a) A person who, with intent to deter a witness from testifying freely, fully, and truthfully to any matter pending in any court, in any administrative proceeding, or before a grand jury, communicates, directly or indirectly, to such witness any threat of injury or damage to the person, property, or employment of the witness or to the person, property, or employment of any relative or associate of the witness or who offers or delivers any benefit, reward, or consideration to such witness or to a relative or associate of the witness shall, upon conviction thereof, be punished by imprisonment for not less than one nor more than five years.

(b)(1) **It shall be unlawful for any person knowingly** to use intimidation, physical force, or threats; to persuade another person by means of corruption or to attempt to do so; or **to engage in misleading conduct toward another person with intent to:**

(A) **Influence, delay, or prevent the testimony of any person** in an official proceeding;

(B) **Cause or induce any person to:**

(i) **Withhold testimony or a record, document, or other object from an official proceeding;**

(ii) Alter, destroy, mutilate, or conceal an object with intent to impair the object's integrity or availability for use in an official proceeding;

(iii) Evade legal process summoning that person to appear as a witness or to produce a record, document, or other object in an official proceeding; or

(iv) Be absent from an official proceeding to which such person has been summoned by legal process; or

**(C) Hinder, delay, or prevent the communication to a law enforcement officer, prosecuting attorney, or judge of this state of information relating to the commission or possible commission of a criminal offense or a violation of conditions of probation, parole, or release pending judicial proceedings.**”

54. Thrash and Hatten have committed numerous violations of predicate acts as part of the pattern of racketeering activity.

55. The "pattern of racketeering activity" consisted 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.

56. The acts of racketeering activity committed by Thrash and Hatten have the same or similar methods of commission in that they involve the various aspects of committing fraud in legal matters, including obstruction of justice, perjury, false statements in orders, improper claims of law and case law, and more.

57. The acts of racketeering activity committed by Thrash and Hatten have the same or similar objective: commit fraud upon the courts and upon my wife and me.

58. The acts of racketeering activity committed by Thrash and Hatten

have the same or similar victims, including my wife and me. Upon information and belief, the acts of racketeering activity have affected others who have been parties to civil actions in the N.D.Ga. and the Eleventh Circuit, including, upon information and belief, James Stegeman, Janet McDonald, Jeff Goolsby, Brenda Peppers, David Yang, and others.

59. The acts of racketeering activity committed by Thrash and Hatten are otherwise related by distinguishing characteristics including, but not limited to, the involvement of obstruction of justice.

60. 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.

61. Thrash and Hatten's acts of racketeering activity involve a distinct threat of long-term racketeering activity.

62. 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.

63. Thrash and Hatten's actions appear to be part of a regular way of conducting business.

64. Thrash and Hatten 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.

65. Both Thrash and Hatten have participated in the operation and/or management of the affairs of an enterprise.

66. The association of Thrash and Hatten constitutes an enterprise. The enterprise is composed of groups of individuals and entities associated in fact.

67. The enterprise was established and maintained for the purpose of committing illegal acts.

68. Thrash and Hatten's violations of the Georgia RICO Act were intended to and did in fact subvert the legal and judicial process.

69. The conduct of Thrash and Hatten 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.

70. Thrash and Hatten are guilty of violation of the Georgia RICO Act.

**COUNT 303**  
**Conspiracy**  
**18 U.S.C. § 371**

71. 18 U.S.C. § 371 provides:

If two or more persons conspire . . . to commit any offense against the United States . . . and one or more of such persons do any act to effect the

object of the conspiracy, each [shall be guilty of an offense against the United States]. Maximum Penalty: Five (5) years imprisonment and applicable fine.

72. It's a separate Federal crime for anyone to conspire or agree with someone else to do something that would be another Federal crime if it was actually carried out.

73. A "conspiracy" is an agreement by two or more people to commit an unlawful act. In other words, it is a kind of "partnership" for criminal purposes. Every member of a conspiracy becomes the agent or partner of every other member.

74. The Government does not have to prove that all the people named in the indictment were members of the plan, or that those who were members made any kind of formal agreement.

75. The Government does not have to prove that the members planned together all the details of the plan or the "overt acts" that the indictment charges would be carried out in an effort to commit the intended crime.

76. The heart of a conspiracy is the making of the unlawful plan itself followed by the commission of any overt act. The Government does not have to prove that the conspirators succeeded in carrying out the plan.

77. The Defendant can be found guilty of this crime only if all the following facts are proved beyond a reasonable doubt: two or more persons in



some way agreed to try to accomplish a shared and unlawful plan; (2) the Defendant knew the unlawful purpose of the plan and willfully joined in it; (3) during the conspiracy, one of the conspirators knowingly engaged in at least one overt act as described in the indictment; and (4) the overt act was committed at or about the time alleged and with the purpose of carrying out or accomplishing some object of the conspiracy.

78. An "overt act" is any transaction or event, even one that may be entirely innocent when viewed alone, that a conspirator commits to accomplish some object of the conspiracy.

79. A person may be a conspirator without knowing all the details of the unlawful plan or the names and identities of all the other alleged conspirators.

80. If the Defendant played only a minor part in the plan but had a general understanding of the unlawful purpose of the plan and willfully joined in the plan on at least one occasion, that's sufficient for you to find the Defendant guilty.

81. But simply being present at the scene of an event or merely associating with certain people and discussing common goals and interests doesn't establish proof of a conspiracy. A person who doesn't know about a conspiracy but happens to act in a way that advances some purpose of one doesn't automatically become a conspirator.

82. Thrash and Hatten must be found guilty of this crime because the

following facts will be proven beyond a reasonable doubt: Thrash and Hatten agreed to try to accomplish a shared and unlawful plan to intercept mail intended for prospective witnesses against them; (2) Thrash and Hatten knew the unlawful purpose of the plan and willfully joined in it; (3) during the conspiracy, Thrash and Hatten knowingly engaged in at least one overt act; and (4) the overt act was committed at or about the time alleged and with the purpose of carrying out or accomplishing some object of the conspiracy.

**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.

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**