UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA -- ATLANTA DIVISION

WILLIAM M. WINDSOR, Plaintiff	)	
v.	)	CIVIL ACTION NO.
JUDGE WILLIAM S. DUFFEY, MAID OF THE MIST CORPORATION, MAID OF THE MIST STEAMBOAT COMPANY, LTD., JUDGE ORINDA D. EVANS, JUDGE JULIE E. CARNES, JUDGE JOEL F. DUBINA, JOHN LEY, AND JAMES N. HATTEN, Defendants.	)	1:11-CV-01922-TWT

PLAINTIFF WILLIAM M. WINDSOR'S REPLY TO THE FEDERAL DEFENDANTS' OPPOSITION TO MOTION TO RECUSE JUDGE THOMAS W. THRASH; AND MOTION TO STRIKE

Comes Now Plaintiff William M. Windsor ("Windsor" or "Plaintiff"), and files PLAINTIFF WILLIAM M. WINDSOR'S REPLY TO THE FEDERAL DEFENDANTS' OPPOSITION TO MOTION TO RECUSE JUDGE THOMAS W. THRASH; AND MOTION TO STRIKE.

1. Windsor's motion to recuse is proper and should be granted. The letter of the law is quite clear. Thomas Woodrow Thrash ("TWT") will be violating Windsor's legal and constitutional rights if he does not recuse himself or if he is not disqualified.

THE DEFENDANTS' OPPOSITION VIOLATES THE N.D.GA LOCAL RULES, SO THE MOTION MUST BE STRICKEN AND DENIED.

2. The DEFENDANTS' OPPOSITION must be stricken as it fails to include an affidavit in support of the so-called statements of fact contained therein.

3. The Rules provide that all motions that rely on facts must have an affidavit attached. There was no affidavit filed with the DEFENDANTS' OPPOSITION. (L.R 7.1A.(1) NDGa.) (Catch Curve, Inc. v. Graphnet, Inc., Case No. 1:06-cv-2386 (N.D. Ga. Sept. 16, 2008).)

THE "BACKGROUND" SECTION OF THE DEFENDANTS' OPPOSITION IS FILLED WITH FALSE STATEMENTS, AND IT MUST BE STRICKEN AS IT IS NOT SUPPORTED BY AFFIDAVIT AS REQUIRED BY THE RULES

4. Much said in the so-called "Background and Procedural History" in this Motion is false and/or deceptive. Virtually every ruling mentioned was improper, and Windsor will have absolutely no problem proving that to an honest judge or any jury. Windsor has proof that virtually every order issued in any matter involving him in the N.D.Ga and the Eleventh Circuit was bogus. The orders disregarded the facts, the statutes, and the binding precedent case law. Windsor has all of the proof organized, so it will be an easy task to present this proof. Virtually all of it is in the court dockets, each of which is referenced and incorporated herein in their entirety as if attached hereto.

5. The claim on page 7 ¶2 that Windsor "essentially re-alleged his claims in Windsor v. Judge Orinda D. Evans, No. 1:09-cv-2027-WSD...." is totally false and malicious. The Verified Complaint in Civil Action 1:09-CV-02027-WSD ("MIST-2") and the Verified Complaint in 1:11-CV-01923-TWT ("01923") are referenced and incorporated herein as if attached hereto. An analysis of the two actions is provided in Exhibit 1 hereto, a spreadsheet prepared by Windsor. There were 11 defendants in MIST-2 and 56 in 01923; only one defendant is in both cases, so there are 55 different Defendants in 01923. 100% of the Factual Background that is totally unique in each of the two actions. There were 37 claims in MIST-2. There are 12 in 01923. Only 8 of the 37 are repeated, but none of the Factual Background in 01923 is in MIST-2, and only one Defendant is the same. The false and malicious claim that Windsor "essentially re-alleged his claims in Windsor v. Judge Orinda D. Evans, No. 1:09-cv-2027-WSD...." requires that the U.S. Attorney be sanctioned and that the DEFENDANTS' OPPOSITION BE STRICKEN.

6. The court orders that claim Windsor filed anything frivolous or improper are without any factual or legal basis whatsoever, and they constitute fraud upon the court, obstruction of justice, perjury, and more by those who masqueraded as judges when these outrageous orders were issued by these

racketeers.

7. Judge Evans and Judge Duffey have committed perjury again and again and again. Nothing that they write should be believed.

8. The idea that Windsor's litigation is frivolous is absurd. Windsor is battling a band of criminals, and nothing that he has done has ever been frivolous.

9. Windsor's actions include violations of the Georgia RICO Act by the Defendants. The corrupt, frivolous, dishonest, crooked, criminals are Defendants. Windsor is the good guy. Defendants are bad guys.

THE DEFENDANTS VIOLATE THE GEORGIA RULES OF PROFESSIONAL CONDUCT AND FRCP RULE 11 BY MAKING ARGUMENTS ABOUT RECUSAL THAT THEY KNOW ARE FALSE.

10. Recusal does not require extra-judicial bias. So provides the U.S. Supreme Court binding precedent on recusal. The Defendants fail to disclose essential statements made in the case law that they cite, and they ignore case law that they are well aware of from documents provided to them by Windsor in other matters.

11. The Defendants cite five Eleventh Circuit cases and one Fifth Circuit case. These decisions do not have precedential value as to extra-judicial bias because the United States Supreme Court made it absolutely clear in 1994 that the

source of the impartiality of the court need not necessarily stem from an extra-judicial source:

> "It is wrong in theory...to suggest, as many opinions have, that 'extrajudicial source' is the only basis for establishing disqualifying bias or prejudice. ... A favorable or unfavorable predisposition can also deserve to be characterized as 'bias' or 'prejudice' because, even though it springs from the facts adduced or the events occurring at trial, it is so extreme as to display clear inability to render fair judgment. (***Liteky v US***, 510 US 540, at 551 (1994).) "The fact that an opinion held by a judge derives from a source outside judicial proceedings is not a necessary condition for 'bias or prejudice' recusal...." (***Liteky***, at 554.) Indeed, ***Liteky*** noted approvingly the Court's earlier ruling in ***Berger v. United States***, 255 U.S. 22, 31, 41 S.Ct. 230, 232, 65 L.Ed. 481 (1921), requiring recusal on the basis of judicial remarks made in a prior proceeding. ***Liteky v. United States***, 114 S.Ct. 1147, 127 L.Ed.2d 474 (1994). See also ***Bell v. Chandler***, 569 F.2d 556, 559 (10th Cir.1978); ***United States v. Daley***, 564 F.2d 645, 651 (2d Cir.1977), cert. denied, 435 U.S. 933, 98 S.Ct. 1508, 55 L.Ed.2d 530 (1978). ***In re IBM***, 45 F.3d 641 (2nd Cir. 1995.)

THE IMPARTIALITY OF TWT IS PROVEN

12. The impartiality of TWT has been proven in his own words. The standard for review in recusal is not what TWT thinks; it is what reasonable people think. In this civil action, TWT has a preconceived idea from information that came from outside the case. On the fourth day after this Civil Action was assigned to hi, before any conferences or hearings, and before the Defendants filed any affidavits or evidence of any type, TWT wrote: "This is the latest in a series of frivolous, malicious and vexatious lawsuits filed by the Plaintiff." This is a STATE DECLARATORY JUDGMENT ACTION! It can't be frivolous,

malicious, or vexatious. The only evidence before TWT was the sworn Verified Complaint and sworn affidavits of Windsor. A reasonable person would say that branding someone as "frivolous, malicious and vexatious" based solely on his sworn affidavits under penalty of perjury, without considering any other facts, provides a textbook example of "impartiality might reasonably be questioned."

13. The timing of TWT's words proves he established a negative opinion of Windsor from extra-judicial sources. TWT has expressed at the beginning of the case that Windsor has already lost because TWT has already decided the case in favor of his associates. Judges have been disqualified for far less.

> "It was in the course of these rulings that Judge Hauk made the remark that Gupta was a "bad apple." **Because...Gupta had never previously appeared before the Judge, the Judge's opinion stemmed from an extrajudicial source**. See ***Pau***, 928 F.2d at 885. Moreover, regardless of the merits of the rulings on the withdrawal of claim and other matters, **the timing of Judge Hauk's remark indicates that he based the rulings on his negative opinion of Gupta**." "Accordingly, Judge Hauk abused his discretion by failing to recuse himself." "We therefore reverse the judgment and remand this case for further proceedings before a different Judge. (***United States v. Real Property Located at 25445 Via Dona Christa***, 959 F.2d 243 (9th Cir. 04/10/1992).) [**emphasis added**.]

14. Windsor contends that the average reasonable person, knowing all the facts, would easily conclude that TWT's impartiality could be questioned and that TWT cannot possibly give Windsor a fair and impartial hearing so he should be removed and replaced by an impartial judge.

15. TWT did not know Windsor when he branded him "frivolous, malicious and vexatious." TWT has demonstrated a bias against pro se parties and anyone who would take action against a fellow judge. TWT had a preconceived idea of this case from information that came from outside the case.

16. There are two forms of bias at work in this Civil Action. TWT has a pervasive antagonistic bias against Windsor, and TWT has a pervasive bias in favor of the Defendants. This is demonstrated in the Affidavit of Prejudice.

17. TWT's prejudice for his fellow judges is similarly "extrajudicial." While the prejudice undoubtedly comes from his personal relationship with his friends, the prejudice did not come from an in-courtroom experience with Windsor.

18. Justice Scalia has stated that so-called "extrajudicial bias" includes earlier judicial proceedings by the same judge: "Douglas' use of the term 'extrajudicial' in ***U.S. v. Grinnell Corp***. 384 U.S. 563 (1966) simply meant 'a source outside the judicial proceeding at hand – which would include as extrajudicial sources earlier judicial proceedings conducted by the same judge....'" (***Liteky v. United States***, 510 U.S. 540 at 551, 114 S.Ct. 1147, 1157, 127 L.Ed.2d 474 (1994).)

THE STANDARD FOR RECUSAL DOES NOT REQUIRE EXTRAJUDICIAL BIAS.

19. The distinction of actions or comments that are categorized as "extra-judicial" or not is not the determining factor.

20. The Defendants erroneously claims "any bias must be "personal and extrajudicial . . . ." citing 11th Circuit cases from 1990, 1983, 1977, 1994, and 1993 (***McWhorter v. City of Birmingham, Hamm v Board of Regents of State of Florida, United States v. Archbold-Newball, Loranger v. Stierheim, and United States v. Chandler)***. The Defendants have taken these cases out of context, so they must all be disregarded.

21. ***McWhorter v. City of Birmingham*** **makes no specific pronouncement that bias must be extrajudicial** as the Defendants maliciously attempt to portray. ***McWhorter*** was decided by the Eleventh Circuit in 1990. ***Liteky*** was decided by the Supreme Court in 1994, so ***McWhorter*** is no longer applicable on this point. It uses the term "ordinarily," and that isn't MUST as the Defendants claimed.

22. ***Hamm v Board of Regents of State of Florida*** **makes no specific pronouncement that bias must be extrajudicial**. It uses the term "generally," and that isn't MUST as the Defendants claimed. ***Hamm*** was decided by the Eleventh Circuit in 1983. ***Liteky*** was decided by the Supreme Court in 1994, so ***Hamm*** is no longer applicable on this point.

23. ***United States v. Archbold-Newball*** **makes no specific pronouncement that bias must be extrajudicial**. It does not even address the issue. It claims bias must be personal rather than judicial, which prejudice for friends and co-workers is. ***United States v. Archbold-Newball*** does not apply because it was decided by the Fifth Circuit in 1977. This case hasn't been cited by the Fifth Circuit in 25 years. ***Liteky*** was decided by the Supreme Court in 1994.

24. ***Loranger v. Stierheim***, 10 F.3d 776, 780 (11th Cir. 1994) **makes no specific pronouncement that bias must be extrajudicial**. It uses the term "generally" and ordinarily." Defendants claim these cases say "MUST," but they clearly do not. In ***Loranger***, the complaints about the trial judge were complaints about the judge's timeliness and rulings. This is not anywhere near the level of a decision against Windsor established at the beginning of the action with a declaration in an order that Windsor is "frivolous, malicious and vexatious."

25. The Defendants also rely on ***United States v. Chandler***: "Likewise, a judge's rulings in a related case may not **ordinarily** serve as the basis for recusal." ***United States v. Chandler***, 996 F.2d 1073, 1104 (11th Cir. 1993). [**emphasis added**.] ***United States v. Chandler*** is really off base. Compare the words of the judge in ***United States v. Chandler*** to the words of TWT, and this Court will see that the judge in Chandler said nothing like the biased statements of TWT.

26. ***Chandler*** was actually quoting from ***McWhorter v. City of Birmingham***, 906 F.2d 674, 678 (11th Cir. 1990). ***McWhorter*** was decided by the Eleventh Circuit in 1990. ***Liteky*** was decided by the Supreme Court in 1994, so ***McWhorter*** is no longer applicable on this point.

27. So, the cases cited by the Defendants do not stand for what they claim. Even more important, TWT is so biased that it wouldn't matter what any case says. As a matter of law, as the Supreme Court said in ***Liteky***, supra at 555, the question is whether the remarks of the court "reveal such a high degree of favoritism or antagonism as to make fair judgment impossible."

28. Windsor is entitled, under the amendments to the Constitution, under the decisions of the U.S. Supreme Court and other federal courts of appeal, and under the laws of Congress, to an impartial and fair judge at all stages of the proceeding.

> "the negative bias or prejudice from which the law of recusal protects a party must be grounded in some personal animus or malice that the judge harbors against him, of a kind that a fair-minded person could not entirely set aside when judging certain persons or causes." ***U.S. v. Balistrieri***, 779 F.2d 1191, 1201 (7th Cir. 1985), *cert. denied*, 477 U.S. 908 (1986).

29. ***Action, Accountability, and the Judiciary -- United States Federal Judicial Recusal Reform In a New Century*** by Brian Downing (2001) discusses the "extra-judicial" concept and explains that it was a mistake. ***Liteky*** explained

what the Supreme Court intended as far as bias. (***Liteky v. U.S.***, 510 U.S. 540, 114 S.Ct. 1147, 127 L.Ed.2d 474 (U.S. 03/07/1994).) ***Liteky***:

> **"...there is no per se rule requiring that the alleged partiality arise from an extra-judicial source."** [emphasis added.] "The fact that an opinion held by a judge derives from a source outside judicial proceedings is not a necessary condition for "bias or prejudice" recusal." "...neither the presence of an extra-judicial source necessarily establishes bias, nor the absence of an extra-judicial source necessarily precludes bias...." "...opinions formed by the judge on the basis of facts introduced or events occurring in the course of the current proceedings, or of prior proceedings, do not constitute a basis for a bias or partiality motion unless they display a deep-seated favoritism or antagonism that would make fair judgment impossible."
>
> "Grinnell, therefore, provides a less than satisfactory rationale for reading the extra-judicial source doctrine into§144 or the disqualification statutes at issue here. It should come as little surprise, then, that the Court does not enlist Grinnell to support its adoption of the doctrine."
>
> "...prejudiced opinions based upon matters disclosed at trial may rise to the level where recusal is required."
>
> "From this, the Court is correct to conclude that an allegation concerning some extra-judicial matter is neither a necessary nor a sufficient condition for disqualification under any of the recusal statutes."
>
> "A judge may find it difficult to put aside views formed during some earlier proceeding. In that instance we would expect the judge to heed the judicial oath and step down...."
>
> "In matters of ethics, appearance and reality often converge as one. See ***Offutt v. United States***, 348 U.S. 11, 14, 99 L. Ed. 11, 75 S. Ct. 11 (1954) ("Justice must satisfy the appearance of justice"); ***Ex parte McCarthy***, [1924] 1 KB 256, 259 (1923) ("Justice should not only be done, but should manifestly and undoubtedly be seen to be done"). I do not see how the appearance of fairness and neutrality can obtain if the bare possibility of a fair hearing is all that the law requires. Cf. ***Marshall v. Jerrico, Inc.***,446

U.S. 238, 242, 64 L. Ed. 2d 182, 100 S. Ct. 1610 (1980) (noting the importance of "preserving both the appearance and reality of fairness," which " 'generates the feeling, so important to a popular government, that justice has been done' ") (quoting ***Joint Anti-Fascist Refugee Comm. v. McGrath***,341 U.S. 123, 172, 95 L. Ed. 817, 71 S. Ct. 624 (1951) (Frankfurter, J., concurring))."

"Although the source of an alleged disqualification may be relevant in determining whether there is a reasonable appearance of impartiality, that determination can be explained in a straightforward manner without resort to a nearly dispositive extra-judicial source factor. I would apply the statute as written to all charges of partiality, extra-judicial or otherwise, secure in my view that district and appellate judges possess the wisdom and good sense to distinguish substantial from insufficient allegations and that our rules, as so interpreted, are sufficient to correct the occasional departure."

THE DEFENDANTS FALSELY CLAIM THAT TWT MADE DECISIONS IN THIS CIVIL ACTION THAT WINDSOR DISAGREES WITH.

30. TWT didn't make any decisions; he has made extra-judicial biased statement on the merits of Windsor's actions with absolutely zero evidence.

WINDSOR HAS MET THE SPECIFIC REQUIREMENTS OF 28 U.S.C. § 144, AND THE DEFENDANTS FAILED TO ADDRESS 28 U.S.C. § 144 AND 12 OTHER LEGAL BASES FOR RECUSAL IN THEIR OPPOSITION.

31. Windsor has met the specific requirements of 28 U.S.C. § 144. The Defendants expressed no opposition to this. The Defendants also expressed no opposition to recusal based upon Canons 1, 2, and 3 of the Code of Judicial Conduct, all other relevant statutory and state and federal case law, as well as the First, Fifth, Sixth, Eighth, and Fourteenth Amendments to the United States Constitution, the Due Process Clause of the Fifth Amendment to the U.S.

Constitution, the Constitution of the State of Georgia, and the Court's inherent powers.

THE SO-CALLED RULE OF NECESSITY DOES NOT APPLY.

32. The Defendants make the absolutely outrageous claim that a prejudiced, biased judge must not recuse himself. This violates the Constitution, the Bill of Rights, and thousands of cases. This judge-made rule violates the letter of the law in 28 U.S.C. § 455(a), which provides: "Any justice, judge, or magistrate of the United States **shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned**." [**emphasis added**.]

33. All federal judges have not been disqualified. There are thousands of federal judges in the U.S. to whom this Civil Action may be assigned.

> "Every United States circuit judge in the country is eligible to be sent to Jefferson County to do judicial work. See 28 U.S.C. § 291 (assignment of circuit judges); see also id. § 292 (assignment of district judges)." (Jefferson County v. Acker, 92 F.3d 1561 (11th Cir. 08/30/1996).)

34. The Defendants wanted the matter in federal court, so they should have no problem with assigning this case to a judge from a district court in the Ninth Circuit. The better solution for all, however, is to simply require that the case be remanded to the Fulton County Superior Court.

35. The number one priority of any court in a civil action is fairness and impartiality of the judge.

"As said by the Supreme Court in ***Berger v. United States***, supra,"* * * the tribunals of the county shall not only be impartial in the controversies submitted to them but shall give assurance that they are impartial, free, to use the words of the section, from any `bias or prejudice' that might disturb the normal course of impartial judgment." See also ***In re Murchison***, supra, 349 U.S. 133, 136, 75 S.Ct. 623, 625, 99 L.Ed. 942. One of the fundamental rights of a litigant under our judicial system is that he is entitled to a fair trial in a fair tribunal, and that fairness requires an absence of actual bias or prejudice in the trial of the case. If this basic principle is violated, the judgment must be reversed. (***In re Murchison***, supra; ***Berger v. United States***, supra.)

THE AVERAGE REASONABLE PERSON WOULD DOUBT THAT TWT COULD BE IMPARTIAL.

36. The impartiality of TWT must be questioned. TWT simply cannot slander Windsor as "scurrilous and irresponsible" and then pretend he can be impartial as he has done. This is outrageous! The standard for review in recusal is not what TWT thinks; it is what reasonable people think.

Selkridge v. United of Omaha Life Ins. Co., 360 F.3d 155, 167 (3d Cir. 2004) (quoting ***Krell v. Prudential Ins. Co. of Am.*** (***In re Prudential Ins. Co. Am. Sales Practice Litig. Agent Actions***), 148 F.3d 283, 343 (3d Cir. 1998); ***Liteky v. United States***, 510 U.S. 540, 550 (1994).) ""the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable. ***Withrow v. Larkin***, 421 U. S. 35, 47 (1975). (***Caperton v. A. T. Massey Coal Co., Inc.***, 129 S.Ct. 2252, 173 L.Ed.2d 1208 (U.S. 06/08/2009).) (***Berger v. United States***, 255 U.S. 22, (1921), 41 S.Ct. 230, 65 L.Ed. 481 1921),

37. If a clerk goes out into public and asks 100 people whether a judge who called someone evil and mentally and financially incapable might be impartial

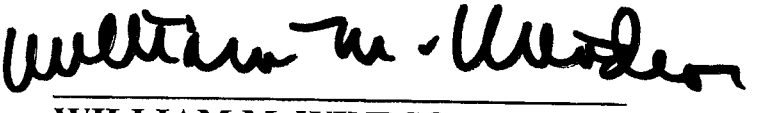
if that person later appeared as a party in his court, the result will be overwhelming that the impartiality must be questioned. Windsor has done so and knows.

38. TWT's void of impartiality in this matter has already prejudiced the case against Windsor. TWT has made biased rulings. TWT is not allowing motions to be filed or considered properly. TWT has "enacted" changes to FRCP rules that disadvantage Windsor. TWT established deadlines that seriously compromised Windsor.

WHEREFORE, having now filed this Reply, the Motion, sworn Affidavit of Perjury, and Certificate, Plaintiff Windsor respectfully requests as follows:

(1) that the Court grant PLAINTIFF WILLIAM M. WINDSOR'S MOTION TO RECUSE TWT;
(2) that the Court strike the Defendants' Opposition;
(3) that the Court issue an order disqualifying TWT;
(4) that the Court strike all orders by TWT and require the Defendants to file timely answers to the Verified Complaint, or in the alternative that the Court conduct a hearing to reconsider the orders issued by TWT;
(5) that the Court grant a conference with all parties; and
(6) that the Court grant such other and further relief as justice requires in association with this Motion.

Submitted, this 28th day of June 2011.



WILLIAM M. WINDSOR
Pro Se

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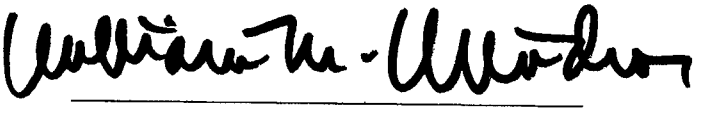
Facsimile: 770-234-4106
Email: williamwindsor@bellsouth.net

VERIFICATION OF WILLIAM M. WINDSOR

I, William M. Windsor, swear that I am authorized to make this verification and that the facts alleged in the foregoing MOTION are true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters I believe them to be true.

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 28th day of June, 2011.



William M. Windsor

CERTIFICATE OF COMPLIANCE

As required by Local Rule 7.1D, N.D. Ga., I hereby certify that this pleading has been prepared in Times New Roman 14-point font, one of the font and point selections approved by this Court in Local Rule 5.1B, N.D. Ga.

William M. Windsor

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing REPLY by fax and mail with sufficient postage addressed to:

CHRISTOPHER J. HUBER
ASSISTANT U.S. ATTORNEY
Georgia Bar No. 545627
600 Richard B. Russell Federal Bldg.
75 Spring Street, S.W. -- Atlanta, Georgia 30303
Telephone: (404) 581-6292 -- Facsimile: (404) 581-6181
Email: chris.huber@usdoj.gov

I have also prepared a copy for each Defendant to be served with the Summons and Complaint.

This 28th day of June, 2011.

WILLIAM M. WINDSOR
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Exhibit 1

Causes of Action	1:09-CV-02027	1:11-CV-01923
Defendants	11	56
Defendants included in Both Actions (only Judge Evans)	1	1
Rule 60(d)	x	
Professional Misconduct	x	
Fraud Upon the Courts -- Rule 60(d)(1) and the Court's Inherent Powers	x	
Georgia RICO Act	x	x
Federal Civil RICO Act	x	
Federal RICO Conspiracy Offense	x	
Theft by Deception -- O.C.G.A. 16-8-3	x	
False Statements to State – Violation of O.C.G.A. 16-10-20	x	
Tampering with Evidence – O.C.G.A. 16-10-94	x	x
Violation of Due Process and Deprivation of Rights – 42 U.S.C. § 1983 and Bivens	x	
Violation of Due Process and Deprivation of Rights – 42 U.S.C. § 1985(2)	x	
Violation of Constitutional Rights	x	
Judicial Misconduct	x	
Fraud	x	x
Common Law Fraud	x	
Conspiracy	x	x
Set Aside for Perjury -- O.C.G.A. 17-1-14	x	x
Breach of Legal Duty -- o.c.g.a. 51-1-6	x	x
Wire Fraud – Violation of 18 U.S.C. § 1343	x	
Mail Fraud – Violation of 18 U.S.C. § 1341	x	
False Swearing – Making False Statements – Violation of 18 U.S.C. § 1001	x	
Perjury – Violation of 18 U.S.C. § 1621	x	
Perjury – Violation of 18 U.S.C. § 1623	x	
Perjury – Violation of O.C.G.A. 16-10-70	x	x
False Unsworn Statements – Violation of 18 U.S.C. § 1746	x	
Obstruction of Justice -- Conspiracy to Defraud United States – 18 U.S.C. § 371	x	
Obstruction of Justice and Witness Tampering -- 18 U.S.C. § 1503	x	
Subornation of Perjury – Violation of 18 USC § 1001	x	
Subornation of Perjury – Violation of 18 USC § 1503	x	
Subornation of Perjury – Violation of 18 USC § 1621	x	
Subornation of Perjury – Violation of 18 USC § 1623	x	
Conspiracy to Suborn Perjury – Violation of 18 USC § 1622	x	
Conspiracy to Suborn Perjury – Violation of O.C.G.A. 16-10-72	x	x
Conspiracy to Suborn Perjury – Violation of O.C.G.A. 16-10-93	x	x
Declare that all judgments in Civil Action No. 1:06-CV-0714-ODE are void.	x	
Declare that all orders in Civil Action No. 1:06-CV-0714-ODE are void.	x	
Declare that licensed ticket brokers in the State of Georgia have the right to sell any ticket lawfully obtained.	x	
VIOLATION OF LAWS AND RULES PERTAINING TO JUDGMENTS		x
Abuse Of Process		x
Violation of Georgia Constitutional Rights		x
New law that the citizens of Georgia must have some means for dealing with federal judicial corruption		x