

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 |) | |
| <hr/> | | |

THIRTEENTH AFFIDAVIT OF WILLIAM M. WINDSOR

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

1. My name is William M. Windsor ("Windsor"). I am over the age of 21, am competent to testify, and have personal knowledge of the matters stated herein.
2. I am the Plaintiff in this action, and I am representing myself pro se.
3. I am not an attorney. I cannot find an attorney who will sue judges, and I can no longer afford an attorney.
4. In an effort to do the best possible job as a pro se party, I have studied the applicable Federal Rules of Civil Procedure, Local Rules, the Georgia Code of Professional Conduct for Attorneys, the Official Code of Georgia Annotated, certain

federal statutes, the Federal Rules of Judicial Procedure, the Federal Rules of Appellate Procedure, the Code of Conduct for United States Judges, the Uniform Rules of the Superior Court, the Procedures of the Fulton County Superior Court, and case law.

5. On August 23, 2011, I took information to the Fulton County Grand Jury that the grand jurors requested on August 19, 2011.

6. Exhibit A is a true and correct copy of the 20-page document that I was asked to prepare. The statements are incorporated herein. The statements of fact contained therein are true and correct based upon my personal knowledge. The criminal charges are true and correct based upon my understanding of the law.

FURTHER SAITH AFFIANT NOT.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

Executed this 3rd day of October 2011.


William M. Windsor

Exhibit

A

William M. Windsor Information for Fulton County Grand Jury Presentation on August 23, 2011¹

Judges Orinda D. Evans, William S. Duffey, and Thomas W. Thrash, persons operating in Fulton County Georgia as judges in the United States District Court for the Northern District of Georgia, James N. Hatten, the Clerk of the Court, Christopher Glynn, Timothy P. Ruddy, Robert J. Schul, Carl Hugo Anderson, and others have conspired to obstruct justice and deny my due process rights under the Constitution of Georgia and the United States by intentionally and knowingly committing crimes to damage me.

I am presenting to the Grand Jury focused statements of the crimes committed and the proof of each. As requested, I am not providing a narrative herein of how this happened – just the most relevant of the facts.

I am charging violations of Georgia state laws: Perjury – O.C.G.A. § 16-10-70; False Swearing – Making False Statements – O.C.G.A. § 16-10-71 and O.C.G.A. 16-10-20; Subornation of Perjury – O.C.G.A. § 16-10-72; Influencing Witnesses – O.C.G.A. § 16-10-93; Tampering with Evidence – O.C.G.A. § 16-10-94; Conspiracy – O.C.G.A. § 16-4-8; Violation of Oath of Office – O.C.G.A. § 16-10-1; and Aiding and Abetting – O.C.G.A. § 16-2-20 and O.C.G.A. § 16-2-21.

I am charging violations of federal laws: False Swearing – Making False Statements – 18 U.S.C. § 1001; Perjury – 18 U.S.C. § 1623 and 18 U.S.C. § 1621; Subornation of Perjury – 18 U.S.C. § 1622; Obstruction of Justice -- 18 U.S.C. § 1503; Conspiracy -- 18 U.S.C. § 371; Misprision of Felonies – 18 U.S.C. § 4; Aiding and Abetting -- 18 U.S.C. § 2; and Violation of Oath of Office.

Many of the said violations also constitute predicate act crimes and prove violation of the RICO statute of the State of Georgia, O.C.G.A. § 16-14-1 et seq.

Each of these statutes is provided in Exhibit A. You need to have an understanding of the laws involved so you will understand how each issue presented violates the law.

Perjury is making a statement under oath that you know to be false. This requires that the Defendant must be under oath. The declarant must be aware that he or she is under oath and required to speak the truth. Judges and attorneys are always under oath, and they are required to speak the truth. Those providing affidavits and deposition and hearing testimony in this case were all under oath.

Tampering with Evidence, in violation of O.C.G.A. § 16-10-94, is when a person obstructs the prosecution or defense of any person by knowingly destroying, altering, concealing, or disguising physical evidence or making, devising, preparing, or planting false evidence. The state must prove beyond a reasonable doubt that (1) the defendant believed that an official proceeding was pending or about to be instituted, (2) the defendant (tampered with / fabricated) physical evidence, or altered / destroyed / concealed / removed) any (record / document / item) with the purpose of impairing its verity or availability in such proceeding.

False Swearing – Making False Statements is knowingly and willfully - (1) falsifying, concealing, or covering up by any trick, scheme, or device a material fact; (2) making any materially false, fictitious, or fraudulent statement or representation; or (3) making or using any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry concerning any matter within the jurisdiction of the federal courts.

¹ Every underlined term is an Exhibit to this Affidavit and is available for review.

Subornation of Perjury or False Swearing is when a person procures or induces another to commit the offense of perjury or the offense of false swearing. Five elements must be proven to convict a person of subornation of perjury. It first must be shown that the defendant made an agreement with a person to testify falsely. There must be proof that perjury has in fact been committed and that the statements of the perjurer were material. The prosecutor must also provide evidence that the perjurer made such statements willfully with knowledge of their falsity. Finally, there must be proof that the procurer had knowledge that the perjurer's statements were false.

Obstruction of Justice is deemed to be any conduct that interferes with the due administration of justice in any manner. The elements are (1) that there was a pending judicial proceeding, (2) that the defendant knew this proceeding was pending, and (3) that the defendant then corruptly endeavored to influence, obstruct, or impede the due administration of justice.

Obstruction of Justice with Witnesses is when any person knowingly engages in misleading conduct toward another person with intent to influence, delay, or prevent the testimony of any person....”

Conspiracy is when two or more persons conspire to commit any criminal offense. Conspiracy to obstruct justice is when two or more people conspire to influence, obstruct, or impede the due administration of justice. Conspiracy to Defraud is (1) an agreement of two more individuals; (2) to defraud the United States; and (3) an overt act by one of conspirators in furtherance of the scheme.

Violation of Oath of Office is when any public official willfully and intentionally violates the terms of his or her oath as prescribed by law.

RICO is a pattern of committing criminal acts. RICO requires proof of at least two of several of the just identified crimes. RICO requires showing an ongoing pattern of racketeering activity, which is to commit, to attempt to commit, or to solicit, coerce, or intimidate another person to commit any crime. The acts of racketeering activity committed by the Defendants 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. 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. 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.

You should also be aware that judges have to abide by the **Canons of the Code of Judicial Conduct**. **Canon 1** -- Judges Shall Uphold the Integrity and Independence of the Judiciary. **Canon 1** -- Judges shall not show favoritism. **Canon 2** -- Judges Shall Avoid Impropriety and the Appearance of Impropriety. **Canon 2A.** -- Judges shall respect and comply with the law. **Canon 2A.** -- Judges shall promote public confidence in the integrity of the judiciary. **Canon 2A.** -- Judges shall promote public confidence in the impartiality of the judiciary. **Canon 3** -- Judges Shall Perform the Duties of Their Office Impartially and Diligently. **Canon 3 B.(2)** -- Judges should be faithful to the law. **Canon 3 B.(5)** -- Judges shall perform judicial duties without bias or prejudice. **Canon 3 B.(7)** -- Judges shall accord to every person the right to be heard according to law. **Canon 3 B.(8)** -- Judges shall dispose of all judicial matters fairly, promptly, and efficiently. **Canon 3 D. (1)** -- Judges who receive information indicating a substantial likelihood that another judge has committed a violation of this Code should take appropriate action. **Canon 3 D. (2)** -- Judges who receive information indicating a substantial likelihood that a lawyer has committed a violation of the Standards of Conduct of the State Bar of Georgia should take appropriate action. **Canon 3 D. (2)** -- Judges having knowledge that a lawyer has committed a violation of the Standards of Conduct of the State Bar of Georgia that raises a substantial question

as to the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects shall inform the appropriate authority. **Canon 3 E. (1)** -- Judges shall disqualify themselves in any proceeding in which their impartiality might reasonably be questioned, and this includes that judges may not act as judge in a case where he or she is a defendant.

Everything that I am communicating to you is uncontroverted (not disputed by evidence). There has not been a sworn affidavit, a sworn deposition, or courtroom testimony to dispute the facts that I am going to tell you.

The decisions of all juries must be based solely on the information they see and hear in the courtroom. The same goes for judges; they may render decisions based only upon the evidence admitted into the court record. The arguments of attorneys do not constitute evidence.

OBSTRUCTION OF JUSTICE AND RICO – FILING FALSE LAWSUIT

On August 29, 2005, a lawsuit was filed against me by Maid of the Mist, the people in New York who operate the boat rides at Niagara Falls. There were 50 sworn paragraphs in the Verified Complaint, and the President, Christopher Glynn, swore under oath that they were all true and correct and based upon his personal knowledge. He did not have personal knowledge. The statements were not true and correct. In deposition testimony, the three senior managers of Maid of the Mist (Christopher Glynn, Timothy P. Ruddy, and Robert J. Schul) admitted the entire lawsuit was false as to me.

Vice-President Timothy P. Ruddy (Page 27, lines 5-24 of Timothy P. Ruddy's November 15, 2006 Deposition), admitted that when the term Defendants' Maid Vouchers was used in the Verified Complaint in 1:06-CV-0714-ODE ("MIST-1"), it should not have included Windsor as he never sold any vouchers, yet he was identified in the term "Defendants." This makes the following paragraphs in the Verified Complaint false as to Windsor: 26, 27, 28, 29, 30, 31, 34, 36, 37, 38, 41, 42, 43, 44, 45, 47, 55, 56, 58, 61, 62, 64, 67, 68, 69, 70, 72, and 73 as these paragraphs all use that term. This alone is 28 of the 50 paragraphs. This false sworn pleading by Christopher Glynn was perjury and constitutes obstruction of justice. It was the first of the acts that qualify as predicate acts for RICO.

- Exhibit 1 -- Verified Complaint and Sworn Affidavit of Christopher Glynn dated August 25, 2005 [1:06-CV-0714-ODE, Docket #1.]
- Exhibit 2 -- Preliminary Injunction Hearing Transcript [1:06-CV-0714-ODE, Docket #36.]
- Exhibit 3 -- Deposition of Christopher Glynn [1:06-CV-0714-ODE, Docket #159.]
- Exhibit 4 -- Deposition of Timothy P. Ruddy [1:06-CV-0714-ODE-90-Deposition-of-Timothy-P-Ruddy-2006-11-15, Docket #90]
- Exhibit 5 -- Deposition of Robert J. Schul [1:06-CV-0714-ODE, Docket #160.]
- Exhibit 6 -- Document detailing each false statement and the proof of the falsity:
 - Exhibit 7 – Third Declaration of William M. Windsor
 - Exhibit 8 – Third Declaration – Ruddy Proof -- Exhibit 10
 - Exhibit 9 – Third Declaration – Glynn Proof -- Exhibit 11
 - Exhibit 10 – Third Declaration – Schul Proof -- Exhibit 12.)
- Exhibit 11 -- Selected example of admission the Verified Complaint was false: Page 27, lines 5-24 of Timothy P. Ruddy's November 15, 2006 Deposition

OBSTRUCTION OF JUSTICE AND RICO – FALSE SWORN TESTIMONY

This perjury did not stop, and in total, I charge Christopher Glynn, Timothy P. Ruddy, Robert J. Schul, and Carl Hugo Anderson with 1,704 counts of obstruction of justice. Proof of the false sworn statements and obstruction of justice are provided in these documents:

- Exhibit 12 – Glynn’s affidavit in Response to Interrogatories [Plaintiffs-Response-to-Defendants-First-Interrogatories-dated-December-30-2005.]
- Exhibit 13 – Proof of False Statements in Glynn’s Response to Interrogatories [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-3-Interrogatories-False-Statements]
- Exhibit 14 – Glynn’s sworn affidavit dated March 14, 2006 [1-06-CV-0714-ODE-006-Glynn-Affidavit-with-Updated-Brief-in-Support-of-Motion-for-Temporary-Restraining-Order.]
- Exhibit 15 – Proof of Glynn’s sworn affidavit dated March 14, 2006 [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-4-Glynn-Affidavit-2006-03-14-False-Statements]
- Exhibit 16 – Updated Brief in Support of Motion for Temporary Restraining Order and Interlocutory Injunction with sworn affidavit of Glynn [1-06-CV-0714-ODE-006-Plaintiffs-Updated-Brief-in-Support-of-Motion-for-Temporary-Restraining-Order.]
- Exhibit 17 – Proof of False Statements in Updated Brief in Support of Motion for Temporary Restraining Order and Interlocutory Injunction with sworn affidavit of Glynn [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-5-Updated-Brief-TRO-&-Injunction-2006-03-20-False-Statements]
- Exhibit 18 – Amended Updated Brief in Support of Motion for Temporary Restraining Order and Interlocutory Injunction with sworn affidavit of Glynn [1-06-CV-0714-ODE-007-Amended-Updated-Brief-in-Support-of-Motion-for-Temporary-Restraining-Order.]
- Exhibit 17 – Proof of False Statements in Amended Updated Brief in Support of Motion for Temporary Restraining Order and Interlocutory Injunction with sworn affidavit of Glynn [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-5-Updated-Brief-TRO-&-Injunction-2006-03-20-False-Statements]
- Exhibit 2 – Glynn testimony at the Preliminary Injunction Hearing
- Exhibit 19 – Proof of False Statements in Glynn testimony at the Preliminary Injunction Hearing [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-6-Glynn-Injunction-Testimony-2006-04-11-False-Statements]
- Exhibit 20 – Proposed Order Granting Preliminary Injunction in MIST-1 [1-06-CV-0714-ODE-027-Proposed-Order-Entering-Preliminary-Injunction.]
- Exhibit 21 – Proof of False Statements in Proposed Order Granting Preliminary Injunction in MIST-1 [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-7-Proposed-Order-Granting-Preliminary-Injunction-False-Statements]
- Exhibit 22 – May 2, 2006 Affidavit of Timothy P. Ruddy [1-06-CV-0714-ODE-030-Affidavit-of-Timothy-P-Ruddy-2006-05-02.]
- Exhibit 23 – Proof of False Statements in May 2, 2006 Affidavit of Timothy P. Ruddy [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-8-Ruddy-Affidavit-2006-05-02-False-Statements]
- Exhibit 24 – Corrected Proposed Order Granting Preliminary Injunction [1-06-CV-0714-ODE-029-2-Corrected-Proposed-Order-Granting-Preliminary-Injunction.]
- Exhibit 21 – Proof of False Statements in Corrected Proposed Order Granting Preliminary Injunction [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-7-Proposed-Order-Granting-Preliminary-Injunction-False-Statements]
- Exhibit 4 – Ruddy Deposition [1-06-CV-0714-ODE-90-Deposition-of-Timothy-P-Ruddy-2006-11-15, Docket #90]
- Exhibit 8 – Proof of False Statements in Ruddy Deposition [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-10-Ruddy-Deposition-2006-11-15-False-Statements]
- Exhibit 3 – Christopher Glynn Deposition [1:06-CV-0714-ODE, Docket #159.]

- Exhibit 9 – Proof of False Statements in Christopher Glynn Deposition [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-11-Glynn-Deposition-2006-12-04-False-Statements]
- Exhibit 5 – Robert J. Schul Deposition [1:06-CV-0714-ODE, Docket #160.]
- Exhibit 10 – Proof of False Statements in Robert J. Schul Deposition [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-12-Schul-Deposition-2006-12-05-False-Statements]
- Exhibit 25 – “Statements of Undisputed Fact” in Maid’s Motion for Summary Judgment [1-06-CV-0714-ODE-148-Statement-of-Undisputed-Facts-Plaintiffs.]
- Exhibit 26 – Proof of False Statements in “Statements of Undisputed Fact” in Maid’s Motion for Summary Judgment [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-13-Plaintiffs-Statement-of-Undisputed-Facts-for-SJ-False-Statements]
- Exhibit 27 – Response to Motion to Reopen the Case [Docket #366.] [1-06-CV-0714-ODE-366-Response-to-Motion-to-Reopen-Case.]
- Exhibit 28 – Proof of False Statements in Response to Motion to Reopen the Case [1-06-CV-0714-ODE-385-Reply-to-Response-to-Motion-to-Reopen.]

OBSTRUCTION OF JUSTICE BY JUDGE EVANS ISSUING A PRELIMINARY INJUNCTION

On May 12, 2006, Judge Evans issued a Preliminary Injunction Order based on Maid’s claim of damages of approximately \$100 involving nine people. Damages are a requirement for an injunction on a claim of tortious interference. But we obtained sworn affidavits for the nine people that prove there were no damages, and Judge Evans refused to do anything about it. The PI Order contains as many as 39 false statements or conclusions based on false statements. 17 of these statements are proven false using the testimony of Maid’s managers.

- Exhibit 29 -- May 12, 2006 Preliminary Injunction Order [1:06-CV-0714-ODE, Docket #33.]
- Exhibit 30 -- May 12, 2006 Order – Page 18 identifying the damages [1:06-CV-0714-ODE, Docket #33, P.18.]
- Exhibit 31 – Preliminary Injunction Hearing Transcript [1:06-CV-0714-ODE, Docket #36.]
- Exhibit 32 – Preliminary Injunction Hearing Transcript Page admitting Exhibit 13-B (identifying the 9 people who allegedly decided not to purchase tickets) [1:06-CV-0714-ODE, Docket #36, P.36:21-25, P.37:1-11.]
- Exhibit 33 – Preliminary Injunction Hearing Exhibit 13-B Customer Log document showing the 9 people who allegedly decided not to purchase tickets [1:06-CV-0714-ODE, Docket #36, Exhibit 13-B.]
- Exhibit 34 – Preliminary Injunction Hearing Exhibit 13-B Customer Log pages showing the 9 people who allegedly decided not to purchase tickets [1:06-CV-0714-ODE, Docket #36, Exhibit 13-B, P.21.]
- Exhibit 35 -- Sworn Affidavit of Sharon Oestereich [1:06-CV-0714-ODE, Docket #146.]
- Exhibit 36 -- Sworn Affidavit of Gail Burgio [1:06-CV-0714-ODE, Docket #146.]
- Exhibit 37 -- Sworn Affidavit of Ken Corson [1:06-CV-0714-ODE, Docket #146.]
- Exhibit 38 -- Sworn Affidavit of Robert Zastrow [1:06-CV-0714-ODE, Docket #146.]
- Exhibit 39 – Deposition of Timothy P. Ruddy stating there were no damages if the 9 people took the boat ride [1:06-CV-0714-ODE, Docket #90, P.189:16-25, P.190:1-2.]
- Exhibit 40 -- Document detailing each false statement in the Preliminary Injunction Order and the proof of the falsity [1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-9-Order-Granting-Preliminary-Injunction-False-Statements.]

OBSTRUCTION OF JUSTICE BY JUDGE EVANS BY IGNORING PERJURY AND OBSTRUCTION OF JUSTICE

At a hearing in the chambers of Federal Judge Orinda D. Evans on February 2, 2007, I told the judge that 46 of the 50 sworn statements in the Verified Complaint were false (P.23-24). I then told her that I had itemized 430 instances of false sworn [statements]...and she cut me off mid-sentence and said, "we can't deal with that..." (P.34.) She changed the subject and ignored the undeniable evidence then and forever. This is obstruction of justice and RICO.

- Exhibit 41 -- February 2, 2007 Hearing Transcript -- [[1:06-CV-0714-ODE, Docket #174.](#)]
- Exhibit 42 -- February 2, 2007 Hearing Transcript -- [[1-06-CV-0714-ODE-174-Transcript-of-Motion-Hearing-2007-02-02-Pages-23-24-34.](#)]
- Proof -- See Exhibit 1, Exhibit 3, Exhibit 4, Exhibit 5, Exhibit 6, Exhibit 7, Exhibit 8, Exhibit 9, Exhibit 10 above.

OBSTRUCTION OF JUSTICE BY JUDGE EVANS BY FAILING TO DISCLOSE TWO VITAL CONTRACTS

Maid of the Mist refused to produce two contracts that we felt would prove their reason for filing the lawsuit against me. On February 2, 2007, Judge Evans ordered that the documents be produced under seal for an in camera inspection (inspection by the judge only for determination if the documents are relevant). On February 13, 2007, Maid of the Mist filed a motion seeking to file the contracts with the Niagara Parks Commission and New York State Parks under seal. On February 15, 2007, Maid of the Mist filed two documents under seal. On April 20, 2007, Judge Evans issued an order [Docket #209] saying the documents were not relevant and would not be provided to us.

- Exhibit 43 -- Plaintiffs' Motion to File Documents Under Seal -- [[1-06-CV-0714-ODE-165-1-Plaintiffs-Motion-to-File-Certain-Documents-Under-Seal](#)]
- Exhibit 44 -- February 2, 2007 Order to File Documents Under Seal -- [[1-06-CV-0714-ODE-167-Order Permitting the Filing of Documents Under Seal.](#)]
- Exhibit 45 -- Filing of the Documents Under Seal -- [[1-06-CV-0714-ODE-168-Notice of Filing of Certain Documents Under Seal.](#)]
- Exhibit 46 -- April 20, 2007 Order [[1-06-CV-0714-ODE-209-ORDER-2007-04-20.](#)]
- Exhibit 47 -- Page 9 of April 20, 2007 Order showing ruling on documents filed under seal [[1-06-CV-0714-ODE-209-ORDER-2007-04-20-Page-9.](#)]

I obtained the contracts, discovered fraud by Maid of the Mist, and saw that the contracts were vital to MIST-1.

- Exhibit 48 -- Email of March 9, 2009 from Graydon Sheppard forwarding the July 21, 1989 Contract [[Email-of-March-9-2009-from-Graydon-Sheppard.](#)]
- Exhibit 49 -- Contract dated July 21, 1989 between Maid of the Mist and Niagara Parks Commission, agency of the Province of Ontario [[Contract-between-Maid-of-the-Mist-and-Niagara-Parks-Commission-dated-July-21-1989-FOI-Response.](#)]
- Exhibit 50 -- Email of April 1, 2009 from Petra M. Larson forwarding the 2002 Contract between Maid of the Mist and the State of New York [[Email-of-April 1-2009-from-Petra-Larsen-of-New-York-State.](#)]
- Exhibit 51 -- 2002 Contract between Maid of the Mist and the State of New York [[Contract-between-Maid-of-the-Mist-and-New-York-State-dated-September-10-2002-FOI-Response.](#)]

I subsequently learned that Maid of the Mist provided an invalid contract to the State of New York. I believe they did the same in MIST-1.

- Exhibit 52 – Emails and letters regarding the Freedom of Information Requests with New York State [[Email-and-Letters-with-New-York-State-regarding-Freedom-of-Information-Requests.](#)]
- Exhibit 53 – New York State Procurement Record cover sheet and two letters produced as part of 243 pages of documents [[Procurement-Record-Cover-Sheet-from-State-of-New-York.](#)]
- Exhibit 54 – 1982 Contract provided to State of New York for Maid of the Mist in Ontario [[Contract-between-Maid-of-the-Mist-and-Niagara-Parks-Commission-dated-December-1-1982-FOI-Response.](#)]
- Exhibit 55 – Affidavit of Christopher Glynn with the valid Contracts attached that should have been filed in 1:06-CV-0714-ODE Docket #168. [[Affidavit-of-Christopher-Glynn-dated-December-22-2009.](#)]

OBSTRUCTION OF JUSTICE BY CHRISTOPHER GLYNN AND CARL HUGO ANDERSON CAN BE PROVEN IF THE GRAND JURY ISSUES A SUBPOENA

Filing bogus documents is fraud-upon-the-court, obstruction of justice, and RICO. The Grand Jury needs to subpoena the documents filed in [1:06-CV-0714-ODE, Docket #168](#), and compare them to Glynn's Affidavit. If they don't match, Maid is guilty of obstruction of justice. If they do match, Judge Evans is guilty of obstruction of justice. If the documents have disappeared, we will know we have yet another crime.

OBSTRUCTION OF JUSTICE BY JUDGE EVANS BY ALLOWING PERJURED TESTIMONY

On August 9, 2007, Judge Evans allowed statements into the record that she knew were false. (See [Third Declaration of William M. Windsor](#) and [Exhibit 1](#), [Exhibit 2](#), [Exhibit 3](#), [Exhibit 4](#), [Exhibit 5](#), [Exhibit 6](#), [Exhibit 7](#), [Exhibit 8](#), [Exhibit 9](#), [Exhibit 10](#), [Exhibit 11](#), [Exhibit 12](#), [Exhibit 13](#), [Exhibit 14](#), [Exhibit 15](#), and [Exhibit 22](#).) When these false statements were brought to the attention of Judge Evans, she intentionally ignored the evidence. As anyone reviewing the record can conclude, this information was critical, and Maid of the Mist's entire lawsuit failed as a result.

OBSTRUCTION OF JUSTICE BY JUDGE EVANS BY MAKING FALSE STATEMENTS IN SUMMARY JUDGMENT ORDER AND IS USING A SUMMARY JUDGMENT ILLEGALLY

Judge Evans issued a Summary Judgment Order in which 210 of the 416 sentences were false, and she knew many of these statements were false. She made up a lot of this. Judge Evans knowingly disregarded and intentionally ruled contrary to the evidence and the record. She obstructed justice, committed fraud upon the courts, and damaged me and my co-defendants. Judge Evans has issued a significant number of other orders that contain perjury and constitute obstruction of justice. In addition, there was no legal basis for Judge Evans to issue a summary judgment. The law provides that there can be no summary judgment if there is a dispute over a material issue of fact.

- Exhibit 56 – Summary Judgment Order dated August 9, 2007 [[1-06-CV-0714-ODE-251-Summary-Judgment-Order.](#)]
- Exhibit 57 – Document proving false statements in the Summary Judgment Order [[1-06-CV-0714-ODE-362-Third-Declaration-of-William-M-Windsor-Exhibit-22-Summary-Judgment-Order-Errors.](#)]
- Exhibit 58 – Law on Summary Judgments – Federal Rules of Civil Procedure 56 [[Federal-Rules-of-Civil-Procedure-Rule-56.](#)]
- Exhibit 59 – Verified Answer [Docket#3.] [[1-06-CV-0714-ODE-3-Verified Answer.](#)]
- Exhibit 60 – Verified Answer pages stating under oath that there was an oral agreement. [[1-06-CV-0714-ODE-3-Verified Answer-Pages-14-15.](#)]
- Exhibit 61 – Pages 61-62 of April 20, 2007 Order showing ruling on inadmissibility of testimony from witnesses who did not show up for depositions [[1-06-CV-0714-ODE-174-Transcript-of-Motion-Hearing-Pages-61-62.](#)]

- Exhibit 62 – Page 44 of August 9, 2007 Summary Judgment Order stating that no Maid of the Mist affidavits from Carlson were considered. [[1-06-CV-0714-ODE-251-Summary-Judgment-Order-Page-44.](#)]

OBSTRUCTION OF JUSTICE BY JUDGE EVANS FOR MAKING ME PAY MAID OF THE MIST'S LEGAL FEES WHEN I WAS NOT FOUND "GUILTY" OF THE ONLY CAUSE OF ACTION

Judge Evans ruled in favor of Maid of the Mist and ordered me to pay \$446,671.26 in legal fees of the liars and costs because I fought the lawsuit. I WAS SUED; I had no choice but to fight the lawsuit. I did not countersue because I had no basis; there is no Georgia or federal statute to allow a counterclaim for a bogus lawsuit. There is no Georgia statute that allows a party to sue for legal fees. On August 28, 2007, Maid of the Mist filed a motion for attorneys' fees against all three defendants. [[1-06-CV-0714-ODE Docket #253.](#)] On December 3, 2007, Judge Evans awarded Maid of the Mist \$421,773.84 in attorneys' fees and made me personally liable for it. Court costs were subsequently added bringing the total to \$446,671.26.

- Exhibit 63 – Summary Judgment Order Page that defines "Alcatraz" – Page 1 [[1-06-CV-0714-ODE-251-Summary-Judgment-Order-Page-1.](#)]
- Exhibit 64 – Summary Judgment Order Page that identifies tortious interference as the summary judgment issue – Page 2 [[1-06-CV-0714-ODE-251-Summary-Judgment-Order-Page-2.](#)]
- Exhibit 65 – Summary Judgment Order Page that shows I was not found to have committed tortious interference – Page 32 [[1-06-CV-0714-ODE-251-Summary-Judgment-Order-Page-32.](#)]
- Exhibit 66 – Judgment dated December 3, 2007 [Docket #327] making me liable for \$421,773.84 in attorney fees [[1-06-CV-0714-ODE-327-Judgment-for-Attorneys-Fees-2007-12-03.](#)]

On December 26, 2007, Judge Evans issued an order allowing \$446,671.26 to be paid into the registry of the court pending appeal. On December 28, 2007, Windsor paid \$446,671.26 into the Registry of the Court (receipt number 572768).

- Exhibit 67 – Order allowing \$446,671.26 to be paid into the registry of the court. [[1-06-CV-0714-ODE-334-Order-dated-December-26-2007-\\$446,671.26-paid-into-court.](#)]
- Exhibit 68 – Money was paid into the Registry of the Court. [[1-06-CV-0714-ODE-335a-Docket-Entry-showing-\\$446,671.26-receipt-number-572768-on-deposit-into-Registry-of-the-Court.](#)]

OBSTRUCTION OF JUSTICE AND RICO BY JUDGES OF THE ELEVENTH CIRCUIT FOR IGNORING THE FACTS AND THE LAW AND IS USING ILLEGAL ORDERS

We appealed to the United States Court of Appeals for the Eleventh Circuit. The 23 errors on the grant of summary judgment on tortious interference identified were:

- Exhibit 69 – Windsor Appellate Brief [[Eleventh-Circuit-07-15200-Appellate-Brief-Windsor.](#)]
- Exhibit 70 – Alcatraz Appellate Brief [[Eleventh-Circuit-07-15200-Appellate-Brief-Alcatraz.](#)]

On September 19, 2008, Judges Joel Dubina, Frank M. Hull, and Judge Fay of the Eleventh Circuit issued an Order affirming Judge Evans' Summary Judgment Order. The Order did not address any of these errors of fact and law. By failing to address the issues, the order was essentially not appealable to the United States Supreme Court.

- Exhibit 71 – Order of Eleventh Circuit [[1-06-CV-0714-ODE-344-ORDER-of-Eleventh-Circuit](#)]

In December 2008, I was forced to settle out of court with Maid of the Mist. The agreed amount was \$395,000 plus costs. I would not give a release to anyone, so I retained my ability to pursue them later if I obtained new evidence.

- Exhibit 72 – Consent Final Order and Judgment [[1-06-CV-0714-ODE-354-ORDER-Consent-final-order-and-judgment-2008-12-09](#)]
- Exhibit 73 – Docket showing money paid into Registry of the Court [[1-06-CV-0714-ODE-354a-Docket-detailing-handling-of-money-paid-into-Registry-of-the-Court](#)]

OBSTRUCTION OF JUSTICE BY JUDGE EVANS IN DENYING ACCESS TO THE CONTRACTS

I obtained new evidence in March and April 2009. On April 24, 2009, I filed a Motion to Reopen the Case with significant evidence. I also filed a Motion to Recuse Judge Evans.

- Exhibit 75 – Motion to Reopen [[1-06-CV-0714-ODE-362-Motion-to-Reopen-Case-2009-04-22](#).]
- Exhibit 76 – Motion to Recuse [[1-06-CV-0714-ODE-361-Motion-to-Recuse-Judge-Evans-2009-04-24](#) and [1-06-CV-0714-ODE-361-Motion-to-Recuse-Second-Affidavit-2009-04-20](#).]
- Exhibit 77 – Order denying the motions [[1-06-CV-0714-ODE-390-ORDER-2009-05-22](#).]

I used a subpoena and motions in an effort to get Judge Evans to lift the seal. She refused to lift the seal on the two contracts. Keeping the documents hidden served to hide the fact that Judge Evans had committed perjury and obstruction of justice...and to protect Maid of the Mist from losing the lawsuit and having its key managers found guilty of hundreds of counts of perjury. Based upon the law, there was no confidentiality justification for keeping the documents sealed as the documents had become public.

- Exhibit 78 – Motion to Lift Seal [Docket #561.] [[1-06-CV-0714-ODE-561-1-Motion-to-Lift-Seal-2009-09-25](#) and [1-06-CV-0714-ODE-561-2-Motion-to-Lift-Seal-2009-09-25 - Eighty-Second-Affidavit-of-WMW](#).]
- Exhibit 79 – December 22, 2009 “Mega Order” that includes order refusing to Lift Seal [[1-06-CV-0714-ODE-723-ORDER-2009-12-22](#).]

OBSTRUCTION OF JUSTICE BY JUDGE EVANS AND JAMES N. HATTEN IN CREATING AN ILLEGAL LAWSUIT

I served a subpoena on Judge Evans so she would have to produce the two documents filed under seal. Then on June 3, 2009, Hatten created a bogus lawsuit at the request of Judge Orinda D. Evans (“ODE”) called Civil Action No. 1:09-CV-01543-WSD in the United States District Court for the Northern District of Georgia (“BOGUS ACTION”). The BOGUS ACTION was used so Judge Evans could fight the subpoena served on her in a case where she was presiding (MIST-1). The Federal Rules of Civil Procedure ([FRCP Rule 3](#) and [FRCP Rule 4](#)) require a petition and issuance and service of a summons to create a civil action. None of this was done in this “matter.” The Court Docket includes no complaint and no summons. A true and correct copy of the [Court Docket](#) shows this. This is obstruction of justice and RICO.

Exhibit 80 – FRCP Rule 3 [[Federal-Rules-of-Civil-Procedure-Rule-3](#).]

Exhibit 81 – FRCP Rule 4 [[Federal-Rules-of-Civil-Procedure-Rule-4](#).]

Exhibit 82 – Docket in 1:09-CV-01543-WSD [[1-09-CV-01543-Docket-2011-08-18](#).]

OBSTRUCTION OF JUSTICE AND RICO BY JUDGE EVANS AND JAMES N. HATTEN IN ISSUING AN IMPROPER WRIT OF EXECUTION

On June 16, 2010, Mr. Hatten, or someone working with him, issued a Writ of Execution in the BOGUS ACTION. (See entry between Doc. 54 and 55 on the Docket – Exhibit 83)

Exhibit 83 – Entry between Doc. 54 and 55 on the 1:09-CV-01543-WSD Docket [1-09-CV-01543-Docket-2011-08-18-54-to-55.]

There was never a “judgment” or mandate issued by the Eleventh Circuit as required by Federal Rules of Appellate Procedure (“FRAP”) Rule 36. I was never served with a “Judgment” as required by Rule 36, nor was there a judgment or mandate issued by the District Court. The Writ of Execution alleges that I have a debt of \$37,333.67 to the United States District Court for the Northern District of Georgia, but it is invalid. The Court Docket indicates on 6/16/2010 that the Writ of Execution was issued pursuant to the Order of the USCA, but the Order provided no such direction to the Clerk of the Court. (1:09-CV-01543-WSD Docket #54.) This is obstruction of justice and I’m sure a number of other things.

Exhibit 84 – FRAP Rule 36 [Federal-Rules-of-Appellate-Procedure-Rule-36.]

Maid of the Mist then filed a lien against all of the assets of my wife any myself in Fulton County. [1:09-CV-01543-WSD Docket #56 and 1:09-CV-01543-WSD Docket #56-1.] My wife and I wanted to file lawsuits to force them to vacate these liens, but Judge Orinda D. Evans blocked us from doing so. The lawsuits and filing fees were all in proper order and were received by the Clerk of the Court, but they both disappeared after receipt.

Exhibit 85 – Notice of Filing of Lien [1-09-cv-01543-WSD-056-Notice-of-Filing-of-Writ-of-Execution-2010-06-28.]

Exhibit 86 – Lien [1-09-cv-01543-WSD-056-1-Writ-of-Execution-2010-06-28.]

Exhibit 87 – Verified Complaint dated October 22, 2010 [Clerk-Lawsuit-Verified-Complaint-2010-10-22.]

Exhibit 88 – Verified Complaint dated October 26, 2010 [Sanders-Lawsuit-Verified-Complaint-2010-10-26.]

Exhibit 89 – Order dated November 22, 2010 [MIST-1 Docket #951.] [1-06-CV-0714-ODE-951-ORDER-denying-filing-of-two-lawsuits.]

When this wrongdoing was brought to the attention of Hatten, Judge Duffey, Judge Ed Carnes, Judge Rosemary Barkett, and Judge Frank M. Hull, they intentionally ignored it. Because of the significant efforts to address this issue and the rejection of these efforts by these people, I can demonstrate this was not error but intentional reckless, criminal, and conspiratorial acts as further defined by the statutes.

Dr. Joseph Zernik is an expert on court corruption. Dr. Zernik has reviewed the docket in 1:09-CV-01543-WSD, and he has issued an opinion that “the case amounts to fraud on Mr. William Windsor by the US District Court, Northern District of Georgia.” [Affidavit of Dr. Joseph Zernik.]

- Exhibit 90 – Affidavit of Dr. Joseph Zernik [Affidavit-of-Joseph-Zernik-2011-08-18.]

OBSTRUCTION OF JUSTICE AND RICO BY JUDGE DUFFEY THROUGH PERJURY AND OBSTRUCTION OF JUSTICE

On June 30, 2009, an Order to Quash the Deposition of Judge Evans was issued by Judge Duffey. [1-09-cv-01543-WSD-32-1-ORDER-granting-Motion-to-Quash.] The order described me as “scurrilous and

irresponsible.” The legal definition of scurrilous is "evil." The legal definition of irresponsible is "mentally or financially incapable." I am neither scurrilous nor irresponsible!

- Exhibit 91 – Order to Quash the Deposition of Judge Evans. [1-09-cv-01543-WSD-32-1-ORDER-granting-Motion-to-Quash.]

This was written by a man who did not know me, had never even seen me, and who made such a statement based solely on my three uncontroverted sworn affidavits. In 2009, there were zero (0) affidavits filed by Maid of the Mist in MIST-1, the BOGUS Action, or MIST-2. So, my testimony and evidence stood alone as the record before the court. (There have also been zero (0) affidavits filed by Maid of the Mist employees in any of the actions in federal court in Atlanta in 2010 and 2011.) There is nothing scurrilous and irresponsible in the affidavits that Judge Duffey had before him when he entered the June 30, 2009 order – Exhibits 92, 93, 94, 95, 96, and 97. They were all sworn, and they were not controverted.

- Exhibit 92 – Twenty-Seventh Declaration of William M. Windsor [1-09-cv-01543-WSD-6-Motion-for-Hearing-on-Motion-to-Quash-and-Twenty-Seventh-Declaration-of-WMW-2009-06-08.]
- Exhibit 93 – Twenty-Ninth Declaration of William M. Windsor [1-09-cv-01543-WSD-15-8-Motion-to-Reconsider-or-Revise-Stay-Order-Exhibit-G-Twenty-Ninth-Declaration-of-WMW – Exhibit 1 – Exhibit 2.]
- Exhibit 94 – Thirty-First Declaration of William M. Windsor [1-09-cv-01543-WSD-9-Motion-to-Disqualify-and-Thirty-First-Declaration-of-WMW-2009-06-10.]
- Exhibit 95 – Thirty-Third Declaration of William M. Windsor [1-09-cv-01543-WSD-13-Motion-for-Conference-and-Thirty-Third-Declaration-of-WMW-2009-06-10.]
- Exhibit 96 – Thirty-Fourth Declaration of William M. Windsor [1-09-cv-01543-WSD-21-Response-to-Motion-to-Quash-Subpoena-and-Thirty-Fourth-Declaration-of-WMW-2009-06-22.]
- Exhibit 97 – Thirty-Fourth Declaration of William M. Windsor [1-09-cv-01543-WSD-24-2-Response-to-Motion-to-Supplement-Motion-to-Quash-Exhibit-A-Thirty-Fourth-Declaration-of-WMW]

On July 27, 2009, I filed Civil Action No. 1:09-CV-02027-WSD (“MIST-2”), an independent action in equity for fraud upon the court and RICO. [MIST-2 Doc.1.] I sued Judge Evans, Maid of the Mist, and their attorneys. An action for fraud upon the court seeks to set aside orders and judgments in a case that previously was ended. There is no statute of limitations on fraud upon the court. This was the first lawsuit that I filed. On July 28, 2009, when I was told by the District Court Clerk’s Office that Judge Duffey (the judge who called me “scurrilous and irresponsible”) would be presiding in MIST-2, I immediately prepared a Motion to Recuse Judge Duffey and a Motion for Change of Venue. I returned later in the day and filed.

- Exhibit 98 – Motion to Recuse Judge Duffey [1-09-CV-02027-WSD-017-1-Motion-to-Recuse-Judge-Duffey – Exhibit A – Exhibit B – Fifth Affidavit.]
- Exhibit 99 – Order denying Motion to Recuse Judge Duffey in MIST-2. [1-09-CV-02027-WSD-70-ORDER-denying-Second-Motion-to-Recuse-Judge-Duffey-2009-09-25.]

The Defendants filed Motions to Dismiss in Civil Action No. 1:09-CV-02027-WSD (“MIST-2”) – Docket #130 and Docket #131. I was required by a July 8, 2010 court order to file a Response by August 18, 2010: “Windsor shall have until August 18, 2010 to respond” and “Windsor may file his response to Rule 12 motions, if any, without requesting specific approval to do so.”

- Exhibit 100 – [Order of July 8, 2011 -- Docket #115, P.1 ¶1, P.2 ¶1.]

I filed motions for an extension of time to respond due to eye surgery; these were filed on July 21, 2010 (MIST-2 Docket #127), August 6, 2010 (MIST-2 Docket #135), and August 12, 2010 (MIST-2 Docket #139). Judge Duffey ignored all of these motions until approximately 12:25 pm on August 18, 2010 when he knew I would have had to stay up all night preparing the responses. [Order dated August 18, 2010 – MIST-2 Docket #140.] I did stay up all night, and a courier picked up my responses and delivered them to the Clerk of the Court the morning of August 18, 2010. MIST-2 Docket #142 and MIST-2 Docket #144 are those responses. Docket #144 is clearly a response to the Motion to Dismiss. On Page 1, it states: “This response will be referred to as RESPONSE TO MOTION FOR SUMMARY JUDGMENT.” It also references the Response to the Motion to Dismiss of Judge Evans and identifies Docket #144 as a Response. (P.3, ¶4.) MIST-2 Docket #142 is clearly a Response. It is titled “RESPONSE TO MOTION TO DISMISS OF USA AND JUDGE ORINDA D. EVANS,” and the first paragraph says: “William M. Windsor hereby files this RESPONSE TO MOTION TO DISMISS OF USA AND JUDGE ORINDA D. EVANS AND A MOTION FOR EXTENSION OF TIME TO RESPOND (‘Response to Judge Evans’).” [MIST-2 Docket #142, P.1 ¶1.] MIST-2 Docket #142, P.29 ¶9 also states: “The response to the so-called “Motion to Dismiss” of the other Defendants is incorporated herein.”

- Exhibit 101 – Order dated August 18, 2010 – MIST-2 Docket #140.
- Exhibit 102 – MIST-2 Docket #142
- Exhibit 103 – MIST-2 Docket #144
- Exhibit 104 – MIST-2 Docket #142, P.1 ¶1.

I received an email at 10:33 am on September 23, 2010 from counsel for Judge Evans. It advised me that an order had been issued by Judge Duffey in MIST-2, and it attached a copy. (MIST-2 Docket #150.) The order of September 23, 2010 is false and constitutes obstruction of justice. Judge Duffey falsely claims that I did not submit a September 1 Report, but I did. I submitted it on August 31 with medical receipts and documentation. (August 31, 2010 Report Letter to Judge Duffey.) The letter was copied to multiple people, so the mailing of it can be verified through those people as well.

- Exhibit 105 – (August 31, 2010 Report Letter to Judge Duffey.)

Judge Duffey then issued an October 19, 2010 order dismissing the case claiming that I did not file a response. [MIST-2 Docket #161, P.12 ¶1.] Judge Duffey was well aware that I filed responses. The court Docket includes the responses. He even acknowledged that I had filed a response in the October 19, 2010 order stating “This court now turns to the two pending motions to dismiss and Windsor’s partial response.” [MIST-2 Docket #161, P.12 ¶2.] Yet he later claims “Because Windsor failed to respond to that motion to dismiss, it will be granted.” [MIST-2 Docket #161, P.12 ¶2.]

- Exhibit 106 – [MIST-2 Docket #161.]
- Exhibit 107 – [1-09-CV-02027-WSD-161-ORDER-2010-10-19, P.12 ¶1,2.]

In addition to the responses that I filed on August 18, 2010, I filed a motion to deny the Maid of the Mist Defendants’ ability to file a Motion to Dismiss on July 21, 2010. [MIST-2 Docket #119] The Docket shows that this motion was submitted to Judge Duffey for action on August 26, 2010 (MIST-2 Docket entry unnumbered after #148.) The Docket shows that Judge Duffey never ruled on this motion, which he was obligated to do before ruling on the Motions to Dismiss.

- Exhibit 10 – MIST-2 Docket [1:09-CV-02027-WSD (MIST-2) Docket.]

By dismissing the case, Judge Duffey made a lawsuit vanish that had been filed against his friend and associate, Judge Orinda D. Evans, and the law firm and attorneys with Hawkins Parnell. He dismissed the case by

committing perjury claiming that documents had not been filed or provided when he knew they had been. I have **numerous** examples of the same corrupt practices by Judge Duffey in both 1:09-CV-02027-WSD and 1:09-CV-01543-WSD.

OBSTRUCTION OF JUSTICE AND RICO BY JAMES N. HATTEN, ANNIVA SANDERS, BEVERLY GUTTING, JOYCE WHITE, AND MARGARET CALLIER

James N. Hatten, Clerk of the Court for the United States District Court for the Northern District of Georgia, Anniva Sanders, Beverly Gutting, Joyce White, Margaret Callier, and others have conspired to obstruct justice and deny me and others of our due process rights under the Constitution of Georgia and the United States by intentionally and knowingly committing the crimes of obstruction of justice.

Hatten and his employees (Sanders, Gutting, White, and Callier) are obligated to file motions, documents, and affidavits that are presented to them for filing. But in my cases, they have failed to make my filings part of the record of the court, and many of my filings have not been shown on the dockets.

- Exhibit 109 – copies of the cover letters
- Exhibit 110 – courier's proof of delivery
- Exhibit 111 – Docket in 1:11-CV-01922-TWT
- Exhibit 112 – Docket in 1:11-CV-01923-TWT
- Exhibit 113 – Docket in 1:11-CV-02027-TWT
- Exhibit 114 – Docket in 1:11-CV-02326-TWT

OBSTRUCTION OF JUSTICE, CONSPIRACY, AND RICO BY JUDGE DUFFEY, JAMES N. HATTEN, ANNIVA SANDERS, BEVERLY GUTTING, AND JOYCE WHITE BY BLOCKING APPEALS AND DENYING LEGAL PROTECTIONS

Judge William S. Duffey has conspired with James N. Hatten, Clerk of the Court for the United States District Court for the Northern District of Georgia, and his employees, and they have failed to docket motions, documents, and affidavits that have been presented to them for filing. They have failed to docket and process appeals filed by my wife ("BGW").

Blocking the appeals allows wrongful actions to take place when the case should be stayed so that nothing further takes place until the Court of Appeals rules on BGW's Appeal. Blocking the appeals may allow the courts to deny any appeal from BGW as being untimely.

On June 30, 2009, Civil Action No. 1:09-CV-01543-WSD ("BOGUS ACTION") was closed. The Docket entry between #33 and #34 shows that this is a closed case – "Civil Case Terminated."

- Exhibit 116 – BOGUS ACTION Docket entry between #33 and #34

On September 24, 2010, Judge Duffey entered an oral order as to me and no one else.

- Exhibit 82 – Docket
- Exhibit 117 – between Docket entries #91 and 92

On October 6, 2010, non-party BGW was served by the Plaintiffs with a subpoena to produce documents on October 18, 2010. The documents requested were identical to the documents requested in a request for production of documents served on me.

On October 18, 2010, BGW timely filed a Motion for Protective Order. [Docket #96 and 96-1.]

- Exhibit 118 -- [Docket #96 and 96-1.]

On November 3, 2010, Judge Duffey issued an order denying BGW's Motion for Protective Order claiming BGW was bound by the September 24, 2010 order. [Docket #99.] BGW had no knowledge of the September 24, 2010 Oral Order as to me, and the order placed no restrictions on BGW, as paragraph 7 above clearly shows. Judge Duffey's actions stripped BGW of essential protections. Judge Duffey did this knowingly and intentionally to damage BGW and me.

- Exhibit 119 -- [Docket #99.]

EVERYONE has a right to appeal court decisions that affect them. On November 5, 2010, BGW presented a Notice of Appeal to the District Court Clerk with the required filing fee of \$455 cash.

The District Court Clerk refused to process BGW's November 5, 2010 Notice of Appeal. The U.S. Treasury sent a refund check for \$455 to BGW. No explanation was provided. It was a totally proper appeal.

- Exhibit 120 -- Notice of Appeal

On April 11, 2011, BGW filed another Notice of Appeal with the Clerk of the Court and paid the appeal fee. [Courier Connection Receipt.] The cover letter was stamped proving it was in the hands of the Clerk of the Court, which is all that is required for "filing." The Notice of Appeal was returned by the CLERK. Note that this Notice of Appeal was never docketed, and notice that only the cover letter was file stamped.

- Exhibit 121 – Notice of Appeal
- Exhibit 122 – Courier Connection Receipt
- Exhibit 123 -- cover letter was stamped

On April 21, 2011, Judge Duffey entered an order [Docket # 151] questioning the signature on the April 11, 2011 Notice of Appeal. BGW was ordered to add her signature over the top of the signature stamp that had been used. Note that this April 21, 2011 Order (P.4, ¶2) acknowledges the receipt of the April 11, 2011 Notice of Appeal and says "the Notice of Appeal, Certificate of Compliance, and Certificate of Service that were filed in her name on April 11, 2011," but it is not shown anywhere on the Docket.

- Exhibit 124 – Docket # 151
- Exhibit 125 – April 21, 2011 Order (P.4, ¶2)
- Exhibit 82 -- Docket

On April 28, 2011, BGW added her signature to the Notice of Appeal and had Courier Connection deliver it and a check for the filing fee to the Clerk of the Court for processing. [Courier Connection Delivery Receipt.] Note that this Notice of Appeal is not reflected anywhere on the Docket.

- Exhibit 126 – BGW added her signature to the Notice of Appeal
- Exhibit 127 – Courier Connection Delivery Receipt
- Exhibit 82 -- MIST-2 Docket

The Clerk did not accept the check, and Deputy Clerk of the Court Joyce White wrote BGW a letter providing acceptable forms of payment. This letter serves as an acknowledgment that the Notice of Appeal was received – a second time. Cash was sent by Courier Connection on May 4, 2011.

- Exhibit 128 -- Joyce White wrote BGW a letter
- Exhibit 129 -- Courier Connection

On May 4, 2011, Judge Duffey entered an order ordering BGW to appear for a hearing on May 13, 2011. [Docket #158.] Note that in this order, Judge Duffey acknowledges that on April 28, 2011, the CLERK received the April 11, 2011 Notice of Appeal with the original signatures. Judge Duffey questioned the signatures, so BGW submitted an Affidavit dated May 10, 2011 attesting to the validity of both the stamp and her signature.

- Exhibit 130 – Order to Show Cause -- Socket #158
- Exhibit 131 -- Affidavit dated May 10, 2011

BGW's valid Notices of Appeal were not docketed or processed by the CLERK as required by the FRCP and FRAP. They are not shown on the Docket. This is a violation of the Rules and BGW's rights to due process. It is obstruction of justice.

- Exhibit 82 -- Docket

When this wrongdoing was brought to the attention of Judge Duffey, he intentionally ignored it. He has even denied the filing of a motion seeking an explanation as to the disappearance of the Appeal.

OBSTRUCTION OF CORRESPONDENCE, TAKING OF MAIL, CONSPIRACY, AND RICO BY JUDGE THOMAS WOODROW THRASH AND JAMES N. HATTEN

Judge Thomas Woodrow Thrash has conspired with Clerk of the Court, James N. Hatten, judges, and others to deny me of my due process rights under the Constitution of Georgia and the United States by intentionally and knowingly committing the crimes of obstruction of justice and theft of mail.

This activity is by definition in violation of federal laws: Obstruction of Correspondence – Taking of Mail -- 18 U.S.C. § 1702; Theft of Mail -- 18 U.S.C. § 1708; Possession of Stolen Mail -- 18 U.S.C. § 1708; Obstruction of Justice -- 18 U.S.C. § 1503; and Conspiracy -- 18 U.S.C. § 371; and as such, said violations also constitute predicate act crimes and prove violation of the RICO statute of the State of Georgia, O.C.G.A. 16-14-1 § et seq.

On July 22, 2011, Judge Thrash and Clerk Hatten conspired to intercept and take mail that I had mailed to prospective witnesses against them. On July 22, 2011, Judge Thrash issued an order in Civil Action No. 1:11-CV-01923-TWT in which he admitted a plan to intercept the mail and block it from being distributed to the addressees. [July 22, 2011 ORDER.] I did a mailing to potential witnesses who can prove criminal acts of the federal judges in Atlanta. I prepared a mailing list by doing online searches and reviewing the Northern District of Georgia website. I sent one letter to judicial employees and another letter to each federal judge.

- Exhibit 132 -- July 22, 2011 ORDER
- Exhibit 133 – mailing list
- Exhibit 134 – letter to judicial employees
- Exhibit 135 -- letter to each federal judge

When the illegality of this was brought to the attention of Judge Thrash and Clerk Hatten, they ignored it. (See Letters that I had delivered to Hatten and Thrash.) Judge Thrash and Clerk Hatten knowingly disregard the law and took personal mail addressed to specific people that had been delivered by the U.S. Postal Service. This was done to obstruct justice and damage me.

- Exhibit 136 – Hatten
- Exhibit 137 -- Thrash

Emails with Nicholas Marrone, one of the judicial employees who was sent a letter on July 19, 2011 that was received at the courthouse on or before July 22, 2011, show he had not been received my mail as of August 3, 2011. I am confident that many, if not all, of the addressees will testify that they did not receive their mail.

- Exhibit 138 -- Emails with Nicholas Marrone

OBSTRUCTION OF JUSTICE BY JUDGE THOMAS WOODROW THRASH

Judge Thomas Woodrow Thrash of the United States District Court for the Northern District of Georgia, and others have conspired to obstruct justice and deny me due process rights under the Constitution of Georgia and the United States by intentionally and knowingly committing the crime of obstruction of justice.

Judge Thrash has arranged to be the presiding judge in two lawsuits in which Judge Thrash is one of the defendants. This is Obstruction of Justice -- 18 U.S.C. § 1503; and as such, said violation also constitutes a predicate act crime and proves violation of the RICO statute of the State of Georgia, O.C.G.A. 16-14-1 et seq. This is a direct violation of the Canons of the Code of Judicial Conduct.

- Exhibit 139 -- Canons of the Code of Judicial Conduct

This is proven with a copy of the dockets in Civil Action Nos. 1:11-CV-02027-TWT and 1:11-CV-02326-TWT (Exhibits 1, and 2.) I filed these lawsuits in Fulton County Superior Court.

The U.S. Supreme Court said in *In re Murchison*, 349 U. S. 133, that "**no man can be a judge in his own case,**" and "**no man is permitted to try cases where he has an interest in the outcome,**" *id.*, at 136. This is the law!

Judge Thrash then issued a permanent injunction against me that blocks me from ever filing a lawsuit in any court anywhere in the country for the rest of my life. Judge Thrash issued this injunction that violates the Constitution and Bill of Rights after denying me the legal right to respond to the motion of the U.S. Attorney that resulted in the so-called hearing. Everyone has a legal right to file a response to a motion filed in a court. It is provided in the Rules of Civil Procedure, and no one can deny anyone this right...but Judge Thrash did.

Judge Thrash denied my request for subpoenas so I could compel witnesses. Pro Se parties like me do not have the ability to subpoenas as attorneys do, so by denying me subpoenas, I was blocked from calling witnesses, a right that everyone has in court...except me. At the hearing, Judge Thrash denied me the ability to introduce my evidence into the record. He denied my request to testify under oath. Everyone has the right to testify...except me. Judge Thrash denied me the right to cross-examine the U.S. Attorney who made a number of false and deceptive statements at the hearing.

The ultimate violation of the law, however, was that Judge Thrash denied me the right to have a decision rendered after hearing from me. On July 15, 2011, Judge Thrash entered a Permanent Injunction Order [Docket

#74]. On July 7, 2011, Judge Thrash had entered an order denying my right to file a response to the motion [Docket #57]. On July 12, 2011, Judge Thrash entered an order placing restrictions on the hearing [Docket #58].

- Exhibit 140 – Docket #74
- Exhibit 141 – Docket #57
- Exhibit 142 -- Docket #58

Judge Thrash had already decided he was going to issue this permanent injunction order against me, and he had his order written before the hearing began. I asked him at the start of the hearing if an order had already been written, and he snapped at me and said he would not answer any of my questions. Then a few minutes after he heard from me, he leaned to his left and read from the pre-written order. This was obvious to people in the courtroom, and Jeff Goolsby has provided an affidavit in which he explains how totally biased Judge Thrash was and that he had predetermined the outcome and read from a pre-written order. There are many other witnesses to this. Affidavits are available from Gary Bryant and others.

- Exhibit 143 -- Jeff Goolsby has provided an affidavit

OBSTRUCTION OF JUSTICE AND JURY TAMPERING BY PAUL HOWARD, JR., DEPUTY SHERIFF BETTS, DEPUTY SHERIFF ENGLISH, AND NAOMI FUDGE

Fulton County Deputy Sheriff Betts, Deputy Sheriff English, and Fulton County District Attorney Paul Howard, Jr., receptionist Naomi Fudge, and others have conspired to obstruct justice and deny me due process rights under the Constitution of Georgia and the United States by intentionally and knowingly committing the crimes of obstruction of justice and jury tampering.

My attempts to present my evidence to the Fulton County Grand Jury have been met with a variety of actions and inactions designed to damage me and deny my legal rights. Actions were taken by each of the Defendants.

- Exhibit 144 -- Notes of my calls in January 2008
- Exhibit 145 – Letters – 2009
- Exhibit 146 – Letters – 2010
- Exhibit 147 -- Letters – 2011
- Exhibit 148 -- criminal complaint to Mr. Howard
- Exhibit 149 -- letter to the Fulton County Grand Jury
- Exhibit 150 -- letter to the Fulton County Grand Jury
- Exhibit 151 -- letter to Mrs. Rebecca Keel
- Exhibit 152 -- letter to Mrs. Keel
- Exhibit 153 -- letter to many elected Fulton County officials
- Exhibit 154 -- letter by courier to the receptionist of the Fulton County District Attorney's Office
- Exhibit 155 -- letter by courier to Mr. Howard
- Exhibit 156 -- fax to Mr. Howard
- Exhibit 157 -- letters to the Fulton County Grand Jury
- Exhibit 158 -- fax to Mr. Howard

On June 7, 2011, I received a letter from Herbert J. Bridgewater, Jr., Foreman of the Grand Jury, stating that the Fulton County Grand Jury did not have the power to consider my criminal charges.

- Exhibit 159 -- letter from Herbert J. Bridgewater, Jr., Foreman of the Grand Jury

On June 10, 2011, I sent a letter to Mr. Bridgewater and the Grand Jury Members to advise them that Mr. Bridgewater's letter was not factual.

- Exhibit 160 -- letter to Mr. Bridgewater and the Grand Jury Members

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. I arrived with sealed confidential envelopes with evidence for the Grand Jury, and Ms. Naomi Fudge said the Grand Jury didn't want to speak with him. I asked how she could possibly know that, and she did not respond.

Deputy Betts and Deputy Sheriff Roye appeared a few minutes later, 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. A slew of Sheriff's deputies showed up a short while later. Deputy English asked what I wanted to accomplish today. I said I wanted to speak to the Grand Jury and present evidence of many crimes. Deputy 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. Deputy England repeated "that will not happen. I expressed that I would simply wait in the lobby with my sign and envelopes until grand jurors passed by. Deputy English told me that I would be arrested for "jury tampering" if I spoke to a grand juror in the lobby. Witnesses present include Cynthia Nwokocha, Deputies Betts, English, and Roye, as well as citizens Kia'Vonne Ginton and Venoya Sims, and me.

What Deputy English and the others had done is 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.

- Exhibit 161 -- fax to Ms. Nwokocha, Mr. Howard, Sheriff Ted Jackson, and Major Christopher Leighty of the Atlanta Police Department
- Exhibit 162 -- fax to Ms. Nwokocha, Mrs. Rebecca Keel, and Mr. Howard
- Exhibit 163 -- fax to Ms. Nwokocha, Mrs. Rebecca Keel, Mr. Howard, Sheriff Ted Jackson, Lieutenant Colonel Graham, and Major Leighty

Deputy Betts, Deputy English, Ms. Naomi Fudge, and unknown others are guilty of obstruction of justice and violation of O.C.G.A. § 16-10-93: A person who, with intent to deter a witness from testifying to any matter before a grand jury, communicates, any threat shall, upon conviction thereof, be punished by imprisonment for not less than one nor more than five years. It shall be unlawful for any person knowingly to use intimidation, physical force, or threats to engage in misleading conduct toward another person with intent to: Influence, delay, or prevent the testimony of any person; 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.

Deputy Betts, Deputy English, and unknown others are guilty of violation of O.C.G.A. § 16-10-94: A person commits the offense of tampering with evidence when, with the intent to obstruct the prosecution or defense of any person, he knowingly destroys, alters, conceals, or disguises physical evidence.

Upon information and belief, improper information was 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 is 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.

On additional visits to the Grand Jury area, Ms. Fudge and Deputy Sheriff Betts refused to give my evidence to the Grand Jury.

OBSTRUCTION OF JUSTICE AND RICO BY EVERY FEDERAL JUDGE IN FULTON COUNTY GEORGIA

Every federal judge in Georgia has been informed of the perjury and obstruction of justice, and none have done anything about it. This violates 18 U.S.C. § 4, which requires that when a judge becomes aware of a felony, he/she is required by law to report it to law enforcement. This violates their oath of office. This makes them accessories after the fact to the crimes of the judges and the office of the clerk.

THEFT BY TAKING BY CARL HUGO ANDERSON

I provided the original and only copy of all of my financial documents to Carl Hugo Anderson on May 13 and May 16, 2011 in response to a request for production of documents that was required by Judge Duffey. I informed Anderson that I was providing the originals for copying. It is clearly stated in the Response to the Production of Documents, and it was arranged prior to production with Carl Hugo Anderson. On June 30, 2011, I emailed demanded return of the documents again. Anderson and HPTY have not responded to my demands for the return of his property.

O.C.G.A. § 16-8-2 says: “A person commits the offense of theft by taking when he unlawfully takes or, being in lawful possession thereof, unlawfully appropriates any property of another with the intention of depriving him of the property, regardless of the manner in which the property is taken or appropriated.”

I provided documents to the Defendants pursuant to an agreement dated May 14, 2011. The agreement was that the documents were to be provided to be copied and returned. I own my financial and medical records. The records were provided temporarily to be copied and returned. The terms were stated in writing. Anderson and HPTY have unlawfully appropriated my property. Anderson and HPTY have all of my financial records. Several demands have been made for the return of the property, and Anderson and HPTY have refused to do so. Anderson and HPTY have intentionally deprived me of the property.

I have been damaged as a result. I am unable to obtain refunds for items that need to be returned because he is unable to produce the receipt for the purchases. I am unable to file my income tax return or document deductions. I am unable to respond to requirements to submit financial proof in Civil Action No. 1:09-CV-01543-WSD in the United States District Court for the Northern District of Georgia, and I have been damaged as a result. Anderson and HPTY have voluntarily committed the act of theft by taking my property. The actions of Anderson and HPTY are inconsistent with my ownership rights.

- Exhibit 164 – All relevant documents on the theft

OTHER CHARGES AND RICO BY ALL NAMED PARTIES AND OTHERS

The most important charge is the pattern of racketeering activity by everyone involved throughout the past six years. Judges obstruct justice by using various techniques to render decisions and issue orders that deny justice.

Ignore the Law: One of the primary techniques used by corrupt judges is to simply ignore the law. **Cite Invalid Law:** Sometimes a judge will feel like citation of case law is needed to support their ruling. So, they claim a case applies when it doesn't. **Ignore the Facts:** Judges don't address points raised by parties who aren't favored. **Lie about the Facts in Orders:** Lying under oath is perjury. Judges are always under oath, and a judge is supposed to never say or write anything that isn't true. So, when a judge knowingly lies in orders for the purpose of ruling against a party for the judge's criminal reasons, it is a criminal violation of perjury. **Ignore Issues:** Another favorite technique is to simply ignore issues in orders. **Conceal Evidence:** A really dishonest judge will simply conceal evidence. **Say Nothing in Orders:** One of the favorite techniques of Judge Thrash and the Eleventh Circuit Court of Appeals' judges is to say nothing. They corruptly call an appeal "frivolous" and dismiss it with no explanation whatsoever. Sometimes the Eleventh Circuit writes a page or two simply reciting history of the case, so it appears it is a real order, and then they write one sentence dismissing the appeal with no valid reason or explanation. **Block Filing of Motions and Evidence:** By allowing the favored party to file anything they choose and blocking the filings and motions of the pro se party, judges commit the worst form of obstruction of justice. The pro se party is denied the information needed to defeat the other party, and there is no record of this evidence and these arguments on appeal. **Tamper with Evidence:** Tampering with evidence is a crime. Judges commit tampering with evidence by causing evidence submitted for filing to disappear and not get added to the court record. **Deny Constitutional Rights:** The Constitution is meaningless to corrupt judges. They simply violate Constitutional rights with no regard for the people they damage. All of the judges that I have encountered have violated my Constitutional rights. **Violate and Ignore the Rules of Civil Procedure:** By violating and ignoring the Rules of Civil Procedure and the Rules of Evidence, judges commit obstruction of justice. They allow the favored party to break rules and get away with it. **Automatically Rule against Certain Classes of People:** Judges automatically rule against certain classes of people. The concept of fair and impartial judges is a fairy tale. I have proven that people who represent themselves as plaintiffs in the federal courts in Atlanta always lose. We have a right to represent ourselves in court, but we automatically lose. **Order Monetary Sanctions against Parties they want to Damage:** The criminal judges inflict damage on parties who aren't favored by ordering monetary sanctions against them. They inflict financial punishment to break people. **Refuse to Disqualify Themselves:** The Constitution and case law clearly provide that we are supposed to be entitled to a fair and impartial judge, but the corrupt judges simply ignore the law. They refuse to disqualify themselves so they can inflict damage on parties who aren't favored. **Violate their Oath of Office and the Code of Judicial Conduct:** Like the rules of civil procedure, a judge's Oath of Office and Code of Judicial Conduct READ great. But the judges pay no attention to the Oath or Code. When they intentionally violate their Oath and the Code of Judicial Conduct, they are intentionally damaging a party. **Conspire with their Fellow Judges and Judicial Employees:** The corrupt judges commit conspiracy with their fellow judges and judicial employees. They often need help from other judges as well as law clerks, the employees in the Office of the Clerk of the Court, and others. **Allow Perjury:** Dishonest judges allow a favored party to lie and cheat. The felony of perjury is ignored. This is an excellent way for a crooked judge to allow a favored party who is dishonest to obstruct justice. **Deny Hearings:** In the federal courts in Fulton County, it is extremely difficult to get a hearing. **Practice Simulated Litigation:** Dishonest judges don't issue valid orders, and they don't maintain legal dockets. I guess this makes it easier for them to manipulate things. Many illegal orders have been issued and are void. **Dismiss Cases or Grant Summary Judgments:** Dishonest judges ignore the law and violate the law by dismissing cases or by granting summary judgment. This is done regularly. This keeps the honest party from the right to have a jury make the decision. **Deny Jury Trials:** Judges corrupt the judicial process by depriving parties of a jury trial. Juries can't be controlled by the judges to ensure that their favored party wins, so judges end cases before the people who should win can reach a jury.

I have not brought most of the evidence on this because it involves many orders and motions. I respectfully request that I be allowed to bring this documentation at your next jury session.