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

SECOND AMENDED NOTICE OF APPEAL OF APPEAL NO. 11-13212-A

1. Notice is hereby given that William M. Windsor ("Windsor" or "Plaintiff") in the above-named case hereby amends the appeal filed on July 14, 2011 [Docket #46] and amended on August 1, 2011 [Docket #58]. The Appeal (No. 11-13212-A) is amended by adding orders dated August 9, 11, and 16 2011 [Docket #'s 62, 66, 67]. (Exhibits A, B, and E are true and correct copies of these Orders.) Windsor also appeals the failure to docket motions and other documents that Windsor has filed with the Clerk of the Court.

2. Windsor is merely adding the Orders of August 9, 11, and 16 2011 to the initial Appeal. (See ***Rinaldo v. Corbett***, 256 F.3d 1276 (11th Cir. 07/13/2001).) The originally appealed orders are not being attached as exhibits again. The appeal fee has already been paid. This is an amendment, not a new appeal. Amended appeals are absolutely authorized by the FRCP and case law in the Eleventh Circuit. The Clerk of the Court have illegally charged Windsor for amended appeals in the past when ***Federal Rules of Appellate Procedure*** 4(a)(4)(B)(iii) clearly states:

> "No additional fee is required to file an amended notice." (FRAP 4(a)(4)(B)(iii).)
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> See 20 James Wm. Moore, ***Moore's Federal Practice*** § 303.21[3][c] (explaining that a notice of appeal does not ordinarily include orders that have not been entered at the time a notice of appeal is filed and that, for post-notice orders, a second notice or appeal, or an amended notice of appeal, is usually necessary). (***Bogle v. Orange County Board of County Commissioners***, 162 F.3d 653 (11th Cir. 12/09/1998).)
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> "a party intending to challenge an order disposing of [a post-judgment motion] . . . must file a notice of appeal, or an **amended notice of appeal**." Federal Rules of Appellate Procedure 4(a)(4)(B)(ii) and (iii). (***Williams v. Plantation Police Dep't***, 379 Fed.Appx. 866 (11th Cir. 05/17/2010).) [**emphasis added**.]
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> See also ***Finch v. City of Vernon***, 845 F.2d 256, 259-60 (11th Cir. 1988); ***Fuller v. Terry***, 381 Fed.Appx. 907 (11th Cir. 06/03/2010); ***Davis v. Locke***, 936 F.2d 1208 (11th Cir. 07/26/1991); ***United States v. Elso***, 571 F.3d 1163 (11th Cir. 06/19/2009); ***United States v. Calles***, No. 07-10166 (11th Cir. 03/31/2008).)

3. Windsor has also moved the 11th Circuit to allow appeals filed on July 14, 2011 in Civil Actions 1:11-CV-01923-TWT, 1:11-CV-01922-TWT, AND 1:11-CV-02027-TWT to be considered as one appeal. The 11th Circuit erroneously assigned Docket #58 an Appeal No. 11-13253-A, so Windsor is also moving the Eleventh Circuit to correct that by consolidating it with Appeal No. 11-13212-A.

4. This appeal is necessary due to the violation of Windsor's Constitutional rights by Judge Thomas Woodrow Thrash ("TWT"), abuse of "discretion," fraud upon the court by TWT, perjury, and more. The appeal will be based upon abuse of discretion, violation of Constitutional rights, denial of due process, errors of law, violation of statutes, errors of fact, violations of various statutes, judicial bias, corruption, conspiracy, racketeering, and more.

5. TWT's orders were, and are, **void**. The U.S. Supreme Court has stated that if a court is "without authority, its judgments and orders are regarded as nullities." (***Elliot v. Piersol***, 1 Pet. 328, 340, 26 U.S. 328, 340 (1828).)

6. Fraud was committed in the removal of this case from the Fulton County Superior Court. This fraud means this Court does not have jurisdiction. TWT has committed fraud upon the court as has the U.S. Attorney.

7. TWT has not followed mandatory statutory procedures. TWT committed unlawful acts. TWT has violated due process. TWT is part of a

criminal racketeering enterprise. TWT has not complied with the rules, the Code of Judicial Conduct, or the Federal Rules of Civil Procedure. Upon information and belief, TWT does not have a copy of his oath of office in his chambers. This means this Court does not have subject matter jurisdiction.

8. It is clear and well established law that a judge must first determine whether the judge has jurisdiction before hearing and ruling in any case. TWT failed to do so, and his so-called orders are void. (***Adams v. State***, No. 1:07-cv-2924-WSD-CCH (N.D.Ga. 03/05/2008).) (***See Steel Co. v. Citizens for a Better Env't***, 523 U.S. 83, 94 (1998); see also ***University of S. Ala. v. The Am. Tobacco Co.***, 168 F.3d 405, 410 (11th Cir. 1999) ("[O]nce a federal court determines that it is without subject matter jurisdiction, the court is powerless to continue."). (***Jean Dean v. Wells Fargo Home Mortgage***, No. 2:10-cv-564-FtM-29SPC (M.D.Fla. 04/21/2011).) (***Taylor v. Appleton***, 30 F.3d 1365, 1366 (11th Cir. 1994).)

9. Failure to follow the mandatory requirements of the law is a further evidence of the appearance of partiality of TWT. This required recusal.

> **"Disqualification is required** if an objective observer would entertain reasonable questions about the judges impartiality. If a judge's attitude or state of mind leads a detached observer to conclude that a fair and impartial hearing is unlikely, the judge **must be disqualified**." (***Liteky v. U.S.***, 114 S.Ct. 1147 (1994).)
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> ***Rankin v. Howard*** (1980) 633 F.2d 844, cert den. ***Zeller v. Rankin***, 101 S.Ct. 2020, 451 U.S. 939, 68 L.Ed 2d 326. When a judge knows that he

lacks jurisdiction, or acts face of clearly statutes valid statutes expressly depriving him of jurisdiction, judicial immunity is lost.

"When there is no jurisdiction, there can be no discretion, for discretion is incident to jurisdiction." ***Piper v. Pearson***, 2 Gray 120, cited in ***Bradley v. Fisher***, 13 Wall 335, 20 L. Ed. 646 (1872).

10. TWT has committed treason.

Whenever a judge acts where he/she does not have jurisdiction to act, the judge is engaged in an act or acts of treason. ***U.S. v. Will***, 449 U.S. 200, 216, 101 S.Ct. 471, 66 L.Ed.2d 392, 406 (1980); ***Cohens v. Virginia***, 19 U.S. (6 Wheat) 264, 404, 5 L.Ed 257 (1821).

11. Amendment V of the U.S. Constitution provides: "No person shall be...deprived of life, liberty, or property, without due process of law...." Article 1of the Georgia Constitution provides: "No person shall be deprived of life, liberty, or property except by due process of law."

12. All of these rights have been violated.

13. TWT has improperly foreclosed Windsor's access to the court. TWT issued an injunction without giving Windsor the opportunity to be heard at a hearing. Procedural due process requires notice and an opportunity to be heard before any governmental deprivation of a property or liberty interest. (***Zipperer v. City of Fort Myers***, 41 F.3d 619, 623 (11th Cir. 1995).)

14. Meaningful access to the courts is a Constitutional right that has been denied by TWT, and this latest order denies significant rights.

(See ***Procup v. Strickland***, 792 F.2d 1069, 1072 (11th Cir. 1986) (per curiam) (en banc); ***Christopher v. Harbury***, 536 U.S. 403, 415 & n.12, 122 S.Ct. 2179, 2187 & n.12, 153 L.Ed.2d 413 (2002).)

15. There was no Show Cause order issued to Windsor as required by Eleventh Circuit law. Windsor has had no proper notice.

> Upon these findings and **consistent with Eleventh Circuit law, this Court required Plaintiff to show cause within ten days... why a Martin-Trigona injunction should not be entered**. (See ***Procup v. Strickland***, 792 F.2d 1069 (11th Cir. 1986); ***Torres v. McCoun***, No. 8:08-cv-1605-T-33MSS (M.D.Fla. 09/10/2008); ***Western Water Management, Inc. v. Brown***, 40 F.3d 105, 109 (5th Cir. 1994).) [**emphasis added**.]

16. Every judge or government attorney takes an oath to support the U.S. Constitution. Whenever any judge violates the Constitution in the course of performing his/her duties, as TWT has, then he has defrauded not only the Plaintiff involved, but has also the government.

17. The Court of Appeals has jurisdiction pursuant to 28 U.S.C. § 1292(a)(1) because one of the district court's rulings (1) imposed an injunction; or (2) had the practical effect of an injunction; or (3) worked a modification of an injunction. The PROTECTIVE ORDER denies rights to Windsor and implicitly enjoins Windsor from future exercise of rights.

18. Injunctions are appealable pursuant to 28 U.S.C. §1292(a). A court order prohibiting someone from doing some specified act is an injunction. The PROTECTIVE ORDER prohibits Windsor from filing anything.

See ***Black's Law Dictionary*** 784 (6th ed. 1990) (defining "injunction" as "[a] court order prohibiting someone from doing some specified act or commanding someone to undo some wrong or injury"). (***Nken v. Holder***, 129 S.Ct. 1749, 173 L.Ed.2d 550 (U.S. 04/22/2009).) (See also ***KPMG, LLP v. SEC***, 289 F.3d 109, 124 (D.C. Cir. 2002); ***Lundberg v. United States***, No. 09-01466 (D.D.C. 07/01/2010).)

"...we have jurisdiction under 28 U.S.C. § 1292(a)(1) (1982), which permits an immediate appeal from the issuance of a new or modified injunction. It is immaterial that the court characterized the March order as a finding of contempt. 'an injunction does not cease to be appealable under section 1292(a) (1) merely because it is contained in an order for civil contempt.' ***Szabo v. U.S. Marine Corp.***, 819 F.2d 714, 718 (7th Cir. 1987); see also ***I.A.M. Nat'l Pension Fund Benefit Plan A v. Cooper Indus.***, 252 U.S. App. D.C. 189, 789 F.2d 21, 23-24 (D.C. Cir.), cert. denied, 479 U.S. 971, 107 S. Ct. 473, 93 L. Ed. 2d 417 (1986). Accordingly, we have jurisdiction over Eastern's appeal under 28 U.S.C. § 1292(a) (1)." (06/07/88 ***International Association v. Eastern Airlines, Inc.***, No. 88-7079, UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT.)

...preliminary injunctions are appealable orders under 28 U.S.C. § 1292(a)(1). See, e.g., ***El Paso Natural Gas Co. v. Neztsosie***, 526 U.S. 473, 482 (1999).

...we have appellate jurisdiction to review the District Court's granting or denying of a preliminary injunction. See ***Davis v. Pension Benefit Guar. Corp.***, 571 F.3d 1288, 1291 (D.C. Cir. 2009). A restraining order lasting longer than 14 days generally is considered an injunction, the granting or denying of which is subject to appeal. See ***Sampson v. Murray***, 415 U.S. 61, 86 (1974); ***United States v. E-Gold, Ltd.***, 521 F.3d 411, 414-15 (D.C. Cir. 2008) (order restraining "assets pending trial and judgment" is an "injunction" under 28 U.S.C. § 1292(a)(1)). (***In re Any and all Funds or Other Assets, in Brown Brothers Harriman & Co. Account #8870792 in the Name of Tiger Eye Investments Ltd.***, 613 F.3d 1122 (D.C.Cir. 07/16/2010).)

Under 28 U.S.C. § 1292(a)(1), the court has jurisdiction to review "[i]nterlocutory orders of the district courts of the United States ... granting, continuing, modifying, refusing, or dissolving injunctions, or refusing to dissolve or modify injunctions...." 28 U.S.C. § 1292(a)(1). Although the provision is typically invoked to appeal preliminary injunctions, it can be invoked to appeal permanent injunctions that are interlocutory in nature. ***Smith v. Vulcan Iron Works***, 165 U.S. 518 (1897); see also ***Ty, Inc. v. Publ'ns Int'l Ltd.***, 292 F.3d 512, 516 (7th Cir. 2002), cert. denied, 123 S. Ct. 892 (2003); ***Cohen v. Bd. of Trs. of Univ. of Med. & Dentistry***, 867 F.2d 1455, 1464 n.7 (3d Cir. 1989); ***CFTC v. Preferred Capital Inv. Co.***, 664 F.2d 1316, 1319 n.4 (5th Cir. 1982); 16 Charles Alan Wright & Arthur R. Miller, ***Federal Practice and Procedure*** § 3924 (2d ed. 1996). (***National Railroad Passenger Corporation v. ExpressTrak, L.L.C.***, 330 F.3d 523 (D.C.Cir. 06/06/2003).)

Under 28 U.S.C. § 1292(a)(1), circuit courts have jurisdiction to review "[i]nterlocutory orders . . . granting, continuing, modifying, refusing or dissolving injunctions." Regardless of how the district court may choose to characterize its order, **section 1292(a)(1) applies to any order that has "the practical effect of granting or denying an injunction**," so long as it also "might have a serious, perhaps irreparable, consequence, and . . . can be effectually challenged only by immediate appeal." ***I.A.M. Nat'l Pension Fund Benefit Plan A v. Cooper Indus., Inc.***, 789 F.2d 21, 23-24 (D.C. Cir. 1986) (internal quotation marks omitted). [**emphasis added**.]

19. In this matter, practicality and fundamental fairness require that the orders be appealable. TWT has obliterated Windsor's Constitutional rights and rights to due process.

20. Windsor's fundamental rights are seriously prejudiced by the appealed orders. Many jurisdictions make an exception for decisions that are particularly prejudicial to the rights of one of the parties. The Court of Appeals has the recognized right to do what is fair and practical. The Court of Appeals cannot

allow TWT to blatantly violate Windsor's rights. The courthouse doors have been closed to Windsor in violation of extensive case law. Windsor has been denied the right to petition the government for redress of grievances. Windsor has been denied rights pursuant to the Constitution and Bill of Rights.

> It is sometimes appropriate to give the finality requirement a practical rather than a technical construction. ***Firestone Tire & Rubber Co. v. Risjord***, 449 U.S. 368, 375, 66 L. Ed. 2d 571, 101 S. Ct. 669 (1981). See ***In Re Coordinated Pretrial Proceedings***, 747 F.2d 1303, 1305 (9th Cir. 1984). "Final . . . does not necessarily mean the last order possible to be made in a case." ***Gillespie v. United States Steel Corp.***, 379 U.S. 148, 152, 13 L. Ed. 2d 199, 85 S. Ct. 308 (1964). (***United States v. Washington***, 761 F.2d 1404 (9th Cir. 05/28/1985).)

21. Some of the appealed orders may be considered "collateral orders." It deals with an important issue that is completely separate from the underlying civil action, and it is effectively unreviewable on appeal from a final judgment because the impact cannot be reversed, and no compensation is available for the wrongdoing.

> In order to be considered a collateral order, it would have to "...resolve an important issue completely separate from the merits of the action, and be effectively unreviewable on appeal from a final judgment." ***Coopers & Lybrand v. Livesay***, 437 U.S. 463, 468 (1978) (footnote omitted). See ***Cohen v. Beneficial Indus. Loan Corp.***, 337 U.S. 541 (1949) (setting out the collateral order doctrine). (See also ***Kassuelke v. Alliant Techsystems, Inc.***, 223 F.3d 929, 931 (8th Cir. 2000).)
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> To be appealable as a collateral order under ***Cohen***, "the order must conclusively determine the disputed question, resolve an important issue completely separate from the merits of the action, and be effectively

unreviewable on appeal from a final judgment." ***Risjord***, 449 U.S. at 375 (quoting ***Coopers & Lybrand v. Livesay***, 437 U.S. 463, 468, 57 L. Ed. 2d 351, 98 S. Ct. 2454 (1978)). (***United States v. One 1986 Ford Pickup***, 56 F.3d 1181 (9th Cir. 06/08/1995).)

22. In this matter, TWT issued an order that had immediate and irreparable impact on Windsor. The statute of limitations is running on claims that Windsor needs to file, and TWT is blocking Windsor from filing anything and taking action to protect his rights. When the statute of limitations expires, Windsor suffers irreparable harm. If Windsor is not given the opportunity to have his motions for remand considered, he will be irreparably harmed as he will have no recourse.

> The courts of appeal have considered "irreparable harm" relevant in determining whether jurisdiction is available pursuant to the collateral order doctrine -- which the Government does not invoke -- but not pursuant to § 1291 itself. See ***Trout***, 891 F.2d at 335; ***Rosenfeld***, 859 F.2d at 721-22; ***Palmer v. City of Chicago***, 806 F.2d 1316, 1318 (7th Cir. 1986).
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> ***Forgay v. Conrad***, 47 U.S. (6 How.) 201, 204 (1848), which held an interlocutory appeal will lie from an order that "directs the property in dispute to be delivered to the complainant" and "subject[s the appellant] to irreparable injury."

23. TWT has never had any jurisdiction over this Civil Action.

24. Orders issued by TWT are invalid. Orders have not been signed, issued under seal, or signed by the Clerk of the Court in violation of 28 U.S.C. 1691.

The word "process" at 28 U.S.C. 1691 means a court order. See ***Middleton Paper Co. v. Rock River Paper Co.***, 19 F. 252 (C.C. W.D. Wisconsin 1884); ***Taylor v. U.S.***, 45 F. 531 (C.C. E.D. Tennessee 1891); ***U.S. v. Murphy***, 82 F. 893 (**DCUS** Delaware 1897); ***Leas & McVitty v. Merriman***, 132 F. 510 (C.C. W.D. Virginia 1904); ***U.S. v. Sharrock***, 276 F. 30 (**DCUS** Montana 1921); ***In re* Simon**, 297 F. 942, 34 ALR 1404 (2nd Cir. 1924); ***Scanbe Mfg. Co. v. Tryon***, 400 F.2d 598 (9th Cir. 1968); and ***Miles v. Gussin***, 104 B.R. 553 (Bankruptcy D.C. 1989).

25. These civil actions are now on appeal and are stayed.

26. In the words of Defendant Duffey:

("[A] federal district court and a federal court of appeals should not attempt to assert jurisdiction over a case simultaneously. The filing of a notice of appeal is an event of jurisdictional significance--it confers jurisdiction on the court of appeals and divests the district court of its control over those aspects of the case involved in the appeal."). (***Bryant v. Jones***, No. 1:04-cv-2462-WSD (N.D.Ga. 01/10/2007).)

27. Windsor has many orders from the United States Court of Appeals for the Eleventh Circuit that provide that this civil action is stayed and hundreds from federal courts everywhere. See ***Mahone v. Ray***, 326 F.3d 1176, 1179 (11th Cir. 2003) and hundreds of others.

28. TWT has demonstrated pervasive bias, and he lost jurisdiction when he failed to recuse himself. A study of pro se cases that TWT has handled reveals that TWT has a proven overwhelming bias against pro se plaintiffs. TWT has an "extra-judicial" bias against pro se parties. According to Windsor's review of every case TWT has handled in his career using www.versuslaw.com, no pro se

plaintiff has ever won in TWT's court; 90% of pro se cases are dismissed, and 10% are defeated at summary judgment; no pro se plaintiff has ever received a jury trial.

29. This is a case of the most overt bias imaginable. TWT has made absolutely false statements in his orders and has announced that he has reached a decision in the case without having any facts before him except Windsor's.

30. The August 11, 2011 ORDER (Docket #66) contains perjury, cites erroneous law, contains information that this Court has no legal right to include in an order, and constitutes obstruction of justice in violation of 18 U.S.C. § 1503.

31. The District Court ("DC") has no legal right to quote something in an order from the Court of Appeals. (ORDER, P.1 ¶2 and P.2, ¶1, Lines 8-10.) ***Federal Rules of Evidence*** Rule 201 specifically disallows this. [ORDER is Exhibit B.]

32. The DC has no legal basis to claim the Motion (erroneously called an appeal on P.2, ¶1 of the ORDER) is not taken in good faith. The Motion was presented in the best of faith. There is no assertion by anyone that the Motion was brought in anything but the best of faith.

33. Windsor's website says absolutely nothing about an "intention to use lawsuits in a campaign of harassment and retaliation against the federal judiciary" as stated in ORDER, P.2 ¶1. This is PERJURY in violation of 18 U.S.C. § 1001,

18 U.S.C. § 1621, 18 U.S.C. § 1623, and obstruction of justice in violation of 18 U.S.C. § 1503. Government Exhibit 1 is quite clear, and DC has claimed in this ORDER that it says something that it absolutely does not say. This is a criminal act. (A true and correct copy of Government Exhibit 1 is attached as Exhibit C.)

34. The DC also falsely states, with no justification or legal authority whatsoever, that "This purpose is also evident in the reckless, malicious and scurrilous accusations that are littered throughout Mr. Windsor's voluminous papers." Windsor's filings in this Court are uncontroverted. The only facts before this Court are in affidavits sworn under oath under penalty of perjury by Windsor. The DC has no option to decide those sworn statements are false; he is obligated to accept them as true, as they are. The DC has no authority to testify. The DC has violated Canon 3 B. (9) of the Code of Judicial Conduct (as well as many other Canons): "Judges shall not, while a proceeding is pending or impending in any court, make any public comment that might reasonably be expected to affect its outcome or impair its fairness or make any non-public comment that might substantially interfere with a fair trial or hearing."

35. The cases cited by the DC are not valid. ***Fridman v. City of New York*** does not stand for what the DC claims. It cites ***Handley v. Union Carbide***

Corp., 622 F. Supp. 1065 (S.D.W.Va. 12/6/1985). In this case, Handley's expenses exceeded his income, and the Court granted IFP.

> In ***Adkins v. duPont Company***, 335 U.S. 331, 93 L. Ed. 43, 69 S. Ct. 85 (1948), the Supreme Court impliedly rejected the notion that an appellant should have to mortgage her home to pay the cost of appeal. As the Second Circuit recently noted in ***Potnick v. Eastern State Hospital***, 701 F.2d 243 (2d Cir. 1983): "Section 1915(a) does not require a litigant to demonstrate absolute destitution; no party must be made to choose between abandoning a potentially meritorious claim or foregoing the necessities of life." Id. at 244.

36. ***Fridman v. City of New York*** has never been adopted by any Circuit or the Supreme Court, nor has ***Williams v. Spencer***, or ***Dycus v. Astrue***. State laws vary, and only Georgia law applies here. For example, ***Fridman*** does not apply in part because the State of New York defines "marital property" as all property acquired by either or both spouses during the marriage and before the execution of a separation agreement or the commencement of a "matrimonial action," which is defined, in part, as an action for annulment, divorce, or separation. N.Y. Dom. Rel. Law, §§ 236 B (1) (c), 236 B (2).

37. The DC claims the Windsors jointly own a home worth $1,640,000. This is false. (ORDER, P.2 ¶2.) The DC claims that the Windsors had $48,000 in dividend income, but this is false. (ORDER, P.2 ¶2, P. 3 ¶1.) The Windsors did not receive a penny in dividend income. Even if they had, their expenses greatly exceeded their income. The ability to pay is determined by net cash flow, which

has been significantly negative for the last five years. For the last five years, the Windsor's expenses have exceeded their income.

38. The DC claims Windsor's statements of his financial affairs is convoluted. This is false. There is nothing convoluted whatsoever. A true and correct copy of this information is attached as Exhibit D hereto.

39. Georgia is a separate property state. In Georgia, a spouse's separate assets are not marital property. Marriage does not make a spouse liable for the separate debts of the other spouse. In Georgia, a husband may file bankruptcy separately from his wife. In Georgia, as long as the non-filing spouse can prove that the items belong to that spouse and not to the other, and are not community property or otherwise an asset of the filing spouse, they are not an asset of the bankruptcy estate, and therefore not subject to claims by the bankruptcy trustee or by the creditors of the filing spouse. In Georgia, a spouse does not share in his or her spouse's liabilities as Georgia is a non-community property state. The Georgia Constitution provides that a spouse's separate property is SEPARATE. (Georgia Constitution, ¶ XXVII. "**Spouse's separate property.** The separate property of each spouse shall remain the separate property of that spouse except as otherwise provided by law.")

40. There is no law to make a spouse liable to use her separate property to pay for debts of her husband.

41. Judge Thrash has violated Canon 3 E. (1) of the Code of Judicial Conduct: "Judges shall disqualify themselves in any proceeding in which their impartiality might reasonably be questioned, including but not limited to instances where: (c) the judge or the judge's spouse, or a person within the third degree of relationship to either of them, or the spouse of such a person, or any other member of the judge's family residing in the judge's household: (i) is a party to the proceeding, or an officer, director, or trustee of a party;" Judge Thrash is a defendant in two cases with Windsor, and he is disqualified from presiding in this case.

> At least since the time of Lord Coke, (Nemo debet esse judex in propria causa -- no one may be a Judge in his own case), a fundamental precept of due process has been that an interested party in a dispute cannot also sit as a decision-maker. See, e.g., ***Withrow v. Larkin***, 421 U.S. 35, 46-47, 43 L. Ed. 2d 712, 95 S. Ct. 1456 (1975); ***Gibson v. Berryhill***, 411 U.S. 564, 578-79, 36 L. Ed. 2d 488, 93 S. Ct. 1689 (1973); ***Wolkenstein v. Reville***, 694 F.2d 35, 38-39 (2d Cir. 1982). (***International Association of Machinists and Aerospace Workers v. Metro-North Commuter Railroad***, 24 F.3d 369 (2nd Cir. 04/18/1994).)
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> "No man is allowed to be a judge in his own cause, because his interest would certainly bias his judgment, and, not improbably, corrupt his integrity. With equal, nay with greater reason, a body of men are unfit to be both judges and parties at the same time . . . ." ***The Federalist No. 10***, p. 79 (C. Rossiter ed. 1961) (J. Madison). See ***In re Murchison***, 349 U. S. 133, 136 (1955) (Black, J.) ("[O]ur system of law has always endeavored to prevent

even the probability of unfairness. To this end 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."); ***Spencer v. Lapsley***, 20 How. 264, 266 (1858) (recognizing statute accords with this maxim); see also ***Publius Syrus, Moral Sayings 51*** (D. Lyman transl. 1856) ("No one should be judge in his own cause."); B. Pascal, ***Thoughts, Letters and Opuscules*** 182 (O. Wight transl. 1859) ("It is not permitted to the most equitable of men to be a judge in his own cause."); 1 W. Blackstone, ***Commentaries*** *91 ("[I]t is unreasonable that any man should determine his own quarrel."). (Gutierrez de Martinez v. Lamagno, 515 U.S. 417, 115 S.Ct. 2227 (U.S. 06/14/1995).)

Due process of law as guaranteed by the Fourteenth Amendment to the Constitution of the United States requires that no man shall be judge in his own cause.

42. ***Hibben v. Smith***, 24 S. Ct. 88, 191 U.S. 310 (U.S. 11/30/1903)

acknowledged that it was well established no man can be a judge in his own case over 100 years ago:

Plaintiff claims while town trustees may apportion and determine the special benefits of a local assessment the benefits must be apportioned and determined by due process of law; and that among the certain established and recognized maxims of right that are guaranteed by the Federal Constitution, is that no man shall be a judge in his own cause. The old maxims show that this is essential. Coke, ***Litt***, 141 a; ***Broom Max***. (8th Am. ed.) 116; ***Littleto***n, § 212; ***Earl of Derby's case***, 12 Coke, 114; ***Jenk. Cent.*** Cas. 40; ***Pandect's Pass***. II, lib. 5, 17.

If the duty to be exercised is of such a judicial character that under the influence of his interest in the subject matter the judge may so decide as to give to himself an unjust or inequitable advantage and perforce impose upon other parties a corresponding inequity or disadvantage, it is a case where the constitutional guaranty of due process of law is applicable. ***North Bloomfield G. M. Co. v. Keyser***, 58 California, 315; ***Helbron v. Campbell***, 23 Pac. Rep. 122; ***Meyer v. City of San Diego***, 121 California, 102; ***Inhabitants of North Hampton v. Smith***, 11 Metc. (Mass.) 390; ***Taylor v.***

Williams, 26 Texas, 583.

As to taxpayers being disqualified the disqualification does not spring from the fact that the judge is a citizen, inhabitant and taxpayer of the city, but from the circumstance that he owns property within the city which may or may not be liable to taxation as he may decide. The authorities agree that in such a case the citizen and taxpayer is disqualified. ***City of Oakland v. Oakland Water Front Co.***, 118 California, 249; ***State v. Young***, 31 Florida, 594; ***Peck v. Freeholders of Essex***, 21 N. J. L. 656; ***Ex parte Harris***, 26 Florida, 77 (23 Am. St. Rep. 548); City of ***Guthrie v. Shaffer***, 7 Oklahoma, 459; ***Austin v. Nalle***, 85 Texas, 520; ***State v. City of Cisco*** (Tex. Civ.), 33 S. W. Rep. 244; ***Jefferson Co., etc., v. Milwaukee Co., etc.***, 20 Wisconsin, 139.

The disqualification is applicable to all officers and boards whose duties are judicial. ***Elliott on Muncp. Corporations***, § 130; ***Markley v. Rudy***, 115 Indiana, 533; ***Meyer v. Shields***, 61 Fed. Rep. 713, 723; ***Stockwell v. Township Board of White Lake***, 22 Michigan, 341; ***Conklin v. Squire***, 29 Weekly Law Bull. 157.

Had one of the appellees brought suit against the town to determine and collect the cost of paving the street crossings, and all the members of this town board had been on the jury, either plaintiff or defendant could have challenged them for cause, for the reason that they were residents and taxpayers of the town. ***Hern v. City of Greensburg***, 51 Indiana, 119; ***Town of Albion v. Hetrick***, 90 Indiana, 545, 549; ***City of Goshen v. England***, 119 Indiana, 368; ***Gaff v. State***, 155 Indiana, 277.

Necessity does not cure this defect except in general and universal questions which do not apply to this case. ***Board of Com. of Fountain Co. v. Loeb***, 68 Indiana, 29; ***State v. Crane***, 36 N. J. L. 394, 400; ***Moses v. Julian***, 45 N.H . 52; 84 Am. Dec. 114; ***Washington Ins. Co. v. Price***, Hopk. Ch. 1; Anonymous, 1 Salk. 396.

Nor is the legislature the final judge of this necessity. To say that the legislature is the final judge in all cases of what interest will disqualify, would be to repudiate all our constitutions, both written and unwritten, and to leave the citizen at the mercy of every legislative whim and caprice. Such a legislative act is unconstitutional. ***Cooley's Const. Lim.*** (6th ed.) 506, et

seq.; ***Conklin v. Squire***, 29 Weekly Law Bull. 157; ***Day v. Savadge***, Hob. 85; ***Hasketh v. Braddock***, 3 Burr. 1847; ***Bonham Case***, 8 Coke, 212, 219, 224; ***Great Charte v. Kensington***, 2 Stra. 1173; ***State v. Castleberry***, 23 Alabama, 85; ***Chamber v. Hodges***, 23 Texas, 104.

The judgment rendered under such circumstances is void -- not voidable and can be attacked collaterally. ***Sanborn v. Fellows***, 22 N. H. 473; ***Moses v. Julian***, 45 N. H. 52; ***Stearns v. Wright***, 51 N. H. 600; ***Bass v. City of Ft. Wayne***, 121 Indiana, 389; ***Chicago & Atlanta Ry. Co. v. Summers***, 113 Indiana, 10; ***Gay v. Minot***, 3 Cush. 353; ***Hall v. Thayer***, 105 Massachusetts, 219; ***Taylor v. County Com. of Worcester***, 105 Massachusetts, 225; ***State v. Crane***, 36 N. J. L. 394; ***Wetzel v. State***, 5 Tex. Civ. App. 17; ***Donnelly v. Howard***, 60 California, 291; ***Galbreath v. Newton***, 30 Mo. App. 380.

For other cases on the point that no one can be a judge in his own case, see 67 additional case law citations in ***Hibben v. Smith.***

43. ***Jones v. Luebbers***, 359 F.3d 1005 (8th Cir. 03/03/2004) says:

"[C]learly established Federal law, as determined by the Supreme Court of the United States", 28 U.S.C. § 2254(d)(1), recognizes not only actual bias, but also the appearance of bias, as grounds for disqualification:

A fair trial in a fair tribunal is a basic requirement of due process. Fairness of course requires an absence of actual bias in the trial of cases. But our system has always endeavored to prevent even the probability of unfairness. To this end 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. That interest cannot be defined with precision. Circumstances and relationships must be considered. This Court has said, however, that "Every procedure which would offer a possible temptation to the average man as a judge... not to hold the balance nice, clear, and true between the State and the accused denies the latter due process of law."

In re Murchison, 349 U.S. 133, 136 (1955) (quoting ***Tumey v. Ohio***, 273 U.S. 510, 535 (1927)) (omission in original).

Where a judge's interest in the outcome of a case is pecuniary, application of

> the rule from ***Murchison*** and ***Tumey*** is simple and the need for disqualification usually will be clear. For example, the Court found a due process violation and held there to be an impermissible appearance of bias where a judicial officer's compensation depended at least in part on obtaining convictions. ***Tumey***, 273 U.S. at 535. Similarly, the Court found a due process violation where an appellate judge participated in a case and set forth a rule of law applicable in a separate, pending proceeding in which the appellate judge was personally involved as a litigant. ***Aetna Life Ins. Co. v. Lavoie***, 475 U.S. 813, 821 (1986).

44. Eleventh Circuit Defendants TJOFLAT, BLACK and WILSON said this in ***Callahan v. Campbell***, 427 F.3d 897 (11th Cir. 10/05/2005):

> A fair trial in a fair tribunal is a basic requirement of due process. . . .
>
> To this end 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. . . . It would be very strange if our system of law permitted a judge to act as a grand jury and then try the very persons accused as a result of his investigations. Id. at 136--37, 75 S.Ct. at 625. Callahan interprets ***Murchison*** as holding that "when a judge's participation in a case allows the judge to acquire extra-judicial knowledge that directly relates to issues over which the judge is presiding, recusal is required because it is difficult if not impossible for a judge to free himself from the influence of what took place."

45. Judge Thrash has a proven bias against pro se parties as no pro se plaintiff has ever won in his court.

> The appearance of impropriety may also result where the judge has evidenced a bias directed against a class of which the defendant is a member. See ***Berger v. U. S.***, 255 U.S. 22, 41 S. Ct. 230, 65 L. Ed. 481 (1921) (espionage convictions of German-American defendants overturned as result of trial judge's alleged anti-German-American remarks); ***U. S. v. Thompson***, 483 F.2d 527 (3d Cir. 1973), (draft violator's conviction overturned because judge's alleged statement that he had a policy of ordering a standard sentence for all such violators evidenced a bias against the class

of which defendant was a member). (***United States v. Cuyler***, 584 F.2d 644 (3rd Cir. 09/29/1978).)

46. Eleventh Circuit Defendants EDMONDSON, BIRCH, and BLACK said this in ***Whisenhant v. Allen***, 556 F.3d 1198 (11th Cir. 02/03/2009):

> It is long established that "[a] fair trial in a fair tribunal is a basic requirement of due process." ***In re Murchison***, 349 U.S. at 136, 75 S.Ct. at 625. The Supreme Court has identified various situations in which "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, 95 S.Ct. 1456, 1464 (1975). Such cases include those in which the judge has a pecuniary interest in the outcome or has been personally abused or criticized by the party before him. Id.

47. Windsor has been treated unfairly; his due process rights have been violated. The DC has personal and financial incentives to rule against Windsor.

> A litigant is denied due process if he is in fact treated unfairly. ***Margoles***, 660 F.2d at 296. After reviewing various judicial disqualification cases, the court stated that "those few cases in which due process considerations were the basis for reversal involved serious facts supporting a finding of prejudice, not mere speculation and 'appearances.'" Id. Due process violations occur where there [is] actually some incentive [for the judge] to find one way or the other, i.e., financial considerations [Ward, 409 U.S. 57, 93 S. Ct. 80, 34 L. Ed. 2d 267 ; ***Tumey v. Ohio***, 273 U.S. 510, 47 S. Ct. 437, 71 L. Ed. 749 (1927); ***Aetna***, 475 U.S. 813, 106 S. Ct. 1580, 89 L. Ed. 2d 823] or previous participation by the trying judge in the proceedings at which the contempt occurred [***In re Murchison***, 349 U.S. 133, 75 S. Ct. 623, 99 L. Ed. 2d 942; ***Taylor v. Hayes***, 418 U.S. 488, 94 S. Ct. 2697, 2704-05 (1974); ***Mayberry v. Pennsylvania***, 400 U.S. 455, 91 S. Ct. 499, 504-05, 27 L. Ed. 2d 532 (1971)]. ***Margoles***, 660 F.2d at 297 (quoting ***Howell v. Jones***, 516 F.2d 53 (5th Cir. 1975)). (***UNITED STATES EX REL. DEL VECCHIO v. ILLINOIS DEPT***, 795 F. Supp. 1406 (N.D.Ill. 06/9/1992).)

"A fair trial in a fair tribunal is a basic requirement of due process." ***In re Murchison***, 349 U.S. 133, 136 (1955); see also ***Ward v. Village of Monroeville***, 409 U.S. 57 (1972). Due process demands more than that the sentencer actually be impartial; rather, "'justice must satisfy the appearance of justice.'" ***In re Murchison***, 349 U.S., at 136, quoting Offutt v. United States, 348 U.S. 11, 14 (1954); see also In re Murchison, 349 U.S., at 136 ("Our system of law has always endeavored to prevent even the probability of unfairness."); ***Mayberry v. Pennsylvania***, 400 U.S. 455, 469 (1971) (Harlan, J., concurring) ("The appearance of even-handed justice . . . is at the core of due process"). The risk that Judge Chapman may have brought to bear on his decision specific information about Robertson not presented as evidence in the sentencing proceeding is too great in this case to satisfy the demands of the Due Process Clause. (***ANDREW EDWARD ROBERTSON v. CALIFORNIA***, 111 S. Ct. 568, 498 U.S. 1004 (U.S. 12/03/1990).)

48. Judge Thrash has become embroiled in a bitter dispute with Windsor, and he is disqualified. The Ninth Circuit recently said this in ***Richard D. Hurles v. Charles L. Ryan***, No. 08-99032 (9th Cir. 07/07/2011):

"A fair trial in a fair tribunal is a basic requirement of due process." ***In re Murchison***, 349 U.S. 133, 136 (1955). Indeed, the "legitimacy of the Judicial Branch ultimately depends on its reputation for impartiality and nonpartisan-ship." ***Mistretta v. United States***, 488 U.S. 361, 407 (1989). This most basic tenet of our judicial system helps to ensure both litigants' and the public's confidence that each case has been fairly adjudicated by a neutral and detached arbiter. An appearance of impropriety, regardless of whether such impropriety is actually present or proven, erodes that confidence and weakens our system of justice.

While most claims of judicial bias are resolved "by common law, statute, or the professional standards of the bench and bar," the Due Process Clause of the Fourteenth Amendment "establishes a constitutional floor." ***Bracy v. Gramley***, 520 U.S. 899, 904 (1997) (citations omitted). To safeguard the right to a fair trial, the Constitution requires judicial recusal in cases where "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). "The Court asks not whether the judge is actually, subjectively biased, but whether the average judge in his position is likely to be neutral, or whether there is an unconstitutional potential for bias." ***Caperton v. A.T. Massey Coal Co.***, 129 S. Ct. 2252, 2262 (2009) (internal quotation marks omitted). The Supreme Court has declared:

Every procedure which would offer a possible temptation to the average man as a judge to forget the burden of proof required to convict the defendant, or which might lead him not to hold the balance nice, clear and true between the state and the accused, denies the latter due process of law. (Tumey v. Ohio, 273 U.S. 510, 532 (1927).)

A claimant need not prove actual bias to make out a due process violation. ***Johnson v. Mississippi***, 403 U.S. 212, 215 (1971); ***Aetna Life Ins. Co. v. Lavoie***, 475 U.S. 813, 825 (1986). Indeed, the Supreme Court has pointed out that it would be nearly impossible for a litigant to prove actual bias on the part of a judge. ***Caperton***, 129 S. Ct. at 2262-63; see also ***Vasquez v. Hillery***, 474 U.S. 254, 263 (1986) ("[W]hen the trial judge is discovered to have had some basis for rendering a biased judgment, his actual motivations are hidden from view, and we must presume the process was impaired." (citing ***Tumey***, 273 U.S. at 535). It is for this reason that the Court's precedents on judicial bias focus on the appearance of and potential for bias, not actual, proven bias. Due process thus mandates a "stringent rule" for judicial conduct, and requires recusal even of judges "who would do their very best to weigh the scales of justice equally" if the risk of bias is too high. Murchison, 349 U.S. at 136.

In determining what constitutes a risk of bias that is "too high," the Supreme Court has emphasized that no mechanical definition exists; cases requiring recusal "cannot be defined with precision" because "[c]ircumstances and relationships must be considered." Id.; see also ***Lavoie***, 475 U.S. at 822 (internal citations omitted). The Supreme Court has just re-affirmed this functional approach. See ***Caperton***, 129 S. Ct. at 2265-66.

The Court's call for pragmatism is particularly important in this instance, for capital cases mandate an even "greater degree of reliability" than other cases do. ***Murray v. Giarratano***, 492 U.S. 1, 9 (1989); ***Woodson v. North Carolina***, 428 U.S. 280, 304 (1976). We are compelled to acknowledge "that

the penalty of death is qualitatively different" from any other penalty and that "there is a corresponding difference in the need for reliability in the determination that death is the appropriate punishment." ***Woodson***, 428 U.S. at 305. As required by the Supreme Court, we therefore utilize a functional approach to the facts of this case as they relate to the Court's established case law.

The Supreme Court's judicial bias doctrine has evolved as it confronts new scenarios "which, as an objective matter, require recusal." ***Caperton***, 129 S. Ct. at 2259. The most basic example of probable bias occurs when the judge " 'has a direct, personal, substantial pecuniary interest in reaching a conclusion against [one of the litigants].' " ***Crater v. Galaza***, 491 F.3d 1119, 1131 (9th Cir. 2007) (quoting ***Tumey***, 273 U.S. at 523). The Court has also held that other financial interests may mandate recusal, even when they are not "as direct or positive as [they] appeared to be in [***Tumey***]." ***Gibson v. Berryhill***, 411 U.S. 564, 579 (1973); see also ***Ward v. Monroeville***, 409 U.S. 57 (1972); ***Lavoie***, 475 U.S. 813. However, financial conflicts of interest are not the only relevant conflicts for judicial bias purposes. See ***Caperton***, 129 S. Ct. at 2260 (explaining that judicial bias doctrine encompasses "a more general concept of interests that tempt adjudicators to disregard neutrality"). The Court has thus required recusal if the judge "becomes 'embroiled in a running, bitter controversy' " with one of the litigants, id. at 2262 (quoting ***Mayberry v. Pennsylvania***, 400 U.S. 455, 465 (1971)); if she becomes "enmeshed in matters involving [a litigant]," ***Johnson v. Mississippi***, 403 U.S. 212, 215 (1971); or "if the judge acts as 'part of the accusatory process,' " ***Crater***, 491 F.3d at 1131 (quoting ***Murchison***, 349 U.S. at 137). At bottom, then, the Court has found a due process violation when a judge holds two irreconcilable roles, such that her role as an impartial arbiter could become compromised. ***Murchison***, 349 U.S. at 137; see also ***Crater***, 491 F.3d at 1131.

49. Judge Thrash's bias is dripping from his orders. He prejudged every issue in this and all other cases. Judge Thrash is a criminal who is hell bent on doing whatever it takes to violate all of Windsor's rights.

> Bias exists where a court has prejudged, or reasonably appears to have prejudged, an issue. The disciplinary proceedings must "satisfy the appearance of justice." ***In re Murchison***, 349 U.S. at 136 (quoting ***Offutt v. United States***, 348 U.S. 11, 14, 99 L. Ed. 11, 75 S. Ct. 11 (1954). (***Partington v. Gedan***, 880 F.2d 116 (9th Cir. 03/13/1989).)

50. The DC has violated just about every rule in the book. He must be disqualified, indicted, convicted, imprisoned, disgraced, and impeached.

51. The denial of docketing of the documents that Windsor filed with his motions and responses is an outrageous denial of due process. Judge Thrash allowed Motion for Reconsideration to be filed but not the evidence.

52. Windsor has not yet fully researched the legal issues, but he will do so by the time he files his Appellant's Brief, so he reserves the right to include anything deemed appropriate in the Brief.

Submitted, this 25th day of August 2011.

William M. Windsor
Pro Se

PO Box 681236
Marietta, GA 30068
Phone: 770-578-1094 -- Fax: 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 NOTICE 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. This Notice is also a Sworn Affidavit.

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 25th day of August 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
Pro Se

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

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing SECOND AMENDED NOTICE OF APPEAL by depositing the same with the United States Postal Service with sufficient postage and addressed as follows:

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

This 25th day of August 2011.

William M. Windsor
Pro Se

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

Exhibit

A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

WILLIAM M. WINDSOR, Plaintiff, v. JUDGE WILLIAM S. DUFFEY, et al., Defendants.	CIVIL ACTION FILE NO. 1:11-CV-1922-TWT

ORDER

This is a pro se civil action. It is before the Court on the Plaintiff's Motion to Confirm Stay [Doc. 51] which is DENIED.

SO ORDERED, this 9 day of August, 2011.

/s/Thomas W. Thrash
THOMAS W. THRASH, JR.
United States District Judge

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Exhibit

B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

WILLIAM M. WINDSOR, Plaintiff, v. JUDGE WILLIAM S. DUFFEY, et al., Defendants.	CIVIL ACTION FILE NO. 1:11-CV-1922-TWT

ORDER

This is a pro se civil action against the Judges of this Court and the Court of Appeals. The Court notes that in a related case where the Plaintiff's appeal was dismissed as frivolous, the Court of Appeals described the Plaintiff's abuse of the judicial system as follows:

> [The Plaintiff's] litigious behavior [has] undermined the integrity of the judgments and orders in this case. Although the case is closed, Windsor has repeatedly filed unsubstantiated, duplicative pleadings, many after the district court issued an order denying them. Moreover, his pleadings are long and repetitive, and the volume of his filings poses a burden to clerical and judicial operations and is an impediment to the administration of justice.

On June 17, 2011, the Court granted the Government's Motion for Protective Order. The Plaintiff has filed a Notice of Appeal.

The Plaintiff's Motion to Proceed in Forma Pauperis should be denied for several reasons. First, I certify that the appeal is not taken in good faith. See 28 U.S.C. § 1915(a)(3). At the hearing on the motion by the United States for an injunction, the government introduced evidence from Mr. Windsor's web site in which he declares his intention to use lawsuits in a campaign of harassment of and retaliation against the federal judiciary. (Government Ex. 1). This purpose is also evident in the reckless, malicious and scurrilous accusations that are littered throughout Mr. Windsor's voluminous papers. The Court of Appeals has already held that his filings pose a burden to clerical and judicial operations and are an impediment to the administration of justice. This appeal is more of the same.

Second, in his application to proceed in forma pauperis, Mr. Windsor refuses to disclose the assets in his wife's name. This is impermissible. The question under 28 U.S.C. § 1915 is whether the litigant is "unable to pay" the costs, and the answer has consistently depended in part on the litigant's actual ability to get funds from a spouse, a parent, an adult sibling, or other next friend. Fridman v. City of New York, 195 F. Supp. 2d 534, 537 (S.D.N.Y. 2002); Williams v. Spencer, 455 F. Supp. 205, 209 (D. Md.1978); Dycus v. Astrue, 2009 WL 47497 *2 (S.D. Ala.2009). Mr. Windsor and his wife jointly own a home that he says is worth $1,640,000.00. In their 2009 federal income tax return, Mr. Windsor and his wife reported receiving over

$48,000.00 in dividend income. Mr. Windsor's elaborate and convoluted exegesis of the state of his financial affairs is not acceptable. He is not "unable to pay" the costs of the appeal. The opportunity to proceed as an indigent in civil cases, created by statute, is not considered a right but a privilege, and "should not be a broad highway into the federal courts." Phillips v. Mashburn, 746 F.2d 782, 785 (11th Cir. 1984). The Plaintiff's Motion to Proceed in Forma Pauperis [Doc. 64]is DENIED. The Plaintiff is ordered to pay the full filing fee in order to pursue the appeal.

SO ORDERED, this 11 day of August, 2011.

/s/Thomas W. Thrash
THOMAS W. THRASH, JR.
United States District Judge

Exhibit C

Scum Strikes Again - No Better Word for Federal Judges in Atlanta Georgia

Tuesday, 21 June 2011 11:17 William M. Windsor

The ScumBags in the federal courts in Atlanta, Georgia have struck again.

I've had my head down working hard for the last 10 days. Sorry I haven't been updating the news here!

It will come as no surprise that a whole new level of scumbagness has hit in Atlanta in an effort to stop me from exposing all the serial crooks masquerading as federal judges.

The newest scumbag is Thomas Woodrow Thrash ("TWT"). He is masquerading as a federal judge in the United States District Court for the Northern Distreict of Georgia.

Thomas Woodrow Thrash issued a number of orders late last week to stop my efforts. Here's what has happened. This is an excerpt from the Affidavit of Prejudice that I have filed against TWT:

1. On May 19, 2011, I filed a Verified Declaratory Judgment Action in the Superior Court of Fulton County. The civil action was assigned No. 2011CV200857.
2. On May 20, 2011, I filed a Verified Complaint in the Superior Court of Fulton County. The civil action was assigned No. 2011CV200971.
3. On June 13, 2011, U.S. Attorney Ms. Sally Quillian Yates ("Ms. Yates") and/or Assistant U.S. Attorney Mr. Christopher Huber ("Mr. Huber") filed a NOTICE OF REMOVAL in regard to 2011CV200857. 2011CV200857 becameUnited States District Court for the Northern District of Georgia ("N.D.Ga") Civil Action No. 1:11-CV-01922-TWT ("01922"), and was assigned to TWT. There is nothing in the record of any court to indicate that Ms. Yates and/or Mr. Huber represent any of the Defendants or had any authority to file anything in 01922. The 01922 Docket erroneously shows Mr. Huber to be the attorney for various Defendants, but this is bogus. The Notice of Removal is illegal and defective. It was done simply to illegally move the Fulton County legal action to the federal court where the criminals can make it go away. Th scumbag federal judges and attorneys in Atlanta had to divert my case as they could not run the risk of a jury of Georgia citizens finding them all guilty of hundreds of crimes!
4. On June 13, 2011, I filed a Motion for Temporary Restraining Order in 2011CV200857 (docketed as Docket #2 in 01922.)
5. On June 13, 2011, the U.S. Attorney filed a MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING OR MOTION. (01922 Docket #3.) They don't want to file an answer because my Verified Complaint mandates a Verified Answer (sworn under oath). They don't want to have to commit perjury again or admit they are criminals, so they must avoid answering at all costs. So, they moved the case to their close friend, TWT, so he could make it go away.
6. On June 13, 2011, the U.S. Attorney filed a MOTION FOR PROTECTIVE ORDER. (01922 Docket #4.) They don't want to have to respond to the depositions, interrogatories, requests for documents, and requests for asmissions that i served because it will nail them all to the wall. So, they filed a motion with their bosom buddy, TWT, and he was queued up to cover their a$$e$.
7. On June 14, 2011, I filed a Motion to Deny Removal AND EMERGENCY MOTION FOR HEARING. (01922 Docket #5.) This MOTION documents and cites just exactly the many ways that the Notice of Removal was illegal and defective. Based upon the statutes and case law, TWT had a legal obligation to immediately rule on the propriety of the NOTICE OF REMOVAL. He HAD to rule that it was illegal. He ignored these duties. I

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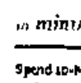

Federal Judge orders that Parties No Longer have Constitutional Rights to Due Process
07.07.11

GOVERNMENT EXHIBIT
1

submit that this proves prejudice because the first matter to be addressed following removal is whether the removal was proper. In 01922, the removal was facially defective. I believe anyone with a legal education or an hour of studying the law can look at it and see that it is defective.

8. On June 14, 2011, I filed a RESPONSE TO THE MOTION FOR PROTECTIVE ORDER. (01922 Docket #6.)
9. On June 15, 2011, I filed a Motion to DISQUALIFY Ms. Yates, Mr. Huber, and the U.S. Attorney's Office. (01922 Docket #12.) This Motion explains their lack of authority and details conflicts galore.
10. On June 15, 2011, TWT denied me a hearing on the TRO and denied the motion for TRO. (A true and correct copy of the order is Exhibit 5 hereto, referenced and incorporated herein.) In this June 15, 2011 Order Denying TRO, TWT commits obstruction of justice, violates the rules, establishes his participation in the racketeering enterprise, and commits perjury. Every party gets a TRO hearing but me. No attorney has ever been denied a TRO hearing.
11. TWT stated in his June 15, 2011 Order Denying TRO that the purpose of the restraining order was to restrain Judge Duffey "from violating O.C.G.A. § 10-6-5," yet he proceeds to deny the motion by claiming it sought to be allowed to commit violations of criminal statutes. This proves prejudice and bias! TWT can't even figure out how to disguise his prejudice and bias.
12. TWT stated in his June 15, 2011 Order Denying TRO that the Motion for TRO fails because I was seeking to commit the unauthorized practice of law. This is perjury. Nowhere in my Motion for TRO does it ask to commit the unauthorized practice of law. The Verified Complain in this Civil Action 01922 and the Motion for TRO make it absolutely clear that the only thing I am seeking is a declaratory judgment as to exactly what a person can do under the Georgia statute that authorizes use of a "power of attorney." The unauthorized practice of law is a criminal offense. No one in their right mind would file a motion with a judge asking to commit a criminal offense.
13. With no testimony of any type from anyone claiming I am seeking to commit the unauthorized practice of law, there isn't even a fact issue. TWT proved his prejudice by committing perjury for the purpose of furthering the racketeering enterprise that he belongs to. He lied to damage me and protect his fellow racketeers.
14. This wasn't an error by TWT. If it was, he could have immediately corrected it when I filed a motion for reconsideration of the order. This was intentional by TWT because he is criminally prejudiced for the Defendants and criminally biased against me. Anything that he does is going to be done to further the racketeering enterprise that the federal judges in Atlanta operate.
15. Every party presenting a motion for a temporary restraining order is allowed the opportunity to present their arguments to a judge. TWT denied me this established right. This proves his prejudice because he did this to further the racketeering enterprise that he belongs to. He lied to damage Windsor and protect his fellow racketeers.
16. On June 17, 2011, I filed a RESPONSE TO THE FEDERAL DEFENDANTS' MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSIVE PLEADING OR MOTION AND MOTION TO STRIKE. (01922 Docket #23.) The Clerk of the Court failed to file the motion; Docket 23 is merely the "notice of filing of the motion" that every pro se party is required to file with the motion. This is one of the ways the staff of the clerks of the court participate in the corruption and racketeering. Things that I send to the clerk's office for filing simly disappear in thin air. (Fortunately, I always have a cover letter and a courier receipt showing exactly what was sent, who signed for it, and when.)
17. On June 17, 2011, three days after the U.S. Attorney filed its non-expedited, non-emergency motion, I received an order (the "01922 EXTENSION ORDER") dated June 16, 2011 (Docket #19) by mail. (Exhibit 7 is a true and correct copy of the June 16, 2011 EXTENSION ORDER, referenced and incorporated herein.) TWT violated my rights under the FRCP and L.R. by issuing the EXTENSION ORDER before giving me the prescribed period of time to respond to the motion. Everyone gets 14 days to respond; I was given no response. This served the needs of the racketeering enterprise in a most significant way.
18. On June 17, 2011, I filed an EMERGENCY MOTION FOR RECONSIDERATION OF ORDER DENYING TRO AND AN EMERGENCY MOTION FOR A PRELIMINARY INJUNCTION HEARING. (01922 Docket #22.) The Clerk of the Court failed to file the motion; docket 22 is merely the "notice of filing of the motion" that every pro se party is required to file with the motion. More criminal activity by the office of the clerk of the court.

19. On June 17, 2011, TWT entered an order ("01922 PROTECTIVE ORDER") (01922 Docket #25.) (Exhibit 9 is a true and correct copy of the June 17, 2011 01922 PROTECTIVE ORDER.) TWT violated my rights under the FRCP and L.R. by issuing the PROTECTIVE ORDER for the many reasons detailed in 01922 Docket #6. In addition, TWT committed obstruction of justice, perjury and proves his criminal bias. TWT had no evidence before him of any type from any of the Defendants. The only evidence before him was the sworn under penalty of perjury testimony from me, yet TWT said: "This is the latest in a series of frivolous, malicious and vexatious lawsuits filed by the Plaintiff." This is absolutely false, and it served the needs of the racketeering enterprise in a most significant way. 01922 is simply a declaratory judgment action that asks the Fulton County Superior Court to clarify a state statute TWT ignored all of my filings because he was acting as a racketeer rather than as a judge.
20. In the 01922 PROTECTIVE ORDER, TWT (who no longer has jurisdiction in 01922 due to his illegal acts) purported to quash discovery, though there was not even a motion before the court seeking to have discovery quashed. This proves prejudice because a judge is not supposed to grant relief that isn't even requested. This proves prejudice because TWT ignored his mandatory initial obligation, which was to rule that the Notice of Removal was defective.
21. TWT issued this 01922 Protective Order without giving me the time for response mandated by the FRCP and Local Rules. This proves prejudice because it is a simple matter to allow a party their legal right to respond to a motion. This is absolutely improper, and it served the illegal needs of the racketeering enterprise in a most significant way.
22. TWT purported to issue filing restrictions against me though there was no notice and no hearing as required by absolutely binding court precedents that a real judge would have to honor. This proves prejudice because the binding precedents for the Eleventh Circuit and Supreme Court require both notice and a hearing.
23. TWT also purportedly ordered me to post a cash bond or surety bond that I do not have the ability to post though there was no notice, no hearing, and no inquiry into ability to pay as required by absolutely binding court precedents that an impartial judge would have to honor. TWT was made aware of the fact that I have essentially no money, have a negative net worth of approximately $900,000, and am unable to post a bond. This proves prejudice because TWT issued the order knowing I could not comply. This enabled him to deny my Constitutional rights and serve the illegal needs of the racketeering enterprise in a most significant way.
24. On June 13, 2011, Ms. Yates and/or Mr. Huber filed a NOTICE OF REMOVAL in regard to 2011CV200971. 2011CV200971 became N.D.Ga Civil Action No. 1:11-CV-01923-TWT ("01923"), and was assigned to TWT. (01923 Docket #1.) There is nothing in the record of any court to indicate that Ms. Yates and/or Mr. Huber represent any of the Defendants or had any authority to file anything in 01923. The docket erroneously shows Mr. Huber to be the attorney for various Defendants, but this is bogus.
25. On June 13, 2011, the U.S. Attorney filed a MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING OR MOTION. (01923 Docket #2.)
26. On June 13, 2011, the U.S. Attorney filed a MOTION FOR PROTECTIVE ORDER. (01923 Docket #4.)
27. On June 14, 2011, I filed a RESPONSE TO THE MOTION FOR PROTECTIVE ORDER. (01923 Docket #6.)
28. On June 14, 2011, I filed a Motion to Deny Removal AND EMERGENCY MOTION FOR HEARING. (01923 Docket #7.)
29. On June 15, 2011, I filed a Motion to DISQUALIFY Ms. yates, Mr. Huber, AND THE u.s. attorney's office. (01923 Docket #27.) This Motion explains their lack of authority and details conflicts galore.
30. On June 15, 2011, I filed several other motions in 01923. (01923 Docket #13, 15, 17, 19, 21, 23, 25.)
31. On June 17, 2011, I filed a RESPONSE TO THE FEDERAL DEFENDANTS' MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSIVE PLEADING OR MOTION AND MOTION TO STRIKE. (01923 Docket #23.)
32. At 10:00 am on June 17, 2011, three days after the U.S. Attorney filed its non-expedited, non-emergency motion, I received an order (the "01923 EXTENSION ORDER") dated June 16, 2011 (01923 Docket #9) by mail. (Exhibit 18 is a true and correct copy of the June 16, 2011 01923 EXTENSION ORDER.) TWT demonstrated his prejudice and violated my rights under the FRCP and L.R. by issuing the EXTENSION ORDER before

giving me the prescribed period of time to respond to the motion. This served the illegal needs of the racketeering enterprise in a most significant way.

33. On June 17, 2011 at 12:30 pm, I presented an EMERGENCY MOTION FOR RECONSIDERATION OF ORDER (01923 DOCKET #9) GRANTING AN EXTENSION OF TIME TO FILE RESPONSIVE PLEADING OR MOTION and an EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND HEARING to Defendant White for filing.
34. On June 17, 2011, TWT entered an order ("01923 PROTECTIVE ORDER") (01923 Docket #39.) (Exhibit 23 is a true and correct copy of the June 17, 2011 01923 PROTECTIVE ORDER.) TWT demonstrated his prejudice and violated my rights under the FRCP and L.R. by issuing the 01923 PROTECTIVE ORDER for the many reasons detailed in 01923 Docket #31. In addition, TWT committed obstruction of justice, perjury and proves his criminal bias. TWT had no evidence before him of any type from any of the Defendants. The only evidence before him was the sworn under penalty of perjury testimony from me, yet TWT said: "This is the latest in a series of frivolous, malicious and vexatious lawsuits filed by the Plaintiff." This is absolutely false, and it served the illegal needs of the racketeering enterprise in a most significant way. TWT ignored all of my filings because he was acting as a racketeer rather than as a judge.
35. In the 01923 PROTECTIVE ORDER, TWT (who no longer has jurisdiction in 01923 due to his illegal acts) purported to quash discovery, though there was not even a motion before the court seeking to have discovery quashed. This proves prejudice because a judge is not supposed to grant relief that isn't even requested. This proves prejudice because TWT ignored his mandatory initial obligation, which was to rule that the Notice of Removal was defective.
36. TWT issued this 01923 Protective Order without giving me the time for response mandated by the FRCP and Local Rules. This proves prejudice because it is a simple matter to allow a party their legal right to respond to a motion. This is absolutely improper, and it served the illegal needs of the racketeering enterprise in a most significant way.
37. TWT purported to issue filing restrictions against me though there was no notice and no hearing as required by absolutely binding court precedents that a real judge would have to honor. This proves prejudice because the binding precedents for the Eleventh Circuit and Supreme Court require both notice and a hearing.
38. TWT also purportedly ordered me to post a cash bond or surety bond that I do not have the ability to post though there was no notice, no hearing, and no inquiry into ability to pay as required by absolutely binding court precedents that an impartial judge would have to honor. TWT was made aware of the fact that I have essentially no money, have a negative net worth of approximately $900,000, and am unable to post a bond. This proves prejudice because TWT issued the order knowing I could not comply. This enabled him to deny my Constitutional rights and serve the illegal needs of the racketeering enterprise in a most significant way.
39. On June 21, 2011, I filed a Motion to Recuse Judge Thomas Woodrow Thrash.
40. Failure to follow proper procedure is a violation of my civil rights where TWT is acting in the absence of all jurisdiction. TWT has issued orders that are invalid, and he no longer has jurisdiction in this Civil Action.
41. An objective observer, lay observer, and/or disinterested observer must entertain significant doubt of the impartiality of TWT.
42. Canon 2 of the Code of Conduct for United States Judges tells judges to "avoid impropriety and the appearance of impropriety in all activities, on the bench and off." TWT has demonstrated his prejudice by violating this Canon.
43. The bias of TWT stems from extra-judicial sources. He has demonstrated a bias against pro se parties and against anyone who would have the audacity to sue a federal judge. He has demonstrated a particular deep-seated antagonism toward me.
44. This Affidavit of Prejudice states very clearly the facts and reasons for the belief that bias and prejudice exists. Dates, times, places, circumstances, and statements are itemized.
45. I submit that this is a case of pervasive bias. This civil action is only a few days old, but the bias has been present throughout. The bias existed before this civil action began.
46. TWT established a clearly fixed view about substantive pending trial matters, so this must raise concerns about the "appearance of impropriety," a standard that must be safeguarded under applicable recusal law.
47. TWT has established a position in this proceeding that I am wrong and that my case does not matter. This proves prejudice.

48. TWT has violated my civil and constitutional rights under color of law.
49. I have just cause to believe that he cannot been given a fair trial. TWT has told everyone that I will not be given a fair trial in his orders.
50. TWT has effectively denied my rights of the equal protection under the law under Article VI of the Constitution.
51. TWT's actions prove that he has exercised his power in this civil action for his own personal purposes rather than the will of the law.
52. The orders issued by TWT in Civil Actions 01922 and 01923 suggest animosity towards me, and the June 17, 2011 protective orders deprive me of rights to which I am entitled under the Federal Rules of Civil Procedure and the United States Code.
53. TWT's June 17, 2011 protective orders obliterate my legal and Constitutional rights.
54. TWT has effectively denied my rights of the equal protection under the law.
55. There is not a chance in the world that I will get a fair and impartial trial with TWT. He is hopelessly biased against me because he is a damn criminal. TWT doesn't even pretend to hide his bias; it is plain to see.
56. TWT is obviously friends with the Defendants. I hoped that TWT's commitment to his oath as a judge would be more important to him than his friendship with the Defendants, but it is clear to me that his prejudice for the Defendants is overwhelming to him. All I want is to have someone fair and impartial with an open mind to listen to the facts and review as much of the evidence as is needed to prove each of my claims. It is obvious to me that TWT doesn't care about the facts and doesn't want to consider the facts.
57. There is not a single piece of evidence and not a single affidavit from anyone with any defendant. They have filed nothing.
58. TWT was told under oath by me that this is the case of a massive fraud upon the courts and a RICO action in which I have already proven hundreds of predicate acts. TWT doesn't seem to care about the facts because he has his own criminal agenda.
59. The United States Constitution guarantees an unbiased judge who will always provide litigants with full protection of ALL RIGHTS. TWT is terminally biased for Defendants and terminally biased against me.
60. TWT has a preconceived idea of this civil action from information that has come from outside the case. TWT wrote: "This is the latest in a series of frivolous, malicious and vexatious lawsuits filed by the Plaintiff" when the only evidence before TWT was the sworn Verified Complaint in this Civil Action and sworn affidavits from me. A reasonable person would say that branding someone as "frivolous, malicious and vexatious" with no evidence or basis, four days after receiving a case, provides a textbook example of "impartiality might reasonably be questioned."
61. TWT has labeled me "frivolous, malicious and vexatious" after reading facts in affidavits presented by me. There was no affidavit from anyone but me before TWT when he defamed me in his court order and made his void of impartiality part of the public record. This proves extra-judicial bias against me because TWT ignored the facts and invented his own facts.
62. TWT has an unfavorable opinion about me that is wrongful and inappropriate. It is undeserved, and it rests upon knowledge that TWT ought not to possess. It is excessive in degree.
63. I have not been treated fairly by TWT. TWT has demonstrated pervasive bias throughout this short proceeding. TWT has demonstrated a personal bias and prejudice against me. TWT has not demonstrated the impartiality required of a judge. The Orders issued by TWT show this.
64. TWT entered this civil action with a closed mind and complete and total bias against me. All I want are my Constitutional rights. I will not get them with TWT.
65. In my filings in 01922 and 01923, I stated emphatically under oath under penalty of perjury before a notary that the Defendants committed all types of illegal, criminal conduct against me. TWT had no basis whatsoever to discount anything that I swore, but he obviously ignored it all. This proves prejudice because no fair, impartial "judge" could read the sworn statements of fact based upon my personal knowledge and not be legally obligated to accept that everything I said was true. There is nothing in the judicial oath of office, Code of Judicial Conduct, or Rules that permit a judge to ignore the facts, so prejudice is absolutely established.
66. On June 20, 2011, I filed a civil action (2011CV202263) against TWT in the Fulton County Superior Court with RICO charges of racketeering, corruption, and conspiracy. I am also seeking a TRO against TWT. I have also sent charges to the U.S. Attorney's Office and the Fulton County District Attorney asking that TWT be indicted, convicted,

and sent to prison. I am filing a judicial misconduct complaint against TWT, and I am filing a request for hearings and impeachment with the U.S. House of Representatives and U.S. Senate.

67. When a jury hears what happened in this case, I will prevail at trial.
68. This motion, affidavit, certificate of good faith, and memorandum of authorities meet the requirements for a 28 U.S.C. 144 motion.
69. This Affidavit of Prejudice states the facts and the reasons for the belief that bias and prejudice exist. The reasons for the belief are material and stated with particularity.
70. This affidavit meets the time requirement of 28 U.S.C. 144. Section 144 says that a motion for recusal "shall be filed not less than ten days before the beginning of the term [session] at which the proceeding is to be heard." With the abolition of terms of court in 1963, I have read that this specific provision no longer applies. I am filing this EMERGENCY MOTION within a week after this Civil Action appeared.
71. This affidavit is accompanied by a "certificate of counsel of record." As I am the only person of record and I am a pro se Plaintiff, the certificate is from me, and it is made in good faith.
72. The bias and antagonism of TWT unfairly prejudice me in this civil action.

The federal judges in Atlanta Georgia are the scum of the earth. Only four-letter words would do these creeps "justice." They make the average murderers look like choirboys. These are serial criminals who commit tens of thousands of crimes because they have the power.

Well, I am unleashing a whole new attack on these slimeballs, so stay tuned for the news on my latest lawsuit. I am suing every cotton pickin' one of them -- 56 criminals who masquerade as employees of the U.S. government and judiciary in Atlanta, Georgia. I will pursue every single one of these crooks until the day I die.

Sadly, the federal judges in your area are undoubtedly just as corrupt.

William M. Windsor

Government

CIANEL

Government Dishonesty is Bad. We must find honest people and make them accountable to We the People. READ all about it.

Last Updated on Thursday, 23 June 2011 11:58

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COMMENTS

H FAITH 2011-06-12 12:35 0
This is the same thing happened to me. My case was heard before TWT. I will also file a complaint with the Justice Department after reading your story.

TWT stated that my case had no merit. The Defendant submitted one affidavit & that we proved to be filtered with lies. I presented nine affidavits.

TWT proves prejudice because a judge is not supposed to grant relief that isn't even requested.

Quote

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Our fundamental rights have been taken away by a government of wrongs. Stolen by corruption. READ all about it.

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Misconduct is everywhere. Dishonesty abounds. Perjury, subornation of perjury, corruption! READ all about it.

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Abuse, Dishonesty, Corruption. It's all common with Police and Law Enforcement. READ all about it.

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Exhibit

D

William M. Windsor

PO Box 681236 * Marietta, GA 30068 * 770-578-1094 * Cell: 404-606-1885

Financial Information

1. Financial Statement

The financial statement of William M. Windsor shows a negative net worth of $932,648. This was prepared and submitted to Judge Duffey on March 21, 2011.

Since this was prepared, the price of the Ball Mill Road home has been lowered by another $50,000. Despite efforts for five years, there has never been an offer to purchase or lease the home. The home has been listed for both sale and lease. Fulton County just sent a new tax appraisal, and they lowered the appraisal from $916,300 to $640,000.

2. Income Tax Returns

These income tax returns show little net income for the Windsors. The true financial picture is even worse as the expenses of one of the Windsor's two residential properties may not be deducted. So, approximately $4,000 per month is spent on interest, taxes, insurance, and maintenance on the Ball Mill Road property, but this expense is not shown on the income tax return as the Windsor's CPA says it is not deductible.

The 2009 income tax return is inaccurate. It was submitted when Windsor was unable to read. It will be amended when time and reading permit.

The 2010 income tax return is on extension due to the same factors. A tax deposit of $100,000 was paid (to cover the taxes on funds withdrawn

from IRA account to pay legal sanctions). The check bounced when Wells Fargo made a mistake on the account number they used for the wire transfer.

3. Financial History

Windsor sold his magazine publishing business in 1981-82. He foolishly invested most of the proceeds after taxes in developing a 600-acre tract of land in Dallas County, Texas. An MAI appraisal scandal in the Dallas area, economic problems in Texas, and the inability of Windsor's small bank to get other banks to participate in an orally-committed loan put Windsor in a serious financial bind. Efforts to obtain financing, despite an MAI Appraisal of $8.1 million, were hopeless.

Windsor went through a series of buyers who did not close. The last of the potential buyers was Vernon Hulme. Hulme put up a significant amount of non-refundable earnest money, and it appeared the Windsors would survive and salvage $1 to $2 million after paying off the mortgages and other related debt. Then Windsor received a call from the Securities and Exchange Commission. It seemed that Hulme had used fraudulent stock certificates as collateral to obtain loans. The money paid to Windsor as earnest money was obtained in that manner.

See http://articles.orlandosentinel.com/1985-10-11/business/0330380221_1_stock-certificates-hulme-securities-transfer

http://articles.orlandosentinel.com/1986-06-23/business/8606270601_1_hulme-civil-contempt-civil-proceedings

http%3a//www.sec.gov/news/digest/1985/dig101685.pdf

This mess had the property tied up for many months. Windsor testified for the SEC. The Windsors sold their home in Dallas (despite the fact they were advised that in Texas, residences are protected in bankruptcy)

and used the $300,000 proceeds to buy time to try to find a buyer. Time finally ran out, and the Windsors ended up with nothing after Chapter 7 liquidation in 1986-87. The trustee had enough assets to pay all other bills after the bank agreed to take the property back. There should have been money left over, but it magically disappeared in the wonderful world of trustees, attorneys, courts, and dishonest creditors. The Windsors received $0.00, so all they had was their furniture and clothes.

From 1987 to 1996, Windsor worked for others and did some consulting work. From 1992 to 1996, he was employed by Advanstar, a large publishing and trade show company owned by Goldman Sachs. Two of those years were based in Chester, England. The Windsors had bought another home in Dallas with the proceeds from a consulting job. While the Windsors were living in England, their property value plummeted when a nearby apartment complex became a center for drug activity. The Windsors had to sell for a price that resulted in a loss of virtually all of their equity.

From 1996 to 2001, Windsor was employed by an entity owned by Bain Capital. He had ownership options, but they were never realized. Windsor resigned from the company in 2001 after receiving bonuses from the sale of two of the company's holdings. From 1994 to 2001, Windsor was able to accumulate approximately $400,000 in a 401(k) that became Wells Fargo IRA – 8913-5517.

Windsor spent approximately two years working on a donut and coffee franchise start-up. He and his wife were minority owners. They sold their interest in 2003 for no profit.

The attached income tax returns show what has happened since. Windsor was advised to maintain his funds in mutual funds after 9/11 and throughout subsequent economic disasters. As a result, the value of those funds plummeted dramatically due to 9/11 and then the banking fiasco.

4. Financial Efforts at This Time

Windsor's financial efforts at this time are centered on two things. First, money has been withdrawn from IRA funds or borrowed to keep the two mortgages current. While there may be little or no equity available from either home, the homes represent the potential to realize something. Second, all efforts are being made to correct the gross miscarriage of justice in the federal courts in Atlanta and Washington, DC. The Windsors will get their lives back if this is resolved in their favor. All this or another court will have to do is do an in camera inspection of two documents filed under seal in 1:06-CV-0714-ODE.

Windsor retained bankruptcy counsel in 2009. He was advised that his IRA funds would be protected inside or outside of bankruptcy. But, as he did with his protected home in Texas in the 1980's, Windsor chose instead to use those funds to avoid bankruptcy as long as possible. Those funds have been used for the mortgage payments, deposits due to court sanctions, and legal expense.

William M. and Barbara G. Windsor[1]

PO Box 681236 * Marietta, GA 30068 * 770-578-1094 * Fax: 770-234-4106

Financial Statement as of March 21, 2011

ASSETS	
Cash – Bank of America	$ 117.02 [2]
Investment Account – Wachovia	$1,005,408.67 [3]
Investment Account (401k funds) – Wachovia	$ 8,369.66 [4]
Real Estate – 7675 Ball Mill Road	$ 695,000.00 [5]
Real Estate – 3924 Lower Roswell Road	$ 945,000.00 [6]
Furniture & Fixtures	$ 10,000.00
Jewelry (watch)	$ 5,000.00
TOTAL ASSETS	$2,668,885.24

[1] Joint balance sheet showing all joint assets as well as sole assets of William M. Windsor.

[2] Joint checking account Bank of America -- William M. and Barbara G. Windsor.

[3] Investment Account – Wachovia – pledged as collateral on loan with Wachovia, and the account is in Wachovia's name and control. Balance is pledged on 2008 note to Ryan Windsor. $62,212.46 of this amount is subject to tax. These funds are not joint, these funds are solely in the name of William M. Windsor (not joint tenant with right of survivorship).

[4] IRA Retirement funds – Wachovia – William M. Windsor FCC as Custodian. This is shown net of income taxes. To obtain the money used to post cash bonds, Windsor borrowed $350,000 from this account rather than file bankruptcy. According to Windsor's bankruptcy attorney, these funds are not available to creditors inside or outside bankruptcy. $100,000 is payable in taxes due now on the money withdrawn in 2010, and $30,000 in tax will be payable in 2011 on the $100,000. The tax obligation on 2010 mutual fund gain has also been deducted from this amount. The remainder is owed to Ryan Windsor These funds are not joint; these funds are solely in the name of William M. Windsor (not joint tenant with right of survivorship).

[5] Home was purchased for $849,000 in 2001. Home has been for sale since 2006, and there has never been an offer. The home next door is on a short sale, and while appraised at about the same amount as our home, it was expected to sell at $695,000 nine months ago, but the listing price has been lowered to $449,900. Our realtor indicates that $695,000 may be a more realistic price for our home, but the price next door is devastating to us..

[6] Home was purchased for $1,133,000 in 2007. Home next door sold for $1,695,000 in 2007 and sold in 2009 for $998,000. Similar home in the neighborhood just sold for less than $945,000 (closing pending, so exact amount is not yet known).

LIABILITIES	
Accounts Payable	$ 13,215.85 [7]
Notes Payable to Bank – Wachovia	$ 495,768.04 [8]
Notes Payable – Ryan Windsor	$1,000,000.00 [9]
Payables	$ 450,000.00 [10]
Mortgage on Real Estate – 7675 Ball Mill Road	$ 658,000.00 [11]
Estimated Real Estate Commission	$ 48,650.00
Estimated Closing Costs & Repairs	$ 10,000.00
Mortgage on Real Estate – 3924 Lower Roswell Road	$ 849,750.00 [12]
Estimated Real Estate Commission	$ 66,150.00
Estimated Closing Costs & Repairs	$ 10,000.00
Income Tax Liability	$ 0.00 [13]
TOTAL LIABILITIES	$3,601,533.89
NET WORTH	($ 932,648.60)

[7] Bank of America credit cards only; pending bills are not reflected.

[8] This money was borrowed for the downpayment on 3924 Roswell Road and improvements to 7675 Ball Mill Road.

[9] Note payable to Ryan Windsor dated December 2008.

[10] This amount is a ballpark; it will definitely be more than this.

[11] Interest Only Mortgage.

[12] Interest Only Mortgage.

[13] Income tax liability of approximately $160,000 has been reflected with net assets shown. 2009 income tax has not yet been calculated as Windsor was unable to read; not sure if more money will be owed.

William M. Windsor Litigation Expenses

Windsor does all the work except delivery service himself. He has found a free notary at a Cobb County government building.

Windsor has paid litigation expenses with whatever funds were available at the time.

In recent months, both the U.S. Treasury and Wachovia sent checks, and Windsor cashed them to have cash for litigation expenses. Windsor believes the U.S. Treasury was interest on money paid into the court. Wachovia was a refund of overcharges to the mortgage escrow account. Windsor believes the total was between $4,000 and $5,000.

Windsor also received and cashed a refund on eye surgery – approximately $500.

This cash is almost gone after filings yesterday.

Within the last month, people from around the country have pledged donations of money for Windsor's legal expenses. Windsor has been contacted by a non-profit association working for government and judicial reform, a wealthy fundraiser for causes such as this, and a number of organizations as well as individuals.

Windsor is confident that donations will enable him to continue paying his litigation expenses.

Someone has suggested that if I get a big piece of cardboard and write; SUING ATTORNEYS AND JUDGES and stand on a busy streetcorner, I should be able to cover my expenses.

If I have to, I will resume doing the deliveries myself. I may do depositions by video only.

William M. Windsor: Note Payable to Ryan

Judge Duffey has asked about this note.

When the Maid of the Mist people filed suit lying and committing perjury, Windsor decided to fight. Windsor told Alcatraz Media that the three Defendants would have no problem proving these people to crooks.

When Judge Evans began making rulings that made absolutely no sense, Windsor told his son, Ryan, that his Dad would be responsible for all of the legal expense. This was around May 2006.

Alcatraz's attorney, G. Brian Raley, was well aware of this as was attorney Jim Penland. Letters have been obtained from Mr. Raley and Mr. Penland because they refused to come today, and I was denied any subpoenas. [Exhibits A and B.]

The total expense through December 2008 was approximately $1,000,000. Legal fees in Atlanta and New York, court reporters, legal researchers, fees paid to Maid's attorneys, Maid's legal fees, court costs, photocopying, printing, etc. There is still a payable to Raley of approximately $30,000. [Exhibit C shows the Consent amount.]

The note was entered into in December 2008 after the settlement with Maid of the Mist. Windsor was planning to reopen the case with Maid of the Mist, so this was done to fulfill the obligation to Windsor's son and to get it in place before starting up the legal process again.

William M. Windsor: Bill Paying

Judge Duffey has asked how Windsor can afford to pay bills.

Windsor can't. He has no income and essentially no money.

Looking at the 2009 tax return, which was estimated, total income (line 22) showed to be $58,401 and adjusted gross income (line 37) shows $56,739. I believe that's going to prove to be high when the tax return is done properly, but it is what it is for now. I know there are errors on this tax return.

Over the last few years, Windsor has gotten money from the Wachovia line of credit – approximately $225,000. That's all gone, and there is essentially no more credit.

Windsor has gotten money by withdrawals from his 401(k) account. Without his financial records, Windsor doesn't know the amount, but ballpark $500,000.

Windsor received a small inheritance from his father following his death in late 2008/early 2009 – perhaps $25,000.

Alcatraz Media paid the vast majority of the legal expense related to Maid of the Mist through the end of 2008. That amount is approximately $1,000,000.

Windsor has a credit card with a revolving balance as does his wife, so the use of some money is obtained by charging things.

Some personal charges get charged on American Express and are to be reimbursed.

William M. Windsor Real Estate Purchases

From 1996 to May 2001, William M. Windsor was employed as CEO of 1st Communications in Independence, Ohio. Windsor does not remember his salary, but he believes it was in the range of $250,000 annually.

Windsor had approximately $2,000,000 in CD's and/or mutual funds in May 2001.

Windsors' home in Ohio was for sale for approximately $500,000, but the Windsors qualified for the loan on the home at 7675 Ball Mill Road, Atlanta, Georgia 30350.

In April 2007 when Windsor was attracted to the home at 3924 Lower Roswell Road, Marietta, Georgia 30068, he thought the Ball Mill Road home would sell quickly, though it had been on the market for a while without a contract offer. There were, however, a number of lookers.

Windsor contacted Wachovia Bank to see if there was any way to qualify without income. Windsor did have an investment account and his 401(k) account with Wachovia. Wachovia asked Windsor for his income, and he indicated his only income was increase in value of mutual funds. Wachovia asked what Windsor's gross income was. Windsor said "you mean net income, don't you?" The Wachovia rep said "no, what is the total amount of income (revenue) that you receive annually?" Windsor said that Round America, LLC represents approximately $1,000,000 in annual tax return income. Windsor should have questioned that if Wachovia was loaning him based on gross revenue rather than net income, maybe they and other banks were doing that with everyone. Windsor should have been smart enough to back off on the house and move his mutual funds to money market funds, but he wasn't smart.

The loan on 3924 Lower Roswell Road, Marietta, Georgia closed in late June 2007. Windsor needed cash for the downpayment and to make some improvements to the Ball Mill home that he felt would cause it to sell faster, so Wachovia gave a line of credit of $500,000 and took 100% collateral of Windsor's mutual fund account; the account was changed from a William M. Windsor account to be in the name of Wachovia. Windsor has no access to those funds. At that time, Windsor believes the mutual fund account had a value of approximately $1,300,000.

Approximately $250,000 was drawn to pay the downpayment, and approximately $25,000 was drawn to make home improvements at Ball Mill Road. Windsor has drawn approximately $220,000 from this account for living expenses since that time.

In August 2007, Judge Orinda D. Evans committed perjury and other crimes when she ordered Windsor to pay approximately $450,000 in Maid of the Mist's legal fees in Civil Action No. 1:06-CV-0714-ODE.

The **United States housing bubble** is an economic bubble affecting many parts of the United States. Housing prices peaked in early 2006, started to decline in 2006 and 2007, and may not yet have hit bottom.

On December 30, 2008 the Case-Shiller home price index reported its largest price drop in its history. Increased foreclosure rates in 2006–2007 among U.S. homeowners led to a crisis in August 2008 for the subprime and other markets. In October 2007, the U.S. Secretary of the Treasury called the bursting housing bubble "the most significant risk to our economy." [See Exhibit A.]

One expert predicted another 20% drop in housing values on July 14, 2011. [See Exhibit B.]

On September 16, 2008, there was the start of a **stock market crash** due to failures of massive financial institutions in the United States, due primarily to exposure of securities of packaged subprime loans and

credit default swaps issued to insure these loans and their issuers. This rapidly devolved into a global crisis. Beginning October 6, 2008 and lasting all week, the Dow Jones Industrial Average closed lower for all 5 sessions. Volume levels were also record breaking. The Dow Jones industrial average fell over 1,874 points, or 18%, in its worst weekly decline ever on both a point and percentage basis. The S&P 500 fell more than 20%. [See Exhibit C.]

Windsor's agent at Wachovia told him to hang in there rather than sell his mutual funds and modify the collateral with Wachovia to a money market account. The advice was terrible, and the value of Windsor's mutual fund account and 401(k) dropped by as much as 40%.

William M. Windsor

PO Box 681236 * Marietta, GA 30068 * 770-678-1094 * Cell: 404-606-1885

July 16, 2011

Judge William S. Duffey
United States District Court
Northern District of Georgia
75 Spring Street, SW
Suite 1721
Atlanta, Georgia 30303-3361

Re: 1:09-CV-01543-WSD

Dear Judge Duffey:

Mr. Anderson made a number of false statements at the hearing. Here are just those that I can remember:

1. Mr. Anderson claimed he had never heard of ZZ, LLC. This is false. See Response to Interrogatories, Interrogatory #7:

   > "Mrs. Windsor is the sole owner of Round America, LLC, ZZ Tours, Inc., and ZZ, LLC."

   The Interrogatories are Exhibit A, and the LLC documentation is Exhibit B.

2. Mr. Anderson claimed they had just discovered an $80,000 receivable from Ryan Windsor. There is no such receivable. I am quite certain that the financial information provided to Mr. Anderson reflects this repayment somewhere. See Response to Interrogatories (Exhibit A), Interrogatory #22:

   > "Mr. Windsor does not recall ever lending any money to Ryan M. Windsor, but he believes Mrs. Windsor loaned either Ryan Windsor or one of his companies some money in 2008 and 2009 due to cash flow problems. This money was repaid within a few months."

3. Mr. Anderson claimed the corporate filings for ZZ Tours, Inc. did not show Barbara Windsor. See Georgia Secretary of State documentation as they clearly show B. Windsor, a change from William M Windsor. (See Exhibit C.)

4. Mr. Anderson claimed he was unaware that the businesses had any contract labor expense. This is false. See Statement 3 to the 2008 ZZ Tours Income Tax Return. It clearly shows Contract Labor. (See Exhibit D.)

5. Mr. Anderson claimed he was provided incomplete 2009 tax return information. This is false. He was provided exactly what I had. I enclose another copy. I have previously provided this to the Court as well. (See Exhibit E, a redacted copy since I am asking this to be filed.)

6. I forgot to ask to submit the letters from the attorneys into the record. They prove that the obligation to repay Alcatraz Media was an agreement that they were well aware of. See letters from G. Brian Raley and Jim Penland. I also enclose the page from the docket in 1:06-CV-0714-ODE that shows the big amount there. These three add up to $905,049.12 of the $1,000,000. (See Exhibit F.)

If Mr. Anderson wants to continue to pretend that obligation is not real, I must ask that sworn affidavits be accepted and that the letters from Raley and Penland be accepted or that I be given subpoenas to conduct two 5-minute depositions. I was denied those rights at the hearing, so please do not claim the note isn't valid because I didn't provide proof. You have my sworn affidavits and testimony, and no one has or can dispute what I have said because it is the God's honest truth.

I have located a December 5, 2007 email from my accountant in the Maid of the Mist legal files. After the hearing, I recalled that there were conversations with Harry Perkins about my obligation when we had to post a bond. The email confirms my obligation to pay the legal expense in the Maid of the Mist deal. (See Exhibit G.) Exhibit H is a fax dated October 13, 2010 regarding the filing of the 2009 personal tax return (on extension) and reminding Harry that ownership changed to Barbara on 12-31-2008, so all 2009 income would be hers.

I also located an email in the Maid of the Mist legal files that is an exchange between Ryan and me about my promise to pay him for all of the legal expense. It is dated October 9, 2008. I'm not sure if it is attorney-client privileged as it

contains exchange of information from the Alcatraz Media attorneys. I have enclosed the last thread in this email string that is the portion relevant to this as it does not include attorney information. (See Exhibit I.)

There was no million dollars delivered to me. The deal is very simple: I agreed to reimburse for all of the legal fees. Alcatraz Media is a sub s corporation, so those fees were income that came out of Ryan and Rod's pocket. Ryan would have paid Rod from the money. Mr. Anderson can't make this go away. Please cease trying. It's ridiculous. Something is nagging me that Mr. Anderson knew about this. I'm almost positive he was told. It might have been at mediation.

There should be some attorney-client privileged emails with Brian Raley that also prove up the deal on the $1,000,000. Do I need to spend time looking through Raley's files?

Judge Duffey, you indicated there were American Express charges that were personal for printing. May I see what it is that you are questioning? Printing bills on the American Express bill don't identify the nature of the printing. We have used Mount Vernon Printing for 10 years to do printing for us. As I testified, American Express pays almost all of the bills for the companies. You also seemed to be indicating that there were a lot of American Express charges that were personal. I checked online, and the total I quickly calculated was about $15,000. $9,000 of that was legal, with $7,500 of that for printing my Supreme Court filings last fall. There are some printing charges that are for the businesses, not legal.

Exhibit J includes two emails that I found in the legal files showing what the deal was on our documents. Thinking back now that these jog my memory, we had filed a request for an extension of a day or so. I also tried to get the Eleventh Circuit to act. The May 12 email notes that there isn't enough time to photocopy. Both emails note the agreement, which was that originals would be provided and they would copy. I have demanded our documents back on Monday.

You have asked for proof that the mutual funds are pledged to Wells Fargo. Exhibit K is the cover page which shows "WFNBA Collateral Account FBO William M. Windsor." So, as I testified, the account is in Wells Fargo's name, and it is clearly stated to be a collateral account. I have sent an email requesting the collateral documentation.

I ask that this letter be filed with the Clerk of the Court.

Sincerely,

William M. Windsor

Exhibit

A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MAID OF THE MIST CORPORATION and MAID OF THE MIST STEAMBOAT COMPANY, LTD.,	)	
Plaintiffs,	)	
v.	)	CIVIL ACTION NO: 1:09-CV-01543-WSD
ALCATRAZ MEDIA, LLC, ALCATRAZ MEDIA, INC. and WILLIAM M. WINDSOR,	)	
Defendants.	)	

DEFENDANT WILLIAM M. WINDSOR'S RESPONSES TO PLAINTIFFS' INTERROGATORIES

Pursuant to Rules 26, 33, and 69 of the Federal Rules of Civil Procedure and O.C.G.A. §§ 9-11-26, 9-11-33 and 9-11-69, Defendant William M. Windsor ("Mr. Windsor") hereby responds to Plaintiffs' Interrogatories as follows:

I. GENERAL OBJECTIONS

Mr. Windsor reserves all objections to the competency, relevancy, and admissibility of any information furnished. The furnishing of any information does not constitute an admission that such information is relevant to any issue in this case, competent for use as proof, or admissible for any purpose in the pending

litigation. No objection or limitation, or lack thereof, made in these objections and responses shall be deemed an admission by Mr. Windsor as to the existence or non-existence of information.

In the interest of economy of time and clarity, Mr. Windsor will state at the outset his general objections in separate paragraphs. These general objections are expressly incorporated by reference into Mr. Windsor's response to each interrogatory below.

A. Mr. Windsor objects to each interrogatory to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, spousal privilege, or any other applicable privilege or protection.

B. Mr. Windsor objects to the definitions insofar as they purport to place a greater burden on Mr. Windsor than the minimum requirements of the Federal Rules of Civil Procedure.

C. Mr. Windsor reserves the right to amend or supplement these objections and responses as further responsive information becomes available pursuant to the Federal Rules of Civil Procedure.

D. Mr. Windsor objects to Plaintiffs' instructions on the grounds that it attempts to impose upon Mr. Windsor an obligation to supplement his responses to

the Interrogatories in a manner that is inconsistent with the obligation of supplementation imposed by Federal Rules and state law.

E. Mr. Windsor objects to the scope of many of these interrogatories as they seek information about Mr. Windsor's wife .

F. Mr. Windsor objects to the time period of all interrogatories that seek information prior to June 2010. This matter deals with a court order issued in June or July 2010, and Mr. Windsor believes that anything that happened prior to that time is totally irrelevant.

Subject to the foregoing objections, Mr. Windsor has endeavored to respond to each individually numbered interrogatory below. In the event that Mr. Windsor has inadvertently failed to answer or to object to any of these interrogatories, he reserves the right, upon being promptly notified of such omission, to supply the answer and state its objections, if any, to the inquiry.

II. SPECIFIC RESPONSES

Interrogatory No. 1: List your full name, home phone number, cell phone number, and address, including house or apartment number and ZIP Code.

Response: Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that his full name is William Michael Windsor. Mr. Windsor's telephone number is 770-578-1094. Mr.

Windsor's address is 3924 Lower Roswell Road, Marietta, Georgia 30068.

Interrogatory No. 2: If you do not own the property which serves as your place of residence, give the name, address, and phone number of the person who owns the property which serves as your place of residence.

Response: Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that his place of residence is co-owned by Barbara Gray Windsor, 3924 Lower Roswell Road, Marietta, Georgia 30068, 770-578-1094.

Interrogatory No. 3: Give the name, address, telephone number, and line of business of your present employer; state the position you hold; and describe the method and amount of payment to you.

Response: Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he is not employed.

Interrogatory No. 4: If you are not presently employed, please list all current sources of income not otherwise specifically described in your previous answers, giving the name and address of the source, the nature and amount of payment, and the future payments you expect to receive from the source.

Response: Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he has no source of income.

Mr. Windsor has mutual funds that are pledged as collateral on a loan, and Mr. Windsor has no access to those funds; the funds are actually maintained in an account in the name of Wachovia (now Wells Fargo). These funds may generate gains (or losses), but these are merely paper transactions. Mr. and Mrs. Windsor's property at 7675 Ball Mill Road, Atlanta, Georgia 30350 has been listed for lease for several years. While the Windsors have never had an offer to lease, it is possible that the Windsors will lease the property someday. If so, it might bring $2,500 to $3,000 per month. This is anticipated to be less than the mortgage interest, taxes, insurance, and maintenance.

Interrogatory No. 5: If you or your wife own an interest in any real property, for each parcel of property, state the address; the date of acquisition; the name and address of the seller or person from whom title was acquired; the name and address of each owner and the respective ownership interest of such owner; the purchase price; the portion of the purchase price paid in cash and the portion financed; the details of the financing; and the present balance on the purchase price.

Response: Mr. Windsor objects to Interrogatory No. 5 on the grounds that it is overly broad, and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor

reasonably calculated to lead to the discovery of discoverable evidence. Real property" has not been defined. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he and his wife own two parcels of real estate.

7675 Ball Mill Road, Atlanta, GA 30350: This was acquired on March 27, 2001. The sellers were Mr. and Mrs. Peter Orr; Mr. Windsor does not know their address. The property is owned jointly by William M. and Barbara G. Windsor. The purchase price was $819,500. $161,500 was paid in cash plus closing costs, and $658,000 was financed. The mortgage is held by EMC Mortgage, PO Box 293150, Lewisville, TX 75029-3150. The loan number is 0022646582. The principal balance is $658,000.

3924 Lower Roswell Road, Marietta, GA 30068: This was acquired in June 2007. The seller was Homes by Williamscraft; Mr. Windsor does not know their address or if they are still in business. Mr. Windsor understands the company is in bankruptcy. An article online says "They have a bunch of corrupt builders and developers like Wilmont Williams still sitting out there in their 3.5 million dollar houses. Wilmont Williams was a big contributor to the collapse of several area banks. Wilmont with his Homes by Williamscraft, did a lot of paper transfers of the land with his daughters and their closely held companies, inflating the land

value. They then took out loans on the subdivision lots getting their skin out. Letting banks, like Integrity, Bank of North Ga, and even Regions hold the bag when the market went south. They also screwed their subcontractors by not paying them. But good old Wilmont brother of John Williams of Post Properties fame still has his 3.5 million dollar house at Reynold Plantation. The average homeowner in one of his subdivision lost 46% of their value or $300 -400,000 cash out of pocket. Just google the Atlanta Business Chronicle article about Regions bank suing Wilmont for 6.4 million." The Lower Roswell Road property is owned jointly by William M. and Barbara G. Windsor. The purchase price was $1,133,000. $305,437 was paid in cash at closing (including closing costs), and $849,750 was financed. The mortgage is held by Wells Fargo Home Mortgage, PO Box 10368, Des Moines, IA 50306-0368. The loan number is 0006739924. The principal balance is $849,750.

Interrogatory No. 6: If any person, firm, or business entity holds any property for you or your wife's benefit, for each item of property, state the name and address of such person, firm, or business entity; a description of the property held for your benefit; the conditions under which the property is held for your benefit; and the approximate value of the property.

Response: Mr. Windsor objects to Interrogatory No. 6 on the grounds that it is vague, ambiguous, overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that the terms "property" and "holds any property" were not defined. Please see response to Interrogatory No. 5. The Windsors do not own any other real property. The mortgage holders hold the deeds on the two real properties; see Interrogatory No. 5. If "property" refers to money, Wells Fargo has full control of Wells Fargo WFNBA Collateral Account (Wells Fargo Loan) – 4997-5040. This was pledged to Wachovia (now Wells Fargo) when Mr. Windsor borrowed the funds to purchase the real property at 3924 Lower Roswell Road, Marietta, GA 30068, to do home improvements on the property at 7675 Ball Mill Road, Atlanta, GA 30350, and cover mortgage payments and living expenses. This account had a balance of $1,059,478.61 at March 31, 2011, and $497,000 was owed on the loan to Wells Fargo. The balance of these funds after payment of the loan to Wells Fargo are pledged to Ryan Michael Windsor on a promissory note. This account has approximately $205,282 in unrealized gain that will be taxed. Windsor receives no funds from this account,

and an interest-only payment of approximately $1,000 per month has to be paid to keep the loan in good standing.

From time to time, the Windsors take clothing to the cleaners, the car for maintenance or repairs, other items for repairs, etc., but Mr. Windsor knows of nothing that is in the possession of anyone else at this time.

Interrogatory No. 7: Give the name, address, phone number, and a description of the nature of any business venture in which you or your wife own any interest.

Response: Mr. Windsor objects to Interrogatory No. 7 on the grounds that it is overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. Mr. Windsor owns no interest in any business. Mrs. Windsor is the sole owner of Round America,

LLC, ZZ Tours, Inc., and ZZ, LLC. The address of these businesses is PO Box 681236, Marietta, GA 30068. The telephone number is 770-578-1094. These businesses sell tours and tickets, and Round America, LLC is also a travel-related business.

Interrogatory No. 8: If anyone owes you and/or your wife any money, state: a) the name and address of each such debtor; b) the amount owed and the form of the obligation; c) the date the obligation was incurred, and the date the obligation becomes, or became, due and owing; d) the condition for payment of the obligation, if any; and f) the consideration given for the obligation.

Response: Mr. Windsor objects to Interrogatory No. 8 on the grounds that it is overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. The term "owes you any money" was not defined. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct

based upon his personal knowledge. No one owes Mr. Windsor or Mrs. Windsor any money. Credits for returns on credit cards happen from time to time, but Mr. Windsor does not know if any of these are pending for anything that Mrs. Windsor may have returned. This doesn't seem to fit the question, but it is offered in an effort to be comprehensive in responding.

Mr. Windsor believes the United States District Court for the Northern District of Georgia owes him money.

Interrogatory No. 9: List the names and addresses of all banks or financial institutions where you or your wife have any sums of money deposited. For each such account, state the type of account; the name(s) on the account; the person(s) authorized to draw on the account; the date the account was opened; the account number; and the amount of the present balance.

Response: Mr. Windsor objects to Interrogatory No. 9 on the grounds that it is overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer

for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor provides the following:

Bank of America – Checking account -- William M. Windsor; account is used solely by William M. Windsor but shows the names of both William M. Windsor and Barbara G. Windsor. Mr. Windsor does not know when the account was opened, but he believes it was April 2001. The account number is 0032-7636-3647, and the present balance is $72.37.

Wells Fargo IRA – Retirement Account -- William M. Windsor. This account has been used solely by William M. Windsor. It was tapped to pay deposits into the court for sanctions improperly ordered by Judge Orinda D. Evans Using these funds triggered taxes. Due to the legal withdrawals, taxes, taxes on the withdrawals used to pay the taxes, and some mortgage payments, this account doesn't even have enough money left in it to pay the taxes that are due on the withdrawals. Approximately $40,000 will be due by April 15, 2012 for taxes. The account number is 8913-5517. The present balance is $37,000.00.

Wells Fargo Estate of Walter M. Windsor c/o William M. Windsor, Executor –Wells Fargo Executor Account. This account has been used solely by William M. Windsor as executor. Walter M. Windsor died in February 2008 with

an estate of approximately $250,000 that was distributed to 10 heirs. The balance in this account is not to be distributed to any of his heirs. This remaining amount is for the payment for the purchase of grave markers at two cemeteries in New York where ancestors lie in unmarked graves. The account number is 3375-6231. This account has a present balance of $12,331.58.

Wells Fargo WFNBA Collateral Account (Wells Fargo Loan) –Wells Fargo mutual funds of William M. Windsor. This is a collateral account that has been controlled by Wachovia and then Wells Fargo since June 27, 2007. Windsor has no ability to withdraw any funds as all of the funds are pledged to Wells Fargo as collateral on approximately $497,000 in loans obtained in 2007. Pursuant to a December 31, 2008 Promissory Note, Ryan Windsor has a second lien on the funds as collateral for money borrowed for legal fees related to civil action 1:06 CV-0714-ODE from 2005 to 2008. The account number is 4997-5040. The present balance at March 31, 2011 was $1,058,468.61.

Bank of America –Barbara G. Windsor. This is a checking account. William M. Windsor's name is shown beneath Barbara G. Windsor's name on this account, but William M. Windsor has never made a withdrawal, written a check, or used this account. This is Barbara's account; she began carrying this checkbook

when we moved to Atlanta in 2001 – approximately April 2001. The account number is 0032-7636-3654. The present balance is $109.65.

While this was not asked, Mr. Windsor has paid deposits into the Court that the Plaintiffs are well aware of. If the appellate court(s) go by the law, this money will be returned to Mr. Windsor.

Interrogatory No. 10: If there are any bank accounts on which your name does not appear, but in which you have money deposited at this time, for each account, state the name and address of the bank; each name under which the account stands; the account number; and the approximate date and amount of each deposit made by you.

Response: Mr. Windsor objects to Interrogatory No. 10 on the grounds that it is vague, ambiguous, overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that there are no bank accounts on which his name does not appear where he has money deposited.

Interrogatory No. 11: If you own any furniture or household goods, give a complete description of same; the date of purchase; the source of the funds used

in the purchase; the estimated present value; the present location; and the name and address of each other person with an ownership interest in such item.

Response: Mr. Windsor objects to Interrogatory No. 11 on the grounds that it is overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he personally does not own any furniture or household goods. Mr. Windsor and Mrs. Windsor jointly own tables, chairs, beds, couches, televisions, shelving, pots, pans, dishes, linens, eating utensils, and other such items. These items have been purchased between June 19, 1971 and the present. The source of the funds used to pay for these items were cash, check, gifts, and loans. Mr. Windsor estimates the garage sale value of these items at $5,000 to $10,000. No other person has any ownership in any of these items.

Interrogatory No. 12: Do you and/or your wife have access to any safe deposit boxes or other depositories for securities, cash or other valuables? If so, for each depository, state: a) the name of the bank or branch where the depository is located; b) the name and address of each person having access to the depository; c) the description of the property contained in the depository as of the date of service

of these Interrogatories, and d) the number or other means of identification of your safe deposit box.

Response: Mr. Windsor objects to Interrogatory No. 12 on the grounds that it is vague, ambiguous, overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that there is one safe deposit box. It is Box 00319, Bank of America, Perimeter Center, Atlanta, Georgia. William M. Windsor and Barbara G. Windsor have access to the safe deposit box. When these interrogatories were served, the box contained a CD-ROM containing a book written by Windsor's father, Walter M. Windsor. The box is now empty. Mrs. Windsor has no other safe deposit box that Mr. Windsor knows about, and he believes she has nothing that he doesn't know about. See Interrogatory No. 9 for bank account information, if that is responsive.

Interrogatory No. 13: Have any of the contents of the above--mentioned depositories been removed during the past 12 months? If so, for each item removed, state: a) a description of the property removed; b) the exact date of the removal; c) why it was removed; d) the name and address of each person who removed it; and e) the name and address of each person, firm, or corporation to whom the property was conveyed or transferred.

Response: Mr. Windsor objects to Interrogatory No. 13 on the grounds that it is vague, ambiguous, overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he is unaware of anything being removed from the safe deposit box in the last 12 months until Mrs. Windsor removed the CD-ROM in May 2011. Mr. Windsor has only been to the safe deposit box once that he can recall. Mr. Windsor believes

that neither he nor Mrs. Windsor had been to the safe deposit box in several years. Mr. Windsor has never put anything in the safe deposit box except perhaps to retrieve documents of his father's. Mr. Windsor believes he went to the safe deposit box to find documents that he was given by his father expressing his wishes for an event to take place after he died. This was done when his father was gravely ill or shortly after he died in February 2008.

Interrogatory No. 14: For each automobile or other motor vehicle that you and/or your wife own or use, please state: a) the year, make, model and license number of the vehicle; b) the name and address of the legal owner, and the name and address of the registered owner, if different; c) the date of purchase, the name and address of the person or firm from whom the vehicle was purchased, the purchase price of the motor vehicle, and the amount of any monthly payments; d) the name and address of each person who has made payments on the motor vehicle; and e) how long you and/or your wife have been driving the motor vehicle.

Response: Mr. Windsor objects to Interrogatory No. 14 on the grounds that it is overly broad, vague, ambiguous, and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable

evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he does not own a car either individually or jointly with Mrs. Windsor. Mrs. Windsor owns a 2010 Jeep Grand Cherokee, license number BME 8435. Barbara G. Windsor is the registered owner, and her address is 3924 Lower Roswell Road, Marietta, GA 30068. It was purchased in May 2010. Barbara G. Windsor is the only person who has made payments on the motor vehicle. Mr. Windsor does not know how long either he or his wife have driven the vehicle, but Mr. Windsor estimates that he has driven the vehicle approximately 2,500 miles. Mrs. Windsor also has use of a company-leased vehicle through her employment at Alcatraz Media, Inc.

Interrogatory No. 15: If you presently own or have an interest in any life insurance or annuity policy, for each such policy, state the name and address of the insurance company; the type of policy; the date the policy was issued; and the face amount of the policy.

Response: Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he does not own or have any interest in any life insurance policy or annuity policy. Mr. Windsor has never had an annuity policy. Mr. Windsor has not had any life insurance policy since the mid-1980's except for any life insurance included as part of health insurance coverage between 1994 and 2001, if any. Mr. Windsor might also have had life insurance coverage by virtue of using American Express for air travel in the past, though Mr. Windsor has never been killed in an airplane crash and has not been on an airplane in over a year.

Interrogatory No. 16: Do you and/or your wife own any stocks, bonds, mutual fund shares, or other securities, of any class, in any government, governmental organization, company, firm or corporation, whether foreign or domestic? If so, for each security, please state: a) the type and number of securities owned; b) the date of purchase; c) the total purchase price; d) the name and address of the broker through whom you and/or your wife made the purchase; and e) the name and address of each person other than you and your wife who has an interest in such security.

Response: Mr. Windsor objects to Interrogatory No. 16 on the grounds that it is overly broad, vague, ambiguous, and seeks information that is outside the

scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he does not own any stocks, bonds, securities of any class in any government, governmental organizations, company, firm or corporation, whether foreign or domestic. Mr. Windsor also volunteers that he does not own any interest of any type in any legal entity. Mr. Windsor has never had any foreign holdings of any type, though he lived in England from 1992-1994. Mr. Windsor did not own a house, car, securities or anything else other than personal possessions while in England.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor believes that Mrs. Windsor does not own any stocks, bonds, securities of any class in any government, governmental organizations, company, firm or corporation, whether foreign or domestic. Mr. Windsor believes

that Mrs. Windsor has never had any foreign holdings of any type, though she lived in England from 1992-1994. Mr. Windsor believes that Mrs. Windsor did not own a house, car, securities or anything else other than personal possessions while in England.

Mr. Windsor has mutual funds that are pledged as collateral to Wells Fargo and Ryan Michael Windsor. This mutual funds account was originally established in approximately 2002. Mr. Windsor does not recall how much was initially invested; he does not have records for years prior to at least 2005. The mutual funds were purchased through George Coleman, Wachovia, Wells Fargo Advisors, 2520 North Winds Pkwy, Suite 200, Alpharetta, GA 30009. Wells Fargo and Ryan Michael Windsor have these funds as collateral; Mrs. Windsor has no interest in these funds, nor does anyone else. These funds get invested in a myriad of stocks and bonds that change regularly. Mr. Windsor assumes that he has no obligation to attempt to determine what those are.

Mr. Windsor has mutual funds in an IRA account. This mutual funds account was originally established in approximately 2002. Mr. Windsor does not recall how much was initially invested; he does not have records for years prior to 2006. The mutual funds were purchased through George Coleman, Wachovia, Wachovia, Wells Fargo Advisors, 2520 North Winds Pkwy, Suite 200, Alpharetta,

GA 30009. No one has an interest in these funds, but the balance in the account is totally allocated to pay part of the taxes that the sale of retirement funds triggered. Mrs. Windsor has no interest in these funds, nor does anyone else. These funds get invested in a myriad of stocks and bonds that change regularly. Mr. Windsor assumes that he has no obligation to attempt to determine what those are.

Interrogatory No. 17: Please specify all ownership interests that you and/or your wife have had in any real property over the last ten years. For each parcel of property, state: a) the address, size and legal description of the property; b) a description of each structure and other improvement on the property; c) the date you and/or your wife acquired an interest in the property; d) the purchase price or other consideration paid for the interest in the property; e) the name and address of each person or business, other than you and/or your wife, with an ownership in the property; and f) the present value of you and/or your wife's equity interest in the property or if you and/or your wife no longer have an interest in the property, state: i) the date that you and/or your wife divested yourselves of the interest and the reason for divesting the interest; ii) the name and address of the organization(s) or person(s) who obtained you and/or your wife's interest in the property and whether the organization(s) or person(s) had any relationship to you and/or your wife and the nature of that relationship; and iii) the purchase price or

other consideration paid to you and/or your wife for the transfer of interest in the real property.

Response: Mr. Windsor objects to Interrogatory No. 17 on the grounds that it is overly broad, vague, ambiguous, and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that Mr. and Mrs. Windsor have had and still have interests in two real properties over the last 10 years.

This is information about the real estate at 7675 Ball Mill Road, Atlanta, GA 30350. The legal description is Lot 3 Block "A" Dunwoody Club Estates Subdivision, Land Lot 352, 6th District, Fulton County, Georgia recorded in Plat Book 111, Page 70. It is approximately 1.055 acres. There is a home on the property. A description has previously been provided to the Plaintiffs' attorney.

and additional information is in Box #6. Mr. and Mrs. Windsor acquired the property on or about March 28, 2001. The purchase price was $819,500. No one other than the mortgage company has ownership in the property. The home is currently listed at $895.000. The tax appraisal was $916,300 last year, but the tax appraisal was reduced to $640,000 this year. The home next door sold for $436,000 in July 2010; the tax appraisal was $701,900. The home next door was originally listed at just under $1,000,000. The Windsor's Ball Mill Road home has been for sale for over four years, and there has never been an offer. The price has been lowered by $355,000 so far, and the real estate agent says it may have to go down another $200,000 to sell. Mr. Windsor is currently estimating the value of this property to be $695,000. At $695,000, real estate commission and closing costs will likely be $51,700, so the sale would net $643,300. The mortgage balance is $658,000. This means the Windsors have a negative equity interest in the property of $14,700. In the extremely unlikely event that the home sold for the current asking price of $895,000, real estate commission and closing costs would be $63,700, for a net of $831,300. The mortgage balance is $658,000. This means the Windsors would realize an equity interest in the property of $173,300. The Plaintiffs have filed a lien on this property.

This is information about the real estate at 3924 Lower Roswell Road, Marietta, GA 30068. The legal description is Land Lot(s) 185 of the 16 District, 2 Section/GMD, Lot 2, Block 0 of Stonewalk Subdivision/Development, Cobb County, Georgia as recorded in Plat Bonk 242, Page 30, et. seq.. It is 1.055 acres. There is a home on the property. A description has previously been provided to the Plaintiffs' attorney, and additional information is in Box #6. Mr. and Mrs. Windsor acquired the property on or about June 27, 2007. The purchase price was $1,133,000. Closing costs were approximately $31,692. The Windsors paid earnest money of $35,000 and $270,403.67 at closing. No one other than the mortgage company has ownership in the property. The home is currently listed at $1,195,000. The tax appraisal showed $1,331,560 in 2008, $1,177,050 in 2009, and $1,004,230 in 2010. The Windsors are objecting to the appraisal and have estimated the value to the county at $908,440. This home has been for sale since a month after it was purchased in 2007. The price has been lowered by approximately $200,000. The home next door (3928 Lower Roswell Road) was purchased for $1,632,500 on March 26, 2007. It was appraised by the tax assessor at $1,676,490 in 2008 and $1,514,340 in 2009. The 2010 statement is not available online, but it has to be dramatically lower. 3928 Lower Roswell Road sold for $998,900 on November 30, 2009 (66% of tax appraisal). As a result, the Windsors

do not now anticipate generating more than $945,000. Windsor's tax appraisal on 3924 Lower Roswell Road for 2009 was $1,177,050 and $1,004,230 in 2010. Based upon 66%, the Windsors could get as little as $776,853, so the $945,000 estimate certainly isn't too conservative. The Windsors have had several contracts, but all have fallen through when the buyers apparently were unable to obtain financing. The Windsors did not previously object to the tax appraisal, but they have now started that process. The home on the other side of the Windsors at 3920 Lower Roswell Road was appraised at $1,166,080 in 2008, $1,056,200 in 2009, and $908,440 in 2010 (after the homeowners objected to their appraisal). A similar home just down the street at 3960 Lower Roswell Road was listed at $945,000, and it sold for $875,000 less $9,000 in the buyer's closing costs that were paid by the seller. The home was appraised at $1,081,240 in 2007 and only $807,730 in 2010. At $908,440, real estate commission and closing costs will likely be $64,504, so the sale would net $843,936. The mortgage balance is $849,750. This means the Windsors have a negative equity interest in the property of $5,814. In the extremely unlikely event that the home sold for the current asking price of $1,195,000, real estate commission and closing costs would be $81,700, for a net of $1,112,300. The mortgage balance is $849,750. This means the Windsors

would realize an equity interest in the property of $262,550. The Plaintiffs have filed a lien on this property.

Interrogatory No. 18: Please specify all ownership interests that you and/or your wife have had over the last fifteen years in any business. For each business, state: a) the name of the business, the address of the principal place of business or general office, and the address of each place at which the business is conducted; b) the type of business conducted; c) the date you and/or your wife acquired an interest in the business; and d) the present value of the equity interest in the business, and its percentage of the total value of the business or, if you and/or your wife no longer have an interest in the business, state: i) the date that you and/or your wife divested yourselves of the interest and the reason for divesting the interest; ii) the name and address of the organization(s) or person(s) who obtained you and/or your wife's interest in the property and whether the organization(s) or person(s) had any relationship to you and/or your wife and the nature of that relationship; and iii) the purchase price or other consideration paid to you and/or your wife for the transfer of interest in the business.

Response: Mr. Windsor objects to Interrogatory No. 18 on the grounds that it is overly broad, vague, ambiguous, and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in

this action nor reasonably calculated to lead to the discovery of discoverable evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. 15 years is totally uncalled for.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that in 1996, he had a small stock holding in Advanstar that was provided to him by the company. Advanstar, 2501 Colorado Avenue, Suite 280, Santa Monica, CA 90404. Advanstar had offices in Berea Ohio, Chester England, New York, New Jersey, Eugene Oregon, Duluth Minnesota, Santa Ana California, and perhaps elsewhere. Advanstar is a magazine publishing, trade show and conference, and marketing services company. Mr. Windsor believes he received this stock in 1995; the company loaned Mr. Windsor the money to buy the stock. When Advanstar was sold in 1996, Mr. Windsor received an amount that he does not recall – perhaps $125,000, and he believes whatever amount was borrowed for the purchase was deducted from the proceeds. The divestiture was required at the time the company was sold. Mr. Windsor assumes the stock went back to the corporation, but he does not recall. He also

recalls that Advanstar had several legal entities, so he does not even know what the entity name was.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that from 1996 to 2001, he had options to receive stock in 1st Communications, Inc. Mr. Windsor believes he had also purchased a small number of shares. Mr. Windsor believes his actual ownership was a fraction of a percentage. 1st Communications, 4700 Rockside Road, Suite 635, Independence, Ohio 44131. 1st Communications had offices in Minneapolis Minnesota, Fremont California, Portland Oregon, Dallas Texas, Orlando Florida, Boston Massachusetts, and perhaps other small sales offices that Mr. Windsor has forgotten about. 1st Communications was in the trade show and conference, career fair, publishing, and Internet businesses. Mr. Windsor left the company in 2001. Mr. Windsor did not receive any payment for his stock.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that from 2001 to 2003, he had a minority stock interest in Hotties, Inc. Hotties, Inc., 400 State Road 436, Altamonte Springs, Florida 32714, Altamonte Springs, Florida. The Windsor home at 7675 Ball Mill Road, Atlanta, GA 30350 was also an address used by the company. Hotties was in the donut, coffee, and dessert business. Mr. Windsor believes that

he and his wife owned shares jointly, but he has no records and cannot be sure. The stock was sold in approximately April 2003 to a group of investors, and Mr. Windsor does not recall their name – some men in the rice business primarily in California. Mr. Windsor believes the stock was sold at approximately the price paid for the stock. Mr. Windsor does not recall the amount, but he believes it would have been at least $250,000 and probably not much more than that amount.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that from 2000 to 2006, he operated The Windsor Companies as a sole proprietorship. The Windsor Companies operated out of the Windsors home at 7675 Ball Mill Road, Atlanta, GA 30350. The Windsor Companies operated a website selling vinyl records and CD's. The business ceased operation in 2005 or 2006; Mr. Windsor is unsure of the date. The business was not sold; it just stopped. Mr. Windsor estimates that the business generated annual revenues that averaged approximately $40,000 from 2000 to 2005.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that from 2004 to 2008, he may have been considered to be the owner of Round America, LLC and ZZ Tours, Inc. These entities used PO boxes in Atlanta, GA, and Mr. Windsor does not recall the

address. Mr. Windsor physically worked from his home at 7675 Ball Mill Road and then at 3924 Lower Roswell Road (detailed above). When the entities were established, it was envisioned that the entities were jointly owned by Mr. and Mrs. Windsor. However, Mr. Windsor was the organizer. On or about December 31, 2008, 100% ownership was formally vested in Barbara G. Windsor.

Mr. Windsor has started many companies over his 42 year career. Based upon his recollection at this time, he believes these are the only businesses that he has had ownership in, but he reserves the right to supplement this response if anything else comes to mind.

Interrogatory No. 19: State specifically all pending lawsuits of any kind and relating to any issue in which you or your wife stand to benefit, either directly or indirectly, in any way, either financially or otherwise.

Response: Mr. Windsor objects to Interrogatory No. 19 on the grounds that it is overly broad, vague, ambiguous, and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also

unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that Mrs. Windsor is not party to any lawsuit. Mr. Windsor is a party only to civil actions that the Plaintiffs are well aware of. These are 1:06-CV-0714-ODE, 1:09-CV-01543-WSD, 1:09-CV-02027-WSD in the United States District Court for the Northern District of Georgia and all related appeals; 1:10-CV-00197-RJL in the United States District Court for the DC Circuit and all related appeals; and Index No. 9808/2009 in the New York State Supreme Court and all related appeals.

Interrogatory No. 20: State your social security number and date of birth.

Response: Mr. Windsor objects to Interrogatory No. 20 on the grounds that it seeks information that is outside the scope of permissible discovery because social security numbers are to be kept confidential due to identity theft concerns. Mr. Windsor confirms that his social security number was listed correctly on a document given to Plaintiffs' attorney in the courtroom of Judge Evans. It ends in 4479. It is also listed on tax returns that are being produced. Mr. Windsor's date of birth is October 2, 1948.

Interrogatory No. 21: State your wife's social security number and date

of birth.

Response: Mr. Windsor objects to Interrogatory No. 21 on the grounds that it seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge. Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that the last four digits of her social security number are 3041. It is also listed on tax returns that are being produced. Mrs. Windsor's date of birth is June 7, 1950.

Interrogatory No. 22: State the amount of money that you have lent to Ryan M. Windsor, Barbara G. Windsor, Brittany Windsor, Tony Windsor, Marty Windsor, Robert Harrell Carolyn Bazzo, John Bazzo, and/or Rod Smith since January 1, 2004.

Response: Mr. Windsor objects to Interrogatory No. 22 on the grounds that it is overly broad and seeks information that is outside the scope of permissible

discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Anything that happened prior to July 2010 or October 2010 is not relevant to this matter. Mrs. Windsor is not a party to this action, and she has no obligation to the Plaintiffs. Her personal finances, other than joint finances with Mr. Windsor, are irrelevant, confidential, and none of Plaintiffs' business. Mr. Windsor is also unable to answer for Mrs. Windsor because he must swear that these answers are correct based upon his personal knowledge.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he does not recall lending any money to anyone since October 1, 2010. Mr. Windsor believes he has never lent any money to Carolyn Bazzo, John Bazzo, and/or Rod Smith. In preparing documents, Mr. Windsor saw a check to Robert Harrell several years ago. Mr. Windsor does not recall what this was for, but if it was a loan, it was promptly repaid.

If Marty Windsor ever obtained a "loan" of any amount from Mr. Windsor, it would have been more than five years ago. Mr. Windsor does not recall any loan, but he does faintly recall speaking with his sister when she was having some financial challenges in the middle of a divorce. If he ever loaned any money to Marty Windsor, she repaid it.

Mr. Windsor has never lent any money to Barbara G. Windsor. Mr. Windsor has given money to Mrs. Windsor over the last 40 years, and vice-versa.

Mr. Windsor does not recall ever lending any money to Tony Windsor; however, he vaguely recalls things like picking up some food or a prescription for which he may have been reimbursed. Checks have been written over the years between Mr. Windsor or Mrs. Windsor and Brittany Harrell or Robert Harrell as reimbursements for purchasing gifts or instances where one purchased something for another and was reimbursed. Mr. Windsor faintly recalls being asked once for a small loan of a few thousand dollars, which he provided and for which he was promptly repaid.

Mr. Windsor does not recall ever lending any money to Ryan M. Windsor, but he believes Mrs. Windsor loaned either Ryan Windsor or one of his companies some money in 2008 and 2009 due to cash flow problems. This money was repaid within a few months.

Interrogatory No. 23: State the amount of money that you have received from Ryan M. Windsor, Barbara G. Windsor, Brittany Windsor, Tony Windsor, Marty Windsor, Robert Harrell, Carolyn Bazzo, John Bazzo, and/or Rod Smith since January 1, 2004.

Response: Mr. Windsor objects to Interrogatory No. 23 on the grounds

that it is overly broad and seeks information that is outside the scope of permissible discovery because information sought is neither relevant in this action nor reasonably calculated to lead to the discovery of discoverable evidence. Anything that happened prior to October 2010 is not relevant to this matter.

Subject to and without waiving the foregoing objections, but specifically relying thereon, Mr. Windsor states that he does not recall ever receiving any money from Marty Windsor, Robert Harrell, Carolyn Bazzo, John Bazzo, and/or Rod Smith.

Mr. Windsor does not recall receiving any money from Brittany Windsor or Tony Windsor since January 1, 2004 unless it was reimbursement for a small loan or some expenditure made on their behalf.

Mr. Windsor does not recall receiving any money from Ryan M. Windsor, though Ryan Windsor and or one or more of his companies paid legal fees that Mr. Windsor agreed to be responsible for.

Mr. Windsor does not recall receiving any money from Ryan M. Windsor, Brittany Windsor, Tony Windsor, Marty Windsor, Robert Harrell, Carolyn Bazzo, John Bazzo, and/or Rod Smith since October 1, 2010.

Mr. Windsor does not know how to answer the question in regard to Barbara G. Windsor. Mr. Windsor has periodically over the years taken money from her

purse and has asked if she had any cash that he could have. Barbara G. Windsor has paid most household bills since 2004, and most of those payments would have been for Mr. Windsor's benefit as well as her benefit. Barbara G. Windsor provided some money in recent months for the payment of mortgages, loan, and other expenses. Barbara G. Windsor is now paying all bills. The only significant expenditure that Mr. Windsor has made recently is to withdraw $100,000 from his IRA to pay to the Internal Revenue Service.

This 11th day of May, 2011.

William M. Windsor
Pro Se

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

VERIFICATION OF WILLIAM M. WINDSOR

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he has read the foregoing Defendant William M. Windsor's Responses to Interrogatories and knows the contents thereof; that the same is true to his knowledge, except as to the matters alleged upon information and belief or belief, and as to those matters, he believes them to be true.

This 11 day of May, 2011.

William M. Windsor

Sworn and subscribed before
me this __ day of _____ 2011.

_____
Notary Public

Commission Expires: NOTARIZED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MAID OF THE MIST CORPORATION and MAID OF THE MIST STEAMBOAT COMPANY, LTD.,	)	
Plaintiffs,	)	
v.	)	CIVIL ACTION NO: 1:09-CV-01543-WSD
ALCATRAZ MEDIA, LLC, ALCATRAZ MEDIA, INC. and WILLIAM M. WINDSOR,	)	
Defendants.	)	

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing DEFENDANT WILLIAM M. WINDSOR'S RESPONSES TO INTERROGATORIES by courier to ensure delivery to the following:

Carl Hugo Anderson, Jr., Esq.
Georgia Bar No. 016320
HAWKINS PARNELL
4000 Suntrust Plaza -- 303 Peachtree Street -- Atlanta, Georgia 30308
Telephone: 404-614-7400 -- Facsimile: 404-614-7500
Email: canderson@hptylaw.com

This 13th day of May, 2011.

William M. Windsor
Pro Se

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

Exhibit

B

Control No. 10077241

STATE OF GEORGIA

Secretary of State

Corporations Division
315 West Tower
#2 Martin Luther King, Jr. Dr.
Atlanta, Georgia 30334-1530

CERTIFICATE OF ORGANIZATION

I, **Brian P. Kemp**, the Secretary of State and the Corporations Commissioner of the State of Georgia, hereby certify under the seal of my office that

ZZ, LLC
a Domestic Limited Liability Company

has been duly organized under the laws of the State of Georgia on **11/04/2010** by the filing of articles of organization in the Office of the Secretary of State and by the paying of fees as provided by Title 14 of the Official Code of Georgia Annotated.

WITNESS my hand and official seal in the City of Atlanta and the State of Georgia on November 4, 2010

Brian P. Kemp
Secretary of State

Control No: 10077241
Date Filed: 11/04/2010 11:41 AM
Brian P. Kemp
Secretary of State

November 04, 2010

ARTICLES OF ORGANIZATION
FOR GEORGIA LIMITED LIABILITY COMPANY

The name of the Limited Liability Company is:
ZZ, LLC

The principal mailing address of the Limited Liability Company is:
PO Box 681236
Marietta, GA 30068

The Registered Agent is:
Barbara Gray Windsor
3924 Lower Roswell Road
Marietta, GA 30068
County: Cobb

The name and address of each organizer(s) are:
Barbara Gray Windsor
3924 Lower Roswell Road
Marietta, GA 30068

The optional provisions are:
No optional provisions

IN WITNESS WHEREOF, the undersigned has executed these Articles of Organization on the date set forth below

Signature(s):
Organizer, Barbara Gray Windsor

Date:
November 04, 2010

Control No: 10077241
Date Filed: 02/25/2011 11:17 AM
Brian P. Kemp
Secretary of State

STATE OF GEORGIA

2011 Limited Liability Company Annual Registration

OFFICE OF SECRETARY OF STATE
Annual Registration Filings
P O Box 23038
Columbus, Georgia 31902-3038

Brian P. Kemp
Secretary of State

Chauncey Newsome
Director

Information on record as of: 2/25/2011

Entity Control No. 10077241 **Amount Due: $50.00** **Amount Due *AFTER* April 1, 2011: $75.00**

ZZ, LLC
PO Box 681236
Marietta, GA 30068

Each business entity registered or filed with the Office of Secretary of State is required to file an annual registration. Amount due for this entity is indicated above and below on the remittance form. Annual fee is $50. If amount is more than $50, the total reflects amount(s) due from previous year(s) and any applicable late fee(s). **Renew by April 1, 2011.** Your Annual Registration must be postmarked by April 1, 2011. If your registration and payment are not postmarked by April 1, 2011, you will be assessed a $25.00 late filing penalty fee.

For faster processing, we invite you to file your Annual Registration online with a credit card at www.georgiacorporations.org. The Corporations Division accepts Visa, MC, Discover, American Express and ATM/Debit Cards with the Visa or MC logo for online filings only. Annual Registrations not processed online require payment with a check, certified bank check or money order. We cannot accept cash for payment.

You may mail your registration in by submitting the bottom portion of this remittance with a check or money order payable to "Secretary of State". **All checks must be pre-printed with a complete address in order to be accepted by our offices for your filing. Absolutely, no counter or starter checks will be accepted. Failure to adhere to these guidelines will delay or possibly reject your filing.** Checks that are dishonored by your bank are subject to a $30.00 NSF charge. Failure to honor your payment could result in a civil suit filed against you and/or your entity may be Administratively Dissolved by the Secretary of State. (See O.C.G.A. § 13-6-15 and Title 14, respectively.)

Registered Agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit.

Note: Registered Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Boxes may be used for principal office and officers' addresses.

Any person authorized by the entity to do so may sign and file registration (including online filing). Additionally, a person who signs a document submits an electronic filing he or she knows is false in any material respect with the intent that the document be delivered to the Secretary of State for filing shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished to the highest degree permissible by law. (O.C.G.A. § 14-2-129.)

Please return ONLY the original form below and applicable fee(s). For more information on Annual Registrations or to file online, visit www.georgiacorporations.org. Or, call 404-656-2817. **PLEASE PRINT LEGIBLY.**

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

LIMITED LIABILITY COMPANY NAME	ADDRESS	CITY	STATE	ZIP
ZZ, LLC	PO Box 681236	Marietta	GA	30068
AGT: Windsor, Barbara Gray	3924 Lower Roswell Road	Marietta	GA	30068
IF ABOVE INFORMATION HAS CHANGED, TYPE OR PRINT CORRECTIONS BELOW:				
Limited Liability Company Address:				
AGT			GA	
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT	*P O BOX NOT ACCEPTABLE FOR REGISTERED AGENT'S ADDRESS*	COUNTY OF REGISTERED OFFICE: Cobb	COUNTY CHANGE OR CORRECTION	
AUTHORIZED SIGNATURE: Barbara Gray Windsor		DATE: 2/25/2011	Total Due: $50.00	
TITLE: Mgr	EMAIL:			

BP214 2011 Limited Liability Company Annual Registration

117 100772415 0050009 ZZLLC0000000000000000 2011040118 0050009

Exhibit

E

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

WILLIAM M. WINDSOR, Plaintiff, v. JUDGE WILLIAM S. DUFFEY, et al., Defendants.	CIVIL ACTION FILE NO. 1:11-CV-1922-TWT

ORDER

This is a pro se civil action against the Clerk of this Court and various Judges of this Court and the Eleventh Circuit Court of Appeals and others. The Court notes that in a related case where the Plaintiff's appeal was dismissed as frivolous, the Court of Appeals described the Plaintiff's abuse of the judicial system as follows:

> [The Plaintiff's] litigious behavior [has] undermined the integrity of the judgments and orders in this case. Although the case is closed, Windsor has repeatedly filed unsubstantiated, duplicative pleadings, many after the district court issued an order denying them. Moreover, his pleadings are long and repetitive, and the volume of his filings poses a burden to clerical and judicial operations and is an impediment to the administration of justice.

After review, permission to file the papers received by the Clerk from the Plaintiff on August 15, 2011 is GRANTED. Pursuant to Local Rule 7.1, the Clerk shall file the

first 25 pages (including any attachments) of the Plaintiff's Motion for Reconsideration of Motion to Proceed in Forma Pauperis.

SO ORDERED, this 16 day of August, 2011.

/s/Thomas W. Thrash
THOMAS W. THRASH, JR.
United States District Judge