DISTRICT COURT OF THE UNITED STATES [1]
(FOR THE EASTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION)

D avid Schied and Others Similarly Situated
Sui Juris Grievant and *Private Attorney General*
Sui Juris Grievant

Case No. 2:15-cv-11840

Judge: Avern Cohn

v.
Karen Khalil, et al
Defendants /

PRIVATE ATTORNEY GENERALS DAVID SCHIED'S AND CORNELL SQUIRES' "*RESPONSE*" AND "*OBJECTIONS*"

TO CO-DEFENDANTS "*MMRMA'S*" AND "*REDFORD'S*" RESPECTIVE "*OBJECTIONS*" AND "*RESPONSE*" TO GRIEVANTS' "*FIRST INTERROGATORIES*"

AND

GRIEVANTS' *WRIT* TO DISQUALIFY MMRMA AND "*REDFORD*" ATTORNEYS JAMES MELLON AND JEFFREY CLARK BASED UPON (RESPECTIVELY) "*FRAUD UPON THE COURT*" AND "*CONFLICT OF INTEREST*"

AND

REITERATING THE NAMING OF JAMES MELLON AS "*DEFENDANT DOE #1*" AND NOTICE OF NAMING JEFFREY CLARK AS "*DEFENDANT DOE #2*"

[1] "The term 'District Courts of the United States,' as used in the rules, without an addition expressing a wider connotation, has its historic significance. It describes the constitutional courts created under article 3 of the Constitution. Courts of the Territories are legislative courts, properly speaking, and are not District Courts of the United States. We have often held that vesting a territorial court with jurisdiction similar to that vested in the District Courts of the United States does not make it a 'District Court of the United States." *Mookini v. United States*, 303 U.S. 201 (1938) citing from *Reynolds v. United States*, 98 U.S. 145 , 154; *The City of Panama*, 101 U.S. 453 , 460; *In re Mills*, 135 U.S. 263, 268 , 10 S.Ct. 762; *McAllister v. United States*, 141 U.S. 174, 182 , 183 S., 11 S.Ct. 949; *Stephens v. Cherokee Nation*, 174 U.S. 445, 476 , 477 S., 19 S.Ct. 722; *Summers v. United States*, 231 U.S. 92, 101 , 102 S., 34 S.Ct. 38; *United States v. Burroughs*, 289 U.S. 159, 163 , 53 S. Ct. 574.

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Sui Juris Grievants / Next Friends and
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David Schied and Cornell Squires

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AND
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Charles Browning
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Defendants
Karen Khalil
Redford Township 17th District Court
Cathleen Dunn
John Schipani
Redford Township Police Department
Joseph Bommarito
James Turner
David Holt
Jonathan Strong
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David Schied and Cornell Squires (hereinafter "*PAGs Schied and Squires*"), being each **of the People**[2], and having established this case as a *suit of the sovereign*[3], acting in their own capacity, herein accept for value the oaths[4] and

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[2] PEOPLE. "*People are supreme, not the state.*" [*Waring vs. the Mayor of Savannah*, 60 Georgia at 93]; "*The state cannot diminish rights of the people.*" [*Hertado v. California*, 100 US 516]; Preamble to the US and Michigan Constitutions – "*We the people ... do ordain and establish this Constitution...;*" *"...at the Revolution, the sovereignty devolved on the people; and they are truly the sovereigns of the country, but they are sovereigns without subjects...with none to govern but themselves...*" [*Chisholm v. Georgia* (US) 2 Dall 419, 454, 1 L Ed 440, 455, 2 Dall (1793) pp471-472]: "*The people of this State, as the successors of its former sovereign, are entitled to all the rights which formerly belonged to the King by his prerogative.*" [*Lansing v. Smith*, 4 Wend. 9 (N.Y.) (1829), 21 Am. Dec. 89 10C Const. Law Sec. 298; 18 C Em.Dom. Sec. 3, 228; 37 C Nav.Wat. Sec. 219; Nuls Sec. 167; 48 C Wharves Sec. 3, 7]. See also, *Dred Scott v. Sandford*, 60 U.S. 393 (1856) which states: "*The words 'people of the United States' and 'citizens' are synonymous terms, and mean the same thing. They both describe the political body who, according to our republican institutions, form the sovereignty, and who hold the power and conduct the Government through their representatives. They are what we familiarly call the 'sovereign people', and every citizen is one of this people, and a constituent member of this sovereignty.*"

[3] *McCullock v. Maryland*, 4 Wheat 316, 404, 405, states "*In the United States, Sovereignty resides in the people, who act through the organs established by the Constitution,*" and *Colten v. Kentucky* (1972) 407 U.S. 104, 122, 92 S. Ct. 1953 states; "*The constitutional theory is that we the people are the sovereigns, the state and federal officials only our agents.*" See also, *First Trust Co. v. Smith*, 134 Neb.; 277 SW 762, which states in pertinent part, "*The theory of the American political system is that the ultimate sovereignty is in the people, from whom all legitimate authority springs, and the people collectively, acting through the medium of constitutions, create such governmental agencies, endow them with such powers, and subject them to such limitations as in their wisdom will best promote the common good.*"

[4] OATHS. Article VI: "*This Constitution, and the laws of the United States... shall be the supreme law of the land; and the judges in every State shall be bound thereby; anything in the Constitution or laws of any State to the contrary notwithstanding... All executive and judicial officers, both of the United States and*

bonds of all the officers of this court, including attorneys. Having already presented the initial causes of action to this Article III District Court of the United States as a *court of record*[5], *PAG Schied* and *PAG Squires* hereby proceed according to the course of Common Law[6].

This court and the opposing parties should all take notice **WE DO NOT CONSENT to the reference of parties named as "*grievants*" and/or as Private Attorney Generals as otherwise being corporate fictions in ALL CAPS of lettering as "*plaintiff*"** (e.g., "DAVID SCHIED, plaintiff"). **Note that all "*summons*" were issued with notice to all co-Defendants that Grievant David Schied is "*sui juris*."**

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of the several States, shall be bound by oath or affirmation to support this Constitution."

[5] "*A Court of Record is a judicial tribunal having attributes and exercising functions independently of the person of the magistrate designated generally to hold it, and proceeding according to the course of common law, its acts and proceedings being enrolled for a perpetual memorial*". [Jones v. Jones, 188 Mo.App. 220, 175 S.W. 227, 229; Ex parte Gladhill, 8 Metc. Mass., 171, per Shaw, C.J. See also, Ledwith v. Rosalsky, 244 N.Y. 406, 155 N.E. 688, 689].

[6] COMMON LAW. – According to *Black's Law Dictionary* (Abridged Sixth Edition, 1991): "*As distinguished from law created by the enactment of legislatures [admiralty], the common law comprises the body of those principles and rules of action, relating to the government and security of persons and property, which derive their authority solely from usages and customs of immemorial antiquity, or from the judgments and decrees of the courts recognizing, affirming, and enforcing such usages and customs.*" "*[I]n this sense, particularly the ancient unwritten law of England.*" [1 Kent, Comm. 492. State v. Buchanan, 5 Har. & J. (Md.) 3G5, 9 Am. Dec. 534; Lux v. Ilaggin, G9 Cal. 255, 10 Pac. G74; Western Union Tel. Co. v. Call Pub. Co., 21 S.Ct. 561, 181 U.S. 92, 45 L.Ed. 765; Barry v. Port Jervis, 72 N.Y.S. 104, 64 App. Div. 268; U. S. v. Miller, D.C. Wash., 236 F. 798, 800.]

WE DO NOT CONSENT to the assignment of this case, otherwise attempted to be "*filed*" in Ann Arbor and ultimately filed in Flint, being subsequently sent to Detroit, in the heart of Wayne County, situated in a building believed to be leased by Defendant Charter County of Wayne to the United States District Court with a proven proclivity toward contributing to the *domestic terrorism* being carried out, hand-in-hand with state and county government imposters, as usurpers of *The People's* power and authority.

SUMMARY OVERVIEW AS THE BASIS FOR THIS FILING

Sui Juris Grievants and Private Attorney Generals David Schied and Cornell Squires, acting under Common Law and in this instant Article III Court of Record, do hereby submit this "*Response*" to the filing of Defendants' attorney James Mellon's "*MMRMA's Objections to [Grievants'] First Interrogatories and Requests for Exhibits*;" **and do hereby submit this "*Objection*"** to the filing of Co-Defendants' attorney Jeffrey Clark's "*Response to [Grievants'] First Interrogatories and Requests for Exhibits on Behalf of the Redford Defendants*."

This combined "*Response*" and "*Objection*" is based upon a plethora of Evidence – already well-established as matters of the official Court of Record – that attorneys Mellon and Clark have committed numerous counts of FRAUD upon

this federal court; and because both of these attorneys are acting with a clear "*conflict of interest*."

Specifically, attorney Mellon was named as "DOE #1" in Grievant Schied's previous filing dated 9/2/15 and docketed by way of a fraudulent description by the U.S. District Court Clerk – likely found as "Docket #71" and captioned as a "*Reply to Motion*" – but actually filed in the official "Court of Record" as cited below[7]:

> *"GRIEVANT DAVID SCHIED'S "REPLY" IN DENIAL OF MMRMA ATTORNEY(S) JAMES MELLON AND MELLON PRIES, P.C.'S FRAUDULENT "RESPONSE" TO GRIEVANT'S "WRIT OF ERROR FOR ASSIGNMENT OF MAGISTRATE AND ENGAGEMENT OF EX-PARTE PROCEEDINGS AND MANDAMUS FOR PROCEEDING IN COMMON LAW UNDER THE CONSTITUTION IN AN ARTICLE III COURT OF RECORD" BASED UPON REPEATED "FRAUD UPON THE COURT" BY ATTORNEY MELLON WITH PROOF OF SUCH FRAUD BY "PRIMA FACIE" EVIDENCE PROVIDED AGAIN HEREIN"*

Importantly, this filing demonstrates that early on in this case Grievant had filed **"*prima facie*" documents of Evidence** in support of claims that **attorney Mellon was committing numerous instances of FRAUD upon this Article III Court of Record, and thus justifying the disqualification of Mellon as an "*officer of the court*" and instead naming him as an addition co-defendant previously reserved by the name of "*DOE #1*."** (Bold emphasis added)

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[7] *See* this record in the Court of Record as located at the following web location for direct download: http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/081815_MyWritofError4AssignofMagistrate/MMRMAResponsetoMyWritofError/MyReply2MellonResponse&EvidenceofFRAUD/EntireReplytoFraudResponseofMellon2WritofError.pdf

Mellon, thus, may not proceed as a "*representative*" attorney in this case due to his proven fraud, both prior to the above filing by Grievant, and in numerous instances after Grievant's filing of that document, inclusive of the fraud Mellon committed in his latest filing chock full of gross *omissions*.

Specifically, Jeffrey Clark was cited for his FRAUD upon this Article III Court of Record by Grievant Schied's previous filing, dated 8/24/15, and docketed by way of a fraudulent description by the U.S. District Court Clerk – likely found as "Docket #67" and captioned as a "*Objection to 31 Answer and affirmative defenses*" – but actually filed in the official "*Court of Record*" as cited below[8]:

"GRIEVANT DAVID SCHIED'S OBJECTIONS AND DENIAL OF DEFENDANT ATTORNEY JEFFREY CLARK'S "ANSWERS" AND "AFFIRMATIVE DEFENSES" BASED ON DEFENDANTS' **INTENT TO DEFRAUD THE COURT** BY HIS "FRIVOLOUS FILING" OF "NON-ANSWERS" AND HIS **INTENT TO VIOLATE PROFESSIONAL CODES OF ETHICS THROUGH "PATTERN AND PRACTICE" OF GROSS OMISSIONS AND FRAUD** UPON THE COURT AS PROVEN IN CONNECTION TO A PAST HISTORY OF THE SAME; **And ORDER FOR SANCTIONS BARRING CLARK FROM FUTURE PROCEEDNGS"**

Importantly, this filing demonstrates that early on in this case Grievant had filed **"*prima facie*" documents of Evidence** in support of claims that **attorney Clark was committing numerous instances of FRAUD upon this Article III Court of Record, and thus justifying the disqualification of Clark as an "*officer of the court.*" For these reasons, Jeffrey Clark is being named as an**

[8] *See* this record in the Court of Record as located at the following web location for direct download: http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/082315_MyResp2RedfordAnswr&AffirmDefenses/MyRespon2RedfordAnswrs&AffirmDefnses/EntireResponse2RedfordAnswers&AffirmDefenses.pdf

addition co-defendant, which was previously reserved by the name of "*DOE #2*." (Bold emphasis added)

Clark, thus, may not proceed as a "*representative*" attorney in this case due to his proven fraud, both prior to the above filing by Grievant, and subsequently to Grievant's filing of that document, inclusive of the fraud Clark committed in his latest filing chock full of gross *omissions*.

Moreover, Mellon and Clark are barred from further action in these proceedings by their clear "conflict of interest," as these attorneys cannot be both named as co-Defendants and committing fraud upon this instant Article III Court of Record, while also carrying out the Duties and Oaths as "*officers of the court*." Clark additionally has a clear conflict of interest by his attempted claim to be representing both the corporate municipality of "*Redford*" as the employer of the "*individuals*" named by Grievant a co-Defendants named in their private capacities, as shown in Grievant's original federal case filing. This final point is further explained below.

ITEMIZED "*RESPONSES*" TO "*MMRMA'S 'OBJECTIONS'*"

1. **DENIED** – On the basis of attorney James Mellon's gross fraud and omission that this case was filed under common law and in an Article III Court of Record.

2. **DENIED** – On to the extent that attorney James Mellon maintains a position that Grievant David Schied, and/or Private Attorney Generals David Schied and Cornell Squires must "*confer*" with criminal fraudsters and domestic terrorists on the terms or "*the matters*" by which Interrogatories may be submitted in cases that have dragged on a full year due to dereliction of duties and outright theft by federal court officials, and the apparent incapacitation of judges, including the instant one refusing to "*answer*" to Grievants' latest filing on 3/31/16 against Avern Cohn on his full-year of "*Denial of Access*" of Grievant's right to First Amendment due process proceedings in this instant Court of Record, as apparently docketed by the Clerk of the Court as "Docket Item #108" with abbreviated captioning of the following actual wording[9]:

> GRIEVANT DAVID SCHIED'S "BRIEF IN SUPPORT OF... " RESPONSES TO DEFENDANTS' THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA ("ICSOP'S") and AMERICAN INTERNATIONAL GROUP, INC. ("AIG'S") AND THEIR DOMESTIC TERRORIST ATTORNEYS CHARLES BROWNING AND WARREN WHITE OF THE CORRUPT RACKETEERING CRIME SYNDICATE NETWORK OF PLUNKET-COONEY'S FRAUDULENT "MOTION FOR SUMMARY JUDGMENT'
> and,
> **GRIEVANT'S "WRIT FOR THE JUDGE AVERN COHN TO 'SHOW CAUSE' AND REASON FOR A 10-MONTH OBSTRUCTION OF GRIEVANT'S FIRST AMENDMENT RIGHT TO ACCESS THIS DISTRICT COURT OF THE UNITED STATES BY HIS PERSISTENT FAILURE TO ACT UPON REPORTS OF CRIMES COMMITTED BY DEFENDANTS' ATTORNEYS AND UPON GRIEVANT REPORTING THE THEFT OF COURT DOCUMENTS BY CLERKS OF THE FEDERAL COURT IN MAY OF 2015"**

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[9] *See* this record in the Court of Record as located at the following web location for direct download: http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/033116_MyResp2PlunkettCooney&AIG-Mot4SummJudg/MyResponse&Exhibits/BriefinSupportofMyResponse2DefendantFraud&WritofShowCauseAgainstJudge.pdf

3. **DENIED** – By Mellon's own admission Grievant has submitted "23 Interrogatories". To the extent that Mellon chooses to "interpret" these itemized 23 interrogatories as 138 without providing one iota of good faith effort or one shred of an "answer" to even one of those 23 interrogatories, Grievant asserts that this is just another example of Mellon's "*fraud by omissions*" upon these Common Law proceedings and in this instant Article III Court of Record.
4. **DENIED** – Criminal fraudster James Mellon and his "*fiction*" of the Mellon Pries, LLC are to be subjected to sanctions and liens for the damages they are causing upon this case and throughout the history of these proceedings beginning with his lies about not having received stolen documents from the federal Clerk of the Court prior to his clients being even served by Grievant in this instant action. This criminal belongs behind bars, as does his companions in *domestic terrorism*.

GRIEVANT'S SPECIFIC OBJECTIONS TO JEFFREY CLARK'S "*RESPONSE*" TO [GRIEVANT'S "*FIRST INTERROGATORIES*"

Grievant incorporates the itemized paragraphs above relating to Mellon's "*objections*" herein as if written herein in reference to Jeffrey Clark and his history of FRAUD upon this instant Article III Court of Record.

In addition to the above, Grievant objects to attorney Jeffrey Clark's filing of "*Response*" based upon his needing to be disqualified from these proceedings for

the conflict of interest inherent in his representing both "*individuals*" and the corporate/municipal employers of these individuals. It has long been established that when an attorney specifically identifies himself or herself on the record as "counsel for the individual employee" AND as the long-time counsel for the corporation – as is happening in this instant federal case – a "*conflict of interest*" occurs. *Advance Mfg. Technologies, Inc. v. Motorola, Inc.* [2002 Westlaw 1446953 (D. Ariz. 2002)]

Courts have clearly established 4-factor test for disqualifying a corporate attorney attempting to also represent individuals on the basis of a "*conflict of interest*" when considering the individual deposition testimonies of the private parties against the policies and practices of the corporation, or in this case the corporate municipality. That 4-factor test includes: a)

The four "FINK" factors are: (1) the nature and extent of the contacts between the attorney and the purported client; (2) whether the purported client divulged confidential information to the attorney; (3) whether the attorney provided the purported client with legal advice; and (4) whether the purported client sought or paid for the attorney's services (*Fink v. Montes,* 44 F. Supp. 2d 1052, 1060 (C.D. Cal. 1999)).

In establishing the first of these four *FINK* factors, the California courts have distinguished between a corporate counsel's representation of corporate officers,

directors, and employees "*in their representative capacities and the representation of those persons in their individual capacities*." (Koo v. Rubio's Restaurants, Inc., 109 Cal. App. 4th 719, 732–33 (2003).) As one court has stated, "*[G]enerally, there is no individual attorney-client privilege between a corporation's attorney and individuals within the corporation unless there is a clear showing that the individual consulted the corporate counsel* ***in the officer's individual capacity***." [Tuttle v. Combined Ins. Co., 222 F.R.D. 424, 429 (E.D. Cal. 2004).]

California case law does not address whether a corporate lawyer whose sole contact with a corporate employee is to prepare him or her for deposition and/or to defend the employee at deposition is by reason of that contact alone disqualified from representing the corporation in a lawsuit against the employee. **However, cases from other jurisdictions generally provide that the corporate attorney is not deemed to represent the employee personally.** For instance, in the case of Advance Mfg. Technologies, Inc. v. Motorola, Inc. cited above, the court determined that silence of corporate attorneys in the face of the individual client's expressed belief of representation made the belief an objectively reasonable one for disqualifying the corporate attorney. It is for this reason that corporate counsel defending an employee or former employee should always state that he or she is representing the individual in the "*witness*" capacity as an employee of the company, and not "*individually*," as is being done in this case.

There are rules of professional practice and ethics rules that assert that there is a strong potential for "*conflict of interest*" with a corporate attorney representing individual employees in their private capacity as Jeffrey Clark is currently doing. For instances, there is the ABA's "*Model Rules of Professional Conduct*" [e.g., Rule 1.13 Comment, Government Agency ("*in a matter involving the conduct of government officials, a government lawyer may have authority [under applicable law] to question such conduct more extensively than that of a lawyer for a private organization under similar circumstances*"]; and the ABA's various "*formal opinions*" (i.e., see 97-405 "*Conflicts in Representing Government Entities*" and "*the lawyer's employment requires him to observe in the performance of his professional responsibility the public interest sought to be served by the governmental organization of which he is a part.*") and "*informal opinions*" (i.e., see 1413 (1978) ("*a Government lawyer assigned to represent a litigant . . . has an attorney/client relationship with the litigant, and . . . the lawyer's status as a Government employee does not exempt him or her from professional obligations, including those to preserve a client's confidences and secrets, that are imposed upon other lawyers*")

These various ethics and professional rules are also supported by state and federal case law. For example, the Court in *U.S. v. Shaffer Equipment Co*. (Nos. 92-2024, 93-1007, and 93-1049) 11 F.3d 450 (1993) has much to state on this

topic, particularly as it relates to attorneys – very much like attorneys Mellon and Clark – that engage in the cover-up of their clients' fraudulent activities, and as it relates to professional candor to the Court:

> "[W]e are confident that a general duty of candor to the court exists in connection with an attorney's role as an officer of the court...Thus, attorneys are expected to bring directly before the Court all those conditions and circumstances which are relevant in a given case.[t is important to reaffirm, on a general basis, the principle that lawyers, who serve as officers of the court, have the first line task of assuring the integrity of the process. Each lawyer undoubtedly has an important duty of confidentiality to his client and must surely advocate his client's position vigorously, but only if it is truth which the client seeks to advance. The system can provide no harbor for clever devices to divert the search, mislead opposing counsel or the court, or cover up that which is necessary for justice in the end. It is without note, therefore, that we recognize that the lawyer's duties to maintain the confidences of a client and advocate vigorously are trumped ultimately by a duty to guard against the corruption that justice will be dispensed on an act of deceit. See 1 Greoffrey C. Hazard, Jr. and W. William Hodes, The Law of Lawyering 575-76 (1990) ('*[W]here there is danger that the tribunal will be misled, a litigating lawyer must forsake his client's immediate and narrow interests in favor of the interests of the administration of justice itself.*')."

The Court, in *Dunton v. County of Suffolk*, 580 F.Supp. 974 (E.D.N.Y. 1983), rev'd, 729 F.2d 903 (2d Cir.), opinion amended, 748 F.2d 69 (2d Cir. 1984) the Court had to say the following in defining a "disqualifying conflict" when an attorney represents both the county and the police officer under its employ:

> "Prior to 1978, such representation would not have caused a conflict because municipalities were not "*persons*" subject to Section 1983 liability. See *Monroe v. Pape*, *365 U.S. 167*, 18792, 81 S.Ct. 473, 48486, 5 L.Ed.2d 492 (1961). Thus, a municipality would have had no reason to give an employee less than full representation. However, since the Supreme Court's decision in *Monell v. Department of Social Services*, *436 U.S. 658*, 98 S.Ct. 2018, 56 L.Ed.2d 611 (1978), municipalities can be held liable under Section 1983 for employees' actions taken pursuant to municipal policy. **After Monell the interests of a municipality and its employee as defendants in a Section 1983 action are in conflict.** See *Van Ooteghem v. Gray*, *628 F.2d 488*, 495 n. 7 (5th Cir.1980), aff'd in part, vacated in part on other grounds, *654 F.2d 304* (5th Cir.1981) (en banc)

> (per curiam), cert. denied, 455 U.S. 909, 102 S.Ct. 1255, 71 L.Ed.2d 447 (1982). A municipality may avoid liability by showing that the employee was not acting within the scope of his official duties, because his unofficial actions would not be pursuant to municipal policy. The employee, by contrast, may partially or completely avoid liability by showing that he was acting within the scope of his official duties. If he can show that his actions were pursuant to an official policy, he can at least shift part of his liability to the municipality. If he is successful in asserting a good faith immunity defense, the municipality may be wholly liable because it cannot assert the good faith immunity of its employees as a defense to a section 1983 action. *Owen v. City of Independence*, *445 U.S. 622*, 100 S.Ct. 1398, 63 L.Ed.2d 673 (1980)."

In this instant case of *Schied v. Khalil et al*, whereas there are a plethora of individuals named in their private capacity along with multiple agencies representing conflicting branches of government (i.e., the 17th District Court as the judicial branch and the Redford Township supervisor and police department as the executive branch) the allegations are that the "*deliberate indifference and reckless failure*" of the co-Defendants are so egregious as to "*shock the conscience of anyone coming to know the extent to which these Defendants had previously acted, under color of law, to quash Plaintiff's prior "filed documents" in request of personal relief and community relief through a criminal grand jury investigation.*" (*See* Docket Item #1, "*Common Law Tort Complaint and Claim for Damages*".)

The allegations – filed as also being a *42 U.S.C. "Section 1983"* action against the so-called collectivity of "*persons*" that have been unified and enjoined by Jeffrey Clark himself under the deceptive auspice of representing this collectivity as "*the Redford Defendants*" – contend that "*the actions committed by Defendants, as described above also invoked, and made the Defendants subject to,*

the "State-Created Danger Doctrine," because Defendants created the condition by which Plaintiff was left in a situation more dangerous than the one in which they found him; and because Defendants acted in conscience disregard of that risk." Therefore, such a conflict of interest is preeminent and precludes Jeffrey Clark from representing both the "persons" of the differing agencies or departments of government, and the individuals named in their private capacities. **Those individuals must have their own attorney and paid for with other than taxpayer funds.** (Bold emphasis added)

Moreover, even the differing agencies and/or departments of the same government should have differing representation as well because of the conflict of interest between these BRANCHES of government that are otherwise under the constitutional duty to hold each other under "*checks and balances*." Therefore, one attorney representing both (or all three) branches of this municipality constitutes a clear "*conflict of interest.*" (Bold emphasis)

CONCLUSION AND ORDER FOR RELIEF

For the above stated reasons, the arguments as presented by attorneys Mellon and Clark as "*objections*" and/or "*responses*" are hereby deemed misleading and/or fraudulent. As such, they present additional circumstances warranting the disqualification and expelling of these attorneys from this instant federal court case, and Grievants' naming of these attorneys to this

case as Co-Defendants "DOE #1" and "DOE #2" respectively for their roles in the overall conspiring of their co-Defendants "*to falsely imprison*" Grievant David Schied "*while knowingly acting without reasonable cause as justification*" and while "*acting with malicious intent, in concerted fashion, and by means of tyrannical acts of 'domestic terrorism,' under 'color of law,*'" to both carry out their dirty deed(s) but to then afterwards cover all of this up, by falsifying official records and by more recently deceiving this Article III Court of Record.

Respectfully submitted,

David Schied 5/14/16