

**“Memorandum” on Criminal Offenses and Evidence  
and, “Sworn Affidavit” and “Complaint” by David Schied**

STATE OF MICHIGAN     )  
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COUNTY OF WAYNE     )

<p><b><u>SWORN AFFIDAVIT AND</u></b> <b><u>“COMPLAINT”</u></b> by:     David Schied</p>
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DAVID SCHIED, being first duly sworn, states that:

1. I have personal knowledge of the facts contained herein.
2. If sworn as a witness, I can testify completely to the facts contained in this Affidavit.
3. I was born in the United States and, as a person, I have resided here my whole life as a citizen of this country.
4. I hold two Bachelor of Arts degrees from the University of Southern California: one in East Asian Language (Japanese) and Culture, and the other in Cinema-Television production. I received a post-graduate teaching credential in “special education classroom instruction” from California State University, Northridge; and I am endorsed to teach four (4) categories of student with “*special needs*” in Michigan public schools.
5. I hold seven (7) degrees of black belt in four varying styles of martial arts. I have authored two published books on home security and personal protection; and I was a founding Advisory Board member alongside (the late) Doris Tate in her startup of the Coalition On Victims’ Equal Rights (COVER).
6. I have an extensive history of film and television credits as a professional stuntman, assistant director, camera operator, and associate producer.
7. I have been married for 15 years; my wife has a lifetime learning disability and is nearly completely dependent upon me. We have one child now twelve (12) years of age.
8. The factual allegations contained in this “Sworn Affidavit” are not new to any of the criminal co-defendants named by this Complaint. For the most part, all of the allegations are familiar to all of the “Accused” as they have been raised already, even repeatedly, in the following court cases that have been repeatedly “*dismissed*” by the Michigan and United States judges named also in by this Complaint.
9. The previous Court cases are listed as follows, and all pleadings, motions, transcripts, judgment orders, and affidavits filed in each of these cases are incorporated herein by reference in evidence to support the claims in this Affidavit and Complaint:
  - a) (04-000577-CL) Washtenaw County Circuit Court – David Schied v. Sandra Harris and the Lincoln Consolidated School District, et al; (Judge Melinda Morris) 2004-2005
  - b) (267023) Michigan Court of Appeals – David Schied v. Sandra Harris and the Lincoln Consolidated School District, et al; (Judges Mark Cavanagh, Deborah Servitto, Karen Fort Hood) 2006
  - c) (131803) Michigan Supreme Court – David Schied v. Sandra Harris and the Lincoln Consolidated School District, et al; (Judges Clifford Taylor, Michael Cavanagh, Elizabeth Weaver, Marilyn Kelly, Maura Corrigan, Robert Young, Stephen Markman) 2006

- d) (06-633604-NO) Wayne County Circuit Court – David Schied v. Northville Public Schools; (Judge Cynthia Diane Stephens)
- e) (07-1256-AW) Ingham County Circuit Court – David Schied v. Jennifer Granholm, Mike Cox, and the State of Michigan, et al; (Judge William Collette); 2008
- f) (282820) Michigan Court of Appeals (“*Writ of Mandamus*”) – David Schied v. Jennifer Granholm, Mike Cox, and the State of Michigan, et al; (Judge Donald Owens); 2008
- g) (202804) Michigan Court of Appeals (“*Claim of Appeal*”) – David Schied v. Jennifer Granholm, Mike Cox, and the State of Michigan, et al; (Judges Richard Bandstra, Donald Owens, Pat Donofrio); 2008-2009 **NOW CURRENTLY ON LEAVE OF APPEAL TO THE SUPREME COURT AS THE INSTANT “QUO WARRANTO/ “STATE EX-REL” CASE**
- h) (08cv10005) U.S. District Court, Eastern District of Michigan, Southern Division – David Schied v. Thomas A. Davis, Jr. (Texas Dept. of Public Safety), Jennifer Granholm, Sandra Harris, Fred Williams; (Judge Paul Borman); 2008
- i) (08-1895) U.S. Court of Appeals for the Sixth Circuit (“*Writ of Mandamus*”) – David Schied v. Thomas A. Davis, Jr., Jennifer Granholm, Sandra Harris, Fred Williams; (Judges Martha Daughtrey, David McKeague, Gregory Van Tatenhove); 2008
- j) (08-1979) U.S. Court of Appeals for the Sixth Circuit; David Schied v. Thomas A. Davis, Jr, Jennifer Granholm, Sandra Harris, Fred Williams; (Judges Martha Daughtrey, David McKeague, Gregory Van Tatenhove); 2008 – **STILL PENDING MOTION FOR IMMEDIATE CONSIDERATION**;
- k) (08-14944) U.S. District Court, Eastern District of Michigan, Southern Division – David Schied v. Martha Daughtrey, David McKeague, Gregory Van Tatenhove, Stephen Murphy (U.S. Attorney/Judge), Terrence Berg (U.S. Attorney); Rod Charles, Andrew Arena (FBI); Michael Mukasey, Marie O’Rourke, Shanetta Cutlar (USDOJ); Margaret Colgate Love (former USDOJ); Greg Abbott (Texas attorney general), and DOES; (Judge Lawrence Zatkoff); 2009
- l) (09cv11307) U.S. District Court, Eastern District of Michigan, Southern Division – David Schied, on behalf of “Student A” v. Scott Snyder, Lynn Mossioian, Kenneth Roth, Richard Fanning, Harvalee Saunto, Donna Paruszkiewicz, Mary Fayad, Susan Liebetreu; Donald Yarab, Catherine Anderle ((USDOE OCR); Arne Duncan (U.S. Secretary of Education); (Judge John O’Meara); 2009 – **STILL PENDING**;
- m) (09cv12374) U.S. District Court, Eastern District of Michigan, Southern Division – David Schied v. Ronald Ward, Ken Hamman, Kirk Hobson, Patricia Meyer, Laura Surrey, Karen Ellsworth, Jessica Murray, Jennifer Bouhana, Patricia Ham, and Joe Mosier; (Judge Patrick Duggan); **PENDING; JUST FILED 6/19/09**

**Allegations contained in the above-referenced cases are described by reiteration and summary in the following pages.**

**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) Evidence shows that Harris criminally misused and disseminated an inaccurate and incomplete 2003 FBI criminal history report *before* seeking confirmation of its accuracy from David Schied. The FBI report displayed a quarter-century old single teenage offense erroneously showing a disposition of a felony “*conviction*” by which a status of “*probation*” was still listed;
  - b) Evidence shows that Harris’ criminal misuse and dissemination of the 2003 FBI report was done intentionally to cause Mr. Schied embarrassment and humiliation. Harris acted maliciously out of spite and in retaliation because Mr. Schied had initiated an employment grievance against Sandra Harris upon being hired by Harris/ This was because she had refused to match Mr. Schied’s new hire salary to the proper salary step as outlined by the local union’s collective bargaining agreement. These retaliatory acts were as criminal as they were as direct federal and state civil rights violations of Mr. Schied’s rights to gainful employment.
  - c) Evidence shows Harris’ malicious intent to criminally “*misuse and disseminate*” the information contained in that 2003 FBI (CHRI) report even *after* being notified that it was inaccurate and incomplete; and after being provided with such proof as with copies of a 1979 Texas “*set aside*” (allowing for the “*withdrawal of plea*”, the “*dismissal of indictment*” and the “*set aside of judgment*”) and 1983 Texas “*governor’s full pardon*” (which “*restored all civil rights*” that *might* had been lost);
  - d) Evidence shows that after receiving proof that the FBI report was inaccurate, Harris nonetheless disregarded Mr. Schied’s efforts to rely upon his statutory right to challenge the accuracy of the FBI report and to keep his job while getting the FBI report corrected. This caused Mr. Schied to have to “*defame himself*” forever in the future by his obligation to answer other job application questions asking, “*Have you ever been terminated while under a teaching contract? And if so, explain ‘why’ using the other side of this application if necessary.*”
  - e) Evidence shows that Harris tortuously terminated Mr. Schied’s employment and converted his remaining contracted employment salary from a school district “*debit*” to a “*credit*” in order to improve her own standing with the Lincoln Consolidated Schools Board of Education. Her motivation for that “*larceny*” and “*larceny by conversion*” was prompted by the need of school district officials to tighten their budgets due to the Governor’s recent announcement to school superintendents about budget cutbacks. That motivation was also prompted by Harris then becoming the newly appointed “*interim*” superintendent of the school district. Harris’ desire to impress the school board by both saving them money on a special education teacher and by “*weeding out*” a “*convicted criminal*” from the teacher ranks, constituted a criminal not only a “*conversion*” of school district debit to credit, but caused a further “*transfer of government funds*” when Mr. Schied sought unemployment compensation from the State of California and from Michigan to support his family in the aftermath of Harris’ “*wrongful termination*” of his employment. Proof of Harris’

- deceptive intent is found in other actions Harris took after terminating Mr. Schied that offer evidence that she was defrauding the Lincoln board members about her interest in going from “*interim*” to “*permanent*” school district Superintendent. Soon after the Lincoln school board voted her to become the “permanent” district superintendent, she then used her newly-gained status to procure a job as superintendent at another school district, leaving the Lincoln school board to contend with Mr. Schied’s civil lawsuit without Harris’ further involvement.
- f) Evidence shows that Harris maliciously “*abused her power and authority*” when she wrote and disseminated two tortuous letters naming the crime presented in the erroneous FBI report, copying those letters to a laundry list of Mr. Schied’s co-workers and supervisors. Her letters falsely and tortuously accused Mr. Schied of being both a “*liar*” and a “*convict*”.
- g) Evidence shows that after terminating Mr. Schied, Sandra Harris placed her two defamatory letters into the District’s public personnel files alongside the clemency documents (i.e., “*set aside*” and “*pardon*”) Mr. Schied had provided to Harris in “*good faith*” to prove the FBI report as being inaccurate and incomplete. These actions brought focus to the fact that Harris acted willfully and with a tortuous intent to “*deprive*” of Mr. Schied’s right to “*challenge and correct*” the accuracy of the FBI report.
- h) Evidence also demonstrates Harris’ intent to use her newly acquired status as the district’s “*interim*” superintendent, to “*defraud the United States*” when she “*converted*” the property of the U.S. Government (i.e., the erroneous FBI report) to her own personal use. In gross disregard of Mr. Schied’s right to privacy, and in gross disregard for CJIS policy, enforceable by both State and Federal laws governing the “*use and dissemination*” of criminal history data retrieved from the FBI, Sandra Harris also placed that “*nonpublic*” FBI document into that public personnel file. The copy of the FBI report that she had placed into that file was even the one that had showed Harris had Faxed the FBI report outside of the human resources office BEFORE even presenting it to Mr. Schied, yet another crime under multiple Michigan and Texas statutes.
- i) The evidence Harris shows that Harris then presided over the Lincoln district’s business office when all of those “*nonpublic*” and erroneous documents in the public personnel file were subsequently delivered in response to a Freedom Of Information Act request submitted by a teacher in December 2003, and while using the U.S. Post Office to commit the crimes, again by abusing a tool of the federal government, by delivery through the U.S. Mail.
- j) Evidence shows that Harris then initiated what was to be later recognized as a “*pattern*” of retaliatory “*harassment of a crime victim*” by her and other Michigan school district employers. The Evidence shows that the scope of crimes also envelopes subsequent “*fraud upon the Courts*” by senior school district officials, operating through their attorneys. Harris’ “*contempt of court*” was perpetrated through attorney Michael Weaver at the Plunkett Cooney law firm. She used her attorney Weaver to repeatedly make the erroneous claim in both State and Federal court that Mr. Schied had never provided her with requested copies of his Texas “*clemency*” documents. These statements were made by Harris despite three sworn

and notarized statements as Evidence to the contrary. (See the three Affidavits, submitted with the “*Sworn Affidavit by Earl Hocquard*” included in “**Exhibit F**”.)

2) **CATHY SECOR (Director of Business Services for the Lincoln Consolidated Schools):**

- a) Evidence shows that after his employment termination Cathy Secor *discriminated* against David Schied by refusing to properly apply his COBRA insurance premiums, causing Mr. Schied and his family to initially lose their insurance coverage, which led to the denial of medical services at a crucial time when Mr. Schied was otherwise scheduled for hospitalization and surgery.
- b) Evidence shows that Secor supervised over the Lincoln Consolidated Schools business office at the time that office “*converted*” FBI property (i.e., an erroneous FBI report subject to USDOJ CJIS policies) for personal use. Secor was also the business office manager when that office used the U.S. Postal Service to criminally violate Mr. Schied’s right to privacy in 2003, and again in 2006 and 2009. Secor was in charge of the Lincoln business office when disseminating a copy of Mr. Schied’s public personnel file under the Freedom of Information Act. These multiple occurrences were (minimally) CRIMES as defined by Texas, Michigan, and United States codes and statutes. The public personnel file “*retained*” by Secor and her criminal accomplices, included the “*nonpublic*” documents of the 2003 FBI report that Mr. Schied had attempt to challenge and correct before he was fired from his employment and denied his rights by Sandra Harris. That public personnel file also contained Harris’ two defamatory letters of defamation naming the 1977 crime referenced by the erroneous FBI report; and the file additionally contained two copies of Mr. Schied 1979 “set aside” clemency documents.
- c) Evidence shows that Cathy Secor *retaliated* against Mr. Schied for having named Secor as a co-defendant in a civil case he had filed in the Washtenaw County Circuit Court. That evidence shows that despite Mr. Schied eventually dropping Secor from that lawsuit “*in good faith*” effort to simplify his claims, Secor nevertheless maintained her retaliatory posture against Mr. Schied by continuing to misapply his COBRA premiums and eventually cancelling his health insurance coverage prematurely over a year later.
- d) Evidence shows that Secor also retaliated by continuing to criminally maintain the erroneous “*nonpublic*” FBI criminal history report alongside Harris’ two defamatory letters and Mr. Schied’s “*nonpublic*” clemency documents, throughout years of Mr. Schied’s civil litigation against the Lincoln Consolidated Schools. Secor maintained and “*publicly*” disseminated these erroneous and “*nonpublic*” documents long after Sandra Harris left the district for a job as “superintendent” of the Oak Park School District in Oak Park, Michigan. The Evidence shows that Secor also supervised the maintenance of those nonpublic documents in the District’s public personnel files for nearly six (6) years despite the submission of numerous civil court pleadings between 2004 and 2006 with focus on these violations of public policy. She continued to retain, to “*convert*”, and to disseminate those defamatory documents and “*government property*” despite a documented criminal investigation into Harris’ actions, as conducted by the Michigan State Police in 2006. This was the crime report Mr. Schied had made against Harris in 2005, about the “*misuse*” and wrongful

dissemination of the FBI report and other documents from the public personnel file being supervised and controlled by Cathy Secor as the business office manager.

- e) Evidence shows that Mr. Schied filed another crime report with the Washtenaw County Sheriff in 2009 when Mr. Schied received additional evidence and a sworn, notarized Affidavit from a 3<sup>rd</sup> party “*witness*” demonstrating that early in this year Cathy Secor was still criminally disseminating the same “*nonpublic*” documents to the public under FOIA request. This evidence shows that in response to the a Washtenaw County sheriff’s criminal investigation, as well as in response to an “*investigation*” by the CJIS division of the Michigan State Police, Cathy Secor attempted to blame another human resources employee working directly under her, Sherry Gerlofs, for that latest occurrence.

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

- n) Evidence shows Sherry Gerlofs is the person named by Cathy Secor as being the one directly handling the 2009 criminal dissemination of the “*nonpublic*” 2003 FBI document and Mr. Schied’s “*nonpublic*” clemency documents (along with Harris tortuous letters of defamation), as they have been maintained by Sandra Harris, Cathy Secor, Fred Williams, and Lynn Cleary in the Lincoln Consolidated School business office.
- o) **NOTE: Most all of the allegations set forth above pertaining to Cathy Secor are equally applicable as if set forth in writing herein regarding Sherry Gerlofs.** Gerlofs has been employed by the Lincoln Consolidated business office at least since 2003 when Mr. Schied first was employed at that school district. Therefore, what is stated above regarding the mishandling of “*nonpublic*” documents by Cathy Secor at the Lincoln business office is fully incorporated as if fully written here and applied to Sherry Gerlofs.

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

- a) Evidence shows that Williams was the “successor” to Sandra Harris as the reigning Superintendent of the Lincoln Consolidated Schools. Essentially, Williams picked up where Harris left off in criminally maintaining and disseminating “*nonpublic*” documents in the Lincoln district’s “*public*” personnel files in criminal violation of CJIS “*Policy Board*” guidelines, and State and Federal clemency laws.
- b) This evidence shows that despite full representation in the courts between 2005 and 2008, and despite knowing the criminal penalties connected with such illegal maintenance and dissemination of these documents, Williams continued to sanction the “*public*” disclosure of the erroneous 2003 FBI report, Harris’ two defamatory letters against Mr. Schied, and the “*nonpublic*” clemency documents had surrendered to Harris in 2003 by Mr. Schied “*in good faith*” to prove the FBI report was inaccurate and in need of correction. Evidence shows that in December 2006 Williams was in command when the business office of the Lincoln Consolidated Schools responded to a FOIA request from at least one citizen by criminally using the U.S. Postal Service to send out a copy of David Schied’s public personnel file. A “*Sworn Affidavit*” submitted to the Courts in 2008 showed that the file included Harris’ two defamatory letters, two copies of the 1979 Texas court Order of “*set*

- aside*”, and the 2003 erroneous FBI criminal history record of “*federal government property*” that Sandra Harris, Cathy Secor, Sherry Gerlofs, and Fred Williams had illegally “*converted*” for their personal use to “*retaliate*” against Mr. Schied as a former employee.
- c) Evidence shows that through his representative attorney Michael Weaver at the Plunkett Cooney law firm, Williams perpetrated fraud upon the Court by submission of claims that Mr. Schied had never provided Sandra Harris with requested copies of his Texas “*clemency*” documents. These statements were made by Williams despite clear evidence to the contrary: 1) by means of three sworn Affidavits from “*witnesses*” Harris herself had called to the “pre-termination” meetings; and 2) by means of the copies of the “*set asides*” documents themselves being illegally “*retained*” in the public personnel files of the school district’s business office. Notably, despite the abundance of this contradictory evidence, Williams “*conspired*” with Sandra Harris to use “*official pleadings*” of attorney Michael Weaver to continually deny the existence of these documents in both State and Federal courts.
  - d) **NOTE: Most all of the allegations set forth above pertaining to Cathy Secor are equally applicable as if set forth in writing herein, regarding Fred Williams.** Therefore, what is stated above regarding the mishandling of “*nonpublic*” documents by Cathy Secor at the Lincoln business office is fully incorporated as if fully written here and applied to Fred Williams, whose own executive office suite is located in the very same small building as the school district’s business office where Cathy Secor and Sherry Gerlofs works on behalf of Williams by handling his “*business*” affairs.

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

- a) Evidence shows that Cleary took over where Fred Williams left off in criminally maintaining “*nonpublic*” documents in the District’s “*public*” personnel files. This evidence shows that despite full representation in the courts between 2008 and 2009 as the reigning Superintendent of the Lincoln Consolidated Schools, despite Mr. Schied’s history of filing criminal complaints against the Lincoln Consolidated School personnel, and despite knowing the criminal penalties connected with such illegal maintenance and dissemination of these documents, Cleary continued to sanction the “*public*” disclosure of the erroneous 2003 FBI report, at least one of Harris’ two defamatory letters against Mr. Schied, and the “*nonpublic*” set aside document surrendered to Harris in 2003 by Mr. Schied in good faith to prove the FBI report was inaccurate and in need of “*challenge and correction*”.
- b) Evidence shows that through the Lincoln Consolidated Schools’ representative attorney Michael Weaver and other attorneys at the Plunkett Cooney law firm, Cleary continued to perpetrated fraud upon the Court by submission of the school district’s claims that Mr. Schied had never provided Sandra Harris with requested copies of the Texas “*clemency*” documents he attempted to use to justify keeping his job while “*challenging and correcting*” the FBI-own government report. These statements are still being made by Cleary and others despite the contradictory evidence showing that Lynn Cleary was “*chief in command*” as Superintendent of the Lincoln Consolidated Schools in 2009 when crime witness Earl Hocquard received a copy of the 2003 erroneous FBI report and other “*nonpublic*” documents from Cathy Secor and Sherry

Gerlofs at the school district's business office (which is located in the very same small building as Cleary's own executive office suite).

- c) **NOTE: Most all of the allegations set forth above pertaining to Cathy Secor are equally applicable as if set forth in writing herein, regarding Lynn Cleary.** Therefore, what is stated above regarding the mishandling of "nonpublic" documents by Cathy Secor at the Lincoln business office is fully incorporated as if fully written here and applied to Lynn Cleary.

\* See "**EXHIBIT F**" as "**Sworn Affidavit by 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) Evidence shows that these school board members benefited by Sandra Harris' criminal *conversion* of Mr. Schied's contracted employment salary from a "debit" to a "credit" on the financial books of the District during the 2003-2004 school year. This constituted a criminal "*conspiracy*" to "*deprive*" Mr. Schied of his rightful employment contract and salary; and forcing Mr. Schied to become an unwilling participant in the "*theft*" and/or "*transfer of government funds*" that occurred when Mr. Schied was forced by the superintendent and school board to seek unemployment "*compensation*" from the State of California and from the State of Michigan to support his family in the aftermath of Sandra Harris' "*wrongful termination*" of his employment.
- b) Evidence shows that from 2003 until the present, these Lincoln Consolidated school board members sanctioned all court costs and attorney fees in ongoing court battles in which Sandra Harris, Fred Williams, Cathy Secor, Lisa Desnoyer, and the School Board of the Lincoln Consolidated Schools was named. These school board members also supported each reigning superintendent of the Lincoln Consolidated Schools despite repeated court pleadings submitted by Mr. Schied's attorneys, and by similar claims submitted by Mr. Schied himself through written "*crime reports*", providing clear notice to these Board members that the "*public*" disclosure of the erroneous 2003 FBI report, Harris' two defamatory letters calling Mr. Schied a "liar" and a "convict", and the "*nonpublic*" clemency documents surrendered by David Schied to Harris in 2003 (in good faith to prove the FBI report was inaccurate and in need of "*challenge and correction*") is blatantly ILLEGAL.
- c) Evidence shows that through Michael Weaver and their other representative attorney at the Plunkett Cooney law firm, these school board members continually conspired with Harris, Williams, Cleary, and others to sanction these crimes; and while continually perpetrating "*fraud upon the Court*" by submission of claims that Mr. Schied had never provided Sandra Harris with requested copies of his Texas "*clemency*" documents. These statements were made despite clear evidence to the contrary by the three sworn and notarized Affidavits (from Claudia Gutierrez, Linda Soper and Donnie Reeves) to which these co-defendants continually denied existence.
- d) **NOTE: Most all allegations set forth above pertaining to Cathy Secor are equally applicable as if set forth in writing herein, regarding the named members of the Board of Lincoln Consolidated Schools.** Therefore, what is stated



above regarding the theft and “*conversion*” of government property (i.e., the erroneous FBI document from 2003) for personal use by Sandra Harris, Cathy Secor, and others at the Lincoln business office, is fully incorporated as if fully written here and applied to each and every member of the Lincoln School Board.

- 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) Evidence shows that Weaver repeatedly perpetrating criminal “*fraud upon the court*” in each case he has entered his appearance as the representative attorney for the defendants’ actions against David Schied.
  - b) Evidence demonstrates that one of the most significant occurrences of fraud happened when Weaver pretended to read directly to the Washtenaw County Circuit Court judge in 2005. Court transcripts show that while pretending to be reading “*verbatim*” from Mr. Schied’s 2004 Texas court “*Order of Expunction*”, Weaver yet intentionally substituted his own words for those in the court Order so as to significantly change the meaning of that document and the resulting outcome of the case. In this instance, Weaver substituted his own word “*conviction*” for the word “*arrest*” appearing in the court order to support his claim (on behalf of Sandra Harris and the Lincoln Consolidated Schools board of education) that “*only an expungement of all records associated with Mr. Schied’s 1977 ‘conviction’ would have allowed Mr. Schied to claim ‘no conviction’ on a 2003 job application*”.
  - c) Evidence also demonstrates that for the past 5 years both Weaver and the Plunkett Cooney law firm in Michigan continued to file fraudulent pleadings insisting that “*Mr. Schied refused to even show Sandra Harris the clemency documents that he claimed proved the FBI report was incorrect*”; and, that “*Harris provided Schied with ample opportunity to challenge the accuracy of the FBI report, but Mr. Schied continually refused to cooperate with Harris’ requests*”.
  - d) Evidence clearly demonstrates that Weaver intentionally perpetrated these acts of “*fraud upon the court*” to “*mischaracterize*” Mr. Schied, and to establish fraudulent “*official*” records that could be used later by subsequent reference and submission to higher and/or different courtrooms and in other legal review forums. Court transcripts and written pleadings both show that Weaver even went so far as to act on his own behalf as a “*witness*” to the court, testifying that Mr. Schied had caused courtroom disruptions during early proceedings of the case when such events otherwise had never taken place.
  - e) **NOTE: Most all of the allegations set forth above pertaining to Sandra Harris, Cathy Secor and others of the Lincoln school district are equally applicable as if set forth in writing herein, regarding Michael Weaver. The records show that Weaver was the “*mastermind*” behind Mr. Schied being once again found “*guilty*” and “*convicted*” again in 2003 – without Constitutional “*due process*” of a “*trial by jury*” – and for the same crime by which Mr. Schied had otherwise been absolved and had the indictment otherwise “*dismissed*” a quarter-century earlier by means of “*withdrawal of plea*”, a “*set aside of judgment*” and by “*full executive pardon and restoration of full civil rights*” from a Texas governor. Therefore, what is stated above regarding the criminal conspiracy to “*convert, misuse***

and disseminate” government property (i.e., the 2003 FBI report) by others at the Lincoln business office is fully incorporated as if fully written here and applied to Michael Weaver.

\* 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) Evidence shows that as the human resources director for the school district in Mr. Schied’s new home town where Mr. Schied’s young son also attended elementary school, Katie Parker recognized that a wrongdoing had been committed at Mr. Schied’s previous place of employment. She also recognized that her school district desperately needed qualified teachers available to substitute for full-time teachers of the multiply-severely impaired. She was thus motivated to engage Mr. Schied in a fraudulent employment contract for part-time employment in the winter 2004 after Mr. Schied was terminated from his employment from the Lincoln Consolidated Schools.
- b) Evidence shows that in early 2004 Parker acted misleadingly when stating her understanding that because of Sandra Harris’ actions in 2003 Mr. Schied would need to “*defame himself*” in explaining on all future job applications why it was that he was terminated in the middle of a teaching contract in 2003, and why it was that “*interim*” superintendent Sandra Harris had refused to allow Mr. Schied to keep his teaching job at the Lincoln while “*challenging and correcting*” the accuracy of the erroneous 2003 FBI report. Parker had stated both orally and in writing that she would hire Mr. Schied while providing him the time he needed to “*challenge and correct*” the wrongful 2003 FBI report that she knew the Northville Public Schools would also be getting in 2004 once Mr. Schied submitted to their procedural requirement to again run additional fingerprints through Michigan law enforcement. She therefore insisted that Mr. Schied provide her with copies of his “*set aside*” and “*pardon*” documents to keep until Mr. Schied got his FBI report “*corrected*”. That fraudulent promise, again, provided both orally and in writing, proffered Parker’s assurance that she would keep those “*nonpublic*” documents “*sealed*” and outside of Mr. Schied’s public personnel file, until such time that Mr. Schied proved that he had successfully “*corrected*” his FBI record (i.e., by paying again later for another set of fingerprints to be run through the Michigan State Police to obtain an “*updated*” CHRI report from the FBI showing that the criminal history report had been corrected and “*cleared*”).
- c) Evidence shows that Katy Parker acted fraudulently again a year later when she proffered a “*modification*” of that original employment “*contract*”. In 2005, both orally and in writing, Parker agreed to exchange possession of those SET ASIDE and PARDON documents for a copy of MR. SCHIED’S recently received Texas EXPUNCTION document. In that exchange, she reiterated the same promise that this “*incriminating*” document would also be maintained far away from Mr. Schied’s public employment file; and that it too would be either “*returned or destroyed*” after such time that the Texas court Order had enough time to take proper effect and a

new fingerprint check could be ordered by Mr. Schied to demonstrate that the FBI record was finally “*corrected*” to show that the record was properly “*cleared*” by Texas and federal law enforcement.

- d) Evidence shows that Katy Parker never intended to follow through with either of these “*contracted*” employment promises. Later court arguments submitted by the Northville Public Schools’ attorney, Bruce Bagdady, in 2007 demonstrate that Parker had been well aware that one of the statutes of Michigan’s Revised School Code otherwise prohibited employers from making contractual agreements for the secrecy of criminal history information uncovered during the teacher employment application process.
- e) Evidence shows that Mr. Schied followed through with his end of this employment contract in good faith, even earning two honorary letters of recommendation from two school principals during that year and a half of part-time substitute teacher employment between 2004 and 2005. While Mr. Schied upheld his agreement to pay for fingerprinting and to order yet another criminal background check from the FBI in summer 2005, even though that came back with a “*corrected*” and completely “*cleared*” FBI record, Katy Parker nevertheless turned around and refused to “*return or destroy*” the documents Mr. Schied had entrusted to her for safekeeping. Instead, she placed two copies of the Texas court “Order of Expunction” into Mr. Schied’s public personnel file anyway.
- f) Evidence shows Katy Parker had clearly had “*stolen*” and “*converted*” for her own personal misuse the Texas court “Order of Expunction” because, by mid-2005, Mr. Schied had been aggressively pursuing civil and criminal charges against Sandra Harris; and because Mr. Schied had reported “*obstruction of justice*” against another Lincoln Consolidated School District administrator – Scott Snyder – who had “*aided and abetted*” in the cover-up of Harris’ crime. Scott Snyder had been hired in mid-2004 by Katy Doerr-Parker to become the new Northville Public Schools elementary school principal at the Silver Springs Elementary School where Mr. Schied’s child had been attending first grade.

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

- a) Evidence shows that since 2005 Bolitho has been acting in a *criminal conspiracy* to deprive Mr. Schied of his right to privacy. That evidence demonstrates that despite clear notice of a multitude of laws making it a criminal misdemeanor offense to disseminate criminal history information known to be set aside, pardoned or expunged, Bolitho continues to freely distribute the 2004 Texas court “Order of Expunction” that Mr. Schied secured and submitted to the Northville Public Schools employer for the sole purpose of proving that the 2003 FBI criminal history report received by that school district in 2004 had been successfully “*challenged and corrected*”.
- b) Evidence of Michigan court pleadings and crime reports filed between 2006 and 2009 show that Bolitho, along with Katy Parker and Leonard Rezmierski, have long been using “*color of law*” and a *distorted* interpretation of Michigan’s Revised School Codes, as their means of justifying their actions despite that the Revised School Codes themselves clearly define the public dissemination of these “*nonpublic*”

- clemency documents as a criminal misdemeanor offense punishable by fine and imprisonment.
- c) Evidence shows that David Bolitho has been freely disseminating to Mr. Schied's prospective employers that "nonpublic" 2004 Texas "clemency" court Order despite that it represents the "obliteration" of all remaining criminal history and a prohibition on any use and dissemination of information related to the single teenage offense that occurred in 1977. Bolitho is intentionally taking such action to mischaracterize and defame Mr. Schied by presenting him in a "false light". The evidence shows that Bolitho is actually passing this "clemency" document off as being "proof" that Mr. Schied has committed some form of "unprofessional conduct" as a present day schoolteacher. He makes such claim by responding to employer requests for previous employment information while conveniently declining to show Mr. Schied's prospective employers that Mr. Schied had actually earned **two** letters of honorary recommendation between 2004 and 2005 while under employ at the Northville Public Schools.
  - d) Evidence also shows that Bolitho has been maintaining that same "Order of Expunction" document in Mr. Schied's "public" personnel file at the Northville Public School District. Written and notarized third party "witness" testimony shows that since 2006 Bolitho has been freely disseminating that nonpublic clemency document to any person requesting information about David Schied under the Freedom of Information Act.
  - e) Evidence shows that Bolitho was the one directly responsible for the criminal dissemination of the "nonpublic" Texas court Order of Expunction in 2009 that crime witness Earl Hocquard received a copy of when he submitted a FOIA request for the public personnel records of David Schied late in 2008.

**\* See "EXHIBIT H" as "Sworn Affidavit by Earl Hocquard" regarding Northville Public Schools.**

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

- a) Evidence shows that "Dr." Rezmierski is conspiring with Katy Parker and David Bolitho to deprive Mr. Schied of his right to privacy. That evidence demonstrates that despite clear notice that it a criminal misdemeanor offense to disseminate criminal history information known to be set aside, pardoned or expunged, Rezmierski continues to sanction the free distribution of the "nonpublic" Texas court "Order of Expunction".
- b) The evidence demonstrates that Mr. Schied had been relying upon his "due process" rights under Federal statute to "challenge and correct" the FBI report that was received by the Northville Public Schools in 2004. That FBI report was different from the FBI report received by the Lincoln Consolidated Schools in 2003 in that it showed that the State of Texas had "partially corrected" their records by inclusion of notice to the FBI that Mr. Schied had received a "governor's full pardon" in 1983 but still failing to reflect the "set aside" that Mr. Schied received in 1977. This evidence shows that Rezmierski has acted tortuously with his co-conspirators to turn back upon Mr. Schied's "good faith" reliance upon Katy Parker's oral and written assurances of confidentiality, while instead using Mr. Schied's clemency documents as a means to

detract from and justify the crimes being committed against Mr. Schied by Michigan school district senior administrators.

- c) The evidence shows that in 2008, Leonard submitted a *fraudulent* sworn Affidavit to the U.S. District Court for the Eastern District of Michigan claiming that he solely reviews all incoming FOIA requests and that no entity has been sent a copy of Mr. Schied's public personnel file from the Northville Public School District under the Freedom of Information Act. That sworn statement demonstrates "**fraud upon the court**" by both Leonard Rezmierski and his attorney Bruce Bagdady. There are two other Sworn Affidavits, one provided to the Sixth Circuit Court of Appeals in 2008 and another provided to the U.S. District Court and to the Michigan Court of Appeals in 2009, providing statements to the effect that David Bolitho had otherwise criminally sent out Mr. Schied's Texas court "Order of Expunction" through the U.S. Mail in December 2006 and again in January 2009.

**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) Undisputed Evidence shows that shortly after being hired as the new elementary school principal right across the street from the apartment complex where David Schied resided with his family, Scott Snyder had invited Mr. Schied into his new office to discuss the occurrences the previous year at the Lincoln Consolidated Schools. Snyder was candid with Mr. Schied since both had exhibited a mutual respect in their professional relationship when Snyder held a supervisory position over Mr. Schied at the Lincoln High School where they both worked in 2003. In that private meeting during the summer 2004, Scott Snyder revealed that he had become an unwitting "*witness*" in the criminal dissemination of the specific contents of the 2003 erroneous FBI criminal history report received and "*processed*" by Sandra Harris. He revealed detailed knowledge about the specific contents of that erroneous FBI report; and he explained that he had understood Mr. Schied was supposedly terminated by Harris based on the information in that report being conveyed around the District as if it were undisputed and "true". While Harris had made Snyder and others privy to that "*nonpublic*" information, none were ever informed about Mr. Schied having challenged the accuracy of that report or that Mr. Schied had provided Harris with evidence of the 1979 "*set aside*" and 1983 "*pardon*" documents to prove clemency relief and Mr. Schied's claim that the FBI report was erroneous and in need of "*challenge and correction*".
- b) Evidence shows that despite having accepted his job in Michigan government as a public school official under a sworn Oath to uphold and support the laws of Michigan and of the United States, Scott Snyder refused to fully cooperate with a criminal investigation of Sandra Harris conducted by the Michigan State Police in 2005 and extending into 2006. Instead, the evidence shows that Snyder was less than forthcoming when questioned on the phone about the crime by MSP Det. Sgt. Fred Farkas. The crime report itself shows that Snyder refused to answer questions on the phone that might have otherwise implicated his former boss, Sandra Harris. Scott Snyder later revealed to Mr. Schied that this was because Sandra Harris had been the

- very one who had provided him with the letter of recommendation that he had needed to be seriously considered for an interview at the Northville Public Schools, and which had helped him to secure his new job as a Northville elementary school principal.
- c) Evidence shows that subsequent to Mr. Schied accusing Snyder of “*obstruction of justice*” and naming Scott Snyder as a “*hostile witness*” to the crimes Sandra Harris at Lincoln Consolidated Schools, Snyder retaliated against David Schied by using his supervisory role as elementary school principal to repeatedly suspend Mr. Schied’s child from school.
  - d) The evidence shows that each of these suspensions occurred under very questionable conditions, while denying Mr. Schied’s child his Federal and State “*due process*” rights not to be “*bullied*” or otherwise terrorized in public schools. Essentially, Snyder disregarded “*witness*” reports of schoolyard bullying against Mr. Schied’s child, while also refusing to properly document, investigate, or to rectified Mr. Schied’s own parent reports of schoolyard violence against his child. That same evidence shows that Snyder repeated these offenses several times over four years while denying Mr. Schied his right as a parent to challenge the accuracy of the “*suspension notices*” that Snyder then placed into his son’s permanent student file, and without providing Mr. Schied his federal due process right as a parent to amend that erroneous record by adding information to the file on his child’s behalf.
  - e) Evidence shows that when Mr. Schied attempted also to rely upon his son’s rights under the Individuals with Disabilities in Education Act (IDEA) to force school administration to address these suspension incidences with formal assessments and interviews, Scott Snyder participated with Lynn Mossoian, Richard Fanning, and others in an even more expansive conspiracy to deprive Mr. Schied’s child of his rights under a substantial number of those federal due process statutes.

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

- a) Evidence shows that Mossoian was directly involved – over a two year period – in the repeated deprivation of civil rights of Mr. Schied’s son at the Silver Springs Elementary School where Scott Snyder was, and continues to be, the acting school principal. That evidence shows that as the chief special education administrator of the Northville Public School District, Mossoian played a major role in the violation of Mr. Schied’s parent rights and the child’s “*due process*” rights under the Individuals with Disabilities in Education Act.
- b) That evidence demonstrates that Mossoian also acted in a conspiracy with other school and district government officials to “*aide and abet*” Scott Snyder in getting away with retaliatory actions he took against Mr. Schied by repeatedly suspending his child from school, and while not being held in any way accountable for his malfeasance of duty to govern and protect all pupils in attendance at the Silver Springs school.

**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) Evidence of Katy Parker’s letters to David Schied shows that Gary King was instrumentally involved in construction of the *fraudulent* employment agreement proffered to Mr. Schied by the administrators of the Northville Public Schools. The evidence demonstrates that though for the two years Parker was promising confidentiality over the clemency documents that Mr. Schied had surrendered in “*good faith*” to show his need and his desire to exercise his statutory federal right to “*challenge and correct*” the FBI report received by the Northville Public Schools in 2004, attorney Gary King had been throughout that time acting under cover of the Keller Thoma law firm to “*counsel*” and “*advise*” Katy Parker and her administrative associates on how they might otherwise use the “color of law” to commit crimes against Mr. Schied.
- b) Evidence shows that King’s actions contributed to violations of CJIS Advisory Board policies governing Mr. Schied’s rights to privacy. He also did so while supporting the Northville school district administrators “*theft*” of Mr. Schied’s Texas court “Order of Expunction” and “*conversion*” of that document for their own personal use in “*retaliating*” against and “*harassing*” David Schied.
- c) Evidence demonstrates that though clearly aware that Mr. Schied was a “*crime victim*” of Sandra Harris and others at the Lincoln school district, attorney Gary King conspired with Northville school district officials to “*compound*” those crimes by imitating them using the Texas court Order rather than the FBI report itself. King thereby “*aided and abetted*” these Michigan school district officials in misusing the “*due process*” otherwise afforded to Mr. Schied by State and Federal CJIS Advisory Board “*policy*”. Though federal statutes (28 CFR § 50.12) were designed to provide “*due process*” so to protect Mr. Schied’s right to privacy, this attorney conspired with school district officials to make the “*challenge and correction*” process work in just the opposite fashion against Mr. Schied. He “*coached*” these Northville school district officials in using the very same legal instruments afforded to Mr. Schied to prove the FBI report was successfully challenged and “*corrected*”, to undermine the intended effect of those laws; and while depriving Mr. Schied of his “*due process*” and “*privacy*” rights.

**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) Evidence shows that Kenneth Roth played a significant role in the cover up of the crimes being committed against David Schied by the Katy Parker, David Bolitho, and Leonard Rezmierski.
- b) That same evidence shows that Kenneth Roth played the same role in the cover up of the retaliatory civil rights violations that Scott Snyder, Lynn Mossoian and other school officials were committing against Mr. Schied’s young child in the aftermath of the principal repeatedly suspending the child from school without just cause and without accountability for explaining his actions afterwards.
- c) The evidence demonstrates that Roth spearheaded the rest of the Northville Public Schools’ Board of Education members in recruiting the services of Keller Thoma

attorney Richard Fanning. Roth and the other Board of Education members recruited Fanning for the purpose of conspiring with them in using “*color of law*” to reinforcement their denial of a due process hearing for Mr. Schied when Mr. Schied brought focus and protest against Scott Snyder’s retaliatory suspensions of his child. The Board then also continued to instrumentally use Fanning as their “*consultant*”, as well as their tactical and legal “*interference*” against both Mr. Schied’s and the child’s due process rights under IDEA when Mr. Schied attempted to rely upon federal civil rights statutes to hold school administrators accountable for their retaliatory actions.

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) Evidence shows that Fanning assisted various school and district officials, and school board members, in using “*color of law*” to reinforcement their denial of a due process hearing for Mr. Schied when Mr. Schied brought focus and protest against Scott Snyder’s retaliatory suspensions of his child.
- b) Evidence shows that Fanning played an instrumental role as *consultant* as well as ran tactical and legal “*interference*” against both Mr. Schied’s and the child’s “*due process*” rights under IDEA and FERPA when Mr. Schied attempted to rely upon federal civil rights statutes to hold school administrators accountable for their retaliatory actions against David Schied through the unreasonable multiple suspensions of his innocent child.
- c) Evidence shows Fanning, operating under legal cover of the Keller Thoma law firm, then “*interfered*” with official proceedings when questioned by investigative authorities under Federal funding and charged with reporting their findings to the State and to the United States. His actions therefore constitute not only a conspiracy to deprive Mr. Schied and his of their rights under federal laws. His actions also “*compound*” the underlying conspiracy to “*aide and abet*” Scott Snyder in the “*cover up*” of the crimes committed by Sandra Harris.

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) Evidence shows that Bagdady used the cover of the Keller Thoma law firm to conspire with Northville Public Schools elected and administrative officials in using “*color of law*” to reinforcement their denial Mr. Schied’s “*due process*” rights when he attempted to hold school administrators legally accountable for their illegal *retaliatory* actions.
- b) The evidence shows that on behalf of his “*clients*”, Bruce Bagdady knowingly “*misled the court*” when refuted the evidence showing that Katy Parker had committed fraud against Mr. Schied by her repeated written assurances to provide confidentiality to his clemency documents before, during, and after he challenged and corrected his the FBI report received by the Northville Public Schools in early 2004.



Bagdady turned around and cited Michigan Revised School Codes claiming that they prohibited such conduct and insisting therefore that Katy Parker never made such assurances despite irrefutable evidence to the contrary.

- c) The evidence of court transcripts also demonstrate that Bagdady then went on to convincingly argue the placement of a single comma of one particular sentence found in one statute of the Revised School Code, while interpreting that statute to mean that the 2004 Texas court “Order of Expunction” pertaining to a 1977 teenage offense - which otherwise represented the *obliteration* of all records and Mr. Schied’s legal right to deny even the expunction document itself – was somehow “*proof of* (Mr. Schied’s) *unprofessional conduct*” as a public schoolteacher three decades later in 2007.
- d) The evidence shows that in 2008, Bruce Bagdady conspired with Leonard Rezmierski to submitted a fraudulent sworn Affidavit to the U.S. District Court for the Eastern District of Michigan claiming that he solely reviews all incoming FOIA requests and that no entity has been sent a copy of Mr. Schied’s public personnel file from the Northville Public School District under the Freedom of Information Act. That sworn statement demonstrates “**fraud upon the court**” by both Leonard Rezmierski and his attorney Bruce Bagdady. There are two other Sworn Affidavits, one provided to the Sixth Circuit Court of Appeals in 2008 and another provided to the U.S. District Court and to the Michigan Court of Appeals in 2009, providing statements to the effect that David Bolitho had otherwise criminally sent out Mr. Schied’s Texas court “Order of Expunction” through the U.S. Mail in December 2006 and again in January 2009. This was not only a breach of professional ethics, but also constitutes crimes of “*contempt of court*” and “*fraud/interference in an official court proceeding*”. Both offenses are prohibited under penalty of fines and imprisonment.

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

- a) Evidence shows that in 2007, about the time that David Schied was pursuing civil claims through an attorney against the Northville Public School District in Judge Cynthia Stephens’ court, Ron Ward appeared alongside Ken Hamman attempting to terminate David Schied’s teaching employment at the completion of his second year of teaching for the Brighton High School. During that occasion, it is presumed that Ron Ward received information about Mr. Schied’s litigation from the previous “assistant superintendent” for Brighton Schools, DON THOMAS, who left Brighton for a job as the Human Resources director for the Northville Public School District. Ward and Hamman then had attempted to use an “invalid” teacher performance report generated by Ken Hamman as the basis of Ron Ward’s intention not to rehire Mr. Schied for the next school year (’07-’08). That attempt was thwarted by the local teacher’s union based on the questionable action by Ken Hamman violating the collective bargaining agreement by conducting two classroom “observations” with the second of those two observations done with just two hours notice and just the day before generating a derogatory report about Mr. Schied’s classroom performance.
- b) Evidence also shows that at the beginning of 2008, Ron Ward was solicited by the State of Texas for a sworn Affidavit concerning Brighton Area Schools’ policies for conducting criminal background checks. That case was a “civil rights” case filed by Mr. Schied’s Michigan attorney, DARYLE SALISBURY, for “deprivation of rights

under color of law” (42 U.S.C. § 1983) naming Lincoln and Northville school district superintendents, the Michigan Governor Granholm, and the Director for the Texas Department of Public Safety.

- c) Evidence demonstrates that while Ward readily submitted the affidavit to Texas, the evidence several months later of “*arbitration*” testimony from Pat Meyer revealed that Ron Ward had, about the time of his Affidavit, then instructed Pat Meyer to evaluate Mr. Schied “*differently*” than she ever has for other teachers. Right about that time, Ken Hamman, Pat Meyer, and other assistant principals of the Brighton High School also initiated a “*hostile work environment*” upon Mr. Schied by effort to construct and document their “just cause” reason for terminating his employment at the end of that ’07-’08 school year. Soon afterwards, Ron Ward and Ken Hamman conspired together to place Mr. Schied on an “administrative leave”, which was at the same time Mr. Schied had been consulting with his medical doctor about getting a leave of absence under the “*Family Medical Leave Act*” (FMLA) to get away from the hostile work environment. Subsequently, Ron Ward supported Ken Hamman in producing a final “*teacher evaluation*” to the Brighton school board, and he personally argued his reasons for terminating Mr. Schied’s employment based upon the documents “*constructed*” by Ken Hamman and the assistant principals in the final couple of weeks before Mr. Schied left on administrative leave/medical leave.
- d) Evidence convincingly shows that Ron Ward’s actions constituted “*fraud in the construction of official public documentation*” that was placed before the school board. It also shows a “*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 he 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*” (among other things) under the Constitution. Soon after Ron Ward provided Mr. Schied with notice of his intent to terminate Mr. Schied’s employment, David Schied filed a civil rights complaint with the Michigan Department of Civil Rights. Right after that filing, Ron Ward quit his job as the assistant superintendent and left the Brighton school district.

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

- a) **See Evidence and Statements described for Ronald Ward in “a through d” above as incorporated here by reference as if written herein verbatim.**
- b) Evidence presented in a “*civil rights*” Complaint that Mr. Schied had filed with the Michigan Department of Civil Rights, as well as additional evidence submitted during the subsequent Arbitration proceedings and a U.S. District Court case that was filed against Ron Ward, Ken Hamman, and others at the Brighton Area School District, shows that Ken Hamman played a key role in creating a “*hostile work environment*” for Mr. Schied during his last days of employment.
- c) That evidence shows that Ken Hamman’s motivation for terminating Mr. Schied’s employment was not just predicated upon Mr. Schied continually pursuing civil and criminal Complaints against the administrative officials of the Lincoln and Northville public school districts. He was also motivated to “*quiet*” Mr. Schied and put a stop to his **advocacy on behalf of disabled 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.

- d) The Evidence demonstrates that Ken Hamman's blaming of David Schied for his own *incompetence, negligence, and malfeasance* of duty to these disabled children, constituted a "*retaliatory*" civil rights violation of law. In arbitration, he "*perjured*" his testimony when attempting to justify the documents he used in the construction of a "*hostile work environment*". Those documents also consisted of two teacher evaluations for which there is documentation to show that the Michigan Education Association had put Hamman on notice in previous months that his teacher evaluations were invalid because they were based either upon his own violation of the collective bargaining contract with the Union, or because his information had been challenged and proven as erroneous and unjustifiable. Among other things, Hamman is therefore guilty of a "*conspiracy to commit an offense*" and/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 a State-operated legal Arbitration hearing; conspiracy to "*exploitation of a vulnerable victim*"; Conspiracy to retaliation and harassment against a witness, victim, or informant.

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

- a) **See Evidence and Statements described for Ronald Ward in "a through d" and for Kenneth Hamman in "a through d" above as incorporated here by reference as if written herein verbatim.**
- b) The evidence shows that Patricia Meyer remains an administrative employee of the Brighton Area Schools, meaning she has been subject to direct supervision by both Kenneth Hamman and Ronald Ward's replacement at the District. The evidence also shows that Patricia Meyer readily admitted during Arbitration testimony rendered in 2008 and 2009 that she followed Ronald Ward's direct command that she dissent from the usual method in which assistant principals normally evaluate teachers using the "*teacher evaluation*" form. A year after conducting her evaluation in January '08, and providing an evaluation showing that Mr. Schied had performed "*satisfactorily*" in all areas provided by the form, Patricia Meyer stated under Oath that she had not actually evaluated Mr. Schied on anything other than what she had observed when spending one hour in class, thus attempting to undermine and "*disqualify*" her high rating of Mr. Schied's performance in a show of "*support*" to Hamman's and her other co-conspirators' testimony that Mr. Schied was otherwise a "*problem teacher*".
- c) Evidence shows that during arbitration testimony, Meyer constructed grossly "*fraudulent*" stories surrounding her experiences with various cognitively and emotionally impaired students she personally had placed into Mr. Schied's classroom without proper supports to either the students or the teacher as otherwise mandated by the students' "*Individual Education Program*" (IEP) documentation. Her **intent** was clear as hers was only one in a long lineup of false "*testimonies*" staged by the Brighton school district co-defendants designed to discredit Mr. Schied as a professional teacher, to mischaracterize Mr. Schied as a person, and to ensure that the findings of the Arbitrator would be to uphold Mr. Schied's employment termination

from the Brighton school district based upon the abundance of testimony provided by the government co-defendants who had by then been still under Ken Hamman's direct influence and supervision.

- d) Evidence shows that Pat Meyer therefore committed "*perjury*" and a "*conspiracy to perjury*" before an official State judiciary hearing and a State-licensed administrative "*judge*". She committed *slander* by delivery of *false statements* designed to present Mr. Schied in a "*false light*", and while acting in a *conspiracy* with others to use "*color of law*" to "*deprive*" Mr. Schied of his right to gainful employment. The Evidence shows that Pat Meyer also did so in attempt to "*retaliate*" and to "*cover up*" for her own incompetence and negligence in **gross violation of the rights of disabled students.**
- e) Evidence shows that these motives particularly pertained to Pat Meyer when she took action the previous year to get Mr. Schied placed on "*administrative leave*" right after Mr. Schied had notified special education department personnel, Pat Meyer, and a student's parent – in writing – that he wished to have his signature withdrawn from a special education document authorized by Patricia Meyer for the subtraction of "*social worker*" services to a cognitively impaired student whose safety was documented as being in "*jeopardy*" by behavior for which she had otherwise previously needed in social worker services. (The subtraction of social worker services was directed by two Livingston Educational Service Agency officials employed outside the high school and at the district office who knew little to nothing about the child but had instead provided a blanket budgeting directive to cut "*duplicate*" services to children like this student who was then receiving services from both the "*speech and language*" therapist and from the school social worker.)

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

- a) **See Evidence and Statements described for Ronald Ward in "a through d" and for Kenneth Hamman in "a through d" above as incorporated here by reference as if written herein verbatim.**
- b) The evidence shows that Kirk Hobson remains an administrative employee of the Brighton Area Schools, meaning she has been subject to direct supervision by both Kenneth Hamman and Ronald Ward's replacement at the District. The evidence also shows that when called to testify before the State administrative judge as Arbitrator in 2009, Kirk Hobson "*perjured*" himself under Oath by offering testimony which, like all of the other Brighton testimonies, were full of "*gross omissions and misstatements*" of facts concerning Mr. Schied's teaching performance, concerning his standard of performance as a special education case manager, and concerning his personal treatment of students with various learning, cognitive and emotional disabilities.
- c) The evidence therefore shows that Kirk Hobson committed "*perjury*" and participated in a "*conspiracy to commit perjury*" before an official State judiciary hearing and a State-licensed administrative "*judge*". He committed *slander* by delivery of *false statements* designed to present Mr. Schied in a "*false light*", and while acting in a *conspiracy* with others to use "*color of law*" to "*deprive*" Mr. Schied of his right to gainful employment. The Evidence shows that Kirk Hobson also did so in attempt to "*retaliate*" and to "*cover up*" for his own incompetence and negligence since he was

aware that in the previous teaching year, Mr. Schied had documented numerous **gross violation of the rights of disabled students by school and district administrators.**

- d) Evidence retained by Mr. Schied shows one such example, for which Kirk Hobson was aware, when the teachers' union stepped in to challenge two letters Hobson had written early in the '07-'08 school year blaming Mr. Schied solely for what was otherwise a special education student issue for which he as an administrator was otherwise the one ultimately responsible. In that circumstance, the Michigan Education Association investigated Mr. Schied's complaint about the matter and Hobson was made to retract his two letters. In that circumstance however, the information generated by those two erroneous letters was then nevertheless still used by Ken Hamman when he wrote a "*teacher evaluation*" on David Schied the very day Kirk Hobson retracted his two letters.
- e) Evidence also shows that at his time of testimony, Kirk Hobson should have been aware that his behavior the previous school year was just part of a broader "*pattern*" of administrative behaviors at the time related to their rejection of accountability for student rights violations that were occurring regularly at the high school; and which were cause, at least in part, upon the lack of a collective bargaining agreement between the teachers and the Brighton district administration.

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

- a) **See Evidence and Statements described for Ronald Ward in "a through d" and for Kenneth Hamman in "a through d" above as incorporated here by reference as if written herein verbatim.**
- b) The evidence shows that Laura Surrey remains an administrative employee of the Brighton Area Schools, meaning she has been subject to direct supervision by both Kenneth Hamman and Ronald Ward's replacement at the District. The evidence also shows that when called to testify before the State administrative judge as Arbitrator in 2009, Laura Surrey "*perjured*" herself under Oath by offering testimony which, like all of the other Brighton testimonies, were full of "*gross omissions and misstatements*" of facts concerning Mr. Schied's teaching performance, concerning his standard of performance as a special education case manager, and concerning his personal treatment of students with various learning, cognitive and emotional disabilities.
- c) The evidence therefore shows that Laura Surrey committed "*perjury*" and participated in a "*conspiracy to commit perjury*" before an official State judiciary hearing and a State-licensed administrative "*judge*". She committed *slander* by delivery of *false statements* designed to present Mr. Schied in a "*false light*", and while acting in a *conspiracy* with others to use "*color of law*" to "*deprive*" Mr. Schied of his right to gainful employment. The Evidence shows that Laura Surrey also did so in attempt to "*retaliate*" and to "*cover up*" for her own incompetence and negligence since she was aware that in the previous teaching year, Mr. Schied had documented that Surrey had actually been executing her administrative duties in **gross violation of the rights of disabled students on Mr. Schied's caseload.** One such example, for which Laura Surrey was aware, was when she refused to sign a student's IEP document authorizing the implementation of the IEP. Mr. Schied's documentation, including written statement from another special education teacher, shows and that Surrey's

behavior was just part of a broader “*pattern*” of administrative behaviors at the time related to their rejection of accountability for student rights violations at the high school, which were cause in part upon the lack of a collective bargaining agreement between the teachers and the Brighton district administration.

22. **JENNIFER BOUHANA** (former and current teacher at Brighton High School)
- a) **See Evidence and Statements described for Ronald Ward in “a through d” and for Kenneth Hamman in “a through d” above as incorporated here by reference as if written herein verbatim.**
  - b) The evidence shows that Jennifer Bouhana remains an employee of the Brighton Area Schools, meaning she has been subject to direct supervision by both Kenneth Hamman and Ronald Ward’s replacement at the District. The evidence also shows that when called to testify before the State administrative judge as Arbitrator in 2009, Jennifer Bouhana “*perjured*” herself under Oath by offering testimony which, like all of the other Brighton testimonies, were full of “*gross omissions and misstatements*” of facts concerning Mr. Schied’s teaching performance, concerning his standard of performance as a special education case manager, and concerning his personal treatment of students with various learning, cognitive and emotional disabilities.
  - c) The evidence therefore shows that Jennifer Bouhana committed “*perjury*” and participated in a “*conspiracy to commit perjury*” before an official State judiciary hearing and a State-licensed administrative “*judge*”. She committed slander by delivery of false statements designed to present Mr. Schied in a “*false light*”, and while acting in a conspiracy with others to use “*color of law*” to “*deprive*” Mr. Schied of his right to gainful employment. The Evidence shows that Jennifer Bouhana also did so in attempt to “*retaliate*” and to “*cover up*” for her own incompetence and negligence since she was aware that in the previous teaching year, Mr. Schied had pointed out, and had possession of documentation that showed Jennifer Bouhana had actually been the one acting in **gross violation of the rights of disabled students both on her own caseload and in Mr. Schied’s classroom.**
23. **KAREN ELLSWORTH** (former and current special education “*para-pro*” at Brighton High School)
- a) **See Evidence and Statements described for Ronald Ward in “a through d” and for Kenneth Hamman in “a through d” above as incorporated here by reference as if written herein verbatim.**
  - b) The evidence shows that Karen Ellsworth remains an employee of the Brighton Area Schools, meaning she has been subject to direct supervision by both Kenneth Hamman and Ronald Ward’s replacement at the District. The evidence also shows that when called to testify before the State administrative judge as Arbitrator in 2009, Karen Ellsworth retracted a letter she had written a full year earlier while “*perjuring*” herself under Oath. The letter was one that she had otherwise written at Mr. Schied’s request to memorialize and validate that point in time at which Mr. Schied was caringly and competently managing three different curricula for disabled children in his class. The purpose of Ellsworth’s testimony was to state – contrary to evidence Mr. Schied has to the contrary – that she had actually not been employed in Mr. Schied’s classroom for months before writing that letter, and that she had actually

- been coerced by Mr. Schied to write good things when he was otherwise a very bad teacher.
- c) The evidence therefore shows that Karen Ellsworth is guilty of “*perjury*” and a “*conspiracy to commit perjury*” before an official State judiciary hearing and a State-licensed administrative “*judge*”. She committed slander by delivery of false statements designed to present Mr. Schied in a “*false light*”, and while acting in a conspiracy with others to use “*color of law*” to “*deprive*” Mr. Schied of his right to gainful employment. The Evidence shows that Karen Ellsworth also did so in attempt to “*retaliate*” and to “*cover up*” for the incompetence and negligence of her supervisory employers who had otherwise acted in **gross violation of the rights of disabled students in Mr. Schied’s classrooms.**
24. **JESSICA MURRAY** (former special education “*para-pro*” at Brighton High School)
- a) **See Evidence and Statements described for Ronald Ward in “a through d” and for Kenneth Hamman in “a through d” above as incorporated here by reference as if written herein verbatim.**
- b) The evidence shows that Jessica Murray remained an employee of the Brighton Area Schools, and that her father also continues to be employed as a teacher at Brighton high School, meaning that he continues to be subject to direct supervision by both Kenneth Hamman and Ronald Ward’s replacement at the District. The evidence also shows that
25. **PATRICIA HAM** (former and current school social worker employed by the Livingston Educational Service Agency at the Brighton High School)
- a) **See Evidence and Statements described for Ronald Ward in “a through d” and for Kenneth Hamman in “a through d” above as incorporated here by reference as if written herein verbatim.**
- b) The evidence shows that Patricia Ham remained employed at the Brighton Area Schools, meaning that she continues to be subject to direct supervision by both Kenneth Hamman and Ronald Ward’s replacement at the District. The evidence also shows that, as depicted above regarding Patricia Meyer’s effort to “*retaliate*” and to “*cover up*” for Mr. Schied having sent out written notices about student rights violations at the high school by the subtraction of “*school social worker*” services, Patricia Ham “*perjured*” her testimony against David Schied in the same fashion and for similar reason during formal Arbitration hearings a year later in 2009.
- c) The evidence therefore shows that Patricia Ham committed “*perjury*” and a “*conspiracy to perjury*” before an official State judiciary hearing and a State-licensed administrative “*judge*”. She committed slander by delivery of false statements designed to present Mr. Schied in a “*false light*”, and while acting in a conspiracy with others to use “*color of law*” to “*deprive*” Mr. Schied of his right to gainful employment. The Evidence shows that Patricia Ham also did so in attempt to “*retaliate*” and to “*cover up*” for her own incompetence and negligence in **gross violation of the rights of disabled students.**

## **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) Evidence shows that Det./Sgt. Farkas received Mr. Schied’s written crime reports about Sandra Harris in 2005 and then did nothing for 9 months in violation of state and federal victims’ rights laws.
- b) Evidence shows that Farkas only completed a formal crime report on Harris after Mr. Schied had submitted numerous supervisory complaints to Farkas’ commanding officers at the Michigan State Police; and even then, he did so while “*perjuring*” his official government report. Not only did Farkas advance the “original date” of the report by nine (9) full months, but he also constructed the crime report with significant “omissions of relevant evidence”, “misstatements of testimonial facts”, and with “deletions of references to evidence and state and federal laws” that Mr. Schied had otherwise provided (9 months earlier) when submitting to Farkas his “*original*” criminal allegations against Harris.
- c) The evidence shows that Farkas’ so-called “*investigation*” consisted of nothing more than a few abbreviated phone calls; and that he simply used that information to manipulate the facts and evidence so to make it appear as if a 2006 Michigan Court of Appeals’ civil court ruling precluded Mr. Schied having any justifiable grounds for issuing his criminal complaint. Farkas’ actions therefore constitute “*tampering with a victim/witness*”, “*tampering with evidence*” and “*interference with an official proceeding*”. He committed felony “fraud” and “perjury” when submitting his “official” crime report while “*aiding and abetting*” in the commission of crimes. His actions constituted an “*obstruction of justice*” by using “color of law” to constructing “*cover-up*” those crimes and to “deprive” Mr. Schied of his rights to “due process”, to “victims’ relief benefits”, and to “*equal access to the law*”.

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

Evidence shows that McCaffery acted incompetently and with gross negligence by providing no response whatsoever when Mr. Schied initially formalized his complaints about Fred Farkas’ 9-month delay in responding to Mr. Schied’s first three letters of crime report about Sandra Harris in Washtenaw County in 2005.

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

Evidence shows that when Inspector Beth Moranty asked Darryl Hill’s assistance in reviewing Mr. Schied’s complaint about subordinate officer Fred Farkas having perjured his official crime report in 2006, Hill conspired with Farkas, Moranty and others to “*cover up*” the felony crime by simple denial that Farkas had committed “*no violation*” of the law or of ethical codes of conduct. Hill’s actions constitute



*“misprision of felony”, “aiding and abetting”, and a “conspiracy to commit an offense” of an “obstruction of justice”.*

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

Evidence shows that Huggins acted *incompetently and with gross negligence* by providing no response whatsoever when Mr. Schied initially formalized his complaints about Fred Farkas’ 9-month delay in responding to Mr. Schied’s first three letters of crime report about Sandra Harris in Washtenaw County in 2005.

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

- a) Evidence shows that when Mr. Schied complained about subordinate officer Fred Farkas having *perjured* his official crime report in 2006, Hill conspired with Farkas, Darryl Hill and others to “*cover up*” the felony crime by following a simple pattern of denial while stating only that Farkas had committed “*no violation*” of the law or of ethical codes of professional conduct.
- b) The evidence shows that Moranty’s supervisory role over this fraudulent “*investigation*” into allegations that Fred Farkas had committed a felony offense of “*perjury*” and “*obstruction of justice*” constitute other crimes of “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit an offense*” of an “*obstruction of justice*”.

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

- a) Evidence shows that when Mr. Schied complained about the manner in which MSP supervisory officers McCaffery, Hill, Huggins, and Moranty “*aided and abetted*” in the “*criminal cover-up*” of Fred Farkas having *perjured* his official crime report in 2006, Christiansen conspired with supervisory detective lieutenant Dan Pekrul to further these felony crimes by following the simple pattern of denial with claim that “*no violation*” of the law or of ethical codes of professional conduct had been committed by any of these sworn Michigan State Police government officers.
- b) The evidence shows that Christiansen had a supervisory role over this fraudulent “*investigation*” into allegations that Farkas had committed a felony offense of “*perjury*” and “*obstruction of justice*” and that Moranty, and others were “*covering up*” those crimes by committing other crimes. Her actions therefore constitute “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit an offense*” of an “*obstruction of justice*”.

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

- a) Evidence shows that when Mr. Schied complained about the manner in which MSP supervisory officers McCaffery, Hill, Huggins, and Moranty “*aided and abetted*” in the “*criminal cover-up*” of Fred Farkas having *perjured* his official crime report in 2006, Pekrul conspired with subordinate lieutenant Karla Christiansen to further these felony crimes by following the simple pattern of denial with claim that “*no*

*violation*” of the law or of ethical codes of professional conduct had been committed by any of these sworn Michigan State Police government officers.

- b) The evidence shows that Pekrul also had a supervisory role over this fraudulent “*investigation*” into allegations that Farkas had committed a felony offense of “*perjury*” and “*obstruction of justice*” and that Moranty, and others were “*covering up*” those crimes by committing other crimes. His actions therefore constitute “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit an offense*” of an “*obstruction of justice*”.

**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) Evidence shows that on 5/18/09, David Schied forwarded to Liz Canfield a copy of an email and attachment that he had previously sent to “*Executive Secretary of the Criminal Justice Information Service Policy Council (CJIS), Kathy Rector*” after that email was returned as undeliverable. The attachment included a scanned copy of the “*Sworn Affidavit of Earl Hocquard*” in testimony about Cathy Secor having responded to his FOIA request for a copy of David Schied’s public personnel file from the Lincoln Consolidated School District. The attachment included copies of all Evidence provided by reference of that sworn affidavit, demonstrating that Cathy Secor had responded to the FOIA request by “*misusing and disseminating*” one of Sandra Harris defamatory letters from 2003, along with a copy of the Texas court Order of “set aside” from 1979, and a most significantly, a copy of the erroneous 2003 FBI report for which Sandra Harris had denied Mr. Schied the right to “*challenge and correct*”.
- b) The evidence shows that when Mr. Schied called in follow up, Liz Canfield explained that the earlier message sent to Kathy Rector was returned because the CJIS Policy Council was disbanded and the Michigan State Police website information to the public was outdated, erroneous, and obsolete. She then informed Mr. Schied that as the “LEIN field services” manager, the privacy rights violation about which Mr. Schied was report was “*not within her jurisdiction*” to handle. She stated as her reason was because her “*jurisdiction*” handles criminal history information that accessed directly by the computer and not means of fingerprint submissions to the FBI. She stated that she would be of no further service to Mr. Schied and that to the best of her knowledge, only “Bob Grounds” might one to answer legal questions about fingerprint submissions to the FBI, but that he was then out of town. In response to Mr. Schied’s pressing inquiries about Bob Grounds supervisors, she added that if Mr. Schied could not wait until the following week when Grounds returned to the office, Mr. Schied could call her own “*husband*”, CHAD CANFIELD, who happened to be Bob Grounds’ direct supervisor. She also provided the name and phone number of Chad Canfield’s supervisor, as Tim Bolles.
- c) The evidence therefore shows that Canfield “aided and abetted” in the detention of a victim/witness; while conspiring with others in her “*Division*”, including her husband, to “obstruct enforcement” and “*cover up*” for crimes committed by government officials; and while conspiring with other employees and officers of the Michigan State Police to deprive a citizen of his right to privacy and victim’s relief benefits;

**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) Evidence shows that between 5/19/09 and 6/17/09, Mr. Schied had various (some lengthy) phone conversations and engaged in written correspondence with “Bob” Grounds. In those conversations, Grounds acknowledged that the violations by Cathy Secor and the Lincoln Consolidated Schools being reported by Mr. Schied were within his “*jurisdiction*” for response. He stated however that since he had not come across a case as unusual as this particular one, he would need some time to consult with his supervisors and with a reference that Mr. Schied provided (of Marilyn Walton – 304-625-3616) of a “*supervisory legal specialist*” employed in the Access Integrity Unit of the office of the FBI’s General Counsel.
- b) The Evidence of Mr. Schied’s notes taken during those phone conversations, as well as a follow up letter he wrote to Bob Grounds on 6/15/09 shows that Grounds had been informed about, and acknowledged, that this was not the first occurrence of Cathy Secor of the Lincoln Consolidated Schools “*misusing and CRIMINALLY disseminating*” the 2003 FBI report. He well understood that he had not “heard” about these previous occurrences because Michigan State Police (Fred Farkas) has “*perjured*” the report of that crime in 2005, and because the Washtenaw County Prosecutors (Joseph Burke and Brian Mackie) had “*abused their discretion*” by refusing to prosecute in 2006. He also acknowledged that this earlier information had not gotten to him because the “*Internal Affairs*” investigation conducted in 2007 (by Karla Christensen and Dan Pekrul) had miraculously found “*no violations*” by anyone. Therefore, while stating that he should not be held accountable for these earlier “*errors*” by other Michigan State Police agents, he agreed to being held to accountability from the point at which he had come to find out about this latest “*dissemination*” offense.
- c) The Evidence shows that Bob Grounds acknowledged over the phone that he had all of the documents that had been forwarded to him from Liz Canfield, including all of the documents accompanying the “*Sworn Affidavit by Earl Hocquard*”. The evidence also shows that when he called Cathy Secor he seemingly was content on settling on her claim that it was Sherry Gerlofs who had actually packaged the documents and responded to the FOIA request, while Gerlofs claimed innocence by simply executing the directives given to her by her supervisor Secor and by the FOIA request itself. Grounds stated to Mr. Schied however, that he intended to write a letter to Cathy Secor (which he described as a “*slap-on-the-wrist*”) to point out that the documents submitted by the “*Sworn Affidavit of Earl Hocquard*” demonstrate that Mr. Schied had been denied the right to keep his job while “*challenging and correcting*” the FBI report, which was also obvious to Mr. Grounds given that the Lincoln Consolidated Schools had clear possession of the 1979 Texas “*set aside*” court Order and was also disseminating that document. Nevertheless, though Ground stated his intent to provide Cathy Secor and Sherry Gerlofs with a written warning about these and other future issues that may crop up concerning the “*misuse and dissemination*” of criminal history information, the Evidence shows that his letter was instead devoid of all of these items.

- d) Evidence demonstrates that Grounds' letter was designed to "*cover up*" rather than to "*expose*" the history of earlier crimes perpetrated by Harris and others at the Lincoln Consolidated School District. His "*official*" letter to the Lincoln Consolidated Schools fraudulently pretended that this was a "*first*" occurrence of the Michigan State Police being informed about such a violation. That letter was also constructed in such way by Grounds that as to add yet another layer to the "*cover up*" of the crimes perpetrated in the previous years by the various law enforcement and "*internal affairs*" officials employed by the Michigan State Police. Moreover, when Mr. Schied had called Marilyn Walton, the "*supervisory legal specialist*" employed in the Access Integrity Unit of the office of the FBI's General Counsel in Washington, D.C., he discovered that Bob Grounds had come to a "*special arrangement*" with Ms. Walton concerning this extraordinary case. As admitted by Ms. Walton and reaffirmed by Robert Grounds, the "*slap-on-the-wrist*" letter from Bob Grounds to superintendent Lynn Cleary at the Lincoln Consolidated Schools was supposed to also suffice as the end of the FBI's "*investigation*" into Mr. Schied's report of these crimes to the FBI.
- e) Mr. Schied has evidence showing that both Bob Grounds and Marilyn Walton repeatedly dismissed Mr. Schied's concern that the FBI had decided **not** to conduct an "*audit*" or "*investigation*" of their own, as they stated they were otherwise willing to rely solely upon Robert Grounds' letter as the "*resolve*" of this case. Mr. Schied expressed his concern that such method of handling would not provide for the proper documentation of the violation, which should otherwise be included in formalized "*reports*" to the CJIS "Policy Council" at both the State level and at the Federal level. Mr. Schied insisted that failure to notify the Policy Councils at EITHER the State or the Federal level about these intentional "*oversights*" by the Michigan State Police and the FBI in previous years would be "*misleading*" and therefore contribute to a "*fraudulent*" public report about occurrences which are otherwise mandated to be properly report by Federal officials responsible for "*investigating*" these types of matters.
- f) Both Grounds and Walton clearly had come to some form of "*meeting of the minds*" in "*understanding*" by phone that the FBI would not be asking Mr. Grounds to supply them with whatever "*response*" might be provided by Lynn Cleary and the Lincoln school district in reply to Robert Grounds' "*warning*" letter. As far as the Michigan State Police and the FBI were concerned, Grounds' abbreviated "*warning*" letter was sufficient; and both were clearly "*on the same page*" in "*conspiring to conceal*" from all "*official*" and public reports as it pertained to the State police and the FBI having refused to properly respond to these reported matters and repeated crime reports in the previous three years.
- g) The Evidence shows therefore that both Robert Grounds and Marilyn Walton have denied Mr. Schied's demanded that there be accountability for these previous misdeeds by the MSP and the FBI, by means of a more extensive investigation into both State and Federal law enforcement (and judges) having otherwise allowed these crime to continue unabated for the previous six (6) years, and until a third-party "*Sworn Affidavit*" could be introduced to substantiate the same criminal claims that Mr. Schied had been reporting on his own without anyone doing anything to stop it. That evidence demonstrates that the State and Federal government have conspired to generate misleading documentation about these events, by the strategic use of certain

“omissions and misstatements” that fall into a familiar “*pattern of corruption*” exhibited by other officers of the Michigan State Police and the FBI.

- h) Mr. Schied wrote a letter to Bob Grounds, dated 6/15/09, copying that letter to Ground’s “Section” (Tim Bolles) and “Division” (Charles Bush) supervisors at the Michigan State Police. The letter compiled, recounted, and memorialized the contents of Mr. Schied’s notes, as well as his recollections from his earlier conversations and correspondence with Bob Grounds and Liz Canfield. That letter, sent by both email and by U.S. Mail, demanded that Bob Grounds be held accountable for “*lying by omissions*” when writing “*incomplete*” documentation about this case in presenting his “*warning letter*” to Lincoln superintendent Lynn Cleary instead of to Cathy Secor or to Sherry Gerlofs. Mr. Schied’s letter also put Bob Grounds, Tim Bolles, and Charles Bush all on notice that Mr. Schied’s letter itself constituted yet another “CRIME REPORT” against Fred Farkas, against Beth Moranty, Darryl Hill, Dan Pekrul, Karla Christensen, and others regarding their finding of “*no violation*” of any laws (and thus no validity to my 2005 crime report to Farkas) in 2006 or 2007. That letter demanded the reopening of the “MSP Internal Affairs” investigation, and it demanded that Grounds, Bolles, and Bush respond within ten (10) days to notify authorities that the crimes perpetrated by Cathy Secor, Sherry Gerlofs, and Lynn Cleary are in criminal violation of other State and Federal statutes, as referenced by the “Sworn Affidavit of Earl Hocquard”.
- i) To date, there is evidence that Bob Grounds and Tim Bolles have not provided any form of “Affirmative Defense” in light of their receiving notice about prior felony offenses having occurred by means of that which is admittedly within Bob Grounds’ “*jurisdiction*”. That gross negligence of action therefore supports the claim that not only had Bob Grounds acted with criminal negligence to “*cover up*” the crimes reported to him, he is also guilty of “*misprision of felony*” for his failure to initiate a formal crime report or to request the reopening of the 2007 “*Internal Affairs*” investigation by his employers at the Michigan State Police.

**\* 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) There is evidence that Mr. Schied had copied to Tim Bolles, by email and by regular U.S. Mail, his letter to Bob Grounds as referenced and outlined above. As Bob Grounds’ supervisor in the “chain of commands” at the Criminal History Section of the Criminal Records Division of the Michigan State Police, Tim Bolles was thus provided with clear notice that crimes had been committed by Michigan State Police officials as well as by Lincoln Consolidated School District administrators and employees. Along with that notice, Bolles was issued the same demand, that an “*Internal Affairs*” investigation be reopened, and that the Michigan State Police generate a formal “*crime report*”, supported by the “Sworn Affidavit by Earl Hocquard”, regarding the ongoing “*conversion of FBI property for personal use*” by Lincoln school district personnel, and the most recent criminal dissemination of that and other “nonpublic” documents by Cathy Secor and Sherry Gerlofs.

- b) To date, there is evidence that Tim Bolles, his supervisor Charles Bush, or his subordinate Bob Grounds, have not provided any form of “Affirmative Defense” in light of their receiving notice about prior felony offenses having occurred by means of that which is admittedly within “Criminal Records Division” “jurisdiction”. That *gross negligence* of action therefore supports the claim that not only had Tim Bolles acted with criminal negligence by “*covering up*” the crimes reported to him, he is also guilty of “*misprision of felony*” for his failure to initiate a formal crime report or to request the reopening of the 2007 “Internal Affairs” investigation by his law enforcement associates employers at the Michigan State Police.

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

- a) There is evidence that Mr. Schied had copied to “*Captain*” Charles Bush, by email and by mail, his letter to Bob Grounds as referenced and outlined above. As Bob Grounds’ supervisor in the “chain of commands” at the Criminal History Section of the Criminal Records Division of the Michigan State Police, Charles Bush was thus provided with clear notice that crimes had been committed by Michigan State Police officials as well as by Lincoln Consolidated School District administrators and employees. Along with that notice, Bolles was issued the same demand, that an “Internal Affairs” investigation be reopened, and that the Michigan State Police generate a formal “crime report”, supported by the “Sworn Affidavit by Earl Hocquard”, regarding the ongoing “*conversion of FBI property for personal use*” by Lincoln school district personnel, and the most recent criminal dissemination of that and other “nonpublic” documents by Cathy Secor and Sherry Gerlofs.
- b) To date, there is evidence that Charles Bush, or his subordinates Tim Bolles and Bob Grounds, have not provided any form of “Affirmative Defense” in light of their receiving notice about prior felony offenses having occurred by means of that which is admittedly within “Criminal Records Division” “jurisdiction”. That *gross negligence* of action therefore supports the claim that not only had Charles Bush acted with criminal negligence by “*covering up*” the crimes reported to him, he is also guilty of “*misprision of felony*” for his failure to initiate a formal crime report or to request the reopening of the 2007 “Internal Affairs” investigation by his law enforcement associates employers at the Michigan State Police.

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

- a) Evidence shows that in 2006 when presented with personal testimony, a written Complaint, and evidence that criminal misdemeanor violations of the law had taken place by Northville Public School administrators Katy Parker, David Bolitho and Leonard Rezmierski, Anthony Tilger sent his formal crime report to the Wayne County Prosecutor without a warrant request. That same evidence shows that Tilger sent his report, about crimes being perpetrated literally from the building just next door to the Northville City Police Station, by means of a “bribe” and “subornation of perjury” for the prosecutor not to do his duty or follow his sworn Oath of office to further look into or prosecute this particular case.
- b) Further evidence contained in the “*narrative report*” section of the Northville City Police crime report submitted by Tilger shows that Tilger conspired by phone with

Wayne County prosecutor Robert Donaldson both before and after the Faxed submission of that crime report. Initially, the “*meeting of the minds*” on this **bribery** matter prompted Robert Donaldson to simply claim that the crime report had been “*lost*” by his office after the transmission. The evidence shows that subsequently, Robertson collected on the *bribe* by having Officer Anthony Tilger act as his “*witness*” when he later retaliated against Mr. Schied for having reported the lost crime report to supervisory police, the Wayne County Prosecutor Kym Worthy, and to the Government Affairs Bureau of the Office of the Michigan Attorney General Mike Cox.

- c) Evidence also demonstrates that, per the statements made by prosecutor Robert Donaldson to a third party attorney serving as Mr. Schied’s paid counsel, Anthony Tilger’s crime report was constructed with a substandard quality. Despite the statements and evidence submitted to Tilger by the crime victim David Schied, Prosecutor Donaldson stated that found “*no evidence of a crime*” while suggesting that Mr. Schied’s attorney rewrite the officer’s complaint (at a cost to Mr. Schied) in such way to re-introduce the statements and evidence that it made more sense for him to prosecute Mr. Schied’s case.

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

Evidence shows that in 2006, Hannewald committed a legal act in an illegal manner by collecting fraudulent information from the “accused” at Northville Public Schools and passing those fraudulent claims on to the Wayne County prosecutor Donaldson at face value. The evidence of “*narrative reports*” written by Hannewald himself demonstrate that Hannewald acted incompetently and with gross negligence when accepting the school district’s misleading information as representations of the “*truth*”. He then reiterated and misrepresented these statements as “*truth*” to the prosecutor without reservation of questions, without requesting supporting evidence, without informing Mr. Schied as the victim about these counter claims, and while expecting these misrepresentations by Northville Public Schools administrators to be used by the prosecutor Donaldson in the bribery agreement to dismiss Mr. Schied’s case based upon the assertions of these Northville Public School officials.

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

- a) Evidence shows that in 2006 when Mr. Schied filed two written complaints to Carlson as officers Tilger’s and detective Hannewald’s supervisor and acting police chief. Carlson responded instead with a recognizable pattern of incompetence and gross negligence. His only response was a written statement to the effect that he had found no legal or ethical violation by either Tilger or Hannewald, adding only that the officer might have written his crime report somewhat better. He stated that he was therefore closing the case file based upon the prosecutor Donaldson’s refusal to prosecute.
- b) The evidence shows that Carlson had a supervisory role over this fraudulent “*investigation*” into allegations that Tilger had committed a felony offense of

“bribery”, “subornation of perjury”, and “*obstruction of justice*” by “*covering up*” the crimes of Katy Parker, David Bolitho, and Leonard Rezmierski residing in the government building right next to the police station. His actions therefore constitute “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit an offense*” of an “*obstruction of justice*”.

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

- a) The evidence shows that Michael Sawaya acted on behalf of Sheriff Warren Evans to take David Schied’s crime report about the Northville Public Schools disseminating the Texas court “*Order of Expunction*” in 2009. While taking that report Sawaya recognized the Mr. Schied was presenting a “*pattern*” of ongoing offenses and sought to provide “*defenses*” for the criminal against the allegations under pretext of “*playing the devil’s advocate*”; The evidence also shows that Sawaya started what was to become a “*pattern*” of deprivation of Mr. Schied’s right by the Wayne County Sheriff’s office.
- b) Evidence of Mr. Schied’s follow up email letters to Sawaya demonstrates that after taking his crime report, Sawaya never presented Mr. Schied’s letter and crime exhibits to the Sheriff Warren Evans himself, and he never provided Mr. Schied with either the crime report number that he requested or his victims’ rights either. Instead, he did wait until Mr. Schied made another follow up contact (ten) days later and simply stated that he had sent the report to Lt. Larry Crider without his own follow up. Larry Crider, in fact, never did anything with that report and never even contacted Mr. Schied concerning that report.

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

- a) The evidence shows that Larry Crider was in receipt of the crime report sent to him by Lt. Michael Sawaya, but who did absolutely nothing with it despite assurances from Michael Sawaya that Crider would be “*handling*” the case.
- b) Larry Crider did not forward the case to any detective and did not forward the case to Sheriff Warren Evans, the intended recipient address by Mr. Schied’s letter of complaint and crime report. Neither did Larry Crider furnish Mr. Schied with his crime victims’ rights or do anything else with the report.

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

- a) The evidence shows that Det. Hines contacted Mr. Schied under pretense that he had received and read Mr. Schied’s crime report. He caused Mr. Schied to have to pay his own costs to come back to the police station only to be humiliated by a full-body search for weapons and then put through grueling questioning for two hours about the crime report.
- b) That evidence shows that though Mr. Schied complied, he stated right away that he would find it easier to refer to the statements and evidence in his written crime report itself. Though Hines had initially stated that he had possession of the crime report but instead wanted to hear everything from Mr. Schied orally “*from the beginning*” and going back to Mr. Schied’s teenage years, it was only after the two hours of Hines’ questioning of Mr. Schied did he finally admit that he had never even seen much less taken possession of that crime report.



- c) The evidence shows that even though Mr. Schied went to his car and brought back a duplicate package of evidence for Hines to copy, and so to discuss right away with Hines, Hines instead sent Mr. Schied back home refusing to discuss the documents of his crime report. When Mr. Schied started questioning what happened with the original crime report that included a sworn notarized statement by “*witness*” Earl Hocquard, and started questioning if he could get a copy of the formal police report submitted by intake officer Michael Sawaya, Hines stated that he would NOT be providing it and that Mr. Schied would have to order it by FOIA request. From that point forward, Hines only contacted Mr. Schied by email several weeks later to inform him that the prosecutor Robert Donaldson had decided, without further explanation, that “*no further action would be taken on this case*”.

43. **WARREN EVANS (Sheriff for Wayne County)**

- a) The evidence shows that despite having his “agents” act on his behalf in taking Mr. Schied’s letter and crime report information and evidence addressed directly to him, Sheriff Evans took no apparent action on his own on Mr. Schied’s behalf.
- b) Other evidence shows that though Mr. Schied made several follow up phone calls and even wrote a second letter, sending it directly to Warren Evans by mail with a full accounting of the humiliation he was put through with Det. James Hines, that Sheriff Warren Evans still failed to respond back in any way even despite assurances from his secretary that he had received the follow up letter sent to him. Sheriff Evans took no apparent action either to retrieve the “original” crime report and notarized sworn statement from the “witness” Hocquard. Instead, he simply did nothing.

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

- a) The evidence shows that upon being denied any further services or follow up warrant or arrest by Wayne County law enforcement and prosecutors, Mr. Schied wrote a letter requesting copies of all records held by the Wayne County Sheriff concerning the crime report he had submitted, any other formal crime report written by officer Michael Sawaya, any report furnished by Det. James Hines after his two-hour interview, and any correspondence between Sheriff Evans, Larry Crider, and the office of the prosecutor Robert Donaldson. That evidence shows that in an initial response, Mr. Schied received a letter addressed to the U.S. Department of State, apparently sent to Mr. Schied out of carelessness, informing Mr. Schied that Joseph C. Stellmark, Jr. was seeking information about Nancy Cyberski Boughhan for some “*diplomatic security*” reason. That notice received by Mr. Schied was written to inform Stellmark that the FOIA response would be arriving late.
- b) The evidence shows that when Mr. Schied called to inquire about the letter he received addressed to another individual, he spoke with Katherine Ben-Ami directly who stated that Mr. Schied would receive a different letter telling him that his FOIA request response would also be delayed. The evidence demonstrates that instead of actually providing Mr. Schied with the requested information, Ben Ami sent Mr. Schied a billing statement for \$57.34 showing that \$42 was being alone charged to Mr. Schied for the “*report processing fee*” to gather 206 pages of information that Mr. Schied believes constitutes mostly all of his own previously submitted

documentation dating back to events that took place when he had filed a previous crime report with Office Tilger at the Northville City Police Department in 2006.

- c) That evidence collectively demonstrates that the Office of the Wayne County Sheriff is running a “*fraud*” and “*extortion*” operation, using “color of law” to charge money from crime victims who wish to receive the “*incriminating*” proof against the Sheriff’s office itself showing that nothing was ever done by law enforcement to bring the report of these crimes to any sort of action that would “*prevent*” these crimes from continuing to occur against Mr. Schied.

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

- a) Evidence shows that in 2009, Jeff Saren took receipt of a formal written “*crime report*” that David Schied had addressed to Sheriff Jerry Clayton. That crime report itself referenced a sworn and notarized “*original*” of the “*Sworn Affidavit by Earl Hocquard*” (“Exhibit F”) regarding recent crimes committed by Cathy Secor and others at the Lincoln Consolidated Schools. That crime report however, provided copies of numerous other documents, itemized and referenced as separate “*exhibits*” in support of this crime report, depicting that the recent crimes were “*patterned*” upon crimes that had occurred during several previous years naming Cathy Secor, Sandra Harris, Fred Williams, Lynn Cleary, and Michael Weaver.
- b) Evidence of Mr. Schied’s detailed notes of his calls with Jeff Saren show that he promised to promptly “*handle*” the crime report on Sheriff Jerry Clayton’s behalf by contacting Earl Hocquard as the “*witness*” to the crime, by contacting the the Lincoln Consolidated Schools, and notifying his superior officers at the Sheriff’s Department about the “*unusualness*” of this particular crime report, which he stated was clearly a crime as far as he could see. Though deputy Saren went through the motions that he promised, he continually broke his repeated promise to send Mr. Schied a copy of his “*official*” crime report by email or by mail. Without providing Mr. Schied any notification of his “*victims’ rights*”, he then reported by phone that his crime report was turned over to the prosecutor’s office but a follow up phone call by Mr. Schied revealed that was not actually the case and that it was still “*hung up*” on someone’s desk at the Sheriff’s Department.
- c) Evidence shows that a week or two later of continual follow up calls revealed that the prosecutor Joseph Burke had reviewed the crime report and denied it claiming that because Earl Hocquard was a social worker providing services to David Schied’s young son he was “*legally*” an “*agent*” for Mr. Schied. Mr. Schied disputed that claim with first assistant prosecuting attorney KONRAD L. SILLER in Washtenaw County; and while pointing out that Joseph Burke had committed felony “*abuse of prosecutorial*” discretion when handling a previous crime report in 2006. Nevertheless, prosecutor Siller stated that Joseph Burke’s decision was final. So Mr. Schied requested that Mr. Siller send Mr. Schied a copy of Jeff Saren’s crime report in lieu of having to pursue a copy of it by FOIA request and Mr. Siller sent a copy of that “*official*” crime report.
- d) The evidence available in this case shows that upon review of the crime report that Jeff Saren submitted to prosecutors on Sheriff Jerry Clayton’s behalf, Mr. Schied discovered that **Saren had strategically “*omitted*” all reference to Mr. Schied’s cover letter dated 4/13/09 addressed to Sheriff Clayton. Similarly, of the itemized**

eight (8) documents of Evidence that Mr. Schied had submitted along with that letter reporting crimes by Cathy Secor, Sandra Harris, Fred Williams, Lynn Cleary, and Michael Weaver, only the “Sworn Affidavit by Earl Hocquard” was referenced by Saren’s crime report and seemingly made it to the prosecutor for consideration. All of Mr. Schied’s other supporting documents were missing, even by reference in Saren’s “official” crime report.

- e) Evidence demonstrates that this action by Saren – of PERJURING his “official” crime report by strategic “omissions and misstatements” – followed an identical “pattern” of action that occurred three years prior with Michigan State Police detective FRED FARKAS in 2006 when he had passed on “incomplete” crime report to Joseph Burke for review after first doing nothing with Mr. Schied’s statements and evidence for nine (9) months and then “manipulating” Mr. Schied’s statements and subtracting his supporting evidence. This demonstrates a solid “PATTERN OF CORRUPTION” between the Washtenaw County law enforcement and the office of the Washtenaw County Prosecutors. These actions go well beyond mere “incompetence and gross negligence” to bring no doubt to an ongoing “conspiracy to deprive” Mr. Schied of his numerous inalienable rights, and while retaliating against him to for reporting these felony offense to local law enforcement. These actions constitute a deliberate “obstruction of justice” by “concealment” of documents, “tampering with Evidence” and “tampering with a victim/witness” in criminal proceedings, among other crimes involving conspiracy, cover-up, and racketeering.

46. JERRY CLAYTON (The Washtenaw County Sheriff)

- a) See Evidence and Statements described for Jeff Saren in “a through e” above as incorporated here by reference as if written herein verbatim.
- b) The evidence shows that upon discovery that Jeff Saren had committed a FELONY offense against him, Mr. Schied sought to bring these crimes directly to Jerry Clayton and to the Washtenaw County Board of Commissioners. Mr. Schied therefore addressed a letter and hand-delivered it to Jerry Clayton and to ROBERT GUENZEL on 6/12/09 during a Washtenaw Public Safety and Justice Oversight Committee meeting. The letter was attached to a full set of copies of Mr. Schied original cover letter of crime report from 4/13/09, and a full set of copies of all the evidence that he had originally submitted to Jeff Saren several weeks earlier. Evidence of available testimony shows that Mr. Schied attended that “public” meeting in the accompaniment of Earl Hocquard who stated himself to the members of the Committee that were present that day, that he was NOT acting as Mr. Schied’s “agent” when requesting a copy of Mr. Schied’s public personnel file from the Lincoln Consolidated School District.
- c) The evidence and testimony available will verify that Mr. Schied had gotten far enough into his public address of the various attendees at that Public Safety and Justice Oversight Committee meeting, to inform that Committee that a felony pattern of corruption had played out a second time recently when the Sheriff’s deputy “perjured” Mr. Schied’s most recent crime report, and when Washtenaw County prosecutor Joseph Burke again clearly “cherry-picked” what law he would rely on to “deny” prosecuting the case while disregarding many more relevant laws that would

be better suited for providing justification for the criminal arrest and prosecution of “*Accused*”.

- d) The available Evidence and testimony nevertheless shows that when Mr. Schied addressed Sheriff Clayton directly in question about whether or not he personally had ever received or reviewed the “original” crime report that Mr. Schied had addressed to him, Sheriff Clayton got visibly agitated; and when Mr. Schied continued to address Robert Guenzel’s interruption and claim that “*the matter is not within our jurisdiction*”, Sheriff Clayton spoke again while directing Mr. Schied to accompany him right then outside the room where he stated his wish to talk with Mr. Schied in private about the matter. As Earl Hocquard will testify as witness, once outside the room Jerry Clayton did nothing more than to hand over a business card of his associate (GREGORY DILL) and ask Mr. Schied to call him later about the matter. When Mr. Schied stated no such intention but reaffirmed that the responsibility and “*accountability*” for follow up rested upon Clayton’s shoulders since he had just been handed an entire one-inch (1”) thick package and cover letter about all this, Jerry Clayton became very “*unfriendly*”, stating that he had nothing further to say at that time, and while having his Gregory Dill usher Mr. Schied and Mr. Hocquard away from the committee meeting room and out of the that hallway. (Note: A brief research of Gregory Dill’s employment background shows that prior to working for the Sheriff’s department he was an administrative official employed as an operations manager by the Lincoln Consolidated Schools.)
- e) The available Evidence and testimony shows that prior to Sheriff Clayton commanding Mr. Schied to leave with him out of the committee room on 6/12/09, Mr. Schied was able to notify all of the other Committee members that they too would be receiving a full digital copy of the cover letter and all other documents contained in the package being left with Jerry Clayton and with Robert Guenzel. Subsequent to leaving the meeting that day, Mr. Schied returned home and sent out a “batch” copy of all those documents to every member of every Board and Committee listed at the website for the Washtenaw County Board of Commissioners. Their collective failure to take any further action on this entire matters offers even further evidence about how deeply ingrained the “corruption” goes in the government of Washtenaw County. Clearly, all of these individuals are in a “conspiracy to deprive” Mr. Schied of his rights, to “cover up” and sanction “*misprision*” of felony crimes that are occurring right within in their “*jurisdiction*” by the very people for whom they sign paychecks.

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

- a) Evidence shows that on 2/19/09, Mr. Schied walked in to the front lobby of the Livingston County Sheriff, announcing his request to submit directly to Sheriff Bob Bezotte, a letter and supporting documents of criminal complaint that he had prepared and addressed for Sheriff Bezotte. The cover letter on the criminal complaint made reference to and was accompanied by a two-and-a-half-inch (2 ½”) thick packet of 140 pages entitled “Sworn Affidavit and Complaint by David Schied”. Also by reference and in accompaniment to that cover letter and Affidavit were “Exhibits A

- through EE*” in support of the “Statements of Facts and Proof of Truth in this Case” included in the Affidavit.
- b) Evidence shows that although Mr. Schied had requested to deliver the package and cover letter to the address, Bob Bezotte, he was met instead by Sergeant Robert Hudecek, who appeared to have been called to greet Mr. Schied from his duty at the “County Jail” next to the Sheriff Department offices. That evidence, presented by a letter of Complaint that Mr. Schied wrote once he returned home from his ordeal at the Sheriff’s office, depicts the manner in which Hudecek disrespectfully treated Mr. Schied despite his clearly explaining his purpose for being there and introducing himself as the alleged “*crime victim*”. What is detailed in that letter, dated 2/18/09 and again addressed to Sheriff Bob Bezotte, shows that Hudecek presented himself as both “uncooperative” and “aggressive” when refusing to accept either Mr. Schied’s written crime report and evidence or to write his own report based upon a review of the contents of the documents had brought with him for delivery to Bob Bezotte.
  - c) The Evidence of Mr. Schied’s follow up letter memorializing what occurred when confronted by Sgt. Hudecek was summarized in yet a third letter, dated 2/28/09 and sent by email, that Mr. Schied wrote to Lieutenant Scott Domine who responded to Mr. Schied’s second letter to Bob Bezotte. That letter stated that Hudecek’s “refusal” of the Mr. Schied’s crime report occurred immediately following Mr. Schied pointing to and reading from the “subject line” heading in his first letter naming the crimes he was report against the officers and employees of the Brighton Area Schools and the Livingston Educational Service Agency, which happened to be located right across the street from the Sheriff’s department lobby and in the very same government complex as the Sheriff’s office and county jail.
  - d) The evidence of that letter to Lt. Domine also depicted that in “*refusing*” Mr. Schied’s presentation of that “*citizen crime report*”, Hudecek became belligerent in the front lobby when attempting to have Mr. Schied deliver his victims’ testimony in the presence of other people coming and going from that lobby and entering into various discussions with the officer at the lobby window. Hudecek had become very demanding, telling Mr. Schied to state what happened in “(his) own words” and while rejecting Mr. Schied’s attempts to read “his own words” straight from the cover letter addressed otherwise to Sheriff Bob Bezotte. Subsequently, when Hudecek’s insulting demeanor brought stares from the other people, Hudecek instructed Mr. Schied to follow him to a back room, a small cubicle near the jail giving the appearance of being reserved for questioning criminals, where he then stood blocking the doorway and intensified his demands that Mr. Schied deliver his statements to him orally and “in (his) own words”. When Mr. Schied continued to rely upon and read from his two-page cover letter, Hudecek got impatient and threatening, eventually moving from the doorway and instructing Mr. Schied to leave the Sheriff’s station.

- e) The evidence shows that according to Lt. Domine's statements by return email, Hudecek declined to report the occurrence until questioned about Mr. Schied's second letter to Sheriff Bezotte complaining about the treatment he received from Hudecek and Hudecek's refusal to allow Mr. Schied to file a crime report once seeing that the report involved criminal complaints against government officials such as "*tortuous intent in the deprivation of employment for engaging in federally protected activities*" (18 U.S.C. § 245), such as "*deprivation of rights under color of law*" (18 U.S.C. § 242), such as "*perjury under oath in a judicial proceeding*" (18 U.S.C. § 1038) "*by fraudulent statements*" (18 U.S.C. § 1001); and "*conspiracy to commit*" other offenses. As Lt. Domine stated, Robert Hudecek's "*affirmative defense*" to what occurred in the front lobby of the Sheriff's station was simply that Mr. Schied had "*refused to answer questions*".
- f) Given the Evidence, it is clear that Sgt. Robert Hudecek responded in such way as to demonstrate "*incompetence*", "*gross negligence*", in "*retaliatory*" fashion to Mr. Schied introducing himself as a "crime victim" and wishing to file a criminal complaint about "*public corruption*" by his peer government officials. His "report" about what actually occurred, by "*blaming the victim*" for his own refusal to provide "*due process*" to Mr. Schied's right to make a crime report and to be provided with "victims' relief" and law enforcement protection against future crimes by the "*Accused*", demonstrates a "*continued pattern*" of protection and "*cover up*", as well as a blatant "*deprivation*" Mr. Schied's rights using "*color of law*" and "*false statements*" to accomplish his aims.

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

- a) **See Evidence and Statements described for Robert Hudecek in "a through f" above as incorporated here by reference as if written herein verbatim.**
- b) Evidence shows that in 2009 when responding to Mr. Schied's second letter to Sheriff Bezotte, in complaint of the mistreatment he had received the previous day by Robert Hudecek, Lt. Domine left a telephone message. That evidence shows that Mr. Schied then responded back that same day by writing an email message to Scott Domine, and while stating his preference that future correspondence be handled in writing concerning the matter unless the Sheriff was to send a patrol car to Mr. Schied to pick up the crime report that Sgt. Hudecek had refused to accept when Mr. Schied had personally driven across two counties earlier to deliver that package (which Mr. Schied pointed out included an "*original*" notarized crime report).
- c) Evidence in a couple of emails that were subsequently sent between Lt. Domine and David Schied show that rather than to solicit any offer to assist Mr. Schied in getting his "*original*" sworn Affidavit and Evidence of crimes back into the proper hands of the Livingston County Sheriff, Scott Domine wrote an email response letter to David Schied instead. In that letter, Domine continued to "*protect and defend*" Sgt. Hudecek's reiterating claim that Mr. Schied had refused to cooperate under his questioning and that even though the Livingston Educational Service Agency (LESA) was situated right across the street from the Sheriff's Department, the Sheriff's office

was nonetheless “*not the proper jurisdiction*” for bringing this criminal complaint about Brighton Area Schools (BAS) and LESA. He stated instead that the Howell City Police was where Mr. Schied should take one copy of his complaint about LESA, and that the Brighton City Police was where he should take his complaints about Brighton school district employees. He also offered the suggestion that Mr. Schied should take these complaints to the FBI and to the Michigan Attorney General.’

- d) The evidence of those email communications shows that Mr. Schied responded back to Domine with more explicit details about Hudacek’s “*rendition*” of what had transpired in the Sheriff’s lobby when Hudacek had refused to receive Mr. Schied written crime report to Sheriff Bezotte and his sworn and notarized Affidavit. Mr. Schied attached a copy of his original letter to Sheriff Bezotte and pointed out that the “*questions*” that Hudacek was claiming that Mr. Schied was “*refusing to answer*” were all “*answered*” in the first paragraph of the cover letter that Mr. Schied had been attempting to read to Hudacek under pressure and embarrassment as a crime victim. That evidence shows that in response to Domine’s suggestion that Mr. Schied travel across two counties again to deliver separate crime reports to Howell and to Brighton police, and while pointing out that he had presented Mr. Schied with that advice without even reading the cover letter of crime report for himself before making that determination, Mr. Schied suggested that “*as the first law enforcement agency to be notified about these crimes, that (Mr. Schied) as an alleged crime victim both needs (the Sheriff’s) further assistance in determining which agency exactly has jurisdiction over the specific complaints and evidence*” contained in that stacked pages of documents, in his view the Sheriff’s department still had some “*affirmative*” obligation to review the letter addressed to Sheriff Bezotte and better define exactly what documents and claims need to go to what agency, and whether or not “*city*” police have “*proper jurisdiction*” over Mr. Schied’s references to “*federal*” crimes having occurred.
- e) The evidence shows that subsequent to the above-referenced dialogue, Mr. Schied wrote another email letter to Scott Domine dated 3/2/09, forwarding along with it a copy of an article from a “*Sean Hannity Discussion*” found on the Internet depicting a headline statement of how the U.S. District Court decision (Case No. 2:96-cv-099-J in 2006) held that, “*The duly elected sheriff of a county is the highest law enforcement official within a county...with powers that exceed that of any other state or federal official*”. The evidence demonstrates that though Mr. Schied had once again expressed his belief, by this final email letter to Scott Domine, that indeed the Livingston County Sheriff’s Department was the right place after all for filing his crime report, that Domine nevertheless did nothing further to answer Mr. Schied’s questions about why he should need to “*divide*” his crime report and submit “*two*” crime reports. Neither did he take any further step toward definitively assuring Mr. Schied about why the Livingston County Sheriff actually did NOT have proper jurisdiction when available public information stated otherwise.
- f) The evidence in this case demonstrates that Scott Domine not only played a part in the criminal “*cover-up*” of Hudacek’s “*felony*” malfeasance of official duty, but that he also took an active role in “*harassing*” and “*retaliating*” against Mr. Schied despite being aware that he was a crime victim, by seeking to “*extort*” additional money from

Mr. Schied in pursuing such a “*wild goose chase*” that is so similar to others issued such as by U.S. Attorney Stephen Murphy (in referring Mr. Schied to the FBI and toward filing his case “*civilly*” with an attorney), and the Michigan judges dismissing Mr. Schied’s claims while placing the burden of cost and time upon him to seek another level of “*review and rejection*” of his civil and criminal complaints by the “*jurisdiction*” of even higher level courts. Again, this follows a “*continuous pattern*” of “*denial, deprivation, and retaliation*” against Mr. Schied because these government officials understand that Mr. Schied is otherwise organized and intent of asserting his rights to “*due process*” of law in the prosecution of his criminal government perpetrators.

49. **BOB BEZOTTE** (*The Livingston County Sheriff*)

- a) **See Evidence and Statements** described for Robert Hudecek in “**a through f**” above as incorporated here by reference as if written herein verbatim.
- b) **See Evidence and Statements** described for Scott Domine in “**a through f**” above as incorporated here by reference as if written herein verbatim.
- c) Evidence shows that in 2009, Bob Bezotte’s had oversight and authority on all of the illegal activities of his law enforcement personnel, and he acted himself in refusing to respond to either of the two letters that David Schied wrote directly to him. These acts put him squarely in the seat of power and responsibility for the actions of those taking action on his behalf. He therefore is to be held ultimately accountable for this type of corruption and racketeering and continuing pattern of criminal activity. He acted with 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; He participated in a “*conspiracy to commit an offense or legal acts in illegal manners*”;

**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) Evidence shows that in 2006, and again in 2007 when Mr. Schied filed a criminal RICO case in a Michigan circuit court, Mr. Schied provided prosecutor Burke the evidence that MSP Det/Sgt. Fred Farkas had significantly changed the content of Mr. Schied’s original crime report in 2005 after postponing the filing of an “official” crime report for nine (9) months. The information provided to Burke was the same as what had been provided to Farkas, proving that violations of Michigan’s Set Aside Law, Revised School Codes, and Federal “*right to privacy*” statutes had been grossly violated by Sandra Harris.
- b) Evidence shows that Mr. Schied provided prosecutor Burke with proof of Sandra Harris having sent out a copy of the erroneous FBI report via Fax to an unrelated



- elementary school *before* even confronting Mr. Schied with the erroneous FBI report. That evidence demonstrates that Burke was also in possession of proof that Harris had informed Mr. Schied's supervisors about the content of the FBI report before even presenting that FBI report information to Mr. Schied. The evidence included proof that Sandra Harris had maliciously orchestrated unnecessarily large, informative meetings to confront Mr. Schied about the content of the FBI report in front of his peer teachers. It showed proof that Harris went on to tortuously notify all of those individuals in writing by way of two letters that Mr. Schied was being terminated from the school district because he was a "*liar*" and a "*convict*".
- c) That evidence to Joseph Burke showed proof that SANDRA HARRIS had tried to deny that she had been initially informed about, and actually "*seen*" copies of Mr. Schied's *set aside* and *pardon* documents, but that three sworn affidavits testify to the fact that Harris had actually walked out on Mr. Schied's explanation about how those documents justify his challenge of the accuracy of the FBI report as was his statutory right under federal statute. That evidence showed that while Mr. Schied had demonstrated "*good faith*" in providing Harris with requested copies of those documents as demonstrative of his statutory challenge of the FBI report that Harris then turned around and placed those "*nonpublic*" documents into the District's "*public*" personnel files and criminally disseminated them to the public under FOIA request.
- d) The evidence shows that Mr. Schied made follow up phone calls to Burke about the above-referenced documents, Joseph Burke not only continued to evade the issues when pressed repeatedly over the phone, he also replied back once in writing to demonstrate his complete disregard for the underscored issues involving Michigan's Set Aside Law and Mr. Schied's federal right to privacy, in light of clear evidence in his possession demonstrating that Harris had criminally violated these laws.
- e) Evidence shows that because of Burke's negligence Mr. Schied was repeatedly denied victims' rights advocacy and services by the Office of the Washtenaw County Prosecutor. This was advocacy and services that Mr. Schied understood were owed to him by reference to both State and Federal statutes. Mr. Schied was repeatedly denied his victims' rights because the office in charge of victims' services at the prosecutor's office stated that until the Office of the Washtenaw County Prosecutor took some sort of affirmative action to prosecute this case, Mr. Schied was not to be considered to be a "*victim*".
- f) Evidence shows that in 2009 Burke was given a second review of this criminal situation by a second crime report that was filed by Mr. Schied along with a sworn and notarized witness statement submitted with evidence demonstrating the crime was continuing to be committed in Washtenaw County. The evidence shows that Burke continues to deprive Mr. Schied his right to criminal protection while acting "*under color of law*" with claim that FOIA laws provide discretion to school districts on what to send from FOIA files. The evidence also shows that Burke continues to use "*color of law*" to deprive Mr. Schied of his rights to due process and criminal protection. Burke denied Mr. Schied case based on his claim that the "*witness*" (i.e., the one who signed a sworn and notarized Affidavit reporting the receipt of the Texas "*Order of Expunction*" document by response to a FOIA request to the Northville Public Schools in 2009), was actually acting on behalf of Mr. Schied; and that

therefore, he was reasoning that the FOIA response by David Bolitho was “*the same*” as sending the “*nonpublic*” clemency document to Mr. Schied himself as if he had requested the records himself under the Freedom of Information Act.

**51. BRIAN MACKIE (The Washtenaw County Prosecutor):**

- a) Evidence shows that in 2006, prosecutor Mackie had possession of and stated that he had reviewed all of the information described above in regards to assistant prosecutor Joseph Burke. Nevertheless, Mackie responded by simply stating that he intended **not** to consider any of the Mr. Schied’s oral or written arguments because he chose to rely solely upon the decision of his subordinate, prosecutor Burke, not to prosecute this case.
- b) Evidence shows that in 2007, Brian Mackie was provided with all of the same information a second and even a third time when Mr. Schied filed a criminal RICO case in a Michigan circuit court and when dismissed there, ended up taking that case to the Michigan Court of Appeals for review. That evidence shows that in each instance, Mackie denied the evidence and simply refused his *duty* to prosecute these crimes; and while denying Mr. Schied and his family their right to advocacy and services though this was their right as crime victims.

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

- a) Evidence shows that in 2006 when presented with personal testimony, a written Complaint, and evidence that criminal misdemeanor violations of the law had taken place by Northville Public School administrators Katy Parker, David Bolitho and Leonard Rezmierski, prosecutor Donaldson accepted Anthony Tilger’s “*bribe*” and “*perjured*” his Oath of office by refusing to do his duty to further look into or prosecute this particular case.
- b) The evidence shows that Donaldson initially responded to the crime report by “*losing*” it altogether. The evidence then shows that in response to Mr. Schied having notified Donaldson’s supervisory prosecutor Kym Worthy and the Attorney General Mike Cox about this intentional “*incompetence*” and “*gross negligence*”, Robert Donaldson turned toward “**retaliation**” against Mr. Schied. The evidence show that Robert Donaldson cost Mr. Schied well over \$1000 when he requested that Mr. Schied pay his own costs to go down to the prosecutor’s office to be interviewed (with Mr. Schied paying a private attorney to be present during that interview), while yet conspiring with Northville City Police officer Anthony Tilger to do nothing more than to humiliate and deny prosecuting Mr. Schied’s case, and while also denying Mr. Schied his victims’ rights.
- c) The evidence shows that in 2009 Robert Donaldson was again confronted with a crime report taken by the Wayne County Sheriff’s Department, presenting additional evidence that Northville Public School District administrators David Bolitho and Leonard Rezmierski was conspiring to continue committing crimes against Mr. Schied.. The evidence presented to Donaldson by Detective James Hines of the sheriff’s department shows that Donaldson was provided with the sworn, notarized statements of Earl Hocquard, submitted along with copies of all evidence referenced by that written testimony. (See Exhibit B as a copy of that affidavit and supporting evidence.)
- d) In addition, that evidence shows that in 2009 Donaldson was provided again with evidence (through the Wayne County Sheriff’s office) that not only were these public

school administrators criminally violating Mr. Schied's rights to privacy of his clemency documents by a "conspiracy to deprive of rights" between Bolitho and Rezmierski, but that in 2004 and 2005 Katy Doerr-Parker had committed acts of employment fraud by written promises to keep those records confidential. Nevertheless, the evidence shows that Donaldson continued to retaliate against Mr. Schied by simply refusing to perform his duty to prosecute these crimes, and by allowing these offenses to continue ruining Mr. Schied's reputation, his career, and his ability to support his dependent family.

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

- a) Evidence shows that Gonzales participating in a criminal conspiracy to deprive Mr. Schied of criminal relief while acting under "*color of law*" in 2006. That same evidence demonstrates that even when responding to a request by the Wayne County Commission for an investigation into prosecutor Robert Donaldson's denial of Mr. Schied's case, Gonzales demonstrated his intention to deprive Mr. Schied of his Constitutional right to "Full Faith and Credit" of his Texas court "Order of Expunction" while participating in a criminal "*cover up*" of the crimes committed by Katy Doerr-Parker, David Bolitho, and Leonard Rezmierski.
- b) The evidence also shows that even when Mr. Schied presented Gonzales with factual data that proved his "*color of law*" to be unreasonable and a deprivation of Mr. Schied's Constitutional rights to "Privileges and Immunities" and "Due Process", Gonzales simply ignored Mr. Schied's letter and continued to allow the Wayne County Commissioner Laura Cox and other members of the Wayne County Commission to be misled about this matter of requested investigation.
- c) Evidence shows that in 2009 when Gonzales was asked for yet another review of his earlier denial, with additional evidence submitted to him by other prosecutors under another complaint showing similar crimes to the first, that Gonzales failed again to address the specific exhibits of evidence. He wrote a letter to David Schied that completely disregarded the latest evidence that the Northville Public Schools was again illegally disseminating Mr. Schied's nonpublic Texas court "Order of Expunction" to the public under FOIA request. His letter failed to even acknowledge the evidence or Mr. Schied's complaint, and instead simply ridiculed David Schied for continuing his plight as if Mr. Schied was still going after the Northville Public Schools for the 2006 offense. The letter also misleadingly resurrected the Schied v. Sandra Harris and the Lincoln Consolidated Schools case as the basis for his ongoing denial of Mr. Schied's so-called "malicious" claims, despite that the Court of Appeals' ruling in the "Lincoln" case make no reference whatsoever to the Northville Public Schools' dissemination of the Texas "*expunction*" document.
- d) Evidence demonstrates that Gonzales' fraudulent response to the direct inquiry of his employers at the Wayne County Commission constituted a "*misprision of felony*", "*aiding and abetting*", and a "*conspiracy to commit*" the crime of "*obstruction of justice*".

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

- a) The evidence shows that in 2009, David Schied contacted Maria Miller by referral from the Wayne County Commission as the person at the Wayne County prosecutor's office who might know something about the county Grand Jury. Upon contact by phone by Mr. Schied, Miller reported that there has not been a county grand jury convene in over a decade and that the Grand Jury was replaced by the "*Investigative Subpoena Statute*" which put the final decision-making power for public corruption in the prosecutor's hands. When Mr. Schied began protesting the inability of citizens to reach other citizens on a Grand Jury to report public corruption by the prosecutor(s), she then started asking questions about Mr. Schied's case promising to "*investigate*" his complaints about prosecutor Robert Donaldson if Mr. Schied sent her information about what happened with his criminal complaints in 2006 and again in 2009.
- b) That evidence shows that despite Mr. Schied having sent scores of documents and a cover letter complaining that prosecutors Robert Donaldson, Robert Gonzales and Kym Worthy were the focus of Mr. Schied's complaint of a "*felony conspiracy to deprive*" Mr. Schied of his rights to criminal protection in 2006 and 2009, Maria Miller nevertheless did nothing more than to present all of Mr. Schied's documents to Kym Worthy and to Robert Gonzales for "*processing*" and response.
- c) The evidence shows that ultimately, Robert Gonzales was the one to respond back to Mr. Schied, doing so with a letter that did nothing more than to further mischaracterize Mr. Schied and accuse him of still trying to raise arguments regarding the denial of his crime report in 2006, and with no mention of the Evidence and 3<sup>rd</sup> party "witness" affidavit by Earl Hocquard testifying to the repeat of the crime in 2006 with different circumstances.

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

- a) Evidence shows that in 2006 and again in 2009, Worthy demonstrated "*gross negligence*" and "*malfeasance of official duty*" when on two occasions she disregarded Mr. Schied's written complaints to her requesting a preliminary investigation of felony *perjury* and *malfeasance* of her subordinate prosecutors Robert Donaldson and James Gonzales.
- b) The evidence shows that Worthy's demonstration of "*incompetence*" and "*gross negligence*" constituted "*malfeasance of official duty*" and "*perjury of sworn oath of office*". That negligence also constituted a "*misprision of felony*". Her supreme role as the Wayne County Prosecutor makes her a key figure in that agency's "*criminal conspiracy to deprive*" Mr. Schied of his rights.

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

- a) Evidence shows that for nearly a full year between 2006 and 2007, Cameron acted on behalf of Attorney General Mike Cox in "*stonewalling*" Mr. Schied's complaints, first with a letter of "*rhetoric*" and then empty assurances of providing Mr. Schied with a thorough review of additional evidence Mr. Schied had sent in evidence of the crimes being perpetuated against him by the administrative employees of two Michigan school districts.

- b) The evidence shows that Cameron’s demonstration of “*incompetence*” and “*gross negligence*” constituted “*malfeasance of official duty*” and “*perjury of sworn oath of office*”. His central role between Mike Cox and Paul Goodrich made him a key figure in the “*criminal conspiracy to deprive*” Mr. Schied of his rights by the Office of the Attorney General Mike Cox.
- c) Evidence demonstrates that Cameron response to Mr. Schied’s crime report to the Michigan Attorney General constitutes “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”.

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

- d) Evidence shows that Paul Goodrich “misrepresented” himself as being the appointed “*representative*” of Thomas Cameron, being the one who would be acting on Cameron’s behalf as well as on behalf of Attorney General Mike Cox, in responding to Mr. Schied’s letter of rebuttal sent to Thomas Cameron in 2006 along with additional evidence of crimes being perpetrated against Mr. Schied by Michigan school district officials. Goodrich’s empty assurances of providing Mr. Schied with a thorough review of additional evidence contributed to a “*pattern of incompetence, gross negligence, and malfeasance of official duty*” by employees of the Office of Attorney General Mike Cox. As such, Paul Goodrich was a foremost figure in the “*criminal conspiracy to deprive*” Mr. Schied of his rights. His negligent response to Mr. Schied’s crime report to the Michigan Attorney General constitutes “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”.

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

- a) Evidence shows Monticello was working closely with Patrick O’Brien in monitoring felony corruption going on in Wayne County between the Northville City Police and the Wayne County Prosecutor’s office. In fact, Monticello and O’Brien were meeting together when Mr. Schied first dropped off a 3-inch (3”) thick package of evidence in 2006 in explanation of what crimes were being committed at that time by the senior administrators of the Lincoln Consolidated Schools and Northville Public Schools.
- b) Evidence shows that Mr. Schied provided a detailed “*play-by-play*” of the mishandling of Mr. Schied’s crime report between the Anthony Tilger and Robert Donaldson. Essentially, Monticello and O’Brien were both “*watching*” as Mr. Schied provided near daily updates about Tilger’s “*bribe*” to prosecutor Donaldson asking for a felony “*subornation of perjury* (of oath)” that Donaldson not prosecute this case because the Northville school officials’ office resided literally next door to the Northville police station. When Mr. Schied finally asked Monticello to respond to these injustices, as well as to the 3” packet of documents, Monticello insisted that he would pass all of this information to the “Criminal Division” at the Office of the Michigan Attorney General, yet he did nothing but leave Mr. Schied to fend for himself.

- c) Evidence shows that the Attorney General’s office is instrumentally involved in the policy construction and enforcement of laws governing federal criminal history use and dissemination. Given the breadth and scope of Mr. Schied’s complaints about the criminal misuse and dissemination of an erroneous FBI report by the Lincoln Consolidated Schools, and the criminal misuse and dissemination of “clemency” information used by Mr. Schied to correct that erroneous FBI information and prove such correction was completed under federal statute, it is clear that the Attorney General and his staff are “*shielding*” their government “*peers*” from criminal prosecution for their misdeeds. The failure to hold law enforcement and prosecutors accountable for their felony cover-ups of the school district crimes constitute “*misprision of felony*”, a felony in itself. Using “*color of law*” to conduct “*legal acts in illegal manners*” is still a felony offense in itself under both State and Federal statutes.
- d) Evidence demonstrates that Monticello’s response to Mr. Schied’s crime report to the Government Affairs Bureau of the Office of the Michigan Attorney General also constitutes “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”.

**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) Evidence shows O’Brien was working closely with Monticello in monitoring felony corruption going on in Wayne County between the Northville City Police and the Wayne County Prosecutor’s office. In fact, O’Brien was meeting together with Monticello when Mr. Schied first dropped off a 3-inch (3”) thick package of evidence in 2006 in explanation of what crimes were being committed at that time by the senior administrators of the Lincoln Consolidated Schools and Northville Public Schools.
- b) Evidence shows that Mr. Schied provided a detailed “*play-by-play*” of the mishandling of Mr. Schied’s crime report between the Anthony Tilger and Robert Donaldson. Essentially, Monticello and O’Brien were both “*watching*” as Mr. Schied provided near daily updates about Tilger’s “*bribe*” to prosecutor Donaldson asking for a felony “*subornation of perjury* (of oath)” that Donaldson not prosecute this case because the Northville school officials’ office resided literally next door to the Northville police station. When Mr. Schied finally asked O’Brien to respond to these injustices, as well as to the 3” packet of documents, O’Brien wrote back a scathing letter citing the same rhetoric provided by Thomas Cameron and Mike Cox in previous letters while claiming that those previous responses from the Attorney General’s office adequately responded to the continuing criminal injustices occurring with the Northville Public Schools and between the Northville City Police and the Wayne County Prosecutor.
- c) Evidence shows that the Attorney General’s office is instrumentally involved in the policy construction and enforcement of laws governing federal criminal history use and dissemination. Given the breadth and scope of Mr. Schied’s complaints about the criminal misuse and dissemination of an erroneous FBI report by the Lincoln Consolidated Schools, and the criminal misuse and dissemination of “clemency” information used by Mr. Schied to correct that erroneous FBI information and prove

such correction was completed under federal statute, it is clear that the Attorney General and his staff are “*shielding*” their government “*peers*” from criminal prosecution for their misdeeds. The failure to hold law enforcement and prosecutors accountable for their felony cover-ups of the school district crimes constitute “*misprision of felony*”, a felony in itself. Using “*color of law*” to conduct “*legal acts in illegal manners*” is still a felony offense in itself under both State and Federal statutes.

- d) Evidence demonstrates that O’Brien’s response to Mr. Schied’s crime report to the Public Employment, Elections, and Tort Division of the Office of the Michigan Attorney General also constitutes “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”.

**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):**

Evidence shows that Stokes either completely disregarded, or otherwise passed on without formal answer or comment about a formal complaint that Mr. Schied had sent directly to her in 2006. That complaint was in report of a Northville Public School administrator (Scott Snyder) repeatedly suspending Mr. Schied’s young son from elementary school without just cause, and without providing Mr. Schied with his right as a parent to challenge or amend biased documentation about those suspensions being placed into his young son’s permanent student file. The evidence shows that Stokes’s demonstration of “*incompetence*” and “*gross negligence*” constituted “*malfeasance of official duty*” and “*perjury of sworn oath of office*”. Her central role as “Bureau Chief” and “Chief of Staff” to Attorney General Mike Cox made her a noteworthy figure in the “*criminal conspiracy to deprive*” Mr. Schied of his rights by the Office of the Attorney General Mike Cox.

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

- a) Evidence shows that shortly after Wanda Stokes received a three-inch (3”) package of evidence and complaint in 2006 from Mr. Schied, about the criminal activities of the Lincoln Consolidated Schools and Northville Public Schools, the Attorney General issued press releases about Wanda Stokes being appointed as Mike Cox’s new “*chief of staff*”. Shortly after that, Mike Cox sent a letter back to Mr. Schied addressing parts of that complaint, but in such way as to confuse, convolute and deny wrongdoing in the two distinctly different school district (Lincoln and Northville) cases. His letter, being mostly rhetorical, was similar to Thomas Cameron’s letter. It differed only in that **it reiterated some Mr. Schied’s principle facts with misstatements about those facts while issuing the recommendation that Mr. Schied pay the expense to hire an attorney to bring these criminal issues before a civil judge.**
- b) Evidence shows that between 2006 and 2009, Mike Cox’s name was the first in a lineup of “*assistant*” attorney generals supporting ongoing “*defenses*” of Mr. Schied’s subsequent court cases in which he, as plaintiff, followed Mike Cox’s own advice to

- bring take these issues in front of a judge. In each of these instances, Mike Cox and his staff of attorney were repeatedly provided with a plethora of evidence and statements depicting the exact nature of the misdemeanor crimes still being committed by these school officials, as well the evidence of the felony corruption being carried out in “*cover up*” of those crimes by patterns of “*incompetence, gross negligence, and malfeasance of official duties*” by law enforcement officers and their supervisors, including members of the Attorney General’s own staff and Mike Cox himself. Yet Cox and his associates continued to “defend” their government co-conspirators.
- c) Evidence shows that the Attorney General’s office is instrumentally involved in the policy construction and enforcement of laws governing federal criminal history use and dissemination. Given the breadth and scope of Mr. Schied’s complaints about the criminal misuse and dissemination of an erroneous FBI report by the Lincoln Consolidated Schools, and the criminal misuse and dissemination of “*clemency*” information used by Mr. Schied to correct that erroneous FBI information and prove such correction was completed under federal statute, it is clear that the Attorney General and his staff are “*shielding*” their government “*peers*” from criminal prosecution for their misdeeds. The failure to hold law enforcement and prosecutors accountable for their felony cover-ups of the school district crimes constitute “*misprision of felony*”, a felony in itself. Using “*color of law*” to conduct “*legal acts in illegal manners*” is still a felony offense in itself under both State and Federal statutes.
  - d) Evidence demonstrates that Cox’s personal responses to Mr. Schied’s crime reports, including complaints about members of his staff defending the criminal perpetrators in State and Federal courts, also constitutes “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”.

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

- a) Evidence shows that in December 2006 Congressman Thaddeus McCotter sent a letter to Mike Cox requesting his personal response to Mr. Schied’s 22-page letter describing all of the injustices that had occurred in 2006 by his experiences with the Office of the Michigan Attorney General. Several months later David Tanay responded on the Attorney General’s behalf with a letter that served to do nothing except to issue “the same” type of fraudulent claims that were previously issued by Thomas Cameron, Mike Cox, and Patrick O’Brien. His letter stated that the Lincoln Consolidated Schools and Northville Public Schools cases were “*the same*” and that the criminal issues regarding these two school districts were somehow resolved by the Michigan Court of Appeals case in *Schied v. Sandra Harris and the Lincoln Consolidated School District*. (See Court of Appeals No. 267023) The letter, sent misleadingly to the Congressman, concluded that there was “no evidence” of any wrongdoing by any government official in Michigan.
- b) Evidence shows that the Attorney General’s office is instrumentally involved in the policy construction and enforcement of laws governing federal criminal history use



and dissemination. Given the breadth and scope of Mr. Schied's complaints about the criminal misuse and dissemination of an erroneous FBI report by the Lincoln Consolidated Schools, and the criminal misuse and dissemination of "clemency" information used by Mr. Schied to correct that erroneous FBI information and prove such correction was completed under federal statute, it is clear that the Attorney General and his staff are "*shielding*" their government "*peers*" from criminal prosecution for their misdeeds. The failure to hold law enforcement and prosecutors accountable for their felony cover-ups of the school district crimes constitute "*misprision of felony*", a felony in itself. Using "*color of law*" to conduct "*legal acts in illegal manners*" is still a felony offense in itself under both State and Federal statutes.

- c) Evidence demonstrates that Tanay's response to Mr. Schied's crime report to the Criminal Division of the Office of the Michigan Attorney General also constitutes "*aiding and abetting*", and a "*conspiracy to commit*" the crime of "*obstruction of justice*".

## **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) Evidence shows that from 2006 Commissioner Cox had statements, laws, and evidence in her possession depicting that misdemeanor crimes were being committed and that felony cover-ups were occurring by the Office of the Wayne County prosecutor. Yet Cox chose to disregard all of the above and refused to honor Mr. Schied's challenge of the prosecutors' rationale for refusing to prosecute these crimes; and she similarly refused – in writing – to discuss these government corruption grievance matters with husband, the Attorney General Mike Cox.
- b) Evidence shows that Laura Cox was notified from the onset that Mr. Schied was referred to her by Senator Bruce Patterson and his "*chief-of-staff*" who made that referral because Cox and the Wayne County Commission controlled the payment of salaries for those employed by the Office of the Wayne County Prosecutor. That evidence shows that despite knowing that felony "cover-up" crimes were occurring by those on the county payroll, Commissioner Cox and others on the Commission continued to disburse taxpayer money to Robert Donaldson and other law enforcement personnel. By definition, this constitutes "*aiding and abetting*", "*misprision of felony*", "*perjury of Oath*", and "*malfesance of official duty*", among other crimes.

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

- a) Evidence shows that from 2006 John Sullivan had statements, laws, and evidence in his possession depicting that misdemeanor crimes were being committed and that felony cover-ups were occurring by the Office of the Wayne County prosecutor. Yet Sullivan chose to disregard all of the above and refused to honor Mr. Schied's challenge of the prosecutors' rationale for refusing to prosecute these crimes.
- b) Evidence shows that Sullivan was notified from the onset that Mr. Schied was referred to the Wayne County Commission by Senator Bruce Patterson and his "*chief-of-staff*" who made that referral because Sullivan and the others of the Wayne County Commission controlled the payment of salaries for those employed by the Office of the Wayne County Prosecutor. That evidence shows that despite knowing that felony "cover-up" crimes were occurring by those on the county payroll, John Sullivan and others on the Commission continued to disburse taxpayer money to Robert Donaldson and other law enforcement personnel. By definition, this constitutes "*aiding and abetting*", "*misprision of felony*", "*perjury of Oath*", and "*malfeasance of official duty*", among other crimes.

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

Evidence shows that Soebbing played an instrumental role in "*covering up*" a number of civil rights violations that were taking place against Mr. Schied's elementary school-aged child by Scott Snyder and other Northville Public School administrators criminally retaliating against Mr. Schied for asserting his civil rights under the law. His actions not only reflected the familiar pattern of "*incompetence*", "*gross negligence*", and "*malfeasance of duty*", but also his role in a "*conspiracy to deprive of rights*" using "*color of law*" to commit "*legal acts in illegal manners*".

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

Evidence shows that Fayad played an instrumental role in "*covering up*" a number of civil rights violations that were taking place against Mr. Schied's elementary school-aged child by Scott Snyder and other Northville Public School administrators criminally retaliating against Mr. Schied for asserting his civil rights under the law. Her actions not only reflected the familiar pattern of "*incompetence*", "*gross negligence*", and "*malfeasance of duty*", but also his role in a "*conspiracy to deprive of rights*" using "*color of law*" to commit "*legal acts in illegal manners*".

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

Evidence shows that Magin played a supervisory role in "*covering up*" a number of civil rights violations that were taking place against Mr. Schied's elementary school-aged child by Scott Snyder and other Northville Public School administrators criminally retaliating against Mr. Schied for asserting his civil rights under the law. His actions not only reflected the familiar pattern of "*incompetence*", "*gross*

*negligence*”, and “*malfeasance of duty*”, but also his role in a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

Evidence shows that Davis played a supervisory role in “*covering up*” a number of civil rights violations that were taking place against Mr. Schied’s elementary school-aged child by Scott Snyder and other Northville Public School administrators criminally retaliating against Mr. Schied for asserting his civil rights under the law. Her actions not only reflected the familiar pattern of “*incompetence*”, “*gross negligence*”, and “*malfeasance of duty*”, but also his role in a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

Evidence shows that Saunto played an instrumental role in “*covering up*” a number of civil rights violations that were taking place against Mr. Schied’s elementary school-aged child by Scott Snyder and other Northville Public School administrators criminally retaliating against Mr. Schied for asserting his civil rights under the law. Her actions not only reflected the familiar pattern of “*incompetence*”, “*gross negligence*”, and “*malfeasance of duty*”, but also his role in a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

Evidence shows that Omans played an supervisory role in “*covering up*” a number of civil rights violations that were taking place against Mr. Schied’s elementary school-aged child by Scott Snyder and other Northville Public School administrators criminally retaliating against Mr. Schied for asserting his civil rights under the law. Her actions not only reflected the familiar pattern of “*incompetence*”, “*gross negligence*”, and “*malfeasance of duty*”, but also his role in a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

Evidence shows that Thompson played an instrumental role in “*covering up*” a number of civil rights violations that were taking place against Mr. Schied’s elementary school-aged child by Scott Snyder and other Northville Public School administrators criminally retaliating against Mr. Schied for asserting his civil rights under the law. Her actions not only reflected the familiar pattern of “*incompetence*”, “*gross negligence*”, and “*malfeasance of duty*”, but also his role in a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

Evidence shows that Liebetreu played an instrumental role in “*covering up*” a number of civil rights violations that were taking place against Mr. Schied’s elementary school-aged child by Scott Snyder and other Northville Public School administrators criminally retaliating against Mr. Schied for asserting his civil rights under the law. Her actions not only reflected the familiar pattern of “*incompetence*”, “*gross negligence*”, and “*malfeasance of duty*”, but also his role in a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

- a) Evidence shows that in 2007, Joan Blair took receipt of David Schied’s “*request for reconsideration*” of the decision of CHRISTINA BELTZ on behalf of the MDCR to dismiss Mr. Schied’s previously filed complaint about “*discrimination*” and “*retaliation*” by administrators of the Northville Public Schools against his young child, and by Michigan law enforcement officials against him personally. Though Blair agreed that there was a “*disparate impact*” demonstrated by the circumstances of Mr. Schied’s case, she yet refused to execute her job responsibilities in this circumstance.
- b) That evidence demonstrates that Blair simply based her refusal to process Mr. Schied’s civil rights claims based upon her view that, “*nothing is being done by the State about offenses against people with a history of criminal convictions*”, and because (referring to the Michigan Court of Appeals’ ruling in David Schied v. Sandra Harris and Lincoln Consolidated Schools) she personally “*is not at all interested in anything that a Michigan judge says that is ‘unpublished’ ...but will only take the time to read published reports*”. (See Court of Appeals No. 267023) Her actions therefore not only reflected the familiar pattern of “*incompetence*”, “*gross negligence*”, and “*malfeasance of duty*”, but also his role in a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

Evidence shows that in response to Mr. Schied’s written “*request for reconsideration*” of his civil rights matters, as otherwise addressed to Joan Blair in 2007, Paruszkiewicz intercepted and intervened in the delivery of that correspondence and wrote a letter of final denial on behalf of the MDCR. Her letter simply stated, “*The issues you raised do not meet the department’s requirements for filing a formal complaint*”, while only adding that Mr. Schied has the right to appeal that decision to a Michigan circuit court. Thus her actions therefore not only reflected the familiar pattern of “*incompetence*”, “*gross negligence*”, and “*malfeasance of duty*”, but also his role in a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

- a) Evidence shows that in 2007 attorney Kelly Keenan acted independently and on his own behalf when intercepting and intervening in the delivery of correspondence that Mr. Schied had sent to the State Administrative Board and otherwise addressed to Governor Jennifer Granholm as the “*chairperson*” of that State board.

- b) The Evidence of Granholm’s own defense arguments in a previously filed federal court case indicates that Keenan simply confiscated and opened Mr. Schied’s package without the Governor’s knowledge or permission and that he also refused to return the package to Mr. Schied when Mr. Schied requested the return of his documents upon finding out that neither the Governor as “*chairperson*” or the State Administrative Board, nor any other Board member received this package. That evidence instead indicates that Keenan shared the documentation with another attorney, Michelle Rich, who was not even licensed to practice law in Michigan.
- c) The evidence shows that Kelly Keenan committed a federal offense by interfering in the delivery of the United States mail to Governor Jennifer Granholm and the State Administrative Board. Additionally, even in the event that he had acted with the Governor’s knowledge and permission, he acted in such way as to “conspire” with others to “cover up” crimes by his government peers. Additionally, his actions reflected the familiar pattern of “*incompetence*”, “*gross negligence*”, and “*malfeasance of duty*”, as well as his role in a “*conspiracy to fraud*” and a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

- a) Evidence shows that in 2007 Michelle Rich “*misrepresented*” herself on the phone when claiming that she was an attorney calling Mr. Schied on behalf of the Governor Jennifer Granholm. The records of the Michigan State Bar demonstrate that Michelle Rich has never been a licensed attorney in Michigan.
- b) The evidence demonstrates that Rich acted in concert and conspired with Kelly Keenan to deny Mr. Schied’s request that Jennifer Granholm review and respond to the package that he had addressed directly to her at the State Administrative Board. Instead, Rich called Mr. Schied to inform him that the Governor would not further consider his case, either in her capacity as the Governor or her capacity as the “*chairperson*” of the State Administrative Board. She cited as her reason the Michigan Court of Appeals’ ruling in *Schied v. Sandra Harris and Lincoln Consolidated Schools* (Court of Appeals No. 267023), and another Michigan court case involving a sex offender.
- c) Based on the evidence, Michelle Rich has participated in a “*conspiracy to defraud*” and a “*conspiracy to deprive of rights*” using “*color of law*” to commit “*legal acts in illegal manners*”.

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

- a) Evidence shows that from 2007 through the present, as based upon the statements of Kelly Keenan and Michelle Rich in comparison to written statements filed on the Governor’s behalf in the U.S. District Court for the Eastern District of Michigan, Jennifer Granholm is a knowing and willing participant in a “*conspiracy to defraud*” Mr. Schied and the Courts.
- b) The evidence demonstrates that Granholm acted with “*incompetence*”, with “*gross negligence*”, and in “*malfeasance*” of her official duties as the Michigan governor and as the “*chairperson*” for the State Administrative Board. She was, and continues still

- to be a participant in a “*conspiracy to deprive*” Mr. Schied of his rights using “*color of law*” to commit “*legal acts in illegal manners*”. As a magistrate official for the State of Michigan who knew fully about and had possession of statements and evidence of government crimes, even by her “*representative counsel*” and their collective refusal to stop these crimes from continuing, she is guilty of a “*misprision of felony*”.
- c) Evidence demonstrates that Granholm’s response to Mr. Schied’s crime report to the State Administrative Board and to her Office of the Governor also constitutes “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”.
  - d) Evidence shows that in 2007 Jennifer Granholm had direct involvement in determining the response by her legal “*representatives*”, both at her office in her role as Governor and at the State Administrative Board in her role as “*chairperson*”. Evidence also shows that Granholm then committed “*fraud upon the Court*” when she attempted to rely upon the misleading claim that she had no direct contact with Mr. Schied and therefore should not be held accountable for the treatment Mr. Schied received by her various “*representatives*” working under her authority.

### **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) Evidence shows that in 2004 Judge Morris violated Mr. Schied’s Constitutional right not to “*self-incriminate*” as well as his rights to privacy, full faith and credit, and privileges and immunities, when she granted the defendant Lincoln Consolidated Schools attorney Michael Weaver a “*Motion to Compel*” Mr. Schied to talk about his 1979 Texas “*set aside*” and 1983 “*pardon*” during deposition hearing. The “*set aside*” referenced a “*plea*” that was “*withdrawn*” when the indictment was also dismissed and the judgment set aside. The “*pardon*” referenced a “*conviction*” that was pardoned with all civil rights restored. During deposition testimony, in order to discuss the “*withdrawal*” of the plea, Mr. Schied admitted to have once pled “*guilty*”. In order to verify the authenticity of the pardon document, Mr. Schied had to admit that the document referenced a “*conviction*”. Subsequently, Judge Morris allowed the defendants’ attorney to bring those admissions of “*guilty plea*” and “*conviction*” into her Court as matters of indisputable “facts” and dismissed Mr. Schied’s civil case based upon those admissions, without giving “*full faith and credit*” to the clemency documents “*withdrawing*” that guilty plea, “*setting aside*” the judgment, “*dismissing the indictment*” in 1979, and “*pardoning*” whatever remained of the offense after that in 1983.
- b) Evidence shows that in 2005 Morris dismissed Mr. Schied’s case and provided Sandra Harris with “*governmental immunity*” while disregarding clear case law in Texas, in Michigan, and in federal courts, which all verified that a set aside of the

- type that Mr. Schied received a quarter century prior to applying for a job in Michigan, meant that “*no conviction exists*”.
- c) Evidence also shows that Morris disregarded a clear **Texas Attorney General opinion (JC-0396) which clarified that for anyone who receives judicial clemency by EITHER pardon OR by expunction of remaining “arrest” record, “the term ‘conviction’ no longer applies” to such individual.**
  - d) Evidence shows that Judge Morris continually disregarded Mr. Schied’s claim that the FBI report received by Sandra Harris and the Lincoln Consolidated Schools was erroneous and that Sandra Harris had denied Mr. Schied his statutory right to challenge and correct that report while keeping his job. This unconscionable judge also disregarded a clear Texas **Attorney General opinion (DM-349) maintaining that anyone in receipt of a Texas “set aside” is not even eligible for a Texas governor’s pardon “for lack of an object to pardon”.**
  - e) This above is not only evidence of “*incompetence*” and “*gross negligence*” but also indicative of “*judicial misconduct*” and a beginning “*pattern of prejudicial and discriminatory treatment*” on the part of Melinda Morris and other judges named by this Complaint. Melinda Morris intentionally disregarded clear notice that public policies protecting Mr. Schied’s rights to privacy were being maliciously and criminally undermined by Sandra Harris, Cathy Secor and others at the Lincoln Consolidated School District. She and her co-conspirators in the judiciary clearly acted in “*malfeasance*” of an official duty to litigate these criminal elements of Mr. Schied’s case.

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

- a) Evidence shows that Cavanagh, as well as his cohorts Servitto and Fort Hood on the Michigan Court of Appeals in 2006, intentionally disregarded clear case law in Texas, in Michigan, and in federal courts, which all verified that a set aside of the type that Mr. Schied received a quarter century prior to applying for a job in Michigan, meant that “*no conviction exists*”.
- b) Evidence also shows that Cavanagh, Servitto, and Fort Hood selectively chose which elements of Texas attorney general opinions to focus on while giving “*prejudicial*” favoritism to the arguments of other government officials. They misapplied an outdated Texas attorney general opinion relating to narrow focus of Texas government agency employment to Mr. Schied’s employment situation in 2003. They then upheld the lower court’s decision to provide “*governmental immunity*” to Sandra Harris and to the Lincoln Consolidated Schools’ school board members for supporting Harris’ criminal acts against Mr. Schied.
- c) Evidence shows that like the lower court judge, Cavanagh and the other two judges Servitto and Cavanagh refused to address Mr. Schied’s federal right to challenge the accuracy of the crime report. They did so while refusing the opportunity to investigate the lower court judge Morris’ question in court transcript about why Mr. Schied would even need a governor’s pardon once his teenage offense had been “*set aside*”. While following judge Morris’ lead in ignoring Texas attorney general opinion (DM-349) otherwise reaffirming that the 2003 FBI report received by Harris was indeed erroneous, Cavanagh and the others on his Michigan Court of Appeals tribunal

- blatantly disregarded **three sworn affidavits**, union meeting minutes, as well as two defamatory letters written by superintendent Harris herself, presenting clear evidence that Mr. Schied had attempted to exercise his right to challenge the accuracy of the FBI report but that Harris had acted tortuously while refusing him that right.
- d) The evidence shows that instead of considering the previous quarter-century of Mr. Schied's exemplary conduct and the fact that he was even teaching self-defense to his Lincoln Consolidated departmental supervisor after being informed that she was being beaten up by her ex-husband in front of her children, Cavanagh and his cohorts condoned Harris' malicious letters calling Mr. Schied a "liar" and a "convict". This Court of Appeals tribunal upheld judge Melinda Morris' admittance of Mr. Schied's deposition explanations about the "guilty plea" and Mr. Schied's verification of the authenticity of the Texas governor's pardon referring to a "conviction" as matters of "fact", essentially using this testimony as "self-incrimination" to re-convict and re-sentence Mr. Schied to further punishment without "due process" of a trial by jury, and while constructing the means by which he was to be subject to "**Self-Incrimination**" and "**Double Jeopardy**", yet other violations of Mr. Schied's rights under the Constitution.
- e) The evidence demonstrates that Cavanagh acted *in concert* with judges Servitto and followed suit in denying Mr. Schied "*full faith and credit*" to the meaning of his clemency documents and the symbiotic significance of his having received BOTH a set aside and a pardon. Instead, these judges paid no attention to Mr. Schied's claim that the FBI report received by Sandra Harris and the Lincoln Consolidated Schools was erroneous and that Sandra Harris had denied Mr. Schied his statutory right to challenge and correct that report while keeping his job.
- f) The evidence of the Court of Appeals ruling itself demonstrates both "*incompetence*" and "*gross negligence*" by these judges placing their decision in an "**unpublished**" ruling in order to hide the fact that this case otherwise set clear "**precedence**" by focus on a clear conflict between state and federal clemency laws governing "*rehabilitated*" offenders' rights to privacy and school administrator rights to protect children under Michigan Revised School Codes.
- g) Furthermore, the evidence shows that these judges committed blatant acts of "*judicial misconduct*" and a continual "*pattern of prejudicial and discriminatory treatment*" against Mr. Schied by refusing to "*litigate*" another clear conflict of law that occurs between Federal right to privacy statutes and Michigan revised school codes. Under federal law (**Title 42 § 14616** called the "*National Crime Prevention and Privacy Compact*"), States are held by statutory contract with the Federal government to uphold the privacy rights of those subject to FBI fingerprinting for purposes of employment background checks. That "*agreement*" between the States and Federal government maintain both civil sanctions and criminal penalties for the misuse and dissemination of criminal history information obtained by State law enforcement agencies on behalf of employers operating in each state. Under that federal "*contract*", States must also establish and enforce statutory similar policies governing individual rights to privacy protection when ordering criminal history reports from the FBI.
- h) The evidence shows that Michigan's policy governing individual rights to privacy protection comes under the **CJIS (Criminal Justice Information System) Policy**



- Council Act (Act 163 of 1974)** for which the Michigan State Police have the “*responsibility and duty*” to enforce the laws governing the criminal dissemination of “*nonpublic*” documents under **MCL 28.214**. The “*precedence*” otherwise “*covered up*” by the “*unpublished*” ruling of Mr. Schied’s case against Sandra Harris and the Lincoln Consolidated School District “*conflict*” in Michigan laws occurs in Michigan Revised School Codes which otherwise authorizes Michigan school district officials to place “*nonpublic*” criminal history information (obtained during the course of evaluating an employee’s qualifications for employment) into “*public*” personnel files. While multiple statutes of the Revised School Codes authorize the placement of that nonpublic information into public personnel files, they all clearly hold criminal penalties for the dissemination of that information to anyone not directly involved in evaluating a prospective employee’s qualifications for employment. Therefore, Judge Cavanagh, conspiring to cover-up these multiple conflicts of laws and the “*precedence*” set by Mr. Schied’s case, intentionally disregarded clear notice by Mr. Schied’s attorney that Harris’ actions of undermining Mr. Schied’s right to privacy were not only malicious, but also criminal violations of public policies.
- i) This evidence of “*judicial misconduct*” and “*malfeasance of duty*” is what Cathy Secor, David Bolitho, Katy Parker and Leonard Rezmierski used to justify continued criminal bombardment against Mr. Schied’s good reputation and standing as an exemplary American and Michigan citizen. This “miscarriage of justice” by judges Cavanagh, Servitto, and Fort Hood is what also has allowed Michigan law enforcement, and the offices of the Michigan Attorney General and Governor, as well as other Michigan judges, to use “*color of law*” against Mr. Schied by also refusing their respective “*duties*” to litigate these ongoing criminal elements of Mr. Schied’s persisting case.

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

**See Evidence and Statements described for Mark Cavanagh in “a through i” above as incorporated here by reference as if written herein verbatim.**

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

**See Evidence and Statements described for Mark Cavanagh in “a” though “i” above as incorporated by reference as if written herein verbatim.**

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

- a) Evidence shows that in 2007 even when evidence and statements were brought before Judge Stephens by an attorney demonstrating that Northville Public Schools was in criminal violation of the Michigan Revised School Codes, and that Mr. Schied was not only a victim of employment fraud but also the victim of Title VII and Michigan’s Elliott-Larsen Civil Rights Act governing employment discrimination, Judge Stephens only dismissed Mr. Schied’s case.

- b) Evidence shows that like the other judges before her in the “Lincoln” school district case, Stephens dismissed the case without litigating Mr. Schied’s criminal allegations, and without application of Mr. Schied’s evidence, or his references to civil rights and criminal statutes. She only insisted that the actions by the Katy Doerr-Parker, David Bolitho and Leonard Rezmierski, of maintaining and disseminating the Texas court “Order of Expunction” from their public personnel files was “*stupid*”.
- c) Evidence demonstrates that Stephens allowed the attorney for the Northville Public Schools to argue their interpretation of a single sentence of Michigan’s Revised School Codes down to the placement of the comma in the sentence to arrive at an interpretation of that sentence to mean that the Texas court “Order of Expunction” symbolized “*proof of unprofessional conduct*” as a Michigan schoolteacher. Stephens formalized the interpretation of that single sentence while simultaneously disregarding entire paragraphs in fully three other statutes of the Revised School Codes depicting that the divulging of criminal history information obtained in the course of evaluating a teacher’s qualifications for employment outside the personnel office is a criminal misdemeanor.
- d) Evidence demonstrates that Stephens ruled that the document representing the “*obliteration*” of all that remaining references to a 30-year old single teen “*arrest*” record should be maintained in “*public*” personnel files and distributed to any inquiring employers as “*proof of unprofessional conduct*” as a Michigan schoolteacher. The evidence shows that she made such ruling while even admitting that she had researched and found that Mr. Schied’s case had set clear precedence for this type of employment circumstance. Nevertheless, she “*incompetently*” and “*gross negligently*” ruled without litigating the clear conflict of laws presented by Mr. Schied’s case. Her actions, like the actions of the other Michigan judges, therefore constituted a criminal malfeasance of her official duty and perjury of her Oath of her public Office to uphold, support, and enforce the laws of the State and of the United States.
- e) Evidence demonstrates that judge Stephens disregarded the fact that Katy Parker had obtained Mr. Schied’s clemency documents by issuance of a “fraudulent” employment agreement, even when the defendant school district’s attorney pointed out themselves that Michigan Revised School Codes prohibited the contracting of secrecy on criminal history information.
- f) Evidence demonstrates that Stephens also disregarded the fact that the “Order of Expunction” document represented the end-product of Mr. Schied having exercised his federal right to “*challenge and correct*” the wrongful criminal history information contained in the FBI report obtained by the Northville Public Schools in February 2004, and that like the set aside and pardon documents presented to Sandra Harris at Lincoln Consolidated Schools, Mr. Schied’s “*clemency*” documents were the “*proof*” that the FBI reports were erroneous and in need of being challenged and corrected.
- g) Evidence demonstrates that, like what occurred with the Lincoln Consolidated School District case, the Michigan courts refuse to acknowledge that the criminal history documentation maintained in the public personnel files as subject to FOIA request and being also disseminated to anyone requesting a copy of Mr. Schied’s public personnel file under the Freedom of Information Act. Court transcripts also demonstrate that like what occurred in the other school district case, Stephens refused

to acknowledge that these school district administrators were robbing Mr. Schied of his state and federal privacy rights under Michigan's Set Aside (and expungement) statute and **42 § 14616** of the *National Crime Prevention and Privacy Compact* otherwise protecting an individual's right to challenge and correct FBI records.

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

- a) Evidence shows that in 2007 even before “*hearing*” statements by attorneys for the Michigan attorney general and the Lincoln and Northville school districts, judge Collette openly admitted from the bench that he was “*lifelong friends*” with Patrick O’Brien, one of the defendants Mr. Schied had named in his criminal conspiracy and racketeering case before this judge.
- b) Evidence shows that using “*color of law*”, Collette denied cut Mr. Schied off when Mr. Schied was reminding this Michigan judge of his statutory “*duty*” to act upon written notice and complaint about felony crimes being committed. Instead, Collette outright stated that his “*civil*” courtroom would not serve as the proper venue for Mr. Schied’s “*criminal*” complaints about a laundry list of Michigan government officials. He had only to sarcastically ask why Mr. Schied had not included him on that very same list of government defendants.
- c) Evidence shows that this Michigan “*chief justice*” refused to “*hear*” a motion that Mr. Schied had otherwise properly paid to have heard at the first hearing; and that he instead used “*color of law*” to require Mr. Schied to rewrite his 404-page Complaint on all of the above-named defendants, without consideration for the 188 documents of evidence that Mr. Schied had submitted to support the facts referenced by the Complaint detailing the crimes of all these government defendants.
- d) Evidence shows that judge Collette then also disregarded three other motions that Mr. Schied had properly paid out-of-pocket to have heard, dismissing Mr. Schied’s case instead days later even though Mr. Schied had also followed the judge’s granting of the government defendants’ earlier motion for Mr. Schied to rewrite his complaint as a “*More Definite Statement*”. One of those motions was for the “*Disqualification of the Judge*” himself for “*judicial misconduct*” and for not disqualifying himself after revealing that he had been “*lifelong friends*” with Patrick O’Brien as one of the criminal co-defendants specifically named by Mr. Schied’s criminal complaint. A second of those motions was for a “*Change of Venue*” from a court of “*civil*” jurisdiction to a court of “*criminal*” jurisdiction since judge Collette had refused to “*hear*” criminal allegations in his “*civil*” courtroom even despite the Michigan statutes cited by Mr. Schied stating that ANY Michigan has the authority and duty to act upon information, belief, and “probable cause” of a written Complaint about felony crimes having occurred.
- e) Evidence shows that even after dismissing Mr. Schied’s case judge Collette’s “*assistant*” failed to properly serve Mr. Schied with notice of the judge’s dismissal of that case as was done with all of the attorneys for the government Defendants. That action had the probable effect of causing Mr. Schied to be “*prejudiced*” against his ability to file a timely “*Claim of Appeal*” in the next

higher court (though Mr. Schied found out later through the court clerk and still filed his “Claim of Appeal” in time).

- f) Evidence demonstrates that Collette’s response to Mr. Schied’s crime report also constitutes a “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”.

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

- a) Evidence shows that in 2008, Mr. Schied had filed his criminal RICO case (Court of Appeals case No. 282804) against Michigan government along with reasons and supporting evidence why the Michigan Court of Appeals should grant him a “*Writ of Mandamus*” and “*Superintending Control*” for immediate relief for him and his family as crime victims. (See Court of Appeals case No. 282820.) Nevertheless, that evidence demonstrates that Judge Owens acted on behalf of other Court of Appeal judges when completely disregarding all of Mr. Schied’s pleadings and evidence of ongoing crimes and dismissing Mr. Schied’s motion, despite having proof that Northville Public Schools administrators were continuing to retaliate against Mr. Schied’s young child by suspending him from elementary school and refusing to provide Mr. Schied with due process in getting to the bottom of those disputed suspensions as described above.
- b) Evidence shows a year later in 2009, Owens acted jointly with two other judges, Richard Bandstra and Pat Donofrio, in **denying** three other motions filed by Mr. Schied with additional evidence that the school district administrators of both the Lincoln and Northville school districts were continuing to perpetrate crimes against Mr. Schied. The first of those three motions was for the Court of Appeals to “*Hear Three Motions Plaintiff-Appellant Properly Filed in Lower Court Yet Still Without Any ‘Hearing’*”. The second of those motions was for a “*Demand to Read All Pleadings Plaintiff Files With This Court, and to Adhere Only to Constitutionally Compliant Law and Case Law and More Particularly, the Bill of Rights, in Its Rulings*”. The third of those motions was for “*Claim and Exercise of Constitutional Rights, and Requiring the Presiding Judges to Rule Upon This Motion for All Public Officers of This Court to Uphold Said Rights*”.
- c) The evidence shows that Owens conspired with Bandstra and Donofrio to deny Mr. Schied criminal relief despite Mr. Schied having provided evidence with two of his three motions that crimes were continuing against him in two separate Michigan counties. Mr. Schied had submitted a sworn and notarized Affidavit from a third-party “*witness*” showing that in 2009 Cathy Secor and the Lincoln Consolidated Schools’ business office was continuing to maliciously disseminate – under the Freedom of Information Act – copies of the 2003 erroneous FBI report, a copy of Mr. Schied’s 1979 “*set aside*” document, and one of Sandra Harris’ two defamatory letters written in 2003 calling Mr. Schied a liar and convict. Mr. Schied had submitted a second sworn and notarized Affidavit from the same third-party “*witness*” showing that in 2009 David Bolitho was also continuing his retaliatory dissemination of the nonpublic Texas clemency “*Order of Expunction*” to the public under response to any incoming FOIA request.
- d) Evidence demonstrates that though Judge Bandstra was actually the one to sign the Order dismissing Mr. Schied’s three motions, Judge Owens took equal share

in those decisions. Owens, Bandstra, and Donofrio all denied Mr. Schied's "Motion to Hear Motions...Still Without Any Hearing" under claim that the supporting Affidavits showed "*no merit*" to Mr. Schied's criminal claim that crimes continued to be committed. In constructing their written denial, the judges followed an ongoing "pattern of omissions" when they failed to detail exactly what it was specifically in Mr. Schied's pleadings that they were denying for "*lack of merit*". Their "*incompetence*" and "*gross negligence*" in writing these types of decisions using "*misstatements*" and "*omissions*" of significant facts constitutes "*malfeasance of Duty*", "*perjury of Oath*" and the willingness to conduct "*legal acts in illegal manners*". Their refusal to formally recognize Mr. Schied's criminal allegations and supporting evidence constitutes "*misprision of felony*", "*aiding and abetting*", and a "*conspiracy to commit*" these crimes. These crimes prove the institutionalization of government corruption by violation of both State and Federal corruption and racketeering statutes.

- e) Evidence demonstrates that Owens knowingly and willingly conspired with fellow judges Bandstra and Donofrio to deny Mr. Schied his Constitutional rights to "*Due Process*" when refusing to read all his court pleadings. Similarly, they conspired to deny Mr. Schied his right to "*equal treatment and protection*" under the law and when refusing to "*adhere only to Constitutionally-compliant law and case law, and more particularly, the Bill of Rights when issuing their rulings*".
- f) The evidence demonstrates even further, that Owens, Bandstra, and Donofrio similarly violated all of Mr. Schied's Constitutional rights when they unnecessarily denied Mr. Schied "*Claim and Exercise of Constitutional Rights, and Requiring the Presiding Judges to Rule...for All Public Officers (of their Court of Appeals)...to Uphold (those Constitutional) Rights*".
- g) The evidence shows that just a week after conspiring to criminally deny Mr. Schied all of the aforementioned Constitutional rights, these very same three Michigan Court of Appeals judges then dismissed Mr. Schied's criminal RICO case that had been pending for the previous year (i.e., the one dismissed by Ingham County judge William Collette without hearing on the three motions). Following the "*same pattern of omissions and misstatements*" making their "*conspiracy to deprive of rights*" self-evident, the judges based their dismissal of Mr. Schied's case on only the criteria described below.
- h) The evidence shows that as it regarded Mr. Schied's allegation that Judge Collette committed "*misconduct*" when refusing to disqualify himself without hearing on the motions these three Court of Appeals judges reasoned that "the issue was not properly before them because of Mr. Schied's "*failure to file an affidavit in support of his motion*" under MCR 2.003(C)(2). Without regard for the fact that judges are required by law to provide more latitude and flexibility toward "pro se" litigants and citizens presenting cases in their courts without an attorney, these judges went on to also claim that the public claim by the judge from the bench of having a lifelong friendship with one of the criminal defendants in the case presented by Mr. Schied "*does not alone demonstrate a probability of bias*" or that that this judge would have more than a "*de minimus*" interest in the outcome of his own ruling (to dismiss that case without hearing on a motion for a new

judge and switch from a “civil” to a “criminal” court as the proper venue for hearing the matter).

- i) The evidence shows that in a simple but broad denial of all of the rest of the criminal allegations contained in the 404-page complaint (simplified by Mr. Schied’s submission of those allegations in the form of a “More Definite Statement” in the lower court) and evidence, these three Michigan judges Owens, Bandstra, and Donofrio dismissed everything else Mr. Schied had filed stating, “*Plaintiff’s complaint and subsequent more definite statement contained many broad and diffuse criminal allegations that were not properly before the circuit court*”.
- j) The evidence shows that without specifically addressing the criminal allegations, the plethora of laws or the evidence referenced by the complaint against each of these above-named government co-defendants, including the Michigan attorney general, the Governor, and four of their fellow judges on the bench of the Michigan Court of Appeals, Owens, Bandstra, and Donofria held simply, “*We see no error in the dismissal of plaintiff’s complaint...(as the complaint itself)... was not discernibly supported by a reasonable application of law and fact.*”
- k) The evidence shows that in light of Mr. Schied having spent literally months in full-time effort drafting a well-written and precise 404-page Complaint with references to 188 documents of itemized evidence, Owens, Bandstra, and Donofria only added in their case dismissal, “*Despite its volume, plaintiff’s complaint did not provide notice to the government defendants on the claims against they were supposed to defend*”.
- l) The evidence shows that despite the “*gross negligent*” failure of their fellow Court of Appeals judges to “litigate” the criminal issues involved in Mr. Schied’s case in 2006, these Court of Appeals judges in 2009 denied Mr. Schied’s case under claim that “*Plaintiff also raises several issues that reargue matters previously before this Court in Schied v. Lincoln Consolidated Schools (Court of Appeals No. 267023)... We have not jurisdiction to review issues arising from a separate but related case*”.
- m) The evidence shows that while acknowledging that the lower court’s dismissal of Mr. Schied criminal racketeering case “*is the harshest sanction that the court may impose on a plaintiff*”, they yet reaffirmed the lower court dismissal while holding their fellow judge, William Collette, in high esteem for having dismissed the case without having otherwise imposed “*appropriate sanctions*” upon Mr. Schied “*to prevent (further) abuses and administer the orderly operation of justice*”.
- n) **The evidence and statements depicted above prove beyond any reasonable doubt that judge Owens acted together with judges Bandstra and Donofrio to intentionally carry out a “gross miscarriage of justice”. Their joint ruling goes well beyond “bad decision-making” to prove a “pattern of judicial misconduct”, and aiding and abetting in a criminal conspiracy to strip away all of Mr. Schied’s rights as a sovereign United States and Michigan citizen, even as such rights are generally stated in the U.S. Constitution, Federal criminal and civil statutes and case law, Texas and Michigan state criminal and civil statutes and case law, and as these rights are more specifically applied to Mr. Schied’s particular case by the former governor of Texas,**

Mark White, in the “*full pardon and restoration of full civil rights*” document that he officially signed for Mr. Schied in 1983.

- o) Evidence demonstrates that Owen’s, Bandstra’s, and Donofrio’s joint responses to Mr. Schied’s crime reports also constitutes a “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”.

\* 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 o” 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 o” above as incorporated here by reference as if written herein verbatim.

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

- a) Evidence shows that in 2006, David Schied hand-delivered a large package of detailed information and evidence in the form of a Complaint to the secretary of his office, informing him about all of the crimes that had been committed against him by the officials of TWO school districts since the dismissal of his civil case against Sandra Harris and the Lincoln Consolidated Schools by the Michigan Court of Appeals. The Complaint included details on how multiple Michigan judges had rejected their respective duties to litigate clear conflicts of laws to cause a gross “miscarriage of justice”; and while placing their unjust ruling in an “unpublished” opinion so not to have to explain themselves in details but while yet knowing that the Westlaw and other publishers on the Internet would be publishing the information to the detriment of Mr. Schied’s reputation and career.
- b) The evidence of follow up letters shows that the secretary had reported back to Mr. Schied that she had shared the package of information with the attorneys employed by Carl Gromek and working on his behalf, that they had considered everything in that package and decided, along with Carl Gromek or on his behalf, that Gromek’s office would not provide any response whatsoever to the submission. Neither would they return the documents Mr. Schied provided to them.
- c) The evidence therefore shows that Gromek himself acted with Incompetence; negligence; and in Dereliction of duty. He abused his public trust; abuse of power and authority; acted in malfeasance of official duty; and committed perjury in acts under Oath; He participated along with others in a Conspiracy to retaliation and harass a witness, victim, or informant by providing various “*protections*” and

“cover” to criminal offenders; He “*aided and abetted*” in the commission of a crime; and participated in a conspiracy to commit an offense or legal acts in illegal manners; misprision of felony; Seditious conspiracy; he and his representative attorneys perpetuated a “*continuing pattern*” of corruption and racketeering;

### **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) Evidence shows that in 2007, Charles was in charge of an FBI investigation initiated by David Schied, which was prompted by the directive of U.S. Attorney Stephen J. Murphy before he became a U.S. District Court judge for the Eastern District of Michigan, Southern Division. The evidence shows that despite being provided with clarifying allegations and the availability of supporting evidence of government corruption occurring in Michigan, Charles acted with the **same pattern** of incompetence, gross negligence, and outright defiance in spite of Mr. Schied’s protests about Charles’ refusal to do anything about these crimes.
- b) Evidence also demonstrates that in 2008 when questioned a second and a third time by U.S. Attorney Terrence Berg and FBI “*agents in charge*” about his refusal to complete his investigation in 2007, Charles justified his denial of Mr. Schied’s case based upon fraudulent information he claimed to have been provided to him from other FBI agents employed by the U.S. Department of Justice in Washington, D.C. and/or Virginia.
- c) Evidence demonstrates that Charles’ refused to provide Mr. Schied with any sort of written response that might document the manner in which Charles mishandled this case. Mr. Schied however, documented the details of two extensive conversations with Rod Charles depicting the number of ways in which he sought to “abuse his authority” and to “disrespect” and “retaliate” against the alleged crime victim for making a report about “public corruption” by high-ranking Michigan government officials. Charles’ illegitimate responses to Mr. Schied’s crime report constitutes a “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”. His “*incompetence*”, “*gross negligence*”, “*perjury of Oath*”, and “*malfeasance of official duty*”, adds to the PATTERN OF GOVERNMENT RACKETEERING AND CORRUPTION already demonstrated by his government co-conspirators.

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

- a) Evidence shows that in 2008, Kennedy acted in his own individual capacity and on behalf of his supervisor, Andrew Arena, when “*investigating*” Mr. Schied’s written complaint to Andrew Arena about Rod Charles’ refusal to investigate Mr. Schied’s



crime reports in 2007 and about other fraudulent information Charles had provided to Terrence Berg earlier in 2008 regarding that botched investigation. The evidence shows that Kennedy disregarded the evidence available from David Schied and instead concluded his “*investigation*” into the matter by taking the statements of other FBI officials at face value and without reliable support documents.

- b) The evidence provided by Mr. Schied when filing his criminal RICO case with the U.S. District Court later in 2008 shows that Kennedy’s response to Mr. Schied’s crime report constitutes a “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”. His “*incompetence*”, “*gross negligence*”, “*perjury of Oath*”, and “*malfeasance of official duty*”, adds to the PATTERN OF GOVERNMENT RACKETEERING AND CORRUPTION already demonstrated by his government co-conspirators.

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

- a) Evidence shows that in 2008, Mr. Schied telephoned Andrew Arena requesting an investigation into the incompetent and negligent actions of Arena’s subordinate FBI agent Rod Charles in 2007. Arena instructed his “*assistant*” Walt Kennedy to the task of “*investigating*” Mr. Schied’s report that Rod Charles had refused to properly investigate Mr. Schied’s crime reports in 2007, and that Agent Charles had provided other fraudulent information U.S. Attorney Terrence Berg earlier in 2008 about that botched investigation. The evidence shows that despite Mr. Schied having followed up with a formal written letter of complaint about Kennedy, and about the information that Kennedy was using to once again dismiss Mr. Schied’s allegations of wrongdoing by the FBI, Andrew Arena simply ignored Mr. Schied while taking the statements of Kennedy and other FBI officials at face value and without reliable support documents to dispute the accuracy of Mr. Schied’s claims.
- b) The evidence also shows that despite Mr. Schied having submitted a request for records to Andrew Arena under authority of the Freedom of Information Act, Andrew Arena did nothing with that FOIA request until well after Mr. Schied had named Andrew Arena and his co-conspirators in the FBI as criminal co-defendants in a RICO criminal complaint filed later in 2008 with the U.S. District Court for the Eastern District of Michigan.
- c) Evidence demonstrates that despite violating Mr. Schied’s rights under the Freedom of Information Act, Andrew Arena responses to Mr. Schied’s oral and written crime reports constitute a “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”. His “*incompetence*”, “*gross negligence*”, “*perjury of Oath*”, and “*malfeasance of official duty*”, adds to the PATTERN OF GOVERNMENT RACKETEERING AND CORRUPTION already demonstrated by his government co-conspirators.

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

- a) Evidence shows that in 2008, Mr. Schied telephoned and emailed Terrence Berg and other members of his staff requesting an investigation into the incompetent and negligent actions of former U.S. Attorney Stephen J. Murphy and FBI agent Rod

- Charles in 2007. Mr. Schied had also included with that complaint about those and other USDOJ employees, additional complaints about three Federal judges employed by the U.S. Court of Appeals for the Sixth Circuit who had refused to provide Mr. Schied with criminal relief in response to his having filed a case with that Court for a “*Writ of Mandamus*” and an accompanying “*Demand for an Investigation by a Federal Grand Jury*”. The evidence shows that Berg disregarded the evidence provided to him by email attachments and by Mr. Schied’s claim of having other supporting documents. Instead, Berg conducted his own “fraudulent” investigation of Mr. Schied’s claims and concluded his inquiry by taking the statements of other FBI officials at face value and without reliable support documents.
- b) The evidence provided by Mr. Schied when filing his criminal RICO case with the U.S. District Court later in 2008 shows that Berg’s response to Mr. Schied’s crime report constitutes a “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”. His “*incompetence*”, “*gross negligence*”, “*perjury of Oath*”, and “*malfeasance of official duty*”, adds to and reaffirms a broad but consistent PATTERN OF GOVERNMENT RACKETEERING AND CORRUPTION in the State of Michigan.

**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) Evidence shows that in 2007, Mr. Schied filed a crime report with Murphy when he was operating as the U.S. Attorney for the Eastern District of Michigan, Southern Division. That crime report held that Mr. Schied had long been a victim of State government corruption and a “*chain pattern*” of felony “*cover ups*” of misdemeanor crimes initially committed in violation of his right to privacy by the administrators of the Lincoln and Northville public school districts. The evidence shows that Murphy disregarded Mr. Schied’s references to evidence he had available and ready to share with Murphy to support his claims. Instead, simply refused to do anything about Mr. Schied’s request for criminal relief, and while stating that it was FBI’s job to investigate such claims about government corruption and to report those findings to the U.S. Attorney if they found Mr. Schied’s complaints valid. Murphy also followed the “*pattern of recommendations*” issued by Mike Cox and others employed by the Michigan Attorney General recommending that Mr. Schied go through the time and expense of hiring a civil attorney to do the job of a prosecuting attorney by bringing these criminal charges in front of a judge for formal ruling(s).
- b) The evidence provided by Mr. Schied when filing his criminal RICO case with the U.S. District Court later in 2008 shows that Murphy’s response to Mr. Schied’s crime report constitutes a “*misprision of felony*”, “*aiding and abetting*”, and a “*conspiracy to commit*” the crime of “*obstruction of justice*”. His “*incompetence*”, “*gross negligence*”, “*perjury of Oath*”, and “*malfeasance of official duty*”, adds to and reaffirms a broad but consistent PATTERN OF GOVERNMENT RACKETEERING AND CORRUPTION in the State of Michigan.

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

- a) Evidence shows that in 2008, Michigan attorney Daryle Salisbury filed a civil rights case with the U.S. District Court in Detroit that was assigned to and presided by judge Paul D. Borman. The case was filed on behalf of David Schied and it named the superintendents of the Lincoln Consolidated and Northville public school districts, as well as the Michigan Governor, and the Director of the Texas Department of Public Safety, as all taking part in the “*deprivation of (Mr. Schied’s) civil rights under color of law*”. At the very first hearing on a defendant “Motion to Dismiss”, Judge Borman granted that dismissal of the case and even held “sanctions” in abeyance against Mr. Schied’s attorney Mr. Salisbury.
- b) The evidence demonstrates that judge Paul Borman acted prejudicially in ruling – without supporting evidence – that my Schied’s “*criminal racketeering*” case filed in Ingham County against the Governor, the Attorney General, Michigan law enforcement, and against various Michigan judges, was “*the same*” as the two separate civil cases filed in Washtenaw County and Wayne County respectively in 2004 against Sandra Harris/Lincoln Consolidated Schools and in 2007 against Northville Public Schools. That evidence shows that Paul Borman acted with intentional *incompetence* and *gross negligence* when he dismissed Mr. Schied’s case while blindly upholding the *misleading* government co-defendants’ claims that Mr. Schied had “*pled guilty*”, “*was convicted*”, and had a history of “*forum shopping*” for the litigation of the “*same issues*” that had “*already been litigated*” in State court.
- c) Evidence shows that Judge Borman committed “*judicial misconduct*” when he issued a fraudulent “*Opinion and Order*” claiming that he had “*considered the entire record*” while ruling that the Michigan Court of Appeals “*had summarized the background facts of the instant (civil rights) case*” in 2006 when “*publishing*” their “*unpublished*” ruling in *Schied v. Sandra Harris and the Lincoln Consolidated Schools*. The evidence of the “*entire record*”, inclusive of the *Schied v. Northville Public Schools* case in 2007 and the *Schied v. Gov. Jennifer Granholm and the State of Michigan* in 2008, otherwise prove that Borman acted in “*malfeasance of his official Duty*” and in “*perjury of his sworn Oath*” when he dismissed the case under that claim.
- d) The evidence shows that there were only three things that were “*the same*” about these three very different State court cases. The **first** similarity was the fact that ALL of the judges in these three cases refused to “*litigate*” the criminal allegations and evidence presented to these courts by David Schied and his various attorneys. The **second** similarity was the fact that ALL of the judges provided “*governmental immunity*” to the government co-conspirators by issuance of their Order, and while using “*color of law*” to “*pick and choose*” what laws and governing court rules would lead to their conclusion to simply “*dismiss*” Mr. Schied’s pleadings, claims, and evidence. The **third** similarity between all these cases was that ALL of these judges issued “*official*” rulings that disregarded Mr. Schied’s Constitutional rights to “*full faith and credit*” and “*due process*”, and his Civil Rights to equal employment opportunity, to equal treatment under the law, and his rights to relief for himself and his family as crime victims; and while generating erroneous “*official*” documentation that the government co-defendants may use in future proceedings to both protect and

- justify themselves and continue using in their execution of further assaults upon Mr. Schied's good character and reputation.
- e) Evidence clearly shows that there were distinct differences between the "Lincoln" case, the "Northville" case, and the "State of Michigan" case. All three cases were filed in different counties. The "Lincoln" case was a "*wrongful termination*" and "*defamation*" case demanding compensatory damages and the reinstatement of employment. The "Northville" case was a report of criminal "*fraud*" and "*employment discrimination*" supporting a "*civil*" claim of "*defamation by false light*" at the hands of school district officials. That case simply asked for the judge to issue a civil "*injunction*" to prevent the government defendants from continuing their illegal activity. The "State of Michigan" case, though filed as a "*civil*" case, named both local and state law enforcement, numerous staff employed by the Michigan Attorney General and Governor, the high-ranking officials of the State Administrative Board, Michigan judges and the State Court Administrator, and employees of the Michigan Department of Civil Rights. This third case was a "*criminal*" case naming these government officials as working concertedly and in a "*conspiracy*" to commit felony crimes in cover-up of "*predicate*" misdemeanor crimes not "*litigated*" by the previous two "*civil*" court proceedings. This third case was filed as a "*criminal Racketeering and Corruption*" case. That case was filed with 188 articles of Evidence, along with a "Writ of Mandamus" and a request for the Court to take "Superintending Control" over State government officials; and to Order law enforcement to their duties to enforce the civil and criminal laws of the State and Federal government. That case was also filed with a request that the Ingham County judge provide an Order, based upon Mr. Schied sworn Complaint as sufficient "*probable cause*" for that judge to issue such an Order, for the investigation of these reported government crimes by a "Grand Jury" or a "Special Master".
- f) The evidence in Michigan court records ignored by Judge Borman demonstrated that at issue in the "Lincoln" case was whether or not Mr. Schied had the right to check a box on an employment application in 2003 indicating that he had never been convicted or pled guilty to a felony offense, a quarter-century after receiving "*probation*" and a suspended sentence, a "*withdrawal of plea*", a "*dismissal of indictment*", a "*set aside of judgment*", and a governor's full pardon and restoration of full civil rights for a single teenage offense in 1977. The Court of Appeals ruling in that case determined that because Mr. Schied did not "*expunge*" what was to be remaining of his "*arrest*" record until 2004 (though this action was taken by Mr. Schied to "*challenge and correct*" an erroneous FBI report sent to Sandra Harris at the Lincoln district), he had been "*misrepresenting*" the status of his "*conviction*" on his employment application and that Harris was therefore entitled by contract to terminate Mr. Schied's teaching contract and to publicly disseminate letters to Mr. Schied's coworkers and supervisors calling Mr. Schied a "*liar*" and a "*convict*".
- g) The evidence in Michigan court record ignored by Judge Borman shows that the issue in the "Northville" case was the fraudulent employment agreement proffered by Katy Parker promising to maintain confidentiality over Mr. Schied's "*clemency*" documents while Mr. Schied executed his statutory right to challenge the FBI reports being disseminated to the Lincoln and Northville public school districts. Connected to that issue was the fact that despite having received two honorary letters of

- employment recommendation from two principals at that school district, Katy Parker turned around and placed Mr. Schied's "*nonpublic*" Texas court "*Order of Expunction*" into the district's "*public*" personnel file while leaving out of that file those two honorary letters. Furthering these issues was the fact that David Bolitho and Leonard Rezmierski were disseminating these documents to new employers and to the public under FOIA request – without the two letters of recommendation – in a retaliatory attempt to portray Mr. Schied to the public in a "*false light*", and because Mr. Schied had been pursuing civil and criminal proceedings against another member (Sandra Harris) of their "*peer group*" of senior school district administrators.
- h) The evidence in Michigan court record ignored by Judge Borman shows that at issue was the fact that with each new level of Mr. Schied's filing of requests for a "*redress of grievances*" on his criminal claims, he was instead dealt back "*further injuries*" by those working in, for, and on behalf of Michigan state government. Included with that negligent disregard for the Constitutional and civil rights of Mr. Schied was the disregard for the civil rights of his elementary school-aged child, who was being repeatedly suspended by Northville school principal Scott Snyder while being supported by senior administrators of the Northville Public Schools acting under "*color of law*" to prevent that school administrator from being held accountable for his retaliatory actions against Mr. Schied through this innocent child. Judge Borman nevertheless claimed that he "considered the entire record" while referencing these other cases and prejudicially siding with the government co-defendants in concluding that because all of these cases were "*the same*" that "*res judicata*" and "*collateral estoppel*" therefore should be applied in his judgment.
- i) Evidence demonstrates that "having considered the entire record" Judge Borman was adequately informed that both criminal *misdemeanors* and *felony* offenses had taken place under authority of the defendants in this case. He is therefore guilty of "*misprision of felony*", "*aiding and abetting*", and a "*conspiracy to commit*" the crime of "*obstruction of justice*". His "*incompetence*", "*gross negligence*", "*perjury of Oath*", and "*malfesance of official duty*", only added to the "*out of control*" and "*runaway*" PATTERN OF GOVERNMENT RACKETEERING AND CORRUPTION taking place in Michigan.

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

- a) Evidence shows that near the end of November 2008, Mr. Schied presented Judge Zatkoff with a combined "*Complaint and Brief in Support of Complaint of Criminal Misconduct, Conspiracy, Fraud, Racketeering and Corruption*". Constructed within that Complaint was a "*Request for Injunctive Relief by 'Writ of Mandamus' and a 'Motion for Order for Criminal Grand Jury Investigation'*". That Complaint was written thoroughly and constructed in compliance with Federal Court Rules. It was also submitted along with a separate "*Appendix of Referenced Exhibits in Support of Plaintiff's Complaint...*" itemizing and summarizing each of the eighty (80) documents of evidence depicting the crimes against the individuals either formerly or currently employed by the U.S. Department of Justice (STEPHEN J. MURPHY, TERRENCE BERG, ROD CHARLES, ANDREW ARENA, MARGARET COLGATE LOVE, MICHAEL MUKASEY, MARIE A. O'ROURKE,

- SHANETTA Y. CUTLAR, and JEROME PENDER), as well as three Sixth Circuit Court of Appeal Judges (MARTHA CRAID DAUGHTREY, DAVID WILLIAM McKEAGUE, GREGORY F. VAN TATENHOVE) and the defendants named in Texas law enforcement and the Judiciary (THOMAS A. DAVIS, JR., GREG ABBOTT, SCOTT M. GRAYDON, and other “DOES”). The Complaint additionally named the Texas Attorney General, the Director of the Texas Department of Public Safety, and others employed by the Texas judiciary and Texas law enforcement. It also issued a “Demand for Jury”. **Evidence also shows that rather than address the content of the Complaint, and rather than to provide any form of criminal relief to Mr. Schied and his family by convening a federal Grand Jury to review the allegations and the itemized Evidence submitted to his court, Judge Lawrence Zatkoff simply dismissed all of the documents Mr. Schied submitted to the court and ordered him to rewrite his criminal complaint.**
- b) Evidence shows that after filing his Complaint with the U.S. District Court as a “*pro se*” and “*forma pauperis*” litigant, Mr. Schied called the court Clerk in mid-December to inquire whether or not the Court had sent out the “Summons” that they collected for all of the co-defendants pending the court’s approval of the application for waiver of fees on filing these documents. At the time of his call in mid-December, the Court clerk informed Mr. Schied that the reason why Judge Zatkoff had not made any decision regarding the “*forma pauperis*” application in waiver of court costs was because the Judge was considering “*disqualifying*” and “*withdrawing*” himself from this case. A possible reason for this was not stated, however it might have had something to do with the fact that shortly before Mr. Schied filed this Complaint naming STEPHEN J. MURPHY individually and in his official capacity as a U.S. Attorney, Stephen J. Murphy had become a U.S. District Court judge on the same bench as Judge Lawrence Zatkoff.
- c) Evidence shows that a couple of weeks later, Mr. Schied called a second time and left a phone message over the holiday season expressing his concern that the longer the Court waited to send out those “*summons*” the more the case might be **prejudiced** by the Court giving the government co-defendants the opportunity to claim that “*officially*” the calendar of days governing their response due date might be extended because they had not been “*served*” for over a month after receiving a copy of the Complaint. The evidence shows that it was right after Mr. Schied left that message that Judge Zatkoff dismissed all of Mr. Schied’s documentation and Ordered him to rewrite everything, using “color of law” (Fed. R. Civ. P.8) as his means of denying Mr. Schied his right to have his complaint “*heard*” by any kind of jury. Evidence shows that ultimately, even after Mr. Schied followed the judge’s order and rewrote his Complaint, Judge Zatkoff dismissed it anyway WITH PREJUDICE under claim that Mr. Schied was vexatious and filing a “*frivolous*” complaint. **Evidence also shows that such dismissal of the entire case was prejudicially provided by this federal judge fully four months after the initial filing of this case, and without the defendants having filed any documents with the Court other than one or two attorney “Notices of Appearance”.**
- d) Evidence shows that because of the undue burden placed upon him to rewrite his 194-page Complaint about these large number of federal government officials, and because of the high cost of having to re-copy and mail 80 sets of documents to all of

these government officials again, Mr. Schied rewrote his Complaint with reference to the documents of Evidence already itemized, summarized, and in the possession of each of the co-Defendants. Evidence shows that Mr. Schied also submitted his rewrite of the original Complaint in January 2009 along with a “Motion for the Judge to Disqualify Himself”. That “*motion*” was based upon the statements made by this judge’s court Clerk in mid-December and the clearly “*prejudicial*” decisions of Zatkoff of first stalling the case then requiring Mr. Schied to rewrite and re-submit his criminal racketeering and corruption complaint despite his being a “*pro se*”, a “*forma pauperis*” litigant, and a reported “*crime victim*”. **That evidence shows that to undermine the potency of Mr. Schied’s written submissions to the Court, Judge Zatkoff issued a second Order in February 2009 which “struck” from the official public record all references to Mr. Schied’s “Motion for the Judge to Disqualify Himself”. By that same Order, Zatkoff also had “stricken” from the “official” record all paragraphs in Mr. Schied’s rewritten Complaint that contained references to the “original” Complaint and/or the Evidence documents (already in possession of the co-defendants) which otherwise supported the factual statements Mr. Schied had restated in the rewritten Complaint.**

- e) Evidence shows that while Mr. Schied had been in complaint that a year and a half earlier Stephen J. Murphy had the power to order a grand jury investigation himself rather than to send Mr. Schied on his own to the FBI and to direct him to hire an attorney and take his criminal complaints to the U.S. District Court, Mr. Schied had also pointed out in both his “*original*” and his “*rewritten*” (“*Amended*”) complaint that former U.S. Attorney Murphy also had the “*duty*” to provide Mr. Schied with criminal relief a year and a half prior to Mr. Schied filing this Complaint with the Court as Murphy had suggested. **The evidence also demonstrates that in rewriting his Complaint, Mr. Schied cited federal statutes informing Judge Zatkoff also of his “*duty*” under sworn Oath to take action upon a signed criminal complaint about felony offenses occurring to undermine not only Mr. Schied’s civil and Constitutional rights, but the rights of any U.S. citizen to be criminally protected by the proper involvement of the People themselves through the grand jury process. Mr. Schied reminded Judge Zatkoff of this duty by reminding him that the failure to do anything about these crimes not only constitutes a “misfeasance of felony” but also “interference in grand jury proceedings”.** Nevertheless, the evidence shows that Zatkoff again used “*color of law*” to deprive Mr. Schied his right to have these crimes reported to the Special Grand Jury (and to deprive the Special Grand Jury of their “duty” to inquire and “*find out*” about such government crimes). He stated simply in his February ruling that, “*Federal criminal proceedings...rest solely on the authority and discretion of the United States Attorney and federal grand juries...This Court, as a federal district court, has no authority or power to order that a criminal complaint be filed by the United States Attorney...It is well-established that a private individual may not file a criminal complaint in a United States District Court...In the interest of justice... (therefore)... because the Court lacks the authority or power to order a criminal grand jury investigation, the Court DENIES Plaintiff’s ‘Motion for Order for Criminal Grand Jury Investigation....’*”. Clearly, this ruling is evidence that Judge Zatkoff was playing a “*game of finger-pointing*” with former U.S. Attorney Murphy (who now is a U.S.

- District Court judge sharing the same bench with Zatkoff), while sending Mr. Schied hopelessly right back to the same place where he started a year and a half earlier with the new U.S. Attorney Terrence Berg and the others that Mr. Schied had already named in this Complaint as being employed by the U.S. Department of ‘Justice’.
- f) Evidence shows that while rewriting and re-submitting his “Amended Complaint” in January along with a “Motion for the Judge to Disqualify Himself” and “Motion for Order for Criminal Grand Jury Investigation”, which were both DENIED by Judge Zatkoff, Mr. Schied had also in January filed two other “motions” of “Claim” and “Demand” of his Constitutional Rights, which Judge Zatkoff also DENIED.
- g) The evidence demonstrates that the first of those two other motions was a “Motion to Demand This Court Read All Pleadings Plaintiff Files With This Court, And To Adhere Only to Constitutionally Compliant Law and Case Law, and More Particularly, the Bill of Rights in Its Rulings”. Judge Zatkoff denied this motion by claiming, “*The Court, in carrying out its functions, always reviews (not “reads” as the motion specified) all of the materials... Further, the Court applies only constitutionally-compliant law to each and every matter before it... Therefore, because the Court already performs the tasks Plaintiff demands, Plaintiff’s motion is DENIED AS MOOT”.*
- h) The evidence demonstrates that the second of these motions was a “Motion to Claim and Exercise Constitutional Rights, and Require the Presiding Judge To Rule Upon This Motion For All Public Officers Of This Court To Uphold Said Rights”. Judge Zatkoff denied this motion by claiming, “*Plaintiff seeks, among other things, an order for the Court to abide by its oaths, to provide due process of law, to provide equal protection, to respect, to protect, and uphold Plaintiff’s rights, and to acknowledge the Constitution of the United States of America as the Supreme Law of this Court... Once again, because the Court already performs the tasks Plaintiff demands, Plaintiff’s motion is DENIED AS MOOT”.*
- i) The evidence shows that in March 2009, Lawrence Zatkoff dismissed Mr. Schied’s entire “Amended Complaint” WITH PREJUDICE, precluding his ability to procedurally exercise right to his “Claim of Appeal” to the U.S. Court of Appeals for the Sixth Circuit. In his ruling, Zatkoff based the dismissal upon his claim that Mr. Schied’s amended complaint was “*frivolous... (and)... fails to state a ground upon which relief may be granted... (and)... seeks relief from immune parties*”. Such evidence, particularly the claim that Mr. Schied “*failed to state a ground upon which relief may be granted*”, demonstrates that Lawrence Zatkoff is intentionally and willingly a participant in the “cover up” of the reported crimes of his other government co-defendants. This evidence also demonstrates his following the same criminal “PATTERN” of issuing decisions based upon significant “*omissions and misstatements of fact*”; and while generating additional “fraudulent” official documents for the criminal co-defendants to rely upon in justifying even further crimes against Mr. Schied and his family.
- j) The evidence of these public U.S. District Court records, including Zatkoff’s own written “Judgment” in dismissal of Mr. Schied’s entire case, demonstrates Zatkoff’s own “*judicial misconduct*” and his “*obstruction of justice*” in terminating these criminal allegations without affording the criminally “ACCUSED” their Constitutional right to defend themselves against these allegations. The fact is that



- throughout these four months of proceedings, Mr. Schied received NOTHING of an “AFFIRMATIVE DEFENSE” from any of these government co-defendants in response to these criminal allegations that NONE DID THEIR JOB and NONE HONORED THEIR SWORN OATH to uphold Mr. Schied’s rights under the Constitution.
- k) The evidence therefore shows that Lawrence Zatkoff not only deprived Mr. Schied his federal Victims’ Rights to criminal relief (i.e. these are rights that Mr. Schied took an active role in getting legislated during his previous career as a crime prevention expert and victims’ rights advocate). Lawrence Zatkoff also deprived Mr. Schied “*due process of law*” and the right to a “*trial by jury*” for the “Accused” government co-defendants, and while fraudulently using “*color of law*” to mischaracterize both Mr. Schied and his substance of his case; and he did so by means of fraudulently establishing some sort of ridiculous “PRECEDENCE” in the form of a public record that sets forth his “*official*” claim that government officials somehow have “*immunity*” from criminal prosecution by a U.S. District Court. Such undermining of our United States Constitution and other laws governing the People of the United States is an prosecutable act itself of “TREASON”.
- l) The evidence shows that in “*officially*” presenting a “Background” to Mr. Schied’s complaint, Lawrence followed the “pattern” of his other criminal co-defendants by the fraudulent claim, “*The present matter originates from Plaintiff’s plea of guilty...in Texas in 1977*”. Clearly, this statement continues to address Mr. Schied’s continual attempt to get a “*redress of (criminal) grievances*” by only continuing in return to “*injure*” Mr. Schied. Judge Lawrence Zatkoff’s “*answer*” to Mr. Schied’s complaint shows his own part in the co-defendants having continually re-punished him for an offense that occurred three decades prior, for which Mr. Schied had long before “*resolved*” through an “*early termination of probation*”, a “*withdrawal of plea*”, a “*dismissal of indictment*”, a “*governor’s full pardon of the underlying intent*”, and even had what should have been all other references to even the “*arrest*” record “*obliterated*” through a court “Order of Expunction”. The evidence of all of these clemency documents, obtained a quarter-century prior to Mr. Schied having even moved to Michigan shows that this judge Lawrence Zatkoff is using Mr. Schied’s court case as the platform for further “*defaming*” and subjecting him to “Double Jeopardy” by “*prejudicing*” the views of any reader of this “*official*” ruling.
- m) The evidence behind Mr. Schied’s criminal allegations, on the other hand, demonstrate that **Zatkoff’s statements constitute “Fraud Upon the Court” since clearly the “*background*” to this case actually starts with the Michigan school district administrators committing criminal misdemeanors by denying Mr. Schied his statutory right to “*challenge and correct*” erroneous FBI criminal history documents. The more “*truthful*” background to this case is brought forth by these Michigan school district administrators next using the “*proof*” of those federal documents being inaccurate and in need of “*correcting*” (i.e., Mr. Schied’s clemency documents) as the means, as well as the illicit justification, for their committing more recent crimes. Clearly, the evidence of Lawrence Zatkoff’s written “*background*” for this case shows that his misdirecting focus is intentionally designed to also contribute to the long line of “felony” crimes committed by Michigan law enforcement and the named U.S. Department of**

Justice employees who, by **evidence of their own *incompetent, gross negligent, and malfeasant* actions prove their participation in a “*conspiracy to commit*” the crime of “*covering up*” not only the *incompetence, gross negligence and malfeasance* of Texas government officials actions from long ago, but also these more recent government offenses that continue to occur in a “*treasonous*” pattern of succession.**

- n) The evidence shows that Zatkoff also continues to rely upon these corrupt Michigan judges for an interpretation of Texas laws rather than to even read, much less acknowledge and give credence to Mr. Schied’s extensive research into Texas clemency laws, which Mr. Schied had detailed to great extent in the “*original*” Complaint dismissed by judge Lawrence Zatkoff. Rather than review these previous Michigan court rulings in the “*context*” of the above criminal allegations that were otherwise clearly delineated in *both* Mr. Schied’s “*original*” complaint and the “*amended*” compliant to the U.S. District Court, Judge Zatkoff simply ruled, “*Plaintiff has alleged deprivation of certain constitutional rights (and) he has done so ‘vaguely’ and conclusively (while) relying on his belief that the Michigan courts erroneously interpreted Texas law.... (He) continues to maintain that the set aside and pardon (Mr. Schied) received with respect to his 1977 ‘conviction’ erased that conviction’s existence...The Michigan courts however have determined otherwise....*”
- o) The evidence of Zatkoff’s ruling demonstrates that rather than to address any of the specific allegations, laws, or evidence provided by Mr. Schied, **Zatkoff instead relied upon the “*fraudulent*” arguments and documentation generated by the other criminal co-defendants named in this instant Michigan Supreme Court case.** For instance, Lawrence Zatkoff refers to the erroneous 2003 FBI report received by Sandra Harris at the Lincoln Consolidated Schools while claiming that the Michigan Court of Appeals had “*rejected (Mr. Schied’s) appeal on the merits*”; and while holding that the “*resolve*” of Mr. Schied’s single teenage offense in 1977 through an “*early termination of probation*”, a “*withdrawal of plea*”, and a “*dismissal of indictment*”, all in 1979, and a Texas “*governor’s full pardon of the underlying intent*” in 1983 followed by a quarter-century of civic contribution as a self-defense expert and victims’ rights advocate (both omitted in mention by Zatkoff along with focus on the symbiotic meaning of these clemency documents) “*did not (somehow) erase the existence of Mr. Schied’s ‘conviction’ to such extent that he could truthfully deny it on a 2003 teacher job application*” after moving his family to Michigan. Instead, Zatkoff found more significance in the fact that “*the Michigan Supreme Court denied Plaintiff’s application for leave to appeal on November 29, 2006*” in that *Schied v. Harris and Lincoln Consolidated Schools* case. Yet he simultaneously “*omitted*” any reference to Mr. Schied’s longstanding claim that the judges of both the Michigan Court of Appeals and the Michigan Supreme Court had all disregarded their responsibilities in 2006.... to “*litigate*” the clear “*conflict of laws*” presented by Sandra Harris having placed the “*nonpublic*” 2003 FBI report into “*public*” personnel files along with Mr. Schied’s “*clemency*” documents and criminally violating both State and Federal public policies by **publicly disseminating all of those “*nonpublic*” documents under the Freedom of Information Act along with her two malicious letters of defamation calling Mr. Schied a “*liar*” and a “*convict*”.** Mr. Schied had been insisting Harris had done all of

- this in criminal *retaliation* for Mr. Schied having initially challenged Harris' absolute authority as the "interim" district superintendent, because all of this occurred right after Mr. Schied had filed a grievance with his local "union" about Harris having wrongfully placing Mr. Schied at the bottom of the school district's salary scale at his time of hire earlier in 2003 despite his two prior years of full-time teaching experience.
- p) The evidence of Judge Zatkoff's own "Judgment Order" shows yet another instant where Zatkoff, cited the "release document" relied upon by co-defendants' David Bolitho, Katy Parker, and Leonard Rezmierski when defending their case in Schied v. Northville Public Schools. Here again, Zatkoff conveniently "omits" all reference to Mr. Schied's argument and evidence that the "release document" was signed based upon Katy Parker's fraudulent written assurances that the Northville Public Schools would NOT be placing Mr. Schied's "nonpublic" Texas court "Order of Expunction" into Mr. Schied's public personnel file but would, on the contrary, honor the Texas order "prohibiting" (**under criminal penalty**) the use and dissemination of this document proving that Mr. Schied had followed through with finally completing his challenge and correction of the erroneous FBI reports being disseminated to the Lincoln and Northville public school districts. For some reason, Lawrence Zatkoff failed to acknowledge in this newly generated "official" document EITHER that Mr. Schied had presented his U.S. District Court with allegations and available evidence showing that not only were the Northville Public School officials misusing and disseminating this "nonpublic" clemency document to other prospective employers of Mr. Schied, but that these school district officials were readily submitting these documents to anyone who merely requests a copy of Mr. Schied's public personnel file under FOIA request, which is otherwise a criminal offense under Michigan Set Aside Law, Texas government codes, and the federal Privacy Act of 1974 at a minimum of available laws on this type of matter.
- q) Furthering the evidence in this last example of judge Zatkoff "*misrepresenting*" the actual facts about the case in his official U.S. District Court ruling, is Zatkoff's claim that "*Pursuant to the release* (signed by Mr. Schied authorizing Northville Public Schools to submit information about any "*unprofessional conduct*" by Mr. Schied as a Michigan schoolteacher), *the Northville Public Schools system provided the Brighton School District with Plaintiff's employee personnel file which included documents referencing [REDACTED] 'conviction'*". What was misleading here what Judge Lawrence Zatkoff "*omitted*" in his account of these circumstances. He for some reason failed to mention that Mr. Schied's evidence shows "*release*" was sent to the Northville Public Schools requesting information about "*unprofessional conduct while under your employ*", and that Northville Public School officials responded using "*color of law*" to place Mr. Schied in a "*false light*" by sending the "nonpublic" Texas court "Order of Expunction" while checking the box on the letter indicating that indeed Mr. Schied had committed "*unprofessional conduct*" while under employ at the Northville Public School District. Additionally, Lawrence Zatkoff failed to report in his "*account*" of the factual background of this case, that the Northville Public School also had "*misrepresented*" this information to Mr. Schied's new employers at the Brighton Area Schools employer while failing to inform these Brighton employers that **Mr. Schied had otherwise earned two**

**honorary letters of recommendation from two Northville school principals during the year and a half that he was employed at the Northville Public Schools.**

- r) In evidence by Lawrence Zatkoff's written "Judgment" is yet another reference to erroneous documentation provided by the "official" judgment of Zatkoff's co-defendant, Ingham County Circuit Court judge William Collette. Clearly, Zatkoff rejected all of Mr. Schied's 80 documents of evidence and **chose to cite all of these judgments by these other State judges, while knowing all the while that in the Ingham County Circuit Court case Mr. Schied had named these very same State court judges as criminal co-defendants because of their own "pattern of omissions and misstatements" in these previous rulings that Zatkoff was citing and using to justify his own "judicial misconduct".**
- s) Evidence shows that when referring to William Collette's case in the Ingham County court Zatkoff ignored the "evidence" that Mr. Schied had actually complied with judge Collette's granting of the government defendants' motion in 2007 calling for Mr. Schied to have rewrite his 405-page, 180-exhibit RICO conspiracy and corruption Complaint as a "More Definite Statement". Though the docketing sheets for that case clearly show that Mr. Schied timely filed a rewrite of his criminal Complaint, again Demanding a Jury and submitting a request that the judge Order the convening of a Grand Jury, Zatkoff still made yet another fraudulent record of claim that "Plaintiff did not avail himself of the opportunity to file a complaint within the time period prescribed by the court". **He also clearly disregarded the fact that Collette dismissed that case without hearing on all the motions that Mr. Schied had paid out-of-pocket to have heard (i.e., "Motion for Judge to Disqualify Himself", "Motion for Change of Venue", etc.) days before co-defendant William Collette dismissed that case.**
- t) The evidence shows that Lawrence Zatkoff readily recognized that "Plaintiff construes the consistent negative responses from various governmental employees and bodies as a conspiracy to deny him rights". Yet he too jumped on the "bandwagon" when constructing a "multi-step approach" to dismissing Mr. Schied's "original" Complaint with over 80 documents of Evidence and "striking" all of Mr. Schied's references to that Complaint and evidence. First, Zatkoff forced Mr. Schied to simplify and rewrite his "amended" complain; and then he dismissed that Amended Complaint under claim that Mr. Schied's claims were "vague, conclusory, and frivolous" and "do not remotely give rise to any cause of action". Judge Zatkoff wrote, "[Plaintiff's] fails to allege his conspiracy and fraud claims with any particularly...[His] claims lack an arguable basis in law or fact..."
- u) The evidence shows that from the beginning, this judge Zatkoff "CONSTRUCTED" the manner in which he too would deny Mr. Schied his rights. The evidence is clear that he would dismiss this case against his government peers no matter what Mr. Schied had filed, and while using "color of law" as the means for depriving Mr. Schied of his Civil and Constitutional Rights. In his judgment, Zatkoff wrote, "[C]omplaints can be dismissed as frivolous only when the claim is based on an indisputably meritless legal theory, or where the complaint's factual contentions are clearly baseless...(Although) The Court has a duty to construe a pro se plaintiff's pleadings liberally....A complaint fails to state a claim where it lacks either direct or

*inferential allegations respecting all the material elements to sustain a recovery under some viable legal theory...although any ambiguities must be resolved in the plaintiff's favor the Court is not required to accept non-specific factual allegations and inferences or unwarranted legal conclusions...factual allegations must be enough to raise a right to relief beyond the speculative level and more than labels and conclusions...The Court may properly grant a motion to dismiss when no set of facts exists that would allow Plaintiff to recover...*" After spewing the above-referenced "rhetoric", judge Lawrence Zatkoff simply added, "Applying that framework to the present case, there are no facts or inferences therefrom to support a 'civil-conspiracy' claim."

- v) The evidence shows that as it regarded Mr. Schied's criminal allegations about U.S. Attorney/U.S. District Court judge Stephen J. Murphy, judge Lawrence Zatkoff recognized that "Plaintiff claims that (Murphy's) response and (his) refusal to institute criminal proceedings follow the 'same pattern' of responses by the 'conspiracy' complaint in that it was 'rhetorical' in nature and omitted any form of address of the criminal allegations". Yet **Zatkoff follows suit in imitating that very same behavior by refusing to address the individual allegations and documents of evidence when he otherwise has long known that he has that DUTY.** As a United States judge, Zatkoff knew that were he to be questioned about his performance on that duty, he would be required under the law to provide an "AFFIRMATIVE DEFENSE" showing that he did all that he could to properly expose and report Mr. Schied's criminal allegations and to properly provide Mr. Schied with "justice" and criminal relief.
- w) The evidence shows that judge Lawrence Zatkoff followed a clear "pattern of applying the laws out of context" when intentionally "constructing" the denial of Mr. Schied's Civil and Constitutional Rights. Like the other government officials before him, **he used "color of law" as his instrumental means and justification for publishing outright lies for his criminal co-conspirators to later rely on for "official" documentation, just as he relies on the fraudulent "official" documentation of his criminal co-conspirators.** Zatkoff claimed, "Plaintiff alleges that Murphy violated his rights, but he does so generally, without specifying any particular constitutional right...Plaintiff apparently suffered injury at the hands of Murphy because the latter 'allowed the innocent to continue to suffer from the alleged wrongdoings of the accused' ...Plaintiff has not suggested how Murphy could have possibly conspired with others to deprive him of his rights...[F]ailure to conduct a full and fair investigation and prosecution of an alleged crime does not state a claim unless there is a violation of another recognized constitutional right...42 U.S.C. § 1985(3) prohibits conspiracies to violate civil rights...To establish such a violation, Plaintiff must allege that both a conspiracy and an actual deprivation of rights took place...Plaintiff must prove an actual violation under 42 U.S.C. § 1983 to succeed on his 'civil'-conspiracy claim...**Plaintiff has not alleged a violation under 42 U.S.C. § 1983.**" Yet the evidence dismissed by Zatkoff himself demonstrates that in his "original" Complaint – the first one dismissed by Judge Lawrence Zatkoff – Mr. Schied had clearly depicted his civil rights claim by direct reference to his 42 U.S.C. § 1983 court case (on the bottom of page 25) with clear reference to evidence item #7 as also summarized on page 2 of Mr. Schied's "Appendix of

**Exhibits**” placed into Zatkoff’s possession from the very beginning of this case. That Civil Rights case is the one that Zatkoff’s “peer” judge, U.S. District Court judge Paul D. Borman dismissed in 2008. It is the one that still remains pending today in the Sixth Circuit Court of Appeals (**No. 08-1879**)

- x) The evidence shows that Lawrence Zatkoff’s “*rhetoric*”, like that of his government co-conspirators, took form by recognition of his duties as judge and by recognition of specific statutes under the law, but by simply implying without a supporting basis, that Mr. Schied’s allegations and evidence do not apply. For instance, Zatkoff defined “*Misprision of felony*” as that “*which penalizes the failure to report actual knowledge of a felony... (based on) four elements: (1) the principal committed and completed the felony alleged; (2) the defendant had full knowledge of that fact; (3) the defendant failed to notify authorities; (4) the defendant took steps to conceal the crime.*” Yet when it came to Mr. Schied’s allegations that U.S. Attorney Murphy had committed “*misprision of felony*”, judge Zatkoff insisted that, “*despite Plaintiff’s averments to the contrary, his complaint is not criminal in nature... To the extent that any of Plaintiff’s claims are premised on criminal liability, those claims must be dismissed because in American jurisprudence at least, a private citizen lacks a judicially cognizable interest in the prosecution or nonprosecution of another..*”
- y) The evidence shows that as it pertained to Mr. Schied having included other judges in his criminal Complaint, as well as a reminder this Zatkoff about his own “*duties*” as the judge, to act upon a criminal complaint and provide an Order for a criminal grand jury investigation of this government corruption, Zatkoff stated the following in “*side-step*” of these issues, “*Judicial immunity is not overcome by allegations of bad faith or malice... Incompetence... is not a cause of action recognized by law... The United States Attorney and federal grand juries have sole authority and discretion to initiate federal criminal proceedings... this Court has no authority to order the filing of a criminal complaint... The Court (otherwise) lacks personal jurisdiction over these Defendants... Therefore, this Court lacks jurisdiction over these claims and accordingly dismisses them... WITH PREJUDICE.*”
- z) The evidence shows that, as it regarded Mr. Schied’s allegations against FBI agents ROD CHARLES, ANDREW ARENA, JEROME PENDER, GRANT ASHLEY, and former or current USDOJ employees TERRENCE BERG, MARGARET LOVE, MELANIE TIDDLE, SHANETTA Y. CUTLAR, MARIE O’ROURKE, and MICHAEL MUKASEY, judge Lawrence Zatkoff implies that government officials should have no accountability for their actions, either individually or as collectively as those government actions relate to one another as in the context of Mr. Schied’s criminal RICO complaint. Zatkoff’s written judgment provided only more “*rhetoric*” and “*legalese*” as his reason to dismiss Mr. Schied’s criminal co-conspiracy charges on these individuals. He stated, “*Plaintiff contends that (co-defendants) ‘fraudulently misrepresented’ the factual background of his case and omitted various other details that Plaintiff thought were particularly relevant... Plaintiff is adamant that he is a federal crime victim, but this Court has been provided no evidence, not even a case number or name, that demonstrates that any criminal charges have been brought in a federal district court where Plaintiff is a victim... For the reasons set forth... (above) ... [the Counts]... must be dismissed for failure to state a claim upon which relief may be granted... [V]oluminous submissions of Plaintiff do not establish such a right (to*

*relief)...Access to a Grand Jury is not a right contemplated by 42 U.S.C. § 1983...Plaintiff's allegations had 'no nexus' for opening an investigation... [The government co-defendants'] conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known... The determination whether an official protected by qualified immunity may be 'held personally liable for an allegedly unlawful official action generally turns on the objective legal reasonableness' of the action, assessed in light of the legal rules that were 'clearly established' at the time it was taken...Allegations that the defendants' actions combined to injure the plaintiff are not a sufficient basis from which to imply a conspiracy..."*

## **OTHER "DOES"**

### **95. Other "*DOES*" yet formally unnamed by this "*Memorandum*" and "*Sworn Affidavit of Complaint*", pending further Discovery:**

- a) As shown by other available Evidence, **there are many others involved in this case including many unnamed Washtenaw County Commissioners and various Committee members.**
- b) As provided by other evidence, **State legislators also played a role in this gross "miscarriage of justice". Proof is available to show that from the end of 2003 through the middle of 2005 while the Schied v. Sandra Harris and the Lincoln Consolidated Schools case played out in the lower Michigan court concerning Harris' mishandling of the erroneous FBI report (and her violating CJIS board policy by terminating Mr. Schied from his employment and placing clemency documents and the FBI report itself into his public personnel file), the legislators of Michigan used the significant elements made available by that case (as they were introduced to the Michigan Department of Education through ongoing public court "*pleadings*") to institute at least twelve (12) legislative changes to Michigan's Revised School Codes, which were then (quietly and deceptively) applied retroactively against Mr. Schied by judges offering extra "*cover and protection*" to the school district officials of both the Lincoln and the Northville school district officials criminally denying Mr. Schied his rights to "*challenge and correct*" the erroneous information being disseminated by the State of Texas and the FBI.**
- c) **Evidence is available to show that while the American Civil Liberties Union (ACLU) had expressed a willingness to submit an "Amicus Brief" had the Michigan Supreme Court accepted for review the case of "Schied v. Sandra Harris and the Lincoln Consolidated Schools, et al" in 2006, after the Supreme Court denied that case the ACLU turned to "*discriminatory*" practices against David Schied by refusing to provide him with any other form of service to his "*civil rights*" complaints. In 2009, this became most pronounced when former attorney for the Detroit Public Schools school board, PAULA JOHNSON, contacted the ACLU on Mr. Schied's behalf while explaining his loss of employment and the retaliatory measures taken against Mr. Schied to subject him to degradation and "*peonage*" (i.e, employment termination) because of (erroneous) criminal history information uncovered by Michigan employers. During that phone conversation about Mr. Schied's circumstance, BRENDA BOVE, the ACLU intake coordinator, informed Paula Johnson that the ACLU was conducting research for legal**

representation on individuals in Mr. Schied's circumstance, and she asked Ms. Johnson to have Mr. Schied call the ACLU. Yet when Mr. Schied placed that call, **Brenda Bove stated that she recalled having previously denied Mr. Schied's case and she insisted that despite what she had stated to Paula Johnson about Mr. Schied otherwise qualifying, the ACLU would again be denying service or representation for Mr. Schied in this civil rights matter because he was not a person "of color".** She explained that the ACLU was attempting to construe these types of employer offenses as "race-based" and were restricting their research and consideration for representation to only individuals "of color" because they intended to file "*racial discrimination*" lawsuits against employers. When Mr. Schied called Paula Johnson back and explained that response, even she recognized this as a "discriminatory" practice and suggested Mr. Schied call back to request Brenda Bove place her statements in writing. Though when Mr. Schied called Brenda Bove back she stated that she would, she never did provide Mr. Schied with those discriminatory claims in the letter Mr. Schied requested.

- d) Other evidence is available to show that from 2004 through 2009 Mr. Schied had been constantly providing CONGRESSMAN THADDEUS McCOTTER and SENATOR BRUCE PATTERSON with virtually ALL of the details of what was going on with the Lincoln and Northville school districts repeatedly committing crimes, with the local law enforcement and prosecutors perjuring crime reports and abusing their discretion, with the State judges' refusal to properly interpret and apply the laws, and with the Attorney General and Governor doing nothing about all of this abuse of government authority and power. Yet neither McCotter nor Patterson did anything to significantly question, report, or to stop any of this. Their actions followed the same continuous pattern of conspiracy and corruption displayed by all the rest in allowing these crimes to continue and while "*aiding and abetting*" in the cover-up and protection of the criminal offenders.

Further the affiant sayeth not.

\_\_\_\_\_

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

Dated: \_\_\_\_\_

By: David Schied

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

\_\_\_\_\_  
Notary Public, \_\_\_\_\_ County, MI acting in \_\_\_\_\_ County Michigan.