

In the Supreme Court of the State of Michigan

Supreme Court Case #: _____

Associated Cases: (MI)
COA:202804; COA:282820;
CC: 07-1256-AW;
CC: 06-633604-NO;
SC:131803; COA:267023;
CC:04-000577-CL

Associated Cases: (US)
09cv12374; 09cv11307;
08-14944;
08cv10005; 08-1879;
08-1895

The Constitutional “**State of Michigan**”, and all proceeding “**State-Ex-Rel**” and “**Quo-Warranto**” through **David Schied**, and numerous other honorably concerned Michiganders, too numerous to list here, of which are including John and Jane Does, 1-1,000. All Co-Plaintiffs herein are proceeding:
Rex, Sui-Juris, & Propria-Persona;

Plaintiffs, Demandants, & Accusers,

Vs

The private corporation of the *defacto* “**STATE OF MICHIGAN**”, in persons who are known, among others, as:

Jennifer Granholm; Kelley Keenan; Michelle Rich; Mike Cox; Frank Monticello, Patrick O'Brien, Thomas Cameron, Paul Goodrich, Wanda Stokes, David Tanay;

Michigan and U.S. District Court Judges and State Court Administrator: Deborah Servitto, Mark Cavanagh, Karen Fort Hood, Cynthia Stephens, Donald Owens, Pat Donofrio, Richard Bandstra; Melinda Morris, William Collette; Paul Borman, Lawrence Zatkoff, Steven Murphy; Carl Gromek;

U.S. Attorneys, FBI and USDOJ Agents: Terrance Berg; Andrew Arena, Rod Charles, Walt Kennedy;

State Prosecutors: Brian Mackie, Joseph Burke; Robert Donaldson, James Gonzales, Maria Miller, Kym Worthy;

Attorneys for the Michigan State Bar: Michael Weaver, Richard Fanning, Gary King, Bruce Bagdady;

State Police; Local and County Sheriffs: Fred Farkas, Ann McCaffery, Darryl Hill, Lynn Huggins, Beth Moranty, Karla Christiansen, Dan Pekar, Liz Canfield, Robert Grounds, Tim Bolles, Charles Bush; Michael Carlton, Greg Hannewald, Anthony Tilger; Warren Evans, James Hines, Larry Crider, Michael Sawaya; Jerry Clayton, Jeff Saren, Bob Bezotte, Robert Hudecek, Scott Domine;

Michigan OCR, DOE and RESA: Donna Paruszkiewicz, Joan Blair, Harvalee Saunto, Ann Omans, Jackie Thompson, Susan Liebetreu, Wayne County RESA Officers David Soebbing, Mary Fayad, Kevin Magin, Marlene Davis;

County Commissions: Laura Cox, John Sullivan, Rolland Sizemore, Jr., Robert Guenzel, & others of the Wayne and Washtenaw County Commission;

School district administrators: Sandra Harris, Fred Williams, Lynn Cleary, Cathy Secor, Sherry Gerlofs, Leonard Rezmierski, David Bolitho, Katy Parker, Scott Snyder, Lynn Mossoian; Ronald Ward, Ken Hamman, Patricia Meyer, Kirk Hobson, Laura Surrey, teacher Jennifer Bouhana, Karen Ellsworth, Jessica Murray, Patricia Ham; and,

Other Public-Offices Holders at All Levels, as well as their representative attorneys; & including John & Jane Does 1-300; many of whom are named more fully later in this complaint, or will be added by amendment to this complaint as they become known; & all named in their Private & Public Capacities.

Accused Criminal Defendants.

Felony Criminal Complaint of Racketeering, Conspiracy, Fraud, Theft, Bribery, Perjury, Abuse of Public Office, Official Misconduct, Obstruction of Justice;

and, **Other Crimes in Corruption too numerous to list here;**

Class-Action; Civil Rights; Action at Law; Trial by Jury Demanded

We “**Plaintiffs**” are proceeding in the nature of “**State-Ex-Rel**” & “**Quo-Warranto**”, as recognizable under MLC 600.4501 - 600.4545. Hereby, we are seeking a Judicial Warrant directing Executive Personnel to complete the “**Ejectment & Ouster**” of All herein “**Accused**” as corrupted “**public servants**” from the public offices they unlawfully hold; and for levying such fines and prison sentences against said corrupted public officers as the fully-informed and supreme Jury shall direct, in the Service of the Supreme Laws of Nature and of Nature’s God.

Judges, Clerks, and Bailiffs Take Note:

This is a Felony Criminal Complaint that is Solemnly Affirmed, Subscribed, and Verified. Do Not Obstruct this Constitutionally-Guaranteed, and Well-Settled Course of Step-By-Step Procedures for Securing the Naturally-Conscionable “Justice” which is “Due” to Us, Or You Will be Named as a Criminal Co-Conspirator in Future Amended Versions of this Complaint !

On Behalf Of, and In the Interests of, the Common People who Physically Compose this “State of Michigan” We Demand All of Our Rights to Prosecute this Criminal-Complaint through Originally-Constitutionally-Intended “Due Process of Law”, at All Times; and We Relinquish None of these Rights, at Any Time, Nor for Any Reason !

None of we “Co-Plaintiffs with the State”, as listed here-in; are laboring under any form of “Legal Disability”, such as a “Master/Servant” Relationship.; which might in any way be construed as providing any color of lawful basis for any interference with our Full Rights as Sovereign and Free Americans. Such “Legal Disability” would be such as those of the numerous “Public Servants” named here-in, and who are here-by accused of having Abused their Position of “Public Trust” to benefit them-selves, and to benefit their co-conspirators.

All Parties: Take further notice that These Demandants are Not in the receipt of any Franchise of any Membership from any Exclusive Bar-Association for the ‘Privilege’ of ‘Practicing Law’, and here-under these Demandants Demand that All Parties note that: the Exact Proper Wording and Presentation of these Issues is Not to be Held to those Exacting Standards which are Demanded of Bar-Member Lawyers. There are “Liberal Rules of Pleading” under which We Non-Franchised, Sovereign, Non-Bar Members have the Constitutional Right to Proceed, and these Rights are Recognized with-in the U.S. Supreme Court’s wording as:

“ . . . the allegations of the pro se complaint, . . . we hold to less stringent standards than formal pleadings drafted by lawyers, . . .” Haines v. Kerner, 404 U.S. 519, 30 L. Ed. 2nd 652 (1972).

Jurisdiction:

The individual judges sitting on this court have all of the general, civil, criminal, public, and common-law jurisdiction, as of which it is necessary for them to hear this complaint; and all as is recognized in the section of our lex-scripta based “Michigan State Constitution”, and all of which has been formally adopted by the Representatives of the People of our State at “Article 7 Section 1”.

Article I (Bill of Rights) of the **U.S. Constitution, § 3** (Right to petition) states, “*The people have the right peaceably to... petition the government for redress of grievances; and § 13 (Conduct of suits in person or by counsel) states, “A suitor in any court of this state has the right to prosecute or defend his suit, either in his own proper person or by an attorney.”*

Comes Now, “**We the People**” who Organically-Compose the Socially-Compacted De-Jure Body-Politic which is known as “**The State of Michigan**”, and all proceeding “**State-Ex-Rel**” through this solemnly-affirmed Ex-Relatione Complaint of “**David Schied**”; and: Joe ??? Blow, Jack ??? Black; & numerous other honorably concerned Michiganders, too numerous to list here; but many of whom are listed in the final pages of this document, &/or on associated & frequently up-dated web-pages named at the end of this document; all of which are including: John & Jane Does, 1 - 1,000. All Co-Plaintiffs here-in are Proceeding: **Rex, Sui-Juris, & Propria-Persona; as: Plaintiffs, Demandants, & Accusers.**

Complaining Parties and Basis of Complaint

It is the Common People who organically compose both the sovereignty of the constitutional “State of Michigan” and the “United States”. We therefore come before this Court by way of and through the Natural Person and Co-Plaintiff of “David Schied”; also through the soon forth-coming supportive Complaints from numerous other “*John and Jane Doe*” complainants concerned with and damaged by the same or related factual events, as well as the surrounding and larger problem of the willfully corrupted enforcement of a Constitutionally-lawless private /administrative /equity/summary/military jurisdiction, that is violating the Rights of multitudes of unsuspecting and innocent Michiganders in government offices and courts all across this State. At its secretive and star-chamber-like core, this Constitutionally-lawless jurisdiction may be viewed as being of an “*evil-religious*” nature.

Here under; We complaining Parties are proceeding under those ancient Laws which our Anglo-American people/ancestors held in “Common”, pursuant to their individual “Self-Governing” efforts after the American Revolution of 1776. Here under, we are proceeding under the old Common-Law “Quo-Warranto” process; as it is applicable within our American systems of organic/Constitutional government, and so far as it is reasonably inclined to assist in the securing of “naturally conscionable justice” for the Common People. This basic “Quo-Warranto Process” is explained in Michigan Compiled Laws (here in after MLC) and in Oregon Revised Statutes (here-in-after ORS), at MLC 600.4501 - 600.4545, and ORS 30.510 - 30.640, and in the

case-law related there-to. This “*Quo-Warranto Process*” is only briefly explained in these opening paragraphs, it is more fully explained later here-in; and it is exhaustively explained in an Accompanying Document entitled similarly as: “Memorandum and Article in Support of Common Americans Directly Prosecuting Quo-Warranto/State-Ex-Rel Criminal Complaints ...”.

(See “**EXHIBIT A**”)

As is recognizable under Michigan and Oregon statutes, and even though we as individuals are only humble “*private parties*”; yet we are having an “*interest in the question*” presented herein on behalf of and by the People who actually compose our organic /Constitutional County and State. As these “State-Ex-Rel” statutes clearly declare, the Law allows us as Individuals to proceed “In the Name of the State”. This is a “Process of Law” which is Constitutionally “Due” to each and every honorable American, including ourselves; all for the express purpose of bringing “accountability” by way of “Due Process of Law” to bear on “Public Servants” who have been solemnly accused by reputable members of the Community of having “abused their position of public trust”.

Michigan Rule 23: Class Actions (Prerequisites to a class action) – “*One or more members of a class may sue or be sued as representative parties on behalf of all only if (1) the class is so numerous that joinder of all members is impracticable, (2) there are questions of law or fact common to the class, (3) the claims or defenses of the representative parties are typical of the claims or defenses of the class, and (4) the representative parties will fairly and adequately protect the interests of the class.*”

Chief Justice Marshall in the famous case of Marbury v Madison, 1 Cranch 137 (1803) made it amply clear:

"The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws when he receives an injury." 1 Cranch 137 at 163 (1803).

We do not care about the fashionable “*misconceptions*” of the “Law”. All true “Law” comes from God and/or Natural-Law, and our American national and state written and unwritten

Constitutions affirm precisely this. These are the only bounds of social-behavior which the Public-Servants in this nation are lawfully required to conform with. They are the only bounds to which we feel compelled to Conform; and we insist on these being the “*rules of engagement*” for this case. **The co-plaintiffs in this action have been searching for our Constitutionally-Guaranteed “Justice” by “Due Process/Course of Law” for many, many years now.**

This case focuses on a “*pattern of lawlessness*” that goes way beyond the mere economic focus of the RICO statutes. This case presents a “*Pattern of Criminal Activity*” that is so deeply imbedded into the fabric of Michigan government mechanisms that it is overwhelmingly systemic, revealing itself in a “*chain pattern of coercive corruption*” at every level of local and statewide civil administration, of law enforcement, and of the judiciary. Therefore, such degree of lawlessness is extenuatingly detrimental to the Peace, Safety & Happiness of “*We the People*” who constitute the “Body Politic” which is effectively known as this “State of Michigan”.

By both State and Federal definition “*Coercion*” is the equivalent of “*Terrorism*”. It is clearly a Common-Law a “*Breach of the Peace*” Offence, of a most serious nature, as so recognized within Michigan statutes (MCL 750.543b).

As evidenced by the accompanying felony criminal Complaints, “*We the People*” of this “State of Michigan” are being effectively “*terrorized*” and “*coerced*” away from exercising our constitutionally lawful Rights. This is all as a direct result of the systematic administration of lawless and aggressive force directly against David Schied and his family members, and indirectly through similar patterns of “*terrorism*” and “*coercion*” against the rest of his and the State’s co-plaintiffs.

The Evidence referenced by this and other Complaints against these and other government Co-Conspirators shows clearly that these people in Michigan government are systematically administrating “*force*” against “*We the People*” of this State by their “*overt*”

abuse of their “*discretionary*” authority. They are clearly acting “*outside*” of the “*sphere*” of the Law. They are “*Outlaws*”; and individuals such as these who act in such ways have “*gone to War with the Community*”.

Because of the extreme vulnerability of this State of Michigan to this “*Pattern of Criminal Activity*”, being conspiratorially committed and orchestrated by way of its entrusted Public Officers, the penalties, and the otherwise serious remedies associated with the RICO Statute, are insufficient to adequately address the extenuating matters at hand in this case. Hereunder, the Acts committed by the named Co-Defendants, do indeed effectively amount to a “*State of War*” against “*We the People*” of this State of Michigan. All of the “*Acts*” complained of in this document, and the various ones in support hereto, are all typically matters of clear and open public record; and thus these criminal acts are within the definition of being “*Overt*”. Thus, it is that for a “*conscience-bound*” and “*reasonable*” Jury there is the justifiable expectation that they will recognize these said “*Overt Acts*” as within the statutory definitions of “*Treason*” as set forth within the U.S. Constitution and Codes and within Michigan Constitution and Codes.

The statutes and case-law applicable to this Complaint seem to us to make “*self-evident*” the need of this court’s administrators to find a “*conscience-bound*” and “*Constitution-respecting*” Judge, somewhere, somehow, who is capable of following the constitutionally-guaranteed and fundamental legal procedural steps, as demand herein. We do admit that because of the peculiarity of the procedural steps that are being typically followed in the courtrooms of our Counties and State today, that there may be some questions for some who are otherwise intelligent public servants. We have therefore set forth a “*Memorandum*” and other documents of support, in accompaniment hereto, in which our American constitutional “*Guarantees*” and our “*Due Right*” to this manner of courtroom process is exhaustively explained.

We are hereunder moving forward in the “*Best Interests Of*” and “*On Behalf Of*” this

“State of Michigan”. We are specifically recognized in Statutes and Case Law relating hereto as being “Co-Plaintiffs with the State”. This is true and lawful because “Any Crime against One member of our ‘Body-Politic’, is a Crime against All Members of our Body Politic”. This is just precisely as the Quo-Warranto statutes so recognize. Again; these concepts are all explained in much greater detail in the accompanying document entitled similarly as: “Memorandum in Support of Common People Directly Prosecuting Quo-Warranto/State-Ex-Rel Criminal Complaints ...”. (See “Exhibit A”)

Infeasibility of Government Officials relying upon “absolute” or other “immunity” that is otherwise an “affirmative defense” that must be proven

An agency of the government must scrupulously observe rules, regulations, or procedures which it has established. When it fails to do so, its action cannot stand and the courts will strike it down. See Ex rel. Accardi v. Shaughnessy 347 U.S. 260 [1964].

“No man in this country is so high that he is above the Law. No officer of the law may set that law at defiance with impunity. All the officers of the Government, from the highest to the lowest, are creatures of the Law, and are bound to obey it. It [the Law] is the only supreme power in our system of government, and every man who by accepting office participates in its functions is only the more strongly bound to submit to that supremacy, and to observe the limitations which it imposes upon the exercise of the authority which it gives.” United States v. Lee, 106 U.S. 196, 220 28 (1882)).

In Gravel v United States, 408 U.S. 606 (1972) the Supreme Court, interpreting the constitutionally-derived executive privilege, has long recognized that, *“[t]he so-called executive privilege has never been applied to shield executive officers from prosecution for crime.”* (Gravel v. United States, 408 U.S. at 627). The Court held that neither absolute nor qualified immunity can be relied upon to protect interference with the criminal process or grand jury investigations.

In Holton v Boman, 493 F2d 1176 (7th Cir. 1974) and in Madison v Purdy, 410 F2d 99

(5th Cir. 1969) the federal courts held that when prosecutors entered into a conspiracy, they could be held liable in tort. Indeed, in Martin v Merola, 532 F2d 191 (2d Cir. 1976) the federal court insisted that when prosecutors defamed defendants in press conferences, immunity does not protect them from liability in tort. The Courts have also held that police officers were not entitled to immunity either in cases where suits brought with civil rights claims. For example, in the oft-cited Monroe v Pape 365 US 167 (1961), the Court said that actions undertaken by those who would claim immunity: "*Should be read against the background of tort liability that makes a man responsible for the natural consequences of his actions.*" 365 US at 187, 81 S Ct, 484 (1961).

Binding state precedent and federal precedent under 42 U.S.C. Sec. 1983 both show that the Common Law does not support "*absolute immunity*" from tort liability. In the case of Babcock v State where negligent foster care placement was involved, Justice Utter noted in writing for the Court:

"Absolute Immunity shields the recipient from liability for willful misconduct as well as negligence. A caseworker cloaked in absolute immunity could deliberately arrange a foster care placement with a known rapist in order to facilitate the sexual abuse of a child and escape tort liability. This should not be the law."
Babcock v State, 809 P2d 143, 149 (Wash. 1991).

The Supreme Court, lesser Federal and State courts have made it quite clear that immunity must be granted very sparingly. Indeed, in Scheuer v Rhodes, 416 US 232 (1974) the Supreme Court turned aside arguments for immunity as it applied to governors. In Wood v Strickland, 420 US 308 (1975) the Supreme Court refused to give immunity to members of school boards, and in Hazo v Geltz, 537 F2d 747 (3d Cir. 1976) the federal court insisted that court personnel performing many of their functions were entitled to only "*good faith immunity*". In recent years, the court has refused to expand the concept of immunity to prison directors, Proconier v Navarette, 434 US 555 (1978) and to cabinet officers as well as their principle

subordinates. *Butz v Economou*, 98 S.Ct. 2894 (1978)

As the law stands, there is no "*absolute judicial immunity*"; and many cases show that judges indeed have no "*immunity*" against misconduct in office, or where their actions exceed their official jurisdiction.

As stated by the highest court in Maryland in *Mayor of Baltimore v. Porter* 18 Md. 284:

"Where a limited tribunal goes beyond its jurisdiction, its decision amounts to nothing and does not create the necessity for an appeal."

When citizens and their counsel began to utilize 42 U.S.C. § 1983 actions to redress grievances, the Court began to articulate its sense of that civil rights statute as follows:

"The purpose of the statute was to deter public officials from using the badge of their authority to violate persons' constitutional rights and to provide compensation and other relief to victims of constitutional deprivations when that deterrence failed." *Carey v Phipus*, 435 US 247, 253 (1978)

In *Gomez v Toledo*, 446 U.S. 635 (1979) the Court spoke to the concern among plaintiffs that they had an impossible burden to meet by showing in their pleadings that the acts of the defendants were both unreasonable and in bad faith. The Court offered that,

"Nothing in the language or legislative history of Sec. 1983, however, suggests that in an action brought against a public official..... a plaintiff must allege 'bad faith' in order to state a claim for relief." *Gomez* at 640.

The Court went on to instruct:

"Since qualified immunity is a defense, the burden of pleading it rests with the defendant. See Fed. Rule Civ. Proc. 8c (defendant must plead any "matter constituting an avoidance of affirmative defense")" Id.

The Court went on to quote from *Wood v Strickland* and instructed:

"The applicable test focuses not only on whether the official has an objectively reasonable basis for that belief, but also on whether "[t]he official himself [is] acting sincerely and with a belief that he is doing right". *Gomez*, 641

The Court informed that:

"The existence of a subjective belief will frequently turn on factors which a plaintiff cannot reasonably be expected to know. For example, the official's belief

may be based on state or local law, advice of counsel, administrative practice, or some other factor of which the official alone is aware. To impose the pleading burden on the plaintiff would ignore this elementary fact and be contrary to the established practice in analogous areas of the law.” Gomez, 641

In City of Newport v Fact Concerts, Inc., 453 US 247.259 (1981) the Court characterized its process of determining the degree of immunity to which a particular official was entitled as a “careful inquiry into considerations of both history and policy.” Calling the partial immunity granted to many of these officials “qualified immunity”, the Court extended common law immunity for “reasonable” acts in “good faith”. When lower courts became confused as to whether qualified immunity involved a subjective or objective inquiry, the Court explained in Wood v Strickland , 420 U.S. 328, 95 S. Ct. 992 (1975) that the qualified immunity analysis necessarily contains both objective and subjective elements. The analysis is subjective, said the Court, in that the defendant official to receive protection must have acted “with a belief that he [was] doing right.” Wood, 420 U.S. at 321. The analysis is objective, the Court reasoned, in that **officials could not receive protection where they ignorantly believed their actions to be appropriate when in fact their actions violated “settled” and “indisputable” law.**

In Goddard v Urrea, 847 F2d 765 (11th Cir. 1988) the plaintiff brought a civil suit claiming that the defendants, agents of the Bureau of Alcohol, Tobacco and Firearms, had conducted an unlawful search and seizure of her property. The defendants filed a motion for summary judgment, claiming qualified immunity. The district court denied the motion and the defendants appealed. The Eleventh Circuit held that the denial of summary judgment for qualified immunity was justified because **genuine issues of fact remained**, which would impact upon a finding of good faith or reasonableness. **The same year, the Sixth Circuit rejected a plea to dismiss because of “qualified immunity” and declared it an “affirmative defense” which the defendant had to plead and prove.** Duncan v Peck, 844 F2d 1261 (1988).

In Miranda v. Arizona 384 U.S. 436 [1966], Chief Justice Warren delivered the opinion of the court stating in part:

“As Mr. Justice Brandeis once observed: ‘Decency, security and liberty alike demand that government officials SHALL be subjected to the same rules of conduct that are commands to the citizen. In a government of laws, existence of the government will be imperiled if it fails to observe the law scrupulously. Our Government is the potent, the omnipotent teacher. For good or for ill, it teaches the whole people by its example. Crime is contagious. If the Government becomes a lawbreaker, it breeds contempt for law; it invites every man to become a law unto himself; it invites anarchy. To declare that in the administration of the criminal law the end justifies the means ... would bring terrible retribution. Against that pernicious doctrine, this Court should resolutely set its face.’” Olmstead v. United States, 277 U.S. 438, 485 (1928)(dissenting opinion).’ (page 479)

Sufficiency of these Criminal Complaints

Through this complaint, I, “David Schied”, and those co-plaintiffs moving in accompaniment with me hereto, or soon forthcoming; and all proceeding as “Private Parties” directly “related” in socially-compacted organic body-politic to our constitutional State of Michigan; hereby make solemn Oath so as to solemnly affirm or swear under such “penalties of perjury” as a jury following Constitutional “due process of law” may find “conscionable”; that we DO meet the guidelines which have been affirmed by the Congressional Assembly of this State, and by Common-Law, for the defining of the “sufficiency” of “criminal complaints”.

I/We stand as the victim(s) of numerous crimes that are described in this Complaint. Act 175 of 1927, the Michigan Code of Criminal Procedures defines the powers and duties of the courts and judges, and regulates the procedure relative to criminal indictments. Under MCL 761.1 and MCL 750.10, an “indictment” means “a formal written complaint or accusation written under Oath” affirming that one or more crimes have been committed and names the person or persons guilty of the offenses”. According to MCR Rule 6.101 (Rules of the Court):

*“A **complaint** is described as a written accusation that a named or described person has committed a specified criminal offense. The complaint must include the substance of the accusation against the accused and the name and statutory citation of the offense. (B) (Signature and Oath) The complaint must be signed and sworn to before a judicial officer or court clerk. (C) (Prosecutor's Approval or Posting of Security) A complaint may not be filed without a prosecutor's written approval endorsed on the complaint or attached to it, or **unless security for costs is filed with the court.**”*

Under **MCL 761.1**, an **“Act” or “doing of an act” (of criminal offense) includes the “omission to act”**. Under **MCL 767.52** an indictment need not even contain allegations of the means by which the offense was committed; and **MCL 767.47** states, **“No indictment is invalid by reason of any repugnant allegations contained therein, provided that an offense is charged.”**

MCL 764.1(a) holds that, *“A magistrate SHALL issue a warrant upon presentation of a proper complaint alleging the commission of an offense and a finding of reasonable cause to believe that the individual or individuals accused in the complaint committed the offense”*. **MCL 764.1(b)** calls for an *“arrest without delay”*. **MCL 767.3** holds that at the least, *“The filing of any such complaint SHALL give probable cause for any judge of law and of record to suspect that such offense or offenses have been committed...and that such complaint SHALL warrant the judge to direct an inquiry into the matters relating to such complaint”*. **MCL 772.2** holds that *“If a complaint is made in writing on oath to a court that a person has threatened to commit an offense against the person or property of another, the judge SHALL examine on oath the complainant and any witnesses who may be produced.”*

If any person contest that I/we have “not met the sufficiency of a criminal Complaint”, then let them similarly solemnly affirm their contrary accusation. I/We are prepared to “join issue” on that particular and critically important point, if any person is so bold as risk their own personal prosecution by contesting the truthfulness of the words contained in each of our separate complaints.

In addition to these complaints; I “David Schied”, do further hereby proceed in the name of and on behalf of “We the People” of this good/de-jure “State of Michigan”, to file this CRIMINAL Complaint, in full conformity with such statutory guidelines as set forth in Michigan Compiled Laws.¹

In particular, and before the face of “Almighty God”, I do solemnly affirm, subscribe, and verify, so as to make “sufficient” this Complaint, as follows:

Many of the Defendants have herein been properly named, as above; at least so far as they are known to me, and with sufficient fullness so as to move forward with the prosecution of this criminal Complaint. Other defendants, mostly of lesser roles in this conspiracy of evil but presently unknown, may be named at a later date. This lack of specific naming of presently unknown criminal defendants should not hinder the practical ability of this court to move forward with this case.

These offences named by this Complaint were committed within the jurisdiction of this court, or are triable herein. They were committed prior to the filing of this complaint, and about the dates alleged herein.²

The Criminal Co-Defendants are listed in the approximate order in which the situational facts of each person’s Crime was committed:

Further explanation of the Crimes alleged herein are here and now being presented in an

¹ As Michigan statutes (MCL 775.20 and MCL 775.21) suggest, security for court costs in Michigan cases for “*prosecution for malfeasance in state office*” shall be paid from the general fund, by the state treasurer. Also, whenever the attorney general institutes criminal proceedings on behalf of the State, “*all costs incurred in such proceedings, except the pay of circuit judges, prosecuting attorneys, and circuit court stenographers, may be paid by the State*”.

² NOTE: “*Substance*” of the accusations are found in this “*Quo-Warranto*” Complaint in short form; and the accompanying “*Memorandum on Criminal Offenses and Evidence and ‘Sworn Affidavit and Complaint’*” contains the long form of more detailed “*substance*” for these accusations. Similarly, the accompanying “Memorandum of State and Federal Constitutions and Statutes in Support of ‘Quo Warranto/State-Ex-Rel’ Complaint by David Schied” (“*Exhibit C*”) contains the names and statutory citations of all of the offenses listed by the Complaint. Each of the documents are being provided to the Supreme Court in the required number of duplicates, and with one designated “*original*” for each set of “Complaint/Affidavit/Statutes” that has been sworn to, signed, and officially “*notarized*” by a notary public.

accompanying “‘Memorandum’ On Criminal Offenses and Evidence, and ‘Sworn Affidavit’ and ‘Complaint’ by David Schied”. (See “**Exhibit B**”) The offenses are supported by definition of the law contained in the accompanying “Memorandum of State and Federal Constitutions and Statutes in Support of ‘Quo-Warranto / State-Ex-Rel’ Complaint”. (See “**Exhibit C**”) Additional support for specific criminal violations of state and federal policies and laws are provided in an accompanying “CJIS Information Letter” dated April 6, 2001 (see “**Exhibit D**”) and the accompanying “Letter Opinion for the Deputy Director of the Federal Bureau of Investigations” dated June 12, 1998 concerning “Access to Criminal History Records by Non-Governmental Entities Performing Authorized Criminal Justice Functions”. (See “**Exhibit E**”)

All facts and references to Evidence are written “*in ordinary and concise language, without repetition for any one individual, and in such manner as to enable a person of common understanding to know what is intended*”, **as is the generally accepted standards of sufficiency for criminal Complaints.**

These specific situational and factual “Acts Constituting the Offenses”; are now listed as follows:

Primary Level – Predicate Crimes

MICHIGAN SCHOOL SUPERINTENDENTS; SENIOR DISTRICT ADMINISTRATORS

- 1) **SANDRA HARRIS** (former Lincoln Consolidated Schools “*Interim*” Superintendent **currently employed as Superintendent for the Oak Park School District**):
 - a) Incompetence; negligence; violation of duty; perjury in acts under Oath; malicious misconduct in office; abuse of public trust; retaliation for beginning an employment grievance concerning placement on the salary scale.
 - b) Wrongful termination of his employment; Termination based upon violation of public policies prohibiting qualifying employment based on criminal record; “*disparaging impact*” upon certain populations;
 - c) Denial/Deprivation of equal employment opportunity, and of David Schied’s rights under State and Federal criminal justice policy governing the right to “*challenge and correct*” accuracy of an erroneous FBI report; denial of rights based on previous condition of servitude; deprivation of a federally protected activity; deprivation of relief benefits;
 - d) Abuse of power and authority; Exploitation of a vulnerable victim; denial of Constitutional rights to due process, privileges, and immunities; peonage; acting “*under color of law*” to deprive of rights.

- e) Retaliation against person for raising a collective bargaining contract issue (i.e., salary); retaliation by extortion; threat to extort money; and by harassment of victim/witness.
 - f) Rescinding/stealing and converting a teacher contract; Larceny; Theft of money under contract; Larceny by Conversion; Collusion/conspiring with the Lincoln Consolidated School District Board of Education to benefit by conversion of contract.
 - g) Gross frauds and cheats; Receiving stolen or converted property under false pretenses and money and aiding in the concealment of converted property; Fraud by wire or telecommunications as related to access devices and computers; Converting FBI property (2003 criminal background check) to personal use for extorting money and retaliation against former employee; Noncompliance with Criminal Justice Information System (CJIS) Advisory Board policies; fraud upon the Federal government (in procuring criminal records) and then using the federal government (U.S. Mail) to commit other crimes.
 - h) Wrote two defamatory letters and placed them into the school district's public personnel files and disseminated them under FOIA request along with copies of "*nonpublic*" FBI report and Texas court order of "*set aside*"; dissemination dates on record with evidence for distribution of all these items include January 2004, December 2006, and January 2009; interference with informational commerce; Conspiracy to fraud against the United States.
 - i) Criminal Libel and Slander against David Schied; Legal acts in illegal manners; Simulating a legal process;
 - j) Between 2003 and 2009: Colluding with school board, business office employees, and "*defendants*" attorneys to cover up offenses; Conspiracy against the rights of a crime victim (David Schied); conspiracy to "*exploitation of a vulnerable victim*"; Corruption and racketeering;
 - k) False declarations before courts; Perjury in courts; Fraud upon the courts; contemptuous conduct toward the courts;
 - l) Criminal violation of David Schied's privacy.
- 2) **CATHY SECOR (Director of Business Services for the Lincoln Consolidated Schools):**
- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust
 - b) Between 2003-2009: Discriminatory retaliation against Mr. Schied after employment termination, by refusing to properly apply his COBRA insurance premiums causing him to lose his insurance coverage; and later causing health insurance coverage for his family to cancel prematurely;
 - c) Using a federal agency (U.S. Post Office) to commit the crime of retaliation by "*misusing and disseminating*" an outdated and erroneous FBI report, "*nonpublic*" clemency documents, and two letters of defamation.
 - d) Gross frauds and cheats; Possession of stolen property; Converting FBI property (2003 criminal background check) to personal use in retaliation against former employee; Noncompliance with Criminal Justice Information System (CJIS) Advisory Board policies; Simulating a legal process;
 - e) Malicious threat to extort money, to steal identity, property, or other thing of public and private value (i.e., an FBI-owned document as well as Mr. Schied's own personal character, identity and reputation); "*Purloining and converting*" government property for own use when publishing (in 2004, in 2006, and again in 2009) erroneous "*nonpublic*" documents to deprive of employment opportunity and to subject person to "*peonage*";

- f) Denial/Deprivation of State and Federal criminal justice policy governing the right to challenge and correct accuracy of an erroneous FBI report; denial of rights based on previous condition of servitude; deprivation of a federally protected activity; deprivation of relief benefits;
- g) Criminal Libel and Slander; Conducting legal acts in illegal manners for purpose of personal and professional defamation and to defraud the United States;
- h) Conspiracy with Sandra Harris, Sherry Gerlofs, superintendents Fred Williams and Lynn Cleary, to deprive of rights; Conspiracy to cover-up and obstruct a Sheriff's criminal investigation in 2009; conspiracy to "*exploitation of a vulnerable victim*"; Corruption and racketeering; continuing pattern of criminal activity;
- i) Criminal violation of right to privacy laws in Texas, Michigan, and United States as they apply to 'nonpublic' criminal history records, FBI reports, and "*clemency*" records used "*in good faith*" to "*challenge and correct*" the accuracy of erroneous FBI records.

3) SHERRY GERLOFS (Administrative assistant to Sylvester Rowan as executive director of human resources):

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust;
- b) Between 2003-2009: Discriminatory retaliation against Mr. Schied after employment termination, by using a federal agency (U.S. Post Office) to commit the crime of retaliation by "*misusing and disseminating*" an outdated and erroneous FBI report, "*nonpublic*" clemency documents, and two letters of defamation.
- c) Gross frauds and cheats; Possession of stolen property; Converting FBI property (2003 criminal background check) to personal use in retaliation against former employee; Noncompliance with Criminal Justice Information System (CJIS) Advisory Board policies; Simulating a legal process;
- d) Malicious threat to extort money, to steal identity, property, or other thing of public and private value (whether an FBI document or Mr. Schied's personal character, identity and reputation); "*Purloining and converting*" government property for own use when publishing (in 2004, in 2006, and again in 2009) erroneous "*nonpublic*" documents to deprive of employment opportunity and to subject person to "*peonage*"
- e) Denial/Deprivation of State and Federal criminal justice policy governing the right to challenge and correct accuracy of an erroneous FBI report; denial of rights based on previous condition of servitude; deprivation of a federally protected activity; deprivation of relief benefits;
- f) Criminal Libel and Slander; Conducting legal acts in illegal manners for purpose of personal and professional defamation and to defraud the United States;
- g) Conspiracy with Sandra Harris, Cathy Secor, superintendents Fred Williams and Lynn Cleary, to deprive of rights; Conspiracy to cover-up and obstruct a Sheriff's criminal investigation; conspiracy to "*exploitation of a vulnerable victim*"; Corruption and racketeering; continuing pattern of criminal activity;
- h) Criminal violation of right to privacy laws in Texas, Michigan, and United States as they apply to 'nonpublic' criminal history records, FBI reports, and "*clemency*" records used "*in good faith*" to "*challenge and correct*" the accuracy of erroneous FBI records.

4) FRED J. WILLIAMS (former Superintendent of Lincoln Consolidated Schools):

- a) Incompetence; negligence; violation of duty; perjury in acts under Oath; misconduct in office; abuse of public trust as Sandra Harris' successor in the role of "superintendent";

- b) Discriminatory retaliation against Mr. Schied after employment termination, by using a federal agency (U.S. Post Office) to commit the crime of retaliation by “*misusing and disseminating*” an outdated and erroneous FBI report, “*nonpublic*” clemency documents, and two letters of defamation; Action for neglect to prevent;
- c) Gross frauds and cheats; Possession of stolen property; Converting FBI property (2003 criminal background check) to personal use in retaliation against former employee; Noncompliance with Criminal Justice Information System (CJIS) Advisory Board policies.
- d) Malicious threat to extort money, to steal identity, property, or other thing of public and private value (whether an FBI document or Mr. Schied’s personal character, identity and reputation); “*Purloining and converting*” government property for own use when publishing (in 2006) erroneous “*nonpublic*” documents to deprive of employment opportunity and to subject person to “*peonage*”.
- e) Denial/Deprivation of State and Federal criminal justice policy governing the right to challenge and correct accuracy of an erroneous FBI report; denial of rights based on previous condition of servitude; deprivation of a federally protected activity; deprivation of relief benefits;
- f) Abuse of power and authority; Exploitation of a vulnerable victim; denial of Constitutional rights to due process, privileges, and immunities; “*peonage*”; acting “*under color of law*” to deprive of rights.
- g) Criminal Libel and Slander; Conducting legal acts in illegal manners for purpose of personal and professional defamation and to defraud the United States.
- h) Between 2006-2009: Conspiracy with Sandra Harris, Cathy Secor, Sherry Gerlofs, and his successor superintendent Lynn Cleary, to deprive of rights; Conspiracy to cover-up and obstruct a Sheriff’s criminal investigation; Corruption and racketeering;
- i) False declarations, and misleading pleadings before a court as “*perjury*”, “*contempt*”, and “*fraud*” upon the court through representation of Lincoln Consolidated Schools by attorney Michael Weaver and other attorneys for the Plunkett-Cooney law firm.
- j) Conspiracy to “*exploitation of a vulnerable victim*”; Corruption and racketeering; continuing pattern of criminal activity;
- k) Criminal Libel and Slander; Conducting legal acts in illegal manners for purpose of personal and professional defamation and to defraud the United States;
- l) Criminal violation of right to privacy laws in Texas, Michigan, and United States as they apply to ‘*nonpublic*’ criminal history records, FBI reports, and “*clemency*” records used “*in good faith*” to “*challenge and correct*” the accuracy of erroneous FBI records.

5) LYNN CLEARY (current Superintendent of Lincoln Consolidated Schools):

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; perjury in acts under Oath; abuse of public trust as the successor to Fred Williams as the school district “*superintendent*”.
- b) Discriminatory retaliation against Mr. Schied after employment termination, by using a federal agency (U.S. Post Office) to commit the crime of retaliation by “*misusing and disseminating*” an outdated and erroneous FBI report, “*nonpublic*” clemency documents, and two letters of defamation; Action for neglect to prevent;
- c) Gross frauds and cheats; Possession of stolen property; Converting FBI property (2003 criminal background check) to personal use for extorting money and retaliation against former employee; Noncompliance with Criminal Justice Information System (CJIS) Advisory Board policies.

- d) Malicious threat to extort money, to steal identity, property, or other thing of public and private value (character, identity and reputation); “*Purloining and converting*” government property for own use when publishing (in 2006) erroneous “*nonpublic*” documents to deprive of employment opportunity and to subject person to “*peonage*”.
- e) Denial/Deprivation of State and Federal criminal justice policy governing the right to challenge and correct accuracy of an erroneous FBI report; denial of rights based on previous condition of servitude; deprivation of a federally protected activity; deprivation of relief benefits;
- f) Abuse of power and authority; Exploitation of a vulnerable victim; denial of Constitutional rights to due process, privileges, and immunities; acting “*under color of law*” to deprive of rights;
- g) Criminal Libel and Slander; Conducting legal acts in illegal manners for purpose of personal and professional defamation and to defraud the United States;
- h) In 2009: Conspiracy with Sandra Harris, Cathy Secor, Sherry Gerlofs, and his successor superintendent Lynn Cleary, to deprive of rights; Conspiracy to cover-up and obstruct a Sheriff’s criminal investigation; conspiracy to “*exploitation of a vulnerable victim*”; Corruption and racketeering; continuing pattern of criminal activity;
- i) Criminal violation of right to privacy laws in Texas, Michigan, and United States as they apply to ‘nonpublic’ criminal history records, FBI reports, and “*clemency*” records used “*in good faith*” to “*challenge and correct*” the accuracy of erroneous FBI records.
- j) *Fraud* upon the Court through representation of Lincoln Consolidated Schools by attorney Michael Weaver and other attorneys for the Plunkett-Cooney law firm.

* See “**EXHIBIT F**” as “*Sworn Affidavit of Earl Hocquard*” regarding Lincoln Consolidated Schools.

6) LINCOLN CONSOLIDATED SCHOOLS SCHOOL BOARD MEMBERS (KIM SAMUELSON, GREG GURKA, JAMES PASCHAL, KEN GOETZ, JEREMY KEENEY, JENNIFER LaBOMBARBE, and JEANETTE UPSTON):

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust as the ultimate authority over every school district superintendent hired or voted into office at the Lincoln school district.
- b) Between 2003 and 2009: Discriminatory retaliation against Mr. Schied after employment termination, by using a federal agency (U.S. Post Office) to commit the crime of retaliation by “*misusing and disseminating*” an outdated and erroneous FBI report, “*nonpublic*” clemency documents, and two letters of defamation; Action for neglect to prevent;
- c) Gross frauds and cheats; Possession of stolen property; Converting FBI property (2003 criminal background check) to personal use for extorting money and retaliation against former employee; Noncompliance with Criminal Justice Information System (CJIS) Advisory Board policies.
- d) Malicious threat to extort money, to steal identity, property, or other thing of public and private value (character, identity and reputation); “*Purloining and converting*” government property for own use when publishing (in 2006) erroneous “*nonpublic*” documents to deprive of employment opportunity and to subject person to “*peonage*”.
- e) Denial/Deprivation of State and Federal criminal justice policy governing the right to challenge and correct accuracy of an erroneous FBI report; denial of rights based on previous condition of servitude; deprivation of a federally protected activity; deprivation of relief benefits;

- f) Abuse of power and authority; Exploitation of a vulnerable victim; denial of Constitutional rights to due process, privileges, and immunities; acting “*under color of law*” to deprive of rights; Denial of equal public accommodations and/or services;
- g) Criminal Libel and Slander; Conducting legal acts in illegal manners for purpose of personal and professional defamation and to defraud the United States;
- h) Conspiracy with Sandra Harris, Cathy Secor, Sherry Gerlofs, and superintendents Fred Williams and Lynn Cleary, to deprive of rights; Conspiracy to cover-up and obstruct a Sheriff’s criminal investigation; conspiracy to “*exploitation of a vulnerable victim*”; Corruption and racketeering; continuing pattern of criminal activity;
- i) Criminal violation of right to privacy laws in Texas, Michigan, and United States as they apply to ‘nonpublic’ criminal history records, FBI reports, and “*clemency*” records used “*in good faith*” to “*challenge and correct*” the accuracy of erroneous FBI records.
- j) Fraud upon the Court through representation of Lincoln Consolidated Schools by attorney Michael Weaver and other attorneys for the Plunkett-Cooney law firm.

7. **MICHAEL D. WEAVER (P43985) (attorney employed by the Plunkett Cooney law firm hired to represent Sandra Harris, Fred Williams, the Lincoln Consolidated Schools, and the Northville City Police Department):**

- a) Incompetence; negligence; violation of duty; professional ethics; malicious misconduct in duties as an officer of the Court; Perjury in acts under Oath; contempt of court; violation of Michigan Rules of Professional Conduct for Attorneys;
- b) Among other things meant to “*mischaracterize*” David Schied as a “*liar*” and a “*convict*”, in 2005 attorney Weaver pretended to be reading to the judge directly from a Texas court “*Order of Expunction*” yet while substituting his own words for key words in the document to change the intended meaning of the document. He did this deceptively to have the Court support his theory that until David Schied received that 2004 “*expunction*” (of what was only supposed to be remaining records related to the “*arrest*”), Mr. Schied otherwise still had a 1977 “*conviction*” that he was not entitled to deny on a 2003 Michigan job application for his client Sandra Harris and the Lincoln Consolidated Schools.
- c) Between 2004 and 2009: Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to treason;
- d) Perjury in court; Retaliation; and offering false evidence at an official proceeding; false declarations and multiple counts of “*fraud upon the court*”; Violation of Michigan Court Rules and Michigan Rules of Professional Conduct.
- e) Abuse of power and authority; Exploitation of a vulnerable victim; “*Detention of a witness*”; denial of Constitutional rights to due process, privileges, and immunities; “*peonage/obstructing enforcement*”; acting “*under color of law*” to deprive of rights; Simulating a legal process;
- f) Criminal “*Libel*” and “*Slander*”; Conducting legal acts in illegal manners for purpose of personal and professional defamation and to defraud the United States;
- g) Conspiracy against rights; Conspiracy with Sandra Harris, Cathy Secor, Sherry Gerlofs, and superintendents Fred Williams, Lynn Cleary and others, to “*deprive of rights*” to

privacy; Conspiracy to cover-up the defrauding of the federal government and the “conversion” of government property for personal use; Conspiracy to violate CJIS Advisory Board Policy on right to “challenge and correct” FBI report; Corruption and racketeering; continuing pattern of criminal activity;

- h) Receiving stolen or converted property or money and aiding in the concealment of “converted” government property.

*** See “Exhibit G” the letter of Complaint about Michael Weaver filed with the Michigan State Bar’s “Attorney Grievance Commission” dated 1/14/08 along with the “Request for Investigation of an Attorney” form.**

8. KATIE DOERR-PARKER (former Human Resources Director for the Northville Public Schools now retired):

- a) Incompetence; negligence; violation of duty; perjury in acts under Oath; malicious misconduct in office abuse of public trust; employment fraud...when hiring David Schied as a part-time substitute teacher based on the contractual promise that Mr. Schied would be provided the time and the opportunity to “challenge and correct” the FBI report received by the Northville Public Schools in 2004. Katy Parker had fraudulently promised that if Mr. Schied subjected himself to a fingerprint background check and handed over copies of the “clemency” documents he was using (i.e., the 1979 “set aside” and 1983 “pardon” documents), she would stand by the guarantee of “CJIS Board Policy” and federal statutes allowing Mr. Schied to “challenge and correct” that “erroneous” 2004 FBI report;
- b) Between 2004 and 2009: Gross frauds and cheats; Possession of “stolen” property; In 2004, Parker conspired with David Bolitho and Leonard Rezmierski to “Convert for personal use” the Texas court (“clemency”) Orders that David Schied used, by right under his federal entitlement, to “challenge and correct” the erroneous FBI report received by the Northville Public Schools earlier in 2004. Katy Parker then defrauded Mr. Schied twice – in writing – between 2004 and 2005, promising him the second time that she would be allowing David Schied to use his 2004 Texas “expunction” court Order, which Mr. Schied furnished a year after surrendering copies of his 1979 “set aside” and 1983 “pardon” (and in trade back for the “set aside” and “pardon” documents) to show that he was nearly successfully completed with his authorized challenge of the erroneous 2004 FBI report.
- c) Mr. Schied then followed Criminal Justice Information System (CJIS) Advisory Board policies when submitting another set of fingerprints and paying himself “out-of-pocket” for the cost of ordering yet another background check in 2005 to prove to Katy Parker and other Northville Public Schools administrators that he had successfully “challenged and corrected” the FBI report, Parker then turned around and placed the clemency documents (i.e., the 2004 Texas court “Order of Expunction”) into the district’s public personnel file; conspiring thereafter to disseminate those “nonpublic” documents to other Michigan school district employers and to the public under FOIA request.
- d) Parker took an “about-face” on her earlier written assurances, in part, out of retaliation for David Schied having named, in 2005, a former Lincoln Consolidated Schools assistant principal (Scott Snyder who was hired in 2004 by the Northville Public Schools), as a hostile “witness” in the criminal investigation of Sandra Harris being conducted that same year by the Michigan State Police; Retaliation and harassment against a witness, victim, or informant;

- e) Parker retaliated against David Schied for his having reported the crimes of these “peer” school and district administrators. In addition, she and her other “*co-conspirators*” used a federal agency (U.S. Post Office) to commit subsequent crimes after “stealing” and “converting” the Texas court Order to their own personal use, and by “*misusing and disseminating*” the “*expunction*” clemency documents that Mr. Schied had otherwise provided to the Northville Public Schools “*in good faith*” for a “restricted” purpose, and under protective guarantees by the State and Federal governments that pertained to Mr. Schied’s right to “*challenge and correct*” the erroneous FBI report that was sent to the Northville Public School District in 2004.
- f) Parker conspired with others to deprive David Schied of the guarantees set forth by State and Federal criminal justice Advisory Board policy governing the right to “*challenge and correct*” the accuracy of an erroneous FBI report; denial of rights based on previous condition of servitude; deprivation of a federally protected activity; deprivation of relief benefits; criminal “*defamation*” by “*Libel*” and “*Slander*”;
- g) False pretenses with intent to defraud; conspiracy to deprive of rights and subject person (David Schied) to “*peonage*”; “*conspiracy*” to commit criminal offenses; “*aiding and abetted*” in the “*cover-up*” of previous crimes conducted as “*legal acts in illegal manners*”; conspiracy to “*exploitation of a vulnerable victim*”; Corruption and racketeering; continuing pattern of criminal activity;
- h) Criminal violation of Texas, Michigan, and Federal “SET ASIDE” laws, other Texas government codes, Michigan’s Revised School Codes, and State and Federal laws governing the release of “*nonpublic*” records to the public under the Freedom of Information Act. Altogether these and other “*civil rights*” statutes prohibit employers from discriminating against employees based on past criminal history. One statute of the Revised School Codes also makes it unlawful for employers to make any sort of contractual agreements for the secrecy of criminal history information they uncover when interviewing and conducting background checks for teachers during the employment application process.

9. **DAVID BOLITHO (former and current Assistant Superintendent for Administrative Services at Northville Public Schools):**

- a) Incompetence; negligence; violation of duty; perjury in acts under Oath; malicious misconduct in office abuse of public trust; employment fraud;
- b) Bolitho has been the supervisory “Assistant Superintendent” over Katy Doerr-Parker, and has had full knowledge and consent of the hiring agreement proffered by Katy Parker to David Schied as described above. He has acted the role of “*co-conspirator*”, and since Parker retired from the Northville Public Schools around 2007, Bolitho has continued on his own in conspiracy with Leonard Rezmierski, in “*stealing and converting*” to private use the “*nonpublic*” Texas court “Order of Expunction” Mr. Schied had furnished to the Northville Public Schools to prove that the 2004 FBI report received by that school district was erroneous and need of “*challenge and correction*”.
- c) Between 2004 and 2009: Gross frauds and cheats; Possession of “*stolen*” property; In 2004, Bolitho conspired with Katy Parker and Leonard Rezmierski to “*Convert for personal use*” the Texas court (“*clemency*”) Orders that David Schied used, by right under his federal entitlement to “*challenge and correct*” the erroneous FBI report received by the Northville Public Schools earlier in 2004. Subsequently, Bolitho has disregarded Katy Parker two letters of written assurances, and instead has conspired with other Northville Public Schools administrators and employees to place Mr. Schied’s

“*nonpublic*” clemency documents (i.e., the 2004 Texas court “*Order of Expunction*”) into the district’s public personnel file; thereafter disseminate those “*nonpublic*” documents personally to other Michigan school district employers and to the public under FOIA request.

- d) Bolitho has acted out of “*retaliation*” for David Schied having named Northville Public School elementary school principal, Scott Snyder, as a hostile “*witness*” in the criminal investigation of Sandra Harris by the Michigan State Police. He also retaliated against David Schied for his having reported the crimes of his “*peer*” school and district administrators at the Lincoln Consolidated Schools.
- e) Bolitho conspired with others to deprive David Schied of the guarantees set forth by State and Federal criminal justice Advisory Board policy governing the right to “*challenge and correct*” the accuracy of an erroneous FBI report; He denied Mr. Schied his rights based on his previous condition of “*servitude*”; and he did so while taking action to “*harass*” David Schied though he was clearly a “*crime victim*”. This constituted deprivation of a federally protected activity; deprivation of relief benefits; criminal “*extortion*” of “*something of value*” from Mr. Schied; and “*defamation*” by “*Libel*” and “*Slander*” while acting “*under color of law*”; Simulating a legal process; Retaliation and harassment against a witness, victim, or informant;
- f) False pretenses with intent to defraud; conspiracy to deprive of rights (to privacy) and subject person (David Schied) to “*peonage*” and “*obstructing enforcement*”; “*conspiracy*” to commit criminal offenses; “*aiding and abetted*” in the “*cover-up*” of previous crimes conducted as “*legal acts in illegal manners*”; Corruption and racketeering; continuing pattern of criminal activity;
- g) Criminal violation of Texas, Michigan, and Federal “*SET ASIDE*” laws, other Texas government codes, Michigan’s Revised School Codes, and State and Federal laws governing the release of “*nonpublic*” records to the public under the Freedom of Information Act. Altogether these and other “*civil rights*” statutes prohibit employers from discriminating against employees based on past criminal history. One statute of the Revised School Codes also makes it unlawful for employers to make any sort of contractual agreements for the secrecy of criminal history information they uncover when interviewing and conducting background checks for teachers during the employment application process.
- h) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to treason;

* See “**EXHIBIT H**” as “*Sworn Affidavit of Earl Hocquard*” regarding Northville Public Schools.

10. **LEONARD REZMIERSKI** (former and current Superintendent at Northville Public Schools):

- a) NOTE: Allegations against Leonard Rezmierski are inclusive of the allegations related to Katy Doerr-Parker and David Bolitho as Rezmierski has had supervisory knowledge and control over both of these individuals as Superintendent of the Northville school district. Therefore, the crimes set forth above pertaining to David Bolitho and Katy Parker are equally pertaining and applicable to Rezmierski as if set forth in writing herein verbatim.

- b) Between 2004 and 2009: Rezmierski conspired with others to deprive David Schied of the guarantees set forth by State and Federal criminal justice Advisory Board policy governing the right to “*challenge and correct*” the accuracy of an erroneous FBI report; He denied Mr. Schied his rights based on his previous condition of “*servitude*”; and he did so while taking action to “*harass*” David Schied though he was clearly a “*crime victim*”. This constituted deprivation of a federally protected activity; deprivation of relief benefits; criminal “*extortion*” of “*something of value*” from Mr. Schied; and “*defamation*” by “*Libel*” and “*Slander*” while acting “*under color of law*”; Action for neglect to prevent;
- c) In addition, through his attorneys in both State and Federal pleadings, Leonard Rezmierski submitted “*false declarations*”, and misleading pleadings before the court as “*perjury*”, “*contempt*”, and “*fraud upon the court*”. Furthermore, Rezmierski participated in a “*Conspiracy to defraud the United States*” by submission of a fraudulent sworn affidavit containing grossly false statements to the U.S. District Court for the Eastern District of Michigan in 2008. This put Leonard Rezmierski squarely in the center of a “*continuing pattern*” of criminal activity, with others he worked with at the Northville Public Schools, to deprive David Schied of his Civil and Constitutional rights while conniving to operate “*under color of law*”; Simulating a legal process; Retaliation and harassment against a witness, victim, or informant; corruption and racketeering; continuing pattern of criminal activity;
- d) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to treason;

11. SCOTT SNYDER (former assistant principal under Sandra Harris at Lincoln Consolidated Schools hired in 2004 by Katy Doerr-Parker at Northville Public Schools to become the elementary school principal where Mr. Schied’s child had been attending since in 2003):

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; malfeasance of official duty; perjury in acts under Oath;
- b) Negligence to assist an officer in the execution of his duty in a criminal case; Aiding and abetting in the “*cover up*” of a crime; Obstruction of justice; Interference with the administration of justice;
- c) Between 2003 and 2009: Snyder conspired with others to deprive David Schied of the guarantees set forth by State and Federal criminal justice Advisory Board policy governing the right to “*challenge and correct*” the accuracy of an erroneous FBI report; He denied Mr. Schied his rights based on his previous condition of “*servitude*”; and he did so while taking action to “*harass*” David Schied though he was clearly a “*crime victim*”. This constituted deprivation of a federally protected activity; deprivation of relief benefits; criminal “*extortion*” of “*something of value*” from Mr. Schied; and “*defamation*” by “*Libel*” and “*Slander*” while acting “*under color of law*”;
- d) Retaliation for having reported a crime, by a “*deprivation of rights*”; Conspiracy to violate child and parent rights under the Individuals with Disabilities in Education Act (IDEA) and the Family Educational Rights to Privacy Act (FERPA); Denial of equal

- public accommodations and/or services; Peonage by obstructing enforcement; Retaliation and harassment against a witness, victim, or informant;
- e) Conspiracy to commit an offense; simulating a legal process; legal acts in illegal manners; False statements to investigative authorities receiving Federal funding and charged with reporting findings to the State and to the United States; interference with official proceedings; conspiracy to “*exploitation of a vulnerable victim*”
- f) Corruption and racketeering; continuing pattern of criminal activity;

12. LYNN MOSSOIAN (former and current Director of Special Education for the Northville Public Schools):

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Action for neglect to prevent;
- b) Between 2006-2009: Denial of equal public accommodations and/or services; Conspiracy to violate child and parent rights under the Individuals with Disabilities in Education Act (IDEA) and the Family Educational Rights to Privacy Act (FERPA); Peonage by obstructing enforcement;
- c) False statements to investigative authorities receiving Federal funding and charged with reporting findings to the State and to the United States; Conspiracy to deprive of rights using “color of law”; Simulating a legal process; conspiracy to “*aide and abet*” in the “*cover up*” of a crime; conspiracy to commit an offense or legal acts in illegal manners; interference with official proceedings; conspiracy to “*exploitation of a vulnerable victim*”;
- d) Corruption and racketeering; continuing pattern of criminal activity;

13. GARY KING (attorney employed by the KELLER THOMA law firm in Detroit and contracted to assist the Northville Public Schools in the perpetration and “*cover up*” of their crimes against David Schied):

- a) Incompetence; negligence; violation of duty; professional ethics; Perjury in acts under Oath; violation of Michigan Rules of Professional Conduct for Attorneys;
- b) Gary King was advisor to Katy Doerr-Parker when she conspired with others to deprive David Schied of the guarantees set forth by State and Federal criminal justice Advisory Board policy governing the right to “*challenge and correct*” the accuracy of an erroneous FBI report; He helped to “*mastermind*” the retaliatory denial Mr. Schied’s rights to a federally protected activity based on Mr. Schied’s previous condition of “*servitude*”. His actions contributed to violations of CJIS Advisory Board policies and Mr. Schied’s rights to privacy. He also did so while contributing to the “*harassment*” of David Schied though clearly aware that Mr. Schied was a “*crime victim*” of Sandra Harris and others at the Lincoln school district.
- c) Between 2004 and 2009: Gary King’s actions constituted an ongoing “*conspiracy to deprivation*” of relief benefits; “*Aiding and abetting*” in the “*theft and conversion*” of property, the criminal “*extortion*” of “*something of value*” from Mr. Schied, and the “*defamation*” of David Schied by “*Libel*” and “*Slander*” using “*color of law*” to commit an offense or legal acts in illegal manners; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the

purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to *treason*;

e) Corruption and racketeering; continuing pattern of criminal activity;

14. KENNETH ROTH (as former and current “School Board President”) and MARILYN PRICE, LIBBY SMITH, JOAN WADSWORTH, JUDITH HANDLEY, KAREN PACIOREK, and JUDITH WOLLACK (as other participating Board of Education members for the Northville Public School):

a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Denial of equal public accommodations and/or services; Action for neglect to prevent;

b) Conspiracy to violate child and parent rights under the Individuals with Disabilities in Education Act (IDEA) and the Family Educational Rights to Privacy Act (FERPA); Peonage by obstructing enforcement;

c) Between 2006 and 2009: Conspiracy to deprive of rights; conspiracy to “*aide and abet*” in the “*cover up*” of a crime; conspiracy to commit an offense or legal acts in illegal manners; interference with official proceedings; conspiracy to “*exploitation of a vulnerable victim*”

d) Corruption and racketeering

15. RICHARD FANNING, JR. (attorney employed by the KELLER THOMA law firm in Detroit and contracted to assist the Northville Public Schools in the perpetration and “*cover up*” of their crimes against David Schied and his son using “*color of law*”):

a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;

b) Between 2006 and 2009: Conspiracy to violate child and parent rights under the Individuals with Disabilities in Education Act (IDEA) and the Family Educational Rights to Privacy Act (FERPA); Peonage by obstructing enforcement;

c) False statements to investigative authorities receiving Federal funding and charged with reporting findings to the State and to the United States; “*Conspiracy to deprive of rights*”; conspiracy to “*aide and abet*” in the “*cover up*” of a crime; conspiracy to commit an offense or “*legal acts in illegal manners*”; interference with official proceedings; Conspiracy to retaliation and harassment against a witness, victim, or informant;

d) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to *treason*;

e) Corruption and racketeering; continuing pattern of criminal activity;

16. BRUCE BAGDADY (attorney employed by the KELLER THOMA law firm in Detroit and contracted to assist the Northville Public Schools in the defense and “*cover up*” of their crimes against David Schied using “*color of law*”):

- a) Incompetence; negligence; violation of duty; professional ethics; malicious misconduct in duties as an officer of the Court; Perjury in acts under Oath; contempt of court; Conspiracy to commit fraud upon the court; violation of Michigan Rules of Professional Conduct for Attorneys;
- b) Abuse of authority by “*covering up*” for the Northville school district administrators having committed “*employment fraud*” and “*theft and conversion*” of a Texas court Order; and while providing legal justification for criminal “*Libel*” and “*Slander*”. His actions constituted “*fraud upon the court*” as he contributed to the “*deprivation*” of Mr. Schied’s right to “*challenge and correct*” the FBI report received by Northville Public School officials in 2004.
- c) While acting in denial that Mr. Schied had otherwise earned two letters of recommendation from two Northville school principals, Bagdady used “*color of law*” to “*deprive*” Mr. Schied of his Constitutional right to “*full faith and credit*” to his Texas clemency documents when he argued on behalf of Katy Parker, David Bolitho, Leonard Rezmierski, and the Northville school Board to “*mischaracterize*” David Schied as an individual who had committed acts of “*unprofessional conduct*” as a schoolteacher; and while arguing that Texas clemency laws and Texas court documents were a “*myth*” and meant to offer no privacy right protection to Mr. Schied;
- d) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; Conspiracy to treason;
- e) Between 2007 and 2009: Conspiracy to use “*color of law*” to commit an offense or “*legal acts in illegal manners*”; Simulating a legal process; “*aiding and abetting*” in employment “*fraud*”; False declarations before the court; Conspiracy to discriminate and retaliate; peonage by obstructing enforcement; conspiracy to “*exploitation of a vulnerable victim*”;
- f) Corruption and racketeering; continuing pattern of criminal activity;

17. **RONALD WARD (former assistant superintendent of the Brighton Area Schools)**

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; malfeasance of official duty; perjury in acts under Oath;
- b) “*fraud in the construction of official public documentation*” placed before the Brighton Area Schools board of education; *conspiracy to retaliate and deprive of rights*” because Mr. Schied had filed a “*civil rights*” case in federal court naming other school district officials and the Michigan governor; and because Mr. Schied had been exercising his civil rights to “*Free Speech*”, to “*Due Process*”, to “*Full Faith and Credit*”, to “*Privileges and Immunities*”, and to a “*Redress of Grievances*”;
- c) Corruption and racketeering; continuing pattern of criminal activity;

18. **KENNETH HAMMAN (former and current principal at Brighton High School)**

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; malfeasance of official duty; perjury in acts under Oath; In State arbitration, he “*perjured*” his testimony when attempting to justify the documents he had used a year prior in the construction of a “*hostile work environment*”;
- b) Retaliation and “*conspiracy to retaliate and deprive of rights*” because Mr. Schied had been exercising his civil rights to advocate on behalf of disabled children. These were

children under his care at the high school for whom he was speaking out against longstanding violations of their civil rights being perpetrated against them by Ken Hamman and numerous other named individuals employed with the Brighton Area Schools and the Livingston Educational Service Agency, and employed at the high school; Seditious conspiracy;

- c) Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon a State-operated legal Arbitration hearing; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Corruption and racketeering; continuing pattern of criminal activity;

19. PATRICIA MEYER (former and current assistant principal at Brighton High School)

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; malfeasance of official duty; perjury in acts under Oath; In State arbitration, she “*perjured*” her testimony when attempting to justify the documents she had used a year prior in the construction of a “*hostile work environment*”;
- b) Retaliation and “*conspiracy to retaliate and deprive of rights*” because Mr. Schied had been exercising his civil rights to advocate on behalf of disabled children. These were children under his care at the high school for whom he was speaking out against longstanding violations of their civil rights being perpetrated against them by Patricia Meyer and numerous other named individuals employed with the Brighton Area Schools and the Livingston Educational Service Agency, and employed at the high school; Seditious conspiracy;
- c) Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon a State-operated legal Arbitration hearing; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Corruption and racketeering; continuing pattern of criminal activity;

20. KIRK HOBSON (former and current assistant principal at Brighton High School)

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; malfeasance of official duty; perjury in acts under Oath; In State arbitration, he “*perjured*” his testimony when attempting to justify the documents he had used a year prior in the construction of a “*hostile work environment*”;
- b) Retaliation and “*conspiracy to retaliate and deprive of rights*” because Mr. Schied had been exercising his civil rights to advocate on behalf of disabled children. These were children under his care at the high school for whom he was speaking out against longstanding violations of their civil rights being perpetrated against them by Kirk Hobson and numerous other named individuals employed with the Brighton Area Schools and the Livingston Educational Service Agency, and employed at the high school; Seditious conspiracy;
- c) Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon a State-operated legal Arbitration hearing; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Corruption and racketeering; continuing pattern of criminal activity;

21. LAURA SURREY (former and current assistant principal at Brighton High School)

- a) Incompetence; negligence; violation of duty; malicious misconduct in office; abuse of public trust; malfeasance of official duty; perjury in acts under Oath; In State arbitration, she “*perjured*” her testimony to cover up for contributions a year prior in the construction of a “*hostile work environment*”;
- b) Retaliation and “*conspiracy to retaliate and deprive of rights*” because Mr. Schied had been exercising his civil rights to advocate on behalf of disabled children. These were children under his care at the high school for whom he was speaking out against longstanding violations of their civil rights being perpetrated against them by Laura Surrey and numerous other named individuals employed with the Brighton Area Schools and the Livingston Educational Service Agency, and employed at the high school; Seditious conspiracy;
- c) Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon a State-operated legal Arbitration hearing; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Corruption and racketeering; continuing pattern of criminal activity

22. **JENNIFER BOUHANA (former and current teacher at Brighton High School)**

- a) Incompetence; negligence; malicious misconduct in office; abuse of public trust; perjury in acts under Oath; In State arbitration, she “*perjured*” her testimony to cover up for contributions a year prior in the construction of a “*hostile work environment*”;
- b) Retaliation and “*conspiracy to retaliate and deprive of rights*” because Mr. Schied had been exercising his civil rights to advocate on behalf of disabled children. These were children under his care at the high school for whom he was speaking out against longstanding violations of their civil rights being perpetrated against them by Ken Hamman and numerous other named individuals employed with the Brighton Area Schools and the Livingston Educational Service Agency, and employed at the high school; Seditious conspiracy;
- c) Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon a State-operated legal Arbitration hearing; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Corruption and racketeering; continuing pattern of criminal activity;

23. **KAREN ELLSWORTH (former and current special education “*para-pro*” at Brighton High School)**

- a) Incompetence; negligence; malicious misconduct; In State arbitration, she “*perjured*” her testimony to cover up for the construction of a “*hostile work environment*” by her employer;
- b) Retaliation and “*conspiracy to retaliate and deprive of rights*”; Seditious conspiracy;
- c) Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon a State-operated legal Arbitration hearing; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Corruption and racketeering; continuing pattern of criminal activity;

24. **JESSICA MURRAY (former special education “*para-pro*” at Brighton High School)**

- a) Incompetence; negligence; malicious misconduct; In State arbitration, she “*perjured*” her testimony to cover up for the construction of a “*hostile work environment*” by her employer;
- b) Retaliation and “*conspiracy to retaliate and deprive of rights*”; Seditious conspiracy;
- c) Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon a State-operated legal Arbitration hearing; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Corruption and racketeering; continuing pattern of criminal activity

25. PATRICIA HAM (former and current school social worker employed by the Livingston Educational Service Agency at the Brighton High School)

- a) Incompetence; negligence; malicious misconduct; In State arbitration, she “*perjured*” her testimony to cover up for the construction of a “*hostile work environment*” by her employer;
- b) Retaliation and “*conspiracy to retaliate and deprive of rights*”; Seditious conspiracy;
- c) Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon a State-operated legal Arbitration hearing; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- d) Corruption and racketeering; continuing pattern of criminal activity

SECONDARY LEVEL – “FELONY” CRIMES

MICHIGAN STATE POLICE; LOCAL NORTHVILLE CITY POLICE;
WAYNE COUNTY SHERIFF; WASHTENAW COUNTY SHERIFF;
LIVINGSTON COUNTY SHERIFF

26. FRED FARKAS (former investigating detective for the Michigan State Police, now retired):

- a) Incompetence; negligence; Dereliction of duty; “*malicious misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) Between 2005-2009, *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; “*Perjury*” and/or making a materially false statement in the construction of a government document (i.e., an official “crime report”); Providing “*false evidence*” and criminal “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; withholding evidence; preventing report of a crime; Felony concealment; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to privacy, to due process, to full faith and credit, privileges and immunities, and to criminal protection; Denial of equal public accommodations and/or services;

- d) “*Aiding and abetting*” in criminal “*Libel*” and “*Slander*”; Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy;
- e) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to treason;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

27. ANN McCAFFERY (former supervisory officer over Det/Sgt. Fred Farkas, now supervisory Michigan State Police officer at the Detroit MSP Post #29):

- a) Incompetence; negligence; Dereliction of duty; “*malicious misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document; withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- b) “*Aiding and abetting*” in Felony concealment of crimes; contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*;
- d) Between 2006 and 2009: “*Aiding and abetting*” in criminal “*Libel*” and “*Slander*”; Conspiracy to commit an offense or “*legal acts in illegal manners*”; conspiracy to “*exploitation of a vulnerable victim*”; Seditious conspiracy;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

28. DARRYL HILL (former supervisory officer over Det/Sgt. Fred Farkas, now supervisory Michigan State Police officer at the MSP’s Northville headquarters):

- a) Incompetence; negligence; Dereliction of duty; “*malicious misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document; withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- b) “*Aiding and abetting*” in Felony concealment of crimes; contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice; misprision of felony; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;

- d) Between 2006 and 2009: “*Aiding and abetting*” in criminal “*Libel*” and “*Slander*”; Conspiracy to commit an offense or legal acts in illegal manners; conspiracy to “*exploitation of a vulnerable victim*”; Seditious conspiracy;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

29. LYNN HUGGINS (departmental headquarters supervisor over Det.Sgt. Fred Farkas, Ann McCaffery and Darryl Hill):

- a) Incompetence; negligence; Dereliction of duty; “*malicious misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document;
- b) “*Aiding and abetting*” in Felony concealment of crimes; contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice; misprision of felony; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- d) Between 2006 and 2009: “*Aiding and abetting*” in criminal “*Libel*” and “*Slander*”; Conspiracy to commit an offense or legal acts in illegal manners; conspiracy to “*exploitation of a vulnerable victim*”; Seditious conspiracy;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

30. BETH MORANTY (former supervisory officer over Det/Sgt. Fred Farkas, Ann McCaffery and Darryl Hill, now retired):

- a) Incompetence; negligence; Dereliction of duty; “*malicious misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to making a materially false statement in the construction of a government document; Conspiracy to providing “*false evidence*” and criminal “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; withholding evidence; preventing report of a crime; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;

- d) Between 2006 and 2009: “*Aiding and abetting*” in criminal “*Libel*” and “*Slander*”; Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; “*Misprision of felony*”
- e) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to treason;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

31. KARLA CHRISTIANSEN (lieutenant for the Professional Standards Section of the Internal Affairs division of the Michigan State Police):

- a) Incompetence; negligence; Dereliction of duty; “*malicious misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) *Fraudulence* in conducting an MSP “*internal investigation*” and in the filing of an “*official*” government report of investigative findings; Conspiracy to making a materially false statement in the construction of a government document; Conspiracy to providing “*false evidence*” and criminal “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; withholding evidence; preventing report of a crime; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- d) Between 2007 and 2009: “*Aiding and abetting*” in criminal “*Libel*” and “*Slander*”; Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; “*Misprision of felony*”
- e) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to treason;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

32. DAN PEKRUL (lieutenant for the Professional Standards Section of the Internal Affairs division of the Michigan State Police):

- a) Incompetence; negligence; Dereliction of duty; “*malicious misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts

under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;

- b) *Fraudulence* in conducting an MSP “*internal investigation*” and in the filing of an “*official*” government report of investigative findings; Conspiracy to making a materially false statement in the construction of a government document; Conspiracy to providing “*false evidence*” and criminal “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to privacy, to due process, to full faith and credit, privileges and immunities, and to criminal protection; Denial of equal public accommodations and/or services;
- d) Between 2007 and 2009: “*Aiding and abetting*” in criminal “*Libel*” and “*Slander*”; Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; “*Misprision of felony*”
- e) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to treason;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

33. LIZ CANFIELD (manager of the Law Enforcement Information Network (LEIN) “field services” office of the Criminal Justice Information Center of the Michigan State Police)

- a) In 2009: Detention of a victim/witness; Felony concealment; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) Conspiracy to “*cover up*” for crimes of government officials; conspiracy to deprive of citizen right to privacy and victim’s relief benefits; conspiracy to “*exploitation of a vulnerable victim*”; Felony concealment; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to privacy, to due process, to full faith and credit, privileges and immunities, and to criminal protection; Denial of equal public accommodations and/or services; Conspiracy to treason;

34. ROBERT GROUNDS (supervisor of the “Quality Control Sub-unit” office of the Criminal History Section of the Criminal Records Division of the Michigan State Police)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) *Fraudulence* in conducting an MSP “*audit*” or “*investigation*” and in the filing of an “*official*” government report of investigative findings; Conspiracy to making a materially false statement in the construction of a government document; Conspiracy to providing “*false evidence*” and criminal “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; withholding evidence; preventing report of a crime; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- c) In 2009: False statements to investigative authorities receiving Federal funding and charged with reporting findings to the State and to the United States; “*Conspiracy to deprive of rights*”; conspiracy to “*aide and abet*” in the “*cover up*” of a crimes involving “*Libel*” and “*Slander*”; conspiracy to commit an offense or “*legal acts in illegal manners*”; interference with official proceedings; Seditious conspiracy; “*Misprision of felony*”;
- d) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to *treason*;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

*** See “EXHIBIT I” as the letter from David Schied to Bob Grounds dated 6/15/09 and Capt. Charles Bush’s letter of reply dated 6/24/09.**

35. TIM BOLLES (Manager of the Criminal History Section of the Criminal Records Division of the Michigan State Police)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document; withholding evidence; preventing report of a crime;
- b) Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders; Action for neglect to prevent; peonage by obstructing enforcement;
- c) In 2009: False statements to investigative authorities receiving Federal funding and charged with reporting findings to the State and to the United States; “*Conspiracy to deprive of rights*”; conspiracy to “*aide and abet*” in the “*cover up*” of a crimes involving

“*Libel*” and “*Slander*”; conspiracy to commit an offense or “*legal acts in illegal manners*”; interference with official proceedings; Seditious conspiracy; “*Misprision of felony*”;

- d) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Deprivation of Constitutional rights to “*due process*”, “*privileges and immunities*”, and “*full faith and credit*”; “*Impeding*” with the administration of justice; reinstatement of “*penalties and disabilities*”; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing “*self-incrimination*”, and “*double-jeopardy*”; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to *treason*;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

36. CHARLES BUSH (“*Commander*” of the Criminal Records Division of the Michigan State Police)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document; withholding evidence; preventing report of a crime;
- b) Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders; Action for neglect to prevent; peonage by obstructing enforcement;
- c) **In 2009: Charles Bush, as well as Robert Grounds, were notified that Grounds’ letter of reprimand and warning addressed to Lincoln Consolidated Schools’ superintendent Lynn Cleary was insufficient to deal with the CRIMINAL conversion of a 2003 FBI report to private use and dissemination to the public under FOIA request by Cathy Secor in 2009. Bush and Grounds were both apprised of multiple State and Federal statutes not only “*prohibiting*” such activity, but also establishing cause for criminal prosecution under “*set aside*” and “*expunction*” laws, under Revised School Codes, and under other “*right to privacy*” laws. Both were additionally reminded that as officials of the Michigan State Police, they were to understand Mr. Schied’s report of these offenses as patterned upon other similar criminal offenses occurring in 2006 for which a “MSP Internal Affairs” investigation was conducted into “perjury of a crime report” and “abuse of prosecutorial discretion” by law enforcement officials in Washtenaw County, but that nothing had turned up in that investigation because of a “cover up” in failure to address the crimes that had occurred identical to the instant case. In response to Mr. Schied’s demand that the MSP reopen that “Internal Affairs” investigation based on the evidence of this new information to support the 2006 case and complaint about “public corruption”, Captain Charles Bush refused. He responded by stating, “I will not reopen the issues from the past, as these matters have previously been addressed”. He also refused to formalize a new crime report, or to apply “*set aside*” and “*expunction*” laws, Revised School Codes, or any other “*right to privacy*” laws...or to even forward to prosecutors or to the Attorney General Mr.**

Schied's own written report about these crimes having once again occurred against him.

- d) False statements to investigative authorities receiving Federal funding and charged with reporting findings to the State and to the United States; "*Conspiracy to deprive of rights*"; conspiracy to "*aide and abet*" in the "*cover up*" of a crimes involving "*Libel*" and "*Slander*"; conspiracy to commit an offense or "*legal acts in illegal manners*"; interference with official proceedings; Seditious conspiracy; "*Misprision of felony*";
- e) Deprivation of victims' rights under the William Van Regenmortor Crime Victims' Rights Act; "*Deprivation of right to equal access to laws*" governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- f) Deprivation of Constitutional rights to "*due process*", "*privileges and immunities*", and "*full faith and credit*"; "*Impeding*" with the administration of justice; reinstatement of "*penalties and disabilities*"; constructing an interpretation of laws to undermine the purpose and meaning of the Constitution and other State and federal statutes; and doing so by causing "*self-incrimination*", and "*double-jeopardy*"; conspiracy to "*exploitation of a vulnerable victim*"; Conspiracy to *treason*;
- g) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

*** See "EXHIBIT I" as the letter from David Schied to Bob Grounds dated 6/15/09 and Capt. Charles Bush's letter of reply dated 6/24/09.**

37. ANTHONY TILGER (police officer of the Northville City Police department):

- a) Incompetence; negligence; Dereliction of duty; "*misconduct*" in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage bt obstructing enforcement;
- b) Bribery of a public officer; Giving, offering, or promising gratuity to agent, employee, or other person with intent to influence action of agent or employee; Inciting or procuring one to commit perjury; subornation of perjury; Officer omitting duty for reward; officer "*defending*" criminal against allegations;
- c) In 2006: *Fraudulence* in conducting an "*official*" investigation and in the filing of an "*official*" government report of investigative findings; Conspiracy to making a materially false statement in the construction of a government document (i.e., an official "crime report"); Providing "*false evidence*" and criminal "*tampering with evidence*"; "*Detention of a witness*"; tampering with a victim/witness; and "*interference*" with an official proceeding; Felony concealment; Fraud; Contempt of court or contempt by omission to perform; "*obstruction of justice*"; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various "*protections*" and "*cover*" to criminal offenders;
- d) Felony concealment; Contempt of court or contempt by omission to perform; aiding and abetting the commission of a crime; conspiracy to "*exploitation of a vulnerable victim*";
- e) conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

38. GREG HANNEWALD (police detective of the Northville City Police department):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) In 2006: Conspiracy to bribe of a public office and inciting or procuring one to commit perjury; subornation of perjury; Aiding and abetting officer omitting duty for reward;
- c) Conspiracy to “*fraud*” in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; officer “*defending*” criminal against allegations; Conspiracy to making a materially false statement in the construction of a government document (i.e., an official “crime report”); Providing “*false evidence*” and criminal “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- d) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Contempt of court or contempt by omission to perform; conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

39. MICHAEL CARLSON (police captain and interim “chief of police” for the Northville City Police):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) In 2006: Conspiracy to bribe of a public officer; Inciting or procuring one to commit perjury; subornation of perjury; officer “*defending*” criminal against allegations; Aiding and abetting officer omitting duty for reward; aiding and abetting the commission of a crime; misprision of felony;
- c) *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; “*Perjury*” in the construction of a government document (i.e., an official “crime report”); Providing “*false evidence*” and criminal “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;

- d) Deprivation of victims' rights under the William Van Regenmortor Crime Victims' Rights Act; "*Deprivation of right to equal access to laws*" governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Contempt of court or contempt by omission to perform; conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; conspiracy to "*exploitation of a vulnerable victim*"; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

40. **MICHAEL SAWAYA (police lieutenant for the Wayne County Sheriff)**

- a) Incompetence; negligence; Dereliction of duty; "*misconduct*" in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) In 2009: *Fraudulence* in the filing of an "*official*" government report; officer "*defending*" criminal against allegations; Conspiracy to making a materially false statement in the construction of a government document; Providing "*false evidence*" and criminal "*tampering with evidence*"; Aiding and abetting the commission of a crime; Felony concealment; withholding evidence; preventing report of a crime;
- c) "*Detention of a witness*"; tampering with a victim/witness; and "*interference*" with an official proceeding; Felony concealment; Fraud; Contempt of court or contempt by omission to perform; "*obstruction of justice*"; Interference with the administration of justice while simulating a legal process; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various "*protections*" and "*cover*" to criminal offenders;
- d) Deprivation of victims' rights under the William Van Regenmortor Crime Victims' Rights Act; "*Deprivation of right to equal access to laws*" governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Conspiracy to commit an offense or legal acts in illegal manners; conspiracy to "*exploitation of a vulnerable victim*"; misprision of felony; Seditious conspiracy;
- a) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

41. **JAMES HINES (investigating detective for the Wayne County Sheriff)**

- a) Incompetence; negligence; Dereliction of duty; "*misconduct*" in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) In 2009: *Fraudulence* in conducting an "*official*" investigation and in the filing of an "*official*" government report of investigative findings; Conspiracy to making a materially false statement in the construction of a government document; withholding evidence; preventing report of a crime; Aiding and abetting the commission of a crime; officer "*defending*" criminal against allegations;
- c) "*Perjury*" in the construction of a government document; Providing "*false evidence*" and criminal "*tampering with evidence*"; "*Detention of a witness*"; tampering with a

- victim/witness; and “*interference*” with an official proceeding; Felony concealment; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process;
- d) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services; Retaliation and harassment against a witness, victim, or informant; Conspiracy to *treason*;
- e) Conspiracy to commit an offense or legal acts in illegal manners; conspiracy to “*exploitation of a vulnerable victim*”; misprision of felony; Seditious conspiracy;
- f) Corruption and racketeering; continuing pattern of criminal activity;

42. LARRY CRIDER (police sergeant for the Wayne County Sheriff)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Action for neglect to prevent; peonage by obstructing enforcement;
- b) In 2009: Aiding and abetting the commission of a crime; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; withholding evidence; preventing report of a crime; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- d) Conspiracy to commit an offense or legal acts in illegal manners; conspiracy to “*exploitation of a vulnerable victim*”; misprision of felony; Seditious conspiracy;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

43. WARREN EVANS (Sheriff for Wayne County)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) In 2009: “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; withholding evidence; preventing report of a crime; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process;; Conspiracy to making a materially false statement in the construction of a government document;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;

- d) Conspiracy to “*fraud*” in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” in the construction of a government document; Conspiracy to “*false evidence*” and criminal “*tampering with evidence*”;
- e) Conspiracy to commit an offense or legal acts in illegal manners; “*Aiding and abetting*” the commission of a crime; misprision of felony; Seditious conspiracy; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

44. **M. KATHERINE BEN-AMI** (Lead attorney and Wayne County Sheriff’s Department FOIA officer)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Action for neglect to prevent; peonage by obstructing enforcement;
- b) In 2009: “*Extortion*” and “*Conspiracy to Extort*” – Ben-Ami responded to a FOIA request for records of crime reports and all other correspondence between the Wayne County Sheriff’s office and the Wayne County Prosecutor’s office regarding the crime report filed by Mr. Schied earlier that year. Ben-Ami responded with a billing statement showing that, as “lead attorney” for the Sheriff, she was using “*color of law*” to “*extort*” money from Mr. Schied for little more than the evidence of Mr. Schied’s own documents filed with the Sheriff and the Prosecutor concerning the crimes occurring in 2006 and in 2009 for which nothing was done to stop the *public* dissemination of “*nonpublic*” documents by the Northville Public Schools.
- c) “*Detention of a victim/witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Felony concealment; withholding evidence; preventing report of a crime; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while Simulating a legal process; conspiracy to “*exploitation of a vulnerable victim*”;
- d) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*;
- e) Conspiracy to “*fraud*” in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” in the construction of a government document; Conspiracy to “*false evidence*” and criminal “*tampering with evidence*”; Conspiracy to making a materially false statement in the construction of a government document;
- f) Conspiracy to commit an offense or legal acts in illegal manners; “*Aiding and abetting*” the commission of a crime; misprision of felony; Seditious conspiracy; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- g) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

45. **JEFF SAREN** (deputy officer for the Washtenaw County Sheriff’s Department)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under

- Oath; perjuring an “*official*” crime report by strategic “*omissions and misstatements*”; conspiracy to commit perjury;
- b) In 2009: Conspiracy to “*fraud*” in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and making a materially false statement in the construction of a government document (i.e., an official crime report); Conspiracy to “*false evidence*” and criminal “*tampering with evidence*”;
 - c) “*obstruction of justice*” by “*concealment*” of documents, “*tampering with Evidence*” and “*tampering with a victim/witness*” in criminal proceedings, Conspiracy to commit an offense or legal acts in illegal manners; “*Aiding and abetting*” the commission of a crime; misprision of felony; Seditious conspiracy; Action for neglect to prevent; peonage by obstructing enforcement;
 - d) Conspiracy to retaliation and harassment against a witness, victim, or informant; continuing pattern of criminal activity; Conspiracy to treason;

46. JERRY CLAYTON (The Washtenaw County Sheriff)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; perjuring an “*official*” crime report by strategic “*omissions and misstatements*”; conspiracy to commit perjury;
- b) In 2009: Conspiracy to “*fraud*” in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and making a materially false statement in the construction of a government document (i.e., an official crime report); Conspiracy to “*false evidence*” and criminal “*tampering with evidence*”;
- c) “*obstruction of justice*” by “*concealment*” of documents, “*tampering with Evidence*” and “*tampering with a victim/witness*” in criminal proceedings, Conspiracy to commit an offense or legal acts in illegal manners; “*Aiding and abetting*” the commission of a crime; misprision of felony; Seditious conspiracy; Action for neglect to prevent; peonage by obstructing enforcement;
- d) Conspiracy to retaliation and harassment against a witness, victim, or informant; corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

47. ROBERT HUDECEK (deputy officer for the Livingston County Sheriff’s Department)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; threatening abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) In 2009: “*obstruction of justice*”; “*Deprivation of right to equal access to laws*”; Denial of equal public accommodations and/or services; Conspiracy to commit an offense or legal acts in illegal manners; “*Aiding and abetting*” the commission of a crime; misprision of felony; Seditious conspiracy; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; using “*color of law*” to deprive of the right to *criminal protection*;
- d) Conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*”

and “cover” to criminal offenders; Retaliation for filing a crime report about “*public corruption*”; Seditious conspiracy;

- e) corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

48. SCOTT DOMINE (lieutenant for the Livingston County Sheriff’s Department)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) “*obstruction of justice*”; “*Deprivation of right to equal access to laws*”; Denial of equal public accommodations and/or services; Conspiracy to commit an offense or legal acts in illegal manners; “*Aiding and abetting*” the commission of a crime; misprision of felony; Seditious conspiracy; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; using “*color of law*” to deprive of the right to *criminal protection*;
- d) Conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “cover” to criminal offenders; Retaliation for filing a crime report about “*public corruption*”; Seditious conspiracy;
- e) corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

49. BOB BEZOTTE (The Livingston County Sheriff)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) “*obstruction of justice*”; “*Deprivation of right to equal access to laws*”; Denial of equal public accommodations and/or services; Conspiracy to commit an offense or legal acts in illegal manners; “*Aiding and abetting*” the commission of a crime; misprision of felony; Seditious conspiracy; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; using “*color of law*” to deprive of the right to *criminal protection*;
- d) Conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “cover” to criminal offenders; Retaliation for filing a crime report about “*public corruption*”; Seditious conspiracy;
- e) corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

SECONDARY LEVEL – “FELONY” CRIMES

WAYNE COUNTY AND WASHTENAW COUNTY PROSECUTORS;
OFFICE OF THE ATTORNEY GENERAL

50. JOSEPH BURKE (former and current “chief” assistant prosecutor for the Washtenaw County Prosecutor Brian Mackie):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document; Action for neglect to prevent; peonage by obstructing enforcement;
- b) In 2006 and again in 2009: Abuse of prosecutorial discretion; prosecutor “*defending*” criminal against allegations; Aiding and abetting the commission of a crime; withholding evidence; preventing report of a crime; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while Simulating a legal process;;
- c) Deprivation of rights under color of law; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- d) Conspiracy to commit an offense or legal acts in illegal manners; conspiracy to “*exploitation of a vulnerable victim*”; misprision of felony; Seditious conspiracy; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

51. BRIAN MACKIE (The Washtenaw County Prosecutor):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document; Action for neglect to prevent; peonage by obstructing enforcement;
- b) Between 2006 and 2009: Abuse of prosecutorial discretion; prosecutor “*defending*” criminal against allegations; Aiding and abetting the commission of a crime; withholding evidence; preventing report of a crime; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while Simulating a legal process;;
- c) Deprivation of rights under color of law; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- f) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; False declarations before court; Perjury in court; Conspiracy to commit fraud upon the court;

conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;

- d) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

52. ROBERT DONALDSON (“chief” assistant prosecutor for the “Public Integrity Unit” of the Wayne County Prosecutor):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; “*exploitation of a vulnerable victim*”; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document;
- b) In 2006 and again in 2009: Abuse of prosecutorial discretion; Acceptance of Bribery; “*Officer omitting duty for reward*”; Accepting promise of gratuity from agent, employee, or other person with intent to influence action of other agent or employee; withholding evidence; preventing report of a crime; Aiding and abetting the commission of a crime; prosecutor “*defending*” criminal against allegations; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a victim/witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of rights under “*under color of law*”; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services; Retaliation and harassment against a witness, victim, or informant;
- d) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

53. JAMES GONZALES (“chief” prosecutor for the Operations Division of the Wayne County Prosecutor):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury;
- b) In 2006 and again in 2009: Abuse of prosecutorial discretion; prosecutor “*defending*” criminal against allegations; Aiding and abetting the commission of a crime; withholding evidence; preventing report of a crime; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceedings; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and/or making

- materially false statements in the construction of TWO government documents (i.e., an official “investigative report”); Providing “*false evidence*”;
- d) Deprivation of Constitutional “full faith and credit” and other rights “*under color of law*”; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- f) Corruption and racketeering; continuing pattern of criminal activity;

54. **MARIA MILLER (assistant prosecuting attorney and director of communications for the Wayne County Prosecutor):**

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of government documents;
- b) In 2009: Abuse of prosecutorial discretion; Aiding and abetting the commission of a crime; prosecutor “*defending*” criminal against allegations; withholding evidence; preventing report of a crime; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit, privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- d) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

55. **KYM WORTHY (The Wayne County Prosecutor):**

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government documents;
- b) In 2006 and again in 2009: Abuse of prosecutorial discretion; prosecutor “*defending*” criminal against allegations; Aiding and abetting the commission of a crime; withholding evidence; preventing report of a crime; Felony “*concealment*” and “*tampering with*

evidence"; "*Detention of a witness*"; tampering with a victim/witness; and "*interference*" with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; "*obstruction of justice*"; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;

- c) Deprivation of Constitutional "*full faith and credit*" and other rights under color of law; Deprivation of victims' rights under the William Van Regenmortor Crime Victims' Rights Act; "*Deprivation of right to equal access to laws*" governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- d) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to "*exploitation of a vulnerable victim*"; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

56. THOMAS CAMERON (criminal justice bureau "chief" for Michigan Attorney General Mike Cox in Detroit):

- a) Incompetence; negligence; Dereliction of duty; "*misconduct*" in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to "*Perjury*" and/or making a materially false statements in the construction of government documents;
- b) In 2006 and again in 2009: Abuse of prosecutorial discretion; withholding evidence; preventing report of a crime; Aiding and abetting the commission of a crime; prosecutor "*defending*" criminal against allegations; Felony "*concealment*" and "*tampering with evidence*"; "*Detention of a witness*"; tampering with a victim/witness; and "*interference*" with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; "*obstruction of justice*"; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) *Fraudulence* in conducting an "*official*" investigation and in the filing of an "*official*" government report of investigative findings; "*Perjury*" in the construction of a government document (i.e., an official "investigative report"); Providing "*false evidence*" and criminal "*tampering with evidence*"; "*Detention of a victim/witness*"; tampering with a victim/witness; and "*interference*" with an official proceeding; Felony concealment; Fraud; Contempt of court or contempt by omission to perform; "*obstruction of justice*"; Interference with the administration of justice;
- d) Deprivation of Constitutional "*full faith and credit*" and other rights under color of law; Deprivation of victims' rights under the William Van Regenmortor Crime Victims' Rights Act; "*Deprivation of right to equal access to laws*" governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to "*exploitation of a vulnerable victim*"; Conspiracy to retaliation and harassment against a

witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;

- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

57. PAUL GOODRICH (assistant attorney general for the Welfare Fraud section of the “Criminal Division” for the Attorney General Mike Cox in Detroit):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statements in the construction of government documents;
- b) In 2006: Abuse of prosecutorial discretion; withholding evidence; preventing report of a crime; Aiding and abetting the commission of a crime; prosecutor “*defending*” criminal against allegations; Felony “*concealment*”; “*Detention of a victim/witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- d) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Conspiracy to retaliate; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

58. FRANK MONTICELLO (Bureau “chief” for the Government Affairs Bureau of the Office of the Michigan Attorney General Mike Cox in Lansing):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statements in the construction of government documents;
- b) In 2006: Abuse of prosecutorial discretion; withholding evidence; preventing report of a crime; Aiding and abetting the commission of a crime; prosecutor “*defending*” criminal against allegations; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a victim/witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Providing “*false evidence*”;
- d) Deprivation of rights under “*under color of law*”; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal*

access to laws” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;

- e) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

59. PATRICK O’BRIEN (Division “chief” for the Public Employment, Elections, and Tort Division for the Office of Michigan Attorney General Mike Cox in Lansing):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury;
- b) In 2006: Abuse of prosecutorial discretion; withholding evidence; preventing report of a crime; Aiding and abetting the commission of a crime; prosecutor “*defending*” criminal against allegations; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a victim/witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to making a materially false statements in the construction of government documents; (i.e., an official “*investigative report*”); Providing “*false evidence*”;
- d) Deprivation of rights under “*under color of law*”; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

60. WANDA STOKES (former Bureau “chief” for the Attorney General Mike Cox’s “Child and Family Services Bureau”, and “chief of staff” to Mike Cox beginning in 2006):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under

- Oath; Conspiracy to “*Perjury*” and/or making a materially false statements in the construction of government documents;
- b) In 2006: Abuse of prosecutorial discretion; withholding evidence; preventing report of a crime; Aiding and abetting the commission of a crime; Felony “*concealment*”; “*Detention of a victim/witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- d) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Conspiracy to retaliate; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

61. MIKE COX (The Michigan Attorney General and “chief” law enforcement office for the State in Lansing):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Denial of facts and evidence to be heard by a jury;
- b) In 2006: Refusal to remove other public official from office for “*official malfeasance*” and/or “*judicial misconduct*”; Abuse of prosecutorial discretion; Acceptance of Bribery; Aiding and abetting the commission of a crime; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a victim/witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) Conspiracy to “*Fraud*” in conducting an “*official*” investigation and in the submission of an “*official*” government report of investigative findings to Congress (i.e., Congressman Thaddeus McCotter); Conspiracy to “*Perjury*” and/or making a materially false statements in the construction of government documents; (i.e., an official “*investigative report*”); Providing “*false evidence*”;
- d) Deprivation of rights under “*under color of law*”; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Fraud upon State and Federal courts in the filing of court documents; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a*

- vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

62. DAVID TANAY (Division “chief” for the Criminal Division of the Office of the Attorney General Mike Cox in Lansing):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury;
- b) In 2006: Abuse of prosecutorial discretion; withholding evidence; preventing report of a crime; Aiding and abetting the commission of a crime; prosecutor “defending” criminal against allegations; Felony “*concealment*” and “*tampering with evidence*”; “*Detention of a victim/witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Fraud; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- c) “*Fraud*” in conducting an “*official*” investigation and in the submission of an “*official*” government report of investigative findings to Congress (i.e., Congressman Thaddeus McCotter); Conspiracy to “*Perjury*” and/or making a materially false statements in the construction of government documents; (i.e., an official “investigative report”); Providing “*false statements and evidence*”;
- d) Deprivation of rights under “*under color of law*”; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

SECONDARY LEVEL – “FELONY” CRIMES

WAYNE COUNTY REGIONAL GOVERNMENT;
REGIONAL AND STATE EDUCATIONAL AGENCIES

63. LAURA COX (Wayne County Commissioner and wife of Attorney General Mike Cox):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Contempt of court or contempt by omission to perform;
- b) In 2006 and again in 2009: Aiding and abetting in Felony concealment and in prosecutor abusing his/her discretion to “*defend*” criminals against allegations; Conspiracy to

Fraudulence in conducting an “official” investigation and in the filing of an “official” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;

- c) Withholding evidence; Felony “*concealment*” and “*tampering with evidence*”; conspiracy to “*obstruct justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- d) Conspiracy to deprive of Constitutional “*full faith and credit*” and other rights “*under color of law*”; deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services; Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

64. JOHN SULLIVAN (former Chairman of the Wayne County Commission’s Committee on Government Operations):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; conspiracy to commit perjury; Contempt of court or contempt by omission to perform;
- b) In 2006: Aiding and abetting in Felony concealment and in prosecutor abusing his/her discretion to “*defend*” criminals against allegations; Conspiracy to *Fraudulence* in conducting an “official” investigation and in the filing of an “official” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- c) Withholding evidence; Felony “*concealment*” and “*tampering with evidence*”; conspiracy to “*obstruct justice*”; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- d) Conspiracy to deprive of Constitutional “*full faith and credit*” and other rights “*under color of law*”; deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services; Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

65. DAVID SOEBBING (former and current consultant for the Wayne County Regional Educational Service Agency – RESA):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2007: Conspiracy to use “*color of law*” to deprive of rights (i.e., delineated by the *Individuals with Disabilities in Education Act* and the *Family Educational Rights to Privacy Act*); Conspiracy to *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;
- d) Withholding evidence; preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

66. MARY FAYAD (former and current consultant for the Wayne County Regional Educational Service Agency – RESA):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2008: Conspiracy to use “*color of law*” to deprive of rights (i.e., delineated by the *Individuals with Disabilities in Education Act* and the *Family Educational Rights to Privacy Act*); Conspiracy to *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;
- d) Withholding evidence; preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

67. KEVIN MAGIN (assistant superintendent and/or acting superintendent for the Wayne County RESA):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2007: Conspiracy to use “*color of law*” to deprive of rights (i.e., delineated by the *Individuals with Disabilities in Education Act* and the *Family Educational Rights to Privacy Act*); Conspiracy to *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to

“Perjury” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;

- d) Conspiracy to withholding evidence and preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

68. MARLENE DAVIS (former Superintendent for the Wayne County RESA):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2007: Conspiracy to use “*color of law*” to deprive of rights (i.e., delineated by the *Individuals with Disabilities in Education Act* and the *Family Educational Rights to Privacy Act*); Conspiracy to *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “Perjury” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;
- d) Conspiracy to withholding evidence and preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

69. HARVALEE SAUNTO (due process hearing coordinator and special education consultant for the Michigan Department of Education):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2007 and 2008: Conspiracy to use “*color of law*” to deprive of rights (i.e., delineated by the *Individuals with Disabilities in Education Act* and the *Family Educational Rights to Privacy Act*); *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “Perjury” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;
- d) Conspiracy to withholding evidence and preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

70. ANN OMANS (supervisor of program accountability for the Office of Special Education and Early Intervention Services at the Michigan Department of Education):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2007: Conspiracy to use “*color of law*” to deprive of rights (i.e., delineated by the *Individuals with Disabilities in Education Act* and the *Family Educational Rights to Privacy Act*); Conspiracy to *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;
- d) Conspiracy to withholding evidence and preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

71. JACKIE THOMPSON (Director of the Office of Special Education and Early Intervention Services at the Michigan Department of Education):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2007: Conspiracy to use “*color of law*” to deprive of rights (i.e., delineated by the *Individuals with Disabilities in Education Act* and the *Family Educational Rights to Privacy Act*); Conspiracy to *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;
- d) Conspiracy to withholding evidence and preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

72. SUSAN LIEBETREU (consultant for the Office of Special Education and Early Intervention Services at the Michigan Department of Education):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;

- c) In 2007: Conspiracy to use “*color of law*” to deprive of rights (i.e., delineated by the *Individuals with Disabilities in Education Act* and the *Family Educational Rights to Privacy Act*); *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;
- d) Conspiracy to withholding evidence and preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

73. JOAN BLAIR (reconsideration unit manager for the Bureau of Law and Policy at the Michigan Department of Civil Rights):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2007: Conspiracy to use “*color of law*” to deprive of rights; Conspiracy to *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;
- d) Conspiracy to withholding evidence and preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- e) Denial of equal public accommodations and/or services; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

74. DONNA PARUSZKIEWICZ (rights representative for the Bureau of Law and Policy at the MDCR):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath;
- b) Conspiracy to commit perjury; conspiracy to commit an offense or legal acts in illegal manners; Contempt of court or contempt by omission to perform;
- c) In 2007: Conspiracy to use “*color of law*” to deprive of rights; Conspiracy to *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Conspiracy to “*Perjury*” and/or making materially false statements in the construction of a government document (i.e., an official “investigative report”); conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; peonage by obstructing enforcement;

- d) Conspiracy to withholding evidence and preventing report of a crime; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent; peonage by obstructing enforcement;
- a) Denial of equal public accommodations and/or services; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

75. KELLY KEENAN (legal counsel to Governor Jennifer Granholm):

- a) Incompetence; negligence; Dereliction of duty; “*malicious misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document; withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- b) In 2007: Abuse of authority and discretion by “*defending*” criminal against allegations; Conspiracy to “*Perjury*” and/or making a materially false statements in the construction of government documents; Aiding and abetting the commission of a crime; withholding evidence; Felony “*concealment*” and “*tampering with evidence*”; Interference with the administration of justice while simulating a legal process;
- c) Preventing report of a crime; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Denial of equal public accommodations and/or services; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Action for neglect to prevent; peonage by obstructing enforcement;
- d) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- e) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to treason;

76. MICHELLE RICH (attorney working as legal counsel to Michigan Governor Jennifer Granholm and in association with Kelly Keenan in 2007):

See Evidence and Statements described for Kelly Keenan in “a through f” above as incorporated here by reference as if written herein verbatim.

77. JENNIFER GRANHOLM (former and current Michigan Governor):

- a) See Evidence and Statements described for Kelly Keenan in “a through f” above as incorporated here by reference as if written herein verbatim.

- b) In 2007: Refusal to remove other public official from office for “*official malfeasance*” and/or “*judicial misconduct*”; Interference with the administration of justice; Denial of facts and evidence to be heard by a jury or other type of administrative review Board;
- c) In 2008 and 2009: False declarations before courts; Perjury in courts; Fraud upon the courts; contemptuous conduct toward the courts; Conspiracy to treason;

TERTIARY LEVEL – “FELONY” CRIMES

MICHIGAN JUDICIARY at the level of CIRCUIT COURT and COURT OF APPEALS

78. MELINDA MORRIS (former and current Judge of the Washtenaw County Circuit Court in Ann Arbor, Michigan):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; violation of the Canons for the Code of Judicial Conduct;
- b) In 2004 and 2005: Disregarded multiple attorney pleadings bringing attention to Sandra Harris’s denial of David Schied’s federal right under 28 CFR § 50.12 and 28 CFR § 16.34 to keep his job while “*challenging and correcting*” an erroneous FBI report; Disregarding the violation of public policy (under Michigan’s Set Aside Law, Revised School Codes and various Texas government codes “*prohibiting*” the dissemination of FBI reports and clemency documents outside the employment office and to the public under FOIA request; Issuing an “Order to Compel” David Schied to answer questions about criminal history while denying “full faith and credit” to a Texas court “Order of Expunction” granting Mr. Schied the right to remain silent about that history...then admitting those statements into court as “*admissions*” of guilt and conviction to justify dismissing Mr. Schied’s civil claims for wrongful termination and defamation; Interference with the administration of justice while simulating a legal process;
- c) Denial of facts and evidence to be heard by a jury; Denial of Constitutional rights to “*due process*”, to “*full faith and credit*”, to “*privileges and immunities*”, to abstain from being subject to “*self-incrimination*” and “*double-jeopardy*”; Denial of Right not to be denied because of previous condition of “*servitude*”;
- d) Conspiracy to “*Perjury*” and “*fraud upon the Court*” by Sandra Harris and Michael Weaver by disregarding Mr. Schied’s attorney claims about “*misleading the court*”, and while refusing to find them (Harris, Lincoln Schools, and attorney Weaver) in “*contempt*”; and while instead, using their materially false statements in the construction of a government document (i.e., “Order and Opinion”);
- e) Aiding and abetting the commission of a crime; Withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders; Felony “*concealment*” and “*tampering with evidence*”; Interference with the administration of justice while simulating a legal process; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Denial of equal public accommodations and/or services; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Action for neglect to prevent; peonage by obstructing enforcement;
- f) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Judge abusing discretion by “*defending*” criminal against allegations and providing

“governmental immunity” and sanction to repeat of the same or similar crimes;
conspiracy to “*exploitation of a vulnerable victim*”;

- g) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- h) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant; Corruption and racketeering; Conspiracy to *treason*;

79. MARK CAVANAGH, (former and current judges of the Michigan state Court of Appeals):

- a) See Evidence and Statements described for Melinda Morris in “a through h” above as incorporated here by reference as if written herein verbatim.
- b) In 2006: “*Judicial misconduct*” and “*conspiracy to deprive of rights*” and to “*defraud the People of Michigan*” by placement of a Court of Appeals’ ruling in an “*unpublished*” decision while intentionally disregarding a clear “conflict of laws” and many other factors showing that this case otherwise had set a clear “*precedence*” of jurisprudentially significant issues;
- c) Continuing pattern of criminal corruption and racketeering;

80. DEBORAH SERVITTO (former and current Judge of the Michigan state Court of Appeals):

- a) See Evidence and Statements described for Melinda Morris in “a through h” above as incorporated here by reference as if written herein verbatim.
- b) In 2006: “*Judicial misconduct*” and “*conspiracy to deprive of rights*” and to “*defraud the People of Michigan*” by placement of a Court of Appeals’ ruling in an “*unpublished*” decision while intentionally disregarding a clear “conflict of laws” and many other factors showing that this case otherwise had set a clear “*precedence*” of jurisprudentially significant issues;
- c) Continuing pattern of criminal corruption and racketeering; Conspiracy to *treason*;

81. KAREN FORT HOOD (former and current Judge of the Michigan state Court of Appeals):

- a) See Evidence and Statements described for Melinda Morris in “a through h” above as incorporated here by reference as if written herein verbatim.
- b) In 2006: “*Judicial misconduct*” and “*conspiracy to deprive of rights*” and to “*defraud the People of Michigan*” by placement of a Court of Appeals’ ruling in an “*unpublished*” decision while intentionally disregarding a clear “conflict of laws” and many other factors showing that this case otherwise had set a clear “*precedence*” of jurisprudentially significant issues;
- c) Continuing pattern of criminal corruption and racketeering; Conspiracy to *treason*;

82. CYNTHIA D. STEPHENS (for judge of the Wayne County Circuit Court and current Judge on the Michigan Court of Appeals):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; violation of the Canons for the Code of Judicial Conduct;
- b) In 2007: Disregarded multiple attorney pleadings bringing attention to “employment fraud” by Katy Doerr-Parker, and denial by Katy Parker, David Bolitho, and Leonard Rezmierski (Northville Public Schools) of David Schied’s federal right under 28 CFR § 50.12 and 28 CFR § 16.34 to keep his job while “*challenging and correcting*” an erroneous FBI report;
- c) In 2007: Disregarding the violation of public policy (under Michigan’s Set Aside Law, Revised School Codes and various Texas government codes “*prohibiting*” the dissemination of clemency documents used to “*challenge and correct*” erroneous FBI report information; Sanctioning and “*Authorizing*” the criminal dissemination of a Texas court “Order of Expunction” by Northville Public School officials outside the employment office and to the public under FOIA request; Issuing an “*Order and Opinion*” for which transcripts show such ruling was based upon the determination that Texas court or governor’s clemency Orders such as for “*set aside*”, “*full pardon*”, and “*expunction*” (obliteration) of criminal history are a “**MYTH**”, and that legislators intended for “*schoolteachers in Michigan to be subject to a “LIFE SENTENCE*” without regard to the duration of time that has expired since clemency was awarded;
- d) Interference with the administration of justice while simulating a legal process; Denial of facts and evidence to be heard by a jury; Denial of Constitutional rights to “*due process*”, to “*full faith and credit*”, to “*privileges and immunities*”, to abstain from being subject to “*self-incrimination*” and “*double-jeopardy*”; Denial of Right not to be denied because of previous condition of “*servitude*”;
- e) Conspiracy to “*Perjury*” and “*fraud upon the Court*” by Bruce Bagdady on behalf of Katy Parker, David Bolitho, Leonard Rezmierski, and the Northville Schools Board of Education, by disregarding Mr. Schied’s attorney claims about their “*misleading the court*”, Using materially false statements in the construction of a government document (i.e., “Order and Opinion”);
- f) Aiding and abetting the commission of a crime; Withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders; Felony “*concealment*” and “*tampering with evidence*”; Interference with the administration of justice while simulating a legal process; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Denial of equal public accommodations and/or services; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Action for neglect to prevent; peonage by obstructing enforcement;
- g) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Judge abusing discretion by “*defending*” criminal against allegations and providing “*governmental immunity*” and sanction to repeat of the same or similar crimes; conspiracy to “*exploitation of a vulnerable victim*”;
- h) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;

- i) Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing “*governmental immunity*” and other protections to criminal offenders; Continuing pattern of criminal corruption and racketeering; Conspiracy to treason;

83. WILLIAM COLLETTE (former and current Judge and “chief justice” for the Ingham County Circuit Court):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; violation of the Canons for the Code of Judicial Conduct;
- b) In 2008: **Refusal hear “Motion for Judge to Disqualify Himself” after revealing that he had been “*lifelong friends*” with one of the co-defendants named for FELONY criminal offenses; Refusal to hear “Motion for Change of Venue” after informing “pro se” litigant David Schied that his “civil” courtroom was not the place to bring “*criminal*” complaints;**
- c) **Conspiracy to “Fraud” and “Theft” of money David Schied paid (with receipt) for various “Motions” to be heard by the Ingham County Circuit Court but which were denied for hearing as the case was instead “*dismissed*” under fraudulent pretense that it was because Mr. Schied had not properly constructed his CRIMINAL complaint in strict accordance with “*civil court rules*” (as “*prejudicially*” interpreted by Collette himself);**
- d) Disregarding the violation of public policy (under Michigan’s Set Aside Law, Revised School Codes and various Texas government codes “*prohibiting*” the dissemination of clemency documents used to “*challenge and correct*” erroneous FBI report information; Conspiracy to sanctioning the criminal dissemination of an erroneous 2003 FBI criminal history report and Texas court Orders of “*clemency*” (“set aside” order and “Order of Expunction”) Michigan school district officials outside of their employment offices, to include dissemination of these “*nonpublic*” documents under FOIA request;
- e) Refusal to remove other public official from office for “*official malfeasance*” and/or “*judicial misconduct*”; Denial of facts and evidence to be heard by a jury; denial of access or report to a Grand Jury;
- f) Interference with the administration of justice while simulating a legal process; Denial of facts and evidence to be heard by a jury; Denial of Constitutional rights to “*due process*”, to “*full faith and credit*”, to “*privileges and immunities*”, to abstain from being subject to “*self-incrimination*” and “*double-jeopardy*”; Denial of Right not to be denied because of previous condition of “*servitude*”;
- g) Conspiracy to “*Perjury*” and “*fraud upon the Court*” by Mike Cox and his representative attorneys, by Bruce Bagdady, Michael Weaver and other attorneys for the Lincoln Consolidated Schools, the Northville Public Schools, for Wayne County (via their “Corporate Counsel”) when disregarding Mr. Schied’s attorney claims about their “*misleading the court*”; Using materially false statements in the construction of a government document (i.e., “Order and Opinion”);
- h) Aiding and abetting the commission of a crime; Withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders; Felony

“*concealment*” and “*tampering with evidence*”; Interference with the administration of justice while simulating a legal process; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Denial of equal public accommodations and/or services; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Action for neglect to prevent; peonage by obstructing enforcement;

- i) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Judge abusing discretion by “*defending*” criminal against allegations and providing “*governmental immunity*” and sanction to repeat of the same or similar crimes; conspiracy to “*exploitation of a vulnerable victim*”;
- j) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- k) Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing “*governmental immunity*” and other protections to criminal offenders; Continuing pattern of criminal corruption and racketeering; Conspiracy to *treason*;

84. DONALD S. OWENS (current Judge of the Michigan state Court of Appeals):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; violation of the Canons for the Code of Judicial Conduct;
- b) In 2008 through 2009: **Denial of all “Motions”, “Complaints”, “Writ” requests, and other information proving (i.e., with repeated submissions of Evidence and sworn affidavits of “*witness*” statements) that officials and attorneys for the Lincoln Consolidated Schools, Northville Public Schools continue to perpetuate felony “*fraud upon the court*” in felony “*cover up*” for their ongoing “*misuse and dissemination*” of the erroneous 2003 FBI criminal history and Texas court Orders of “*clemency*” prohibiting the “*public*” disclosure of “*nonpublic*” criminal history information that has been otherwise “*set aside*”, “*pardoned*”, and “*expunged*” as a matter of Texas law. “*Discriminatory*” denial of claim that lower court judge acted with “*prejudice*” when refusing to hear properly filed “*motions*”, when refusing to provide a “*change of venue*”, and when refusing to “*disqualify himself*” after revealing from the bench that he had been “*lifelong friends*” with one of the alleged criminal co-defendants.**
- c) Disregarding the violation of public policy (under Michigan’s Set Aside Law, Revised School Codes and various Texas government codes “*prohibiting*” the dissemination of clemency documents used to “*challenge and correct*” erroneous FBI report information; Conspiracy to sanctioning the criminal dissemination of an erroneous 2003 FBI criminal history report and Texas court Orders of “*clemency*” (“*set aside*” order and “Order of Expunction”) Michigan school district officials outside of their employment offices, to include dissemination of these “*nonpublic*” documents under FOIA request;

- d) Refusal to remove other public official from office for “*official malfeasance*” and/or “*judicial misconduct*”; Denial of facts and evidence to be heard by a jury; denial of access or report to a Grand Jury;
- e) Interference with the administration of justice while simulating a legal process; Denial of facts and evidence to be heard by a jury; Denial of Constitutional rights to “*due process*”, to “*full faith and credit*”, to “*privileges and immunities*”, to abstain from being subject to “*self-incrimination*” and “*double-jeopardy*”; Denial of Right not to be denied because of previous condition of “*servitude*”;
- f) Conspiracy to “*Perjury*” and “*fraud upon the Court*” when disregarding Mr. Schied’s attorney claims about attorneys for the co-defendants “*misleading the court*”; Using materially false statements in the construction of a government document (i.e., “*Order and Opinion*”);
- g) Aiding and abetting the commission of a crime; Withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders; Felony “*concealment*” and “*tampering with evidence*”; Interference with the administration of justice while simulating a legal process; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Denial of equal public accommodations and/or services; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Action for neglect to prevent; peonage by obstructing enforcement;
- h) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Judge abusing discretion by “*defending*” criminal against allegations and providing “*governmental immunity*” and sanction to repeat of the same or similar crimes; conspiracy to “*exploitation of a vulnerable victim*”;
- i) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- j) Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing “*governmental immunity*” and other protections to criminal offenders; Continuing pattern of criminal corruption and racketeering; Conspiracy to *treason*;

* See “**Exhibit J**” as a “**Motion and Brief in Support**” related to Court of Appeals case **No.202804** and the Court of Appeals ruling giving reason for “**Denying**” that Motion, as well as other motions for “**Claim and Exercise Constitutional Rights...**” and to “**Demand the Court Read All Pleadings...and Adhere only to Constitutionally Compliant Law and Case Law...**”. Also included with “**Exhibit J**” is the “**unpublished**” **Memorandum** denying David Schied’s Appeal of the dismissal of Mr. Schied’s criminal case by Judge William Collette of the Ingham County Circuit Court.

85. RICHARD A. BANDSTRA (current Judge of the Michigan state Court of Appeals):

See Evidence and Statements described for Donald S. Owens in “a through j” above as incorporated here by reference as if written herein verbatim.

86. PAT M. DONOFRIO (current Judge of the Michigan state Court of Appeals):

See Evidence and Statements described for Donald S. Owens in “a through j” above as incorporated here by reference as if written herein verbatim.

87. CARL GROMEK – (former and current State Court Administrator)

- a) Incompetence; negligence; Dereliction of duty; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statement in the construction of a government document; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders;
- b) In 2006: Conspiracy to “*Perjury*” and/or making a materially false statements in the construction of government documents (i.e., court judgments reflecting a gross “*miscarriage of justice*”); Aiding and abetting the commission of a crime; withholding evidence; Felony “*concealment*” and “*tampering with evidence*”; Interference with the administration of justice while simulating a legal process;
- c) Action for neglect to prevent; peonage by obstructing enforcement;
- d) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant;
- e) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

TERTIARY LEVEL – “FELONY” CRIMES

UNITED STATES DEPARTMENT OF JUSTICE’S OFFICE OF THE U.S. ATTORNEY;
FEDERAL BUREAU OF INVESTIGATIONS; U.S. DISTRICT COURT FOR THE EASTERN
DISTRICT OF MICHIGAN, SOUTHERN DIVISION

88. ROD CHARLES (former and current FBI agent residing in Lansing, Michigan)

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; Conspiracy to “*Perjury*” and/or making a materially false statements in the construction of government documents;
- b) Between 2007 and 2009: *Fraudulence* in conducting an “*official*” investigation and in the filing of an “*official*” government report of investigative findings; Providing “*false evidence*”; withholding evidence; Using materially false statements in the construction of a government document (i.e., “*internal memos and other correspondence with FBI agents and the U.S. Attorney general*”);
- c) Preventing report of a crime; Denial of facts and evidence to be heard by a jury or Grand Jury; aiding and abetting the commission of a crime; “*defending*” criminal against allegations against other government officials; Felony “*concealment*” and “*tampering*”

with evidence"; "*Detention of a victim/witness*"; tampering with a victim/witness; and "*interference*" with an official proceeding; Contempt of court or contempt by omission to perform; "*obstruction of justice*"; Interference with the administration of justice while simulating a legal process; Action for neglect to prevent

- d) Deprivation of rights under "*under color of law*"; Deprivation of victims' rights under the William Van Regenmortor Crime Victims' Rights Act; "*Deprivation of right to equal access to laws*" governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services; Denial of rights based upon previous condition of servitude; peonage by obstructing enforcement;
- e) Conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to "*exploitation of a vulnerable victim*"; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various "*protections*" and "*cover*" to criminal offenders;
- f) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

89. WALT KENNEDY (former and current FBI "*assistant special agent in charge*" residing in Lansing, Michigan)

- a) See Evidence and Statements described for Rod Charles in "a through f" above as incorporated here by reference as if written herein verbatim.
- b) In 2008: Acting on his own behalf as well as on behalf of Andrew Arena, FBI "*assistant*" special agent Walt Kennedy corresponded and conspired with numerous FBI agents residing in Michigan and Virginia in a "*fraudulent*" investigation of David Schied's phoned complaints to Washington, D.C. offices of the FBI and to Andrew Arena. Mr. Schied had left messages for Andrew Arena requesting to file a formal complaint about Rod Charles.
- c) Kennedy telephoned Mr. Schied on Andrew Arena's behalf to state an unreasonable basis for denying any further action on Mr. Schied's complaints as based upon "*fraudulent*" information placed into the FBI computer database by Rod Charles, Jerome Pender, and others employed by the FBI;
- d) Corruption and racketeering; continuing pattern of criminal activity;

90. ANDREW ARENA (former and current FBI "*special agent in charge*" residing in Lansing, Michigan)

- a) See Evidence and Statements described for Rod Charles in "a through f" above as incorporated here by reference as if written herein verbatim.
- b) In 2008: Andrew Arena conspired with Walt Kennedy to conduct a "*fraudulent*" investigation of David Schied's phoned complaints to Washington, D.C. offices of the FBI and to Andrew Arena about Rod Charles. When Arena was provided with statements and evidence to support Mr. Schied's contention that the denial of services by the FBI was based upon erroneous information maintained by the FBI, Arena disregarded that information and evidence. He then also completely disregarded Mr. Schied's FOIA request for copies of all information being maintained about him by the FBI and the U.S. Department of Justice;

- c) Corruption and racketeering; continuing pattern of criminal activity; deprivation of rights under the *Freedom of Information Act*.

91. TERRENCE BERG (former and current United States Attorney for the Eastern District of Michigan, Southern Division):

- a) *See Evidence* and *Statements* described for Rod Charles in “a through f” above as incorporated here by reference as if written herein verbatim.
- b) In 2008: neglected his *duty* to act upon David Schied’s written complaint about added crimes to his earlier criminal complaint about “*public corruption*” by various government officials employed by the State of Michigan. Instead, of utilizing his discretion to call an investigation by the FBI or by a federal Grand Jury, Berg conspired with Rod Charles and other FBI agents to concoct a “*fraudulent*” investigation of these newly reported crimes, and to based their denial to take action based again upon the same fraudulent information that remained in the FBI and/or USDOJ government database.
- c) When Berg was provided with statements and evidence to support Mr. Schied’s contention that the denial of services by the FBI was being based upon erroneous information maintained by the FBI, Berg completely disregarded that information and evidence. He then also completely disregarded a FOIA request that Mr. Schied had also sent to him in request for copies of all information being maintained about him by the FBI and the U.S. Department of Justice.
- d) Corruption and racketeering; continuing pattern of criminal activity; Denial of right to access a Grand Jury, to a jury trial, to the right to confront the “Accused” in a criminal court; Deprivation of rights under the *Freedom of Information Act*; Conspiracy to *treason*;

92. STEPHEN J. MURPHY (former United States Attorney and current Judge for the United States District Court for the Eastern District of Michigan, Southern Division):

- a) *See Evidence* and *Statements* described for Rod Charles in “a through f” above as incorporated here by reference as if written herein verbatim.
- b) Between 2007 and 2008: Stephen J. Murphy neglected his *duty* to act upon David Schied’s written complaint about “*public corruption*” by various government officials employed by the State of Michigan. Instead, of utilizing his discretion to call an investigation by the FBI or by a federal Grand Jury, he provided a phone number and no name to the Detroit office of the FBI, telling Mr. Schied (as the reported “victim”) that the U.S. Attorney does not conduct criminal “*investigations*”.
- c) Subsequently, over a year later, Murphy conspired with Walt Kennedy, Terrence Berg, and others to concoct “*fraudulent*” information so as to justify the denial of David Schied’s phoned complaints to Washington, D.C. offices of the FBI and to Andrew Arena regarding the FBI agent Rod Charles who Mr. Schied ended up with a year earlier as a result of Murphy’s unsupported referral to the FBI.
- d) Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

93. PAUL BORMAN (former and current Judge for the United States District Court for the Eastern District of Michigan, Southern Division):

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; violation of the Canons for the Code of Judicial Conduct;

- b) In 2008 through 2009: **Denial of all “Motions”, “Complaints”, “Writ” requests, and other information proving (i.e., with repeated submissions of Evidence and sworn affidavits of “witness” statements) that officials and attorneys for the Lincoln Consolidated Schools, Northville Public Schools otherwise continue to perpetuate felony “*fraud upon the court*” in “*cover up*” for their ongoing “*misuse and dissemination*” of the erroneous 2003 FBI criminal history and Texas court Orders of “*clemency*” prohibiting the “*public*” disclosure of “*nonpublic*” criminal history information that has been otherwise “*set aside*”, “*pardoned*”, and “*expunged*” as a matter of Texas law. He also “*discriminatingly*” denied, without “*litigating*” the individual allegations or Evidence of David Schied’s otherwise proven claim that lower court judge acted with “*prejudice*” when refusing to hear properly filed “*motions*”, when refusing to provide a “*change of venue*”, and when refusing to “*disqualify himself*” after revealing from the bench that he had been “*lifelong friends*’ with one of the alleged criminal co-defendants.**
- c) Disregarding the violation of public policy (under Michigan’s Set Aside Law, Revised School Codes and various Texas government codes “*prohibiting*” the dissemination of clemency documents used to “*challenge and correct*” erroneous FBI report information; Conspiracy to sanctioning the criminal dissemination of an erroneous 2003 FBI criminal history report and Texas court Orders of “*clemency*” (“*set aside*” order and “Order of Expunction”) Michigan school district officials outside of their employment offices, to include dissemination of these “*nonpublic*” documents under FOIA request;
- d) Refusal to remove other public official from office for “*official malfeasance*” and/or “*judicial misconduct*”; Denial of facts and evidence to be heard by a jury; denial of access or report to a Grand Jury;
- e) Interference with the administration of justice while simulating a legal process; Denial of facts and evidence to be heard by a jury; Denial of Constitutional rights to “*due process*”, to “*full faith and credit*”, to “*privileges and immunities*, to abstain from being subject to “*self-incrimination*” and “*double-jeopardy*”; Denial of Right not to be denied because of previous condition of “*servitude*”;
- f) Conspiracy to “*Perjury*” and “*fraud upon the Court*” when disregarding Mr. Schied’s attorney claims about attorneys for the co-defendants “*misleading the court*”; Using materially false statements in the construction of a government document (i.e., “Order and Opinion”);
- g) Aiding and abetting the commission of a crime; Withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders; Felony “*concealment*” and “*tampering with evidence*”; Interference with the administration of justice while simulating a legal process; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Denial of equal public accommodations and/or services; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Action for neglect to prevent; peonage by obstructing enforcement;
- h) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Judge abusing discretion by “*defending*” criminal against allegations and providing “*governmental immunity*” and sanction to repeat of the same or similar crimes; conspiracy to “*exploitation of a vulnerable victim*”;
- i) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to

due process, to full faith and credit, privileges and immunities, and to criminal protection; Denial of equal public accommodations and/or services;

- j) Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing “*governmental immunity*” and other protections to criminal offenders; Continuing pattern of criminal corruption and racketeering; Interference with the administration of justice while simulating a legal process; Denial of change of venue to criminal court; denial of access or report to Grand Jury; judge “*defending*” criminal against allegations;
- k) Conspiracy to retaliation and harassment against a witness, victim, or informant by providing “*governmental immunity*” and other “*protections*” to criminal offenders; Corruption and racketeering; continuing pattern of criminal activity; Conspiracy to *treason*;

94. **LAWRENCE ZATKOFF (former and current Judge for the United States District Court for the Eastern District of Michigan, Southern Division):**

- a) Incompetence; negligence; Dereliction of duty; “*misconduct*” in office; abuse of public trust; abuse of power and authority; malfeasance of official duty; perjury in acts under Oath; violation of the Canons for the Code of Judicial Conduct;
- b) In 2008 through 2009: **Judge Zatkoff repeatedly denied all “Motions”, “Complaints”, and other information submitted to him by David Schied otherwise proving that Michigan and United States officials were committing numerous crimes of “*coercion*” to “*oppress*” and deprive Mr. Schied and his family of their rights to “*life, liberty and the pursuit of happiness*”. Those dismissed complaints offered proof that attorneys for the Lincoln Consolidated Schools, Northville Public Schools, and the Michigan Attorney General continue to perpetuate felony “*fraud upon the court*” in felony “*cover up*” for their negligence these past few years of their allowing two school district to continue “*misusing and disseminating*” the erroneous 2003 FBI criminal history and Texas court Orders of “*clemency*” prohibiting the “*public*” disclosure of “*nonpublic*” criminal history information that has been otherwise “*set aside*”, “*pardoned*”, and “*expunged*” as a matter of Texas law.**
- c) **This U.S. District Court judge “*prejudicially*” denied Mr. Schied’s claim that Sixth Circuit Court judges Martha Craig Daughtrey, David William McKeague, and Gregory F. Van Tatenhove had acted with “*prejudice*” when refusing to grant properly filed “*motions*”, when refusing to provide a “*change of venue*”, when refusing to provide a “*Writ of Mandamus*” for criminal relief, and when refusing to notify a Grand Jury about the crimes being reported to them by David Schied.**
- d) Zatkoff disregarding violations of public policy (under Michigan’s Set Aside Law, Revised School Codes and various Texas government codes “*prohibiting*” the dissemination of clemency documents used to “*challenge and correct*” erroneous FBI report information; He conspired to sanctioning the criminal dissemination of an erroneous 2003 FBI criminal history report and Texas court Orders of “*clemency*” (“set aside” order and “Order of Expunction”) Michigan school district officials outside of their employment offices, to include dissemination of these “*nonpublic*” documents under FOIA request;

- e) He refused to remove other public official, Stephen J. Murphey, Terrence Berg, Rod Charles, or Andrew Arena from office for “*official malfeasance*” and/or “*obstruction of justice*”; He denied the facts and evidence to be heard by a jury or reported to a Grand Jury;
- f) Judge Zatkoff “*struck*” from the U.S. District Court record all Evidence and supporting pleadings and allegations against all U.S. Department of Justice employees and then dismissed Mr. Schied’s case for lack of “*factual*” support to his claims. This was an “*interference with the administration of justice*” done while “*simulating a legal process*”. His actions constituted “*legal acts done ‘under color of law’ in illegal manners*”;
- g) Denial of Constitutional rights to “*due process*”, to “*full faith and credit*”, to “*privileges and immunities*”, to abstain from being subject to “*self-incrimination*” and “*double-jeopardy*”; Denial of Right not to be denied because of previous condition of “*servitude*”;
- h) Zatkoff committed “*Perjury*” and “*fraud upon the Court*” when using materially false statements in the construction of a government document (i.e., “*Order and Opinion*”);
- i) He aided and abetted the commission of the co-defendants’ crimes; Withholding evidence; preventing report of a crime; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing various “*protections*” and “*cover*” to criminal offenders; Felony “*concealment*” and “*tampering with evidence*”; Interference with the administration of justice while simulating a legal process; “*Detention of a witness*”; tampering with a victim/witness; and “*interference*” with an official proceeding; Denial of equal public accommodations and/or services; Contempt of court or contempt by omission to perform; “*obstruction of justice*”; Action for neglect to prevent; peonage by obstructing enforcement;
- j) Deprivation of Constitutional “*full faith and credit*” and other rights under color of law; Judge abusing discretion by “*defending*” criminal against allegations and constructing “*governmental immunity*” and sanction to their repeating the same or similar crimes; conspiracy to “*exploitation of a vulnerable victim*”;
- k) Deprivation of victims’ rights under the William Van Regenmortor Crime Victims’ Rights Act; “*Deprivation of right to equal access to laws*” governing rights to *privacy*, to *due process*, to *full faith and credit*, *privileges and immunities*, and to *criminal protection*; Denial of equal public accommodations and/or services;
- l) Conspiracy to commit an offense or legal acts in illegal manners; Seditious conspiracy; Retaliation; Offering false evidence at an official proceeding; Criminal Libel and Slander; Conspiracy to commit fraud upon the court; conspiracy to “*exploitation of a vulnerable victim*”; Conspiracy to retaliation and harassment against a witness, victim, or informant by providing “*governmental immunity*” and other protections to criminal offenders; Continuing pattern of criminal corruption and racketeering; Conspiracy to *treason*;

I solemnly declare that the above statements are true to the best of my information, knowledge and belief.

Respectfully submitted,

Dated: _____

By: David Schied

Sworn to and subscribed before me this _____ day of June, 2009.

Notary Public, _____ County, MI acting in _____ County Michigan.
My Commission Expires: _____