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

David Schied,
Sui Juris Grievant
v.
Karen Khalil, et al
Defendants /

Case No. 15-11840
Judge:

GRIEVANT'S OBJECTIONS AND ORDER TO STRIKE

"Defendants, The Insurance Company of the State of Pennsylvania ("ICSOP") and American International Group, Inc's ("AIG") 'Answer' to 'Plaintiff's' Complaint"

BASED ON A PATTERN OF GROSS OMISSIONS, INTENTIONAL DECEPTION, FRIVOLOUS FILING, AND OBSTRUCTION OF JUSTICE (Under F.R.C.P. Rule 11)

AND FOR

SUMMARY JUDGMENT AND/OR DECLARATORY RULING AND SANCTIONS AGAINST DEFENDANTS' INTENTIONAL FAILURE TO ANSWER WITHIN 20 DAYS (as required under F.R.C.P. Rule 56a)

David Schied
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Novi, Michigan 48376
248-974-7703

Defendants
The Insurance Company of the State of Pennsylvania
AND
American International Group, Inc.
Plunkett Cooney
Charles Browning
Warren White
38505 Woodward Ave., Suite 2000
Bloomfield Hills, Michigan 48304
248-901-4000

* NOTE: All type font appearing in this document as ALL CAPS, underlined, or **bold** are intentional and have special emphasis added.

David Schied (hereinafter "*Grievant*"), being one of the People[1] and having established this case as a *suit of the sovereign*[2] acting in his own capacity, herein accepts for value the oaths[3] and bonds of all the officers of this court, including

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[1] 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*."

[2] 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*."

[3] 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*

attorneys. Having already presented his causes of action to this Article III District Court of the United States as a *court of record*[4], *Grievant* hereby proceeds according to the course of Common Law[5].

Incorporated herein by reference are the Statements and Evidence contained in the previously-filed documents and all other documents referenced by the pages herein that can otherwise be located publicly at the website links:

1) *"Memorandum of Law and Jurisdiction"* (as being a copy also of "*Exhibit #4*" that was previously filed with the "*Writ for Change of Judge...and Change of Venue*..." previously **served on these defendants and their attorneys on 6/27/15**) (Bold emphasis added)
2) "*Writ for Change of Judge...and Change of Venue*," in its entirety as **filed on the record of the District Court of the United States on 6/27/15**. (Bold emphasis added)

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

[4] "*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].

[5] 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.]

3) All Statements, Affidavits, and Evidence previously filed in this case to include the initial filing to open this case and the more recent filing of "*Writ for Change of Judge Based on Conflict of Interest and Change of Venue Based on Proven History of Corruption*" and its accompanying *"Sworn and Notarized Affidavit of Truth of David Schied"*.

GENERAL DENIAL TO ALL "*ANSWERS*" OF CO-DEFENDANTS "ICSOP" AND "AIG" *BASED ON PROVEN HISTORY OF CORRUPTION BY THEIR BUSINESS PARTNERS, THEIR CLIENTS, AND THEIR "REPRESENTATIVE" ATTORNEYS*

Attorneys in partnership and under employ at the Plunkett Cooney law firm have a long history of exhibiting the pattern and practice of "*fraud upon the Court*" through their gross omissions, misstatements, frivolous filings, that have proven – by their intended impact on behalf of their clients as insurance companies "*covering*" government corporations and "*litigating*" on their behalf in state and federal courts – to result in the criminal obstruction of justice. These "*agents*" of the Plunkett Cooney law firm therefore have a long and well-documented history of criminal *obstruction* of judicial proceedings, interference with a victim/witness, and fraud upon the court when *litigating* against people like *sui juris* Grievant David Schied, who are calling out domestic terrorists from their roots as usurpers of the People's powers as otherwise delegated to public functionaries by their sworn Oath to the People and the state and federal constitutions guaranteeing *The People's* rights above all else. This instant case and motion serves only to demonstrate furtherance of those previous crimes by Plunkett Cooney.

The same can be said for those employed by and working on behalf of Defendant Charter County of Wayne who are in business partnership and/or clients under contract with the co-Defendants The Insurance Company of the State of Pennsylvania ("ICSOP") and American International Group, Inc. ("AIG"). For starters, this includes but is not limited to the Defendant Charter County of Wayne's Department of [Risk] Management and Budget, the (Wayne) County Commission, the plethora of State BAR of Michigan prosecutors, attorneys, and judges operating the district courts and circuit courts spread around "*3rd Judicial District*" and around the "*Eastern District of Michigan, Southern Division*," and in particular, the State BAR of Michigan attorneys operating as the "*Corporation Counsel*" for the Defendant Charter County of Wayne.

The ***pattern and practice***, which consists of affirmative actions as presented in the very first "*Answers*" of this Defendant, **consists of the following traits or "*hallmarks*" that demonstrate how *color of law* has long been used by these co-Defendants and their agents and attorneys to facilitate ever-growing numbers and intensities of *state created dangers*, particularly for David Schied, but also for many others who are calling these *domestic terrorists* to the carpet of accountability for their other antecedent actions as exhibited in previous cases:**

1) Defendants, as all members of the BAR disparage and intimidate people like *sui juris* Grievant David Schied who come to the courts without payment of homage to the corporatized legal system in place through *representation* by an attorney;
2) Defendants execute their actions with a virtual *wink-and-nod* understanding that their cohorts of hierarchical power mongers, as judges who are also members of the same State BAR of Michigan, will pretend not to see that Defendant's filings are significantly chock full of gross omissions and misstatements of fact;
3) Defendants then *flower* their misstatements of facts with a plethora of case law that otherwise are irrelevant and moot given the FACT that their opening paragraphs are nonsensical, frivolous, redundant, chock full of errors and omissions and misstatements of fact, and outright fraudulent on their face.

The *pattern and practice* of the above allows judges, their law clerks, and all others involved in the final decisions of their cases to slide by in aiding and abetting in these hallmarks of seditious and treasonous conduct that turns both law and justice on their heads, forcibly coerces government policies and practices to all levels of unauthorized degrees, and undermines the very foundational purpose of the courts of getting at the Truth as founded in nature's God and the United States Constitution.

For purposes of opposing this instance of Defendants conspiring under *color of law* and in such fashion as to deprive Grievant David Schied of his right to due process and to provide yet *another* case for them to use to support their fraudulent claim – and the fraudulent claim of other corporate BAR members and their corporate agents operating as terrorists with and around the Defendant Charter County of Wayne – **Mr. Schied presents the following FACTS supporting this instant DENIAL of the so-called "*Answers*" submitted by the co-Defendants and their Plunkett Cooney attorneys. Note that the following also proves the *patterns and practices* of these state *actors* and their agents as described above WITHOUT the need to flower these facts with irrelevant case law.**

SPECIFIC DENIALS OF CO-DEFENDANTS' "*AFFIRMATIVE AND/OR AVOIDANCE DEFENSES*"

1. DENIED – as based upon the FACTS and EVIDENCE showing that Grievant has proper standing and the legal capacity to establish and maintain his civil and/or criminal claims against the co-Defendants ICSOP and AIG, their agents and business partners, and their Plunkett Cooney attorneys.
2. DENIED – as based upon the FACT that "*privity of contract*" is not the basis of claim in the sense that co-Defendants infer. The "*contracts*" are between *The People* and their government servants who are supposed to be acting in accordance with their Oaths and their Duties authorized by *The People* under state and federal constitutions, guaranteed to their performance through statutorily-required bonding; or, as in this case, through the *pattern and practice* of those agents, of forming self-funded "*errors and omissions*" insurance pools and contracting out their fiduciary guarantees through the purchasing of "*excess liability insurance*" from third-party blanket insurance providers in exchange for the corporate interests co-Defendants. This they do in exchange for safeguarding co-Defendants' "*corporate assets,*" preserving co-Defendants' "*company reputation,*" and assisting co-Defendants with their self-interested effort to impede against "*The People*" otherwise rightfully filing and collecting upon "*errors and omissions*" claims for damages caused by the co-Defendants'

business partners employed by and as the Defendant Charter County of Wayne who are otherwise under Oath to their fiduciary contract with *The People*.

3. DENIED – This affirmative or avoidance defense is nothing but a "*conclusory*" and "*bare*" statement, and fraud on its face. The FACTS and EVIDENCE speak for themselves.
4. DENIED – This affirmative or avoidance defense is nothing but a "*conclusory*" and "*bare*" statement, and fraud on its face. The FACTS and EVIDENCE speak for themselves.
5. DENIED – This affirmative or avoidance defense is nothing but a "*conclusory*" and "*bare*" statement, and fraud on its face. The FACTS and EVIDENCE speak for themselves.
6. DENIED – This affirmative or avoidance defense is *intentionally misleading* to this Court. The FACTS and EVIDENCE speak for themselves. The fact is that AIG's own webpage (located at: **http://www.aig.com/at-a-glance_3171_457692.html**) makes the following claim as provided below in quotes:

   > *"We're the world's leading insurance organization, with more than 90 million customers around the globe. We're leaders in property casualty insurance, life insurance, retirement products, mortgage insurance, and other financial services. But we're more than the sum of our parts."*

7. DENIED – The FACTS and EVIDENCE speak for themselves. Grievant's action against co-Defendants reaches beyond a mere "complaint" to be a bona

fide "*claim for damages*" against co-Defendants ICSOP and AIG, their agents and business partners with the Defendant Charter County of Wayne, and their collection of Plunkett Cooney and "*Corporation Counsel*" attorneys.

8. DENIED – to the extent that any future defenses are misleading, fraudulent, "*conclusory*" or "*bare*" statements combined in any way with feinted or actual *ignorance* in "*pattern and practice*" of deceiving this Court with statements such as they "*lack knowledge or information*" to such extent that they are unable to form a legitimate "*belief*" when faced with undeniable FACTS and EVIDENCE. Note that what is being established here is that *"such deceptiveness is a pattern and practice of those operating in Wayne County as public functionaries empowered and paid by the People to otherwise be working as a legitimate government and providing honest government services [which is,] in fact, an indicator of dishonest services and an illegitimate operation under color of law"* as previously asserted by Grievant.

/s/ David Schied

DATED: July 31, 2015

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INDEX OF EXHIBITS

Exhibit #	Name/Description of Exhibit
1	35-page **UNSIGNED** Plunkett Cooney law firm submission of, "*Defendants, The Insurance Company of the State of Pennsylvania and American International Group, Inc's Answer to Plaintiff's Complaint and Affirmative and/or Avoidance Defenses*" – being chock full of the same redundant and frivolous phrase – with the names Charles Browning and Warren White as "*agents*" of Plunkett Cooney
2	*Notice of Appearance* (only) of Plunkett Cooney State BAR of Michigan attorney Warren J. White
	CASE #1: Crimes of Foreclosure and Other Fraud Against Krystal Price
3	a) Fraudulent "*Stipulated Order re: Escrow and Scheduling Order*" constructed and/or signed by 34th District Court "judge" Brian Oakley dated 3/27/12. b) Fraudulent "*Stipulated Order Transferring and Severing Counter-Complaint to Wayne County Circuit Court and Setting Freddie Mac's Deadline to File a Response to Counter-Complaint*" constructed and/or signed by 34th District Court "*judge*" Brian Oakley dated 4/3/12.
4	a) Two cover letters written by Paula Moore, judicial assistant for "judge" Brian Oakley, each demonstrating that no "*session*" of 34th District Court was held on either of the above orders dated 3/27/12 and 4/3/12 as otherwise misrepresented by Oakley. b) Register of Actions for the 34th District Court case with "judge of record" being Brian Oakley, reflecting – again – no "*session*" of 34th District Court was held on either of the above orders dated 3/27/12 and 4/3/12 as otherwise misrepresented by Oakley.
5	Complaint to the State Court Administrative Office in Detroit, Michigan, written by Crystal Price against Brian Oakley, followed by a "Request for Inquiry of Administrative Procedure" form and supporting documents totaling 14 pages.
6	FBI website printout with the definition of "*Domestic Terrorism*"
7	AIG web page describing the nature of AIG's business
8	First 7 pages of AIG/ICSOP's "excess" insurance policy for the cover year May 2014 through May 2015.
9	New article by Matt Stoller with updated truths behind the AIG and Wall Street debacle and subsequent bailout in 2008. (7 pages)
10	Krystal Price's 6/16/14 "*Appellant's Affidavit in Support of Appeal*" depicting the gross number of multi-level crimes that had been perpetuated against her by State BAR of Michigan "*domestic terrorists*" operating in local, county, and federal courts located within the territorial boundaries of the Defendant Charter County of Wayne. (5 pages)
11	Email and other letters of communication between Krystal Price and Defendant Charter County of Wayne's Budget and Management Director for "Risk Management" contracted with by co-Defendants AIG and ICSOP. (6 pages)
12	Ongoing letters of correspondence between Krystal Price and Defendant Charter County of Wayne's agents in the Office of the Wayne County Clerk, the Office of Budget and Management, the Wayne County Executive, Corporation Counsel, State Court Administrator, and Office of the Treasurer. (16 pages)
13	a) FOIA submission answer from the Wayne County Clerk revealing "*no (performance)*

	bonds" behind the Oaths of Office. b) Written "Request to File a Public Official Liability Insurance Claim" from Krystal Price addressed to Defendant Charter County of Wayne's Department of Budget and Management Director Mary Anna Daskas. c) Answer from Mary Anna Daskas denying Ms. Price's request, instructing Krystal Price to hire an attorney and to take her claims back to the corrupted courts. (13 pages)
14	Email and letter communication from Krystal Price to Defendant Charter County of Wayne's "Corporation Counsel," Mary Anna Daskas, and Lyn Roberts of the Department of Management and Budget. (6 pages)
15	Email correspondence between Krystal Price and co-Defendant AIG's "*Claims Intake Department*", the AIG Assistant Vice President Jim Drake and Bob Ulrich, VP of AIG Property Casualty resulting in the assignment of a claim number and a case to AIG "Board Member" Julia Ulrich (Barrueco) (4 pages)
	<u>Case #2</u>: Questionable conduct and Auditing Records pertaining to the Wayne County Prosecutor's reflecting noncompliance and pointing to a likely providing of "*aid and comfort*" to other usurpers of public office levying war upon the People of the county
16	a) Wayne County Fraud Unit description b) Mortgage and Deed Fraud Unit description c) Auditor General Willie Mayo's incriminating follow-up report about the Office of Wayne County Prosecuting Attorney Fraud Investigative Policies and Kym Worthy's office noncompliance history (13 pages)
17	a) Detroit Free Press article (2013) about friction between the Auditor General Willie Mayo and the questionable practices of Robert Ficano's office leading to more indictments against Defendant Charter County of Wayne's chief Executive Ficano's office and its Corporation Counsel. b) Other articles about the corruption scandals pertaining to the Charter County of Wayne's "executive" Ficano pertaining to the Severance Scandal and the more recent Jail Project Debacle being investigated by the FBI. (15 pages)
18	a) News article captioned, "Prosecutor Kym Worthy tells official not to release Wayne County Jail audit pending criminal probe. b) Letter from Kym Worthy to Willie May dated 8/19/13 threatening to prosecute him if he releases to the public any details of his audit probe into the botched "Jail Project" and indictments. (4 pages)
	<u>Case #3</u>: History of unresolved misdemeanor and felony crimes against Grievant David Schied pointing to a multi-tiered criminal government enterprise and domestic terrorism being fostered by the Defendant Charter County of Wayne
19	Title 28, Code of Federal Regulations, Section 50.12
20	1979 – "*Early Termination Order Dismissing the Cause*" (Texas)
21	Two honorary letters of recommendation issued by two principals of Northville Public Schools on behalf of Grievant David Schied (2004 and 2005 respectively)
22	Texas Court of Appeals case: <u>*Rudy Valentino Cuellar v. State of Texas*</u> (2001)
23	Texas Attorney General Opinion DM-349 (1995)
24	a) Texas governor's "*pardon*" and "*restoration of full civil rights*" (1983) b) Texas Attorney General Opinion JC-0396 (2001)

25	**a) (2006) "*political*" and "*fraudulent*" Michigan Court of Appeals ruling issued by judges Karen Fort Hood, Mark Cavanagh, and Deborah Servitto in the case of "*David Schied v. 'Dr.' Sandra Harris and the Lincoln Consolidated School District*" in which the Michigan COA found their way to widely disseminating their "nonpublished" ruling that stated NEITHER a set aside [which included a "*withdrawal of plea*," a "*dismissal of (accusation and) indictment*", and "*set aside of (a NON-FINAL probated) judgment*" separated by a quarter century of model citizenship is enough to wipe away a single NON-FINAL probated judgment of "*conviction*" and that, as a result, in 2003 when applying for a job at the Lincoln Consolidated Schools in Washtenaw County, "Dr." Sandra Harris was justified in disseminating letters calling Mr. Schied a criminal while robbing him of his federal right to "challenge and correct" the FBI identification record which he signed for and paid for himself as subject to the Privacy Act of 1974.** b) **(2008) "*political*" Michigan Court of Appeals ruling issued by judges Jane Merkey, David Sawyer, and Richard Bandstra in the case of "*Eric Frohriep and All Others Similarly Situated v. Michael Flanagan, et al*" pertaining to a class action suit of schoolteachers against the Michigan Department of Education's "policy and practice" of issuing "*lists*" of teachers with "convictions" that had not been verified before publishing and disseminating.**
26	**a)** Michigan's "*Revised School Code*" making it amply clear that **it is a punishable crime of misdemeanor for any school district administrator to disseminate criminal history information obtained for the purpose of evaluating a prospective employee's qualifications for employment.** b) Evidence that "Dr." Sandra Harris had committed criminal misdemeanor offenses against David Schied BOTH before and after terminating his employment and denying him is right under federal laws to challenge and correct the erroneous FBI identification record that resulted from his job application with the Lincoln Consolidated Schools. **(This was ignored by the Michigan Court of Appeals when they refused to "litigate the merits of the case and "cherry picked" their way into ruining Mr. Schied's reputation, career, and ability to financially and emotionally support his dependent family.)** (74 pages)
27	Emails between Northville Public Schools human resources director Katy Doerr-Parker and David Schied in contracted promise that Parker would hire Mr. Schied on the condition that she would return his "*incriminating*" judicial and executive clemency documents after he successfully "*challenges and corrects*" the erroneous FBI identification records stemming from the State of Texas.
28	Evidence that the Northville Public Schools administration retaliated against Grievant David Schied by criminally disseminating the Texas "Agreed Order of Expunction" that the State of Texas has deemed to be "PROHIBITED" from use or dissemination under criminal penalty. This is the tortuous dissemination of the document to one of Mr. Schied's full-time employers in 2005.
29	Evidence that the Northville Public Schools administration retaliated against Grievant David Schied by criminally disseminating the Texas "Agreed Order of Expunction" that the State of Texas has deemed to be "PROHIBITED" from use or dissemination under criminal penalty. This is the tortuous dissemination of the document to Mr. Schied's estranged wife in 2006 as they were going through divorce proceedings. This

	dissemination was sent criminally by NV School administrator David Bolitho in response to a public FOIA request.
30	This is a Complaint filed by Mr. Schied's attorney Daryle Salisbury in 2006 in suit against the Northville Public Schools for their malicious and criminal dissemination of the Texas "*Agreed Order of Expunction*." This complaint was accompanied by a "Motion for Injunctive Relief" requesting that the district simply remove the document from their personnel files as promised in 2004 as a condition of hiring and in return for Mr. Schied relinquishing to the administration copies of his clemency documents while the FBI identification record was being challenged and corrected.
31	This is the ruling of 3rd Judicial Circuit Court "judge" Cynthia Diane Stephen just prior to her being promoted to the Michigan Court of Appeals. In this transcript, she clearly can be found to state (repeatedly) that "***Expungements are a MYTH***" and that the legislator's intent for the Michigan law is for "***schoolteachers to be subject to a LIFE SENTENCE***."
32	a) Crime report to the Northville City Police Department about Northville Public Schools administrator Leonard Rezmierski, David Bolitho, and Katy Doerr-Parker committing crimes by the dissemination of the Texas "Agreed Order of Expunction" in reply to FOIA and other school district requests for information about David Schied. **b) A fraudulent crime report constructed by NV police officer Anthony Tilger filled with *gross omissions and misstatements of fact*.** **c) Letter written by David Schied to the Northville City Police chief and to the Wayne County Prosecutor Kym Worthy revealing a conspiracy to deprive of rights between officers of the Northville Police and "Public Integrity Unit" assistant prosecutor Robert Donaldson in Detroit.**
33	a) Contract with an attorney paid to be a witness to "victim" testimony at the office of Robert Donaldson; b) Letter sent to prosecutor Robert Donaldson in memorialization that Donaldson deliberately had his building security "hold" Mr. Schied's attorney at the bottom floor of the building for 45 minutes while he attempted to force Mr. Schied to testimony without the attorney present; and then when Mr. Schied elected to continue to wait that Donaldson refused to move forward with the interview after releasing the attorney to come up to his office...before then recommending that the attorney charge Mr. Schied more money to rewrite Police Officer Anthony Tilger's crime report because it was written in such way that he "*saw no evidence of a crime*." c) Detroit Free Press clipping showing that Kym Worthy was making public threats to stop all prosecution of public corruption cases and to sue the Wayne County Commission if they did not cough up more money for her office. d) Grievant David Schied's letter to Kym Worthy reporting felony corruption BY Robert Donaldson and the officers of the Northville City Police Department in a criminal conspiracy to deprive of rights under color of law.
34	Grievant Schied's letter of Complaint about Officer Tilger's crime report being fraudulent; and the "acting chief of police" Michael Carlson's reply letter stating that he found nothing done wrong by his department. (16 pages)
35	a) Robert Donaldson's 3-sentence letter to Grievant David Schied revealing that he had dismissed Mr. Schied's criminal complaint (for person reason) because he did not like how Mr. Schied had "postured" against him by hiring an attorney as his witness after having first confronted the shenanigans between the Northville City Police department

	and the Wayne County Prosecutor's office in "*losing*" the initial crime report. b) Cptn. Michael Carlson's letter stating that he found no fault by his officer, which was copied to the Defendant Michigan Municipal Risk Management Authority showing that Defendant MMRMA has had peripheral knowledge of this malfeasance by their "*clients*" and/or business partners for this past nearly nine (9) years. c) Mr. Schied's written correspondence with Wayne County Commissioner Laura Cox and the Wayne County Commission in request for a criminal investigation of the activities between the Northville Public School administrators, the Northville City Police Department, and the Wayne County Prosecutor's office. d) Laura Cox's forwarding of Mr. Schied's complaint to the "special operations" chief of the Wayne County Prosecutor's office, James Gonzales for review of Donaldson's "discretionary" decisions. **e) James Gonzales' fraudulent letter of reply exhibiting the usual "*pattern and practice*" of constructing a fraudulent official government document chock full of treasonous color of law, errors and omissions, and deliberate misstatements of fact.** (21 pages)

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<u>SUMMARY OVERVIEW</u>:
PLUNKETT COONEY'S "*ANSWER*" FILING ON BEHALF OF THEIR CLIENTS, *ICSOP* and <u>AIG</u>, EXHIBITS THE <u>*PATTERN AND PRACTICE*</u> OF "*FRAUD UPON THE COURT*" BY THEIR GROSS OMISSIONS, INTENTIONAL DECEPTION, FRIVOLOUS FILING, AND OBSTRUCTION OF JUSTICE

1. **<u>FACT #1</u>** – Plunkett Cooney has submitted 181 numbered paragraphs in 35 pages that on its face is entirely fraudulent. As shown on p.35, the final page was intentionally "*submitted*" as undated and unsigned, while listing the names of two attorneys – Charles Browning and Warren White – for which only ONE attorney has formalized any "*appearance*" into this official "*court of record*," that attorney being Warren White. (*See* **"<u>EXHIBIT #1</u>"** as the cover page through page 35 as the final page of "*Answers*" purportedly "*submitted*" by two attorney for which neither holds accountability for the statements being "*submitted*.")

<u>Defendants ICSOP, AIG and their "*Plunkett Cooney*" attorneys are in blatant violation of F.R.C.P. Rule 7(b)(3) and Rule 11</u>

2. **<u>FACT #2</u>** – The failure by co-Defendants and their representative attorney(s) to sign papers and their written "*representations to the court*" blatant violate F.R.C.P. <u>Rule 7(b)(3)</u> and <u>Rule 11</u> and undermine the integrity and basis for creating a "*Court of Record*."
3. **<u>Rule 7(b)(3)</u>** clearly commands, "*All motions shall be signed in accordance with Rule 11*." **<u>Rule 11</u>** commands, "*Every pleading, written motion, and other*

paper shall be signed by at least one attorney of record, in the attorney's individual name...and unsigned paper shall be stricken..."

4. **<u>FACT #3</u>** – Page 38, being the final page of Plunkett Cooney's submission of tortuous gross omissions of redundancy statements in succession of 181 times, demonstrates – prima facie – that at least TWO attorneys exercised the opportunity and responsibility to construct, review, and correct the filings. Accordingly, the initial "*omission*" of the signature on that page has already been "*called to the attention*" by the attorney's cohort upon review by the associate attorney, being either attorney Browning or attorney White, and nevertheless BOTH attorneys have refused to promptly "*correct*" that significant omission in accordance with the conditions set forth by **<u>Rule 11(a)</u>**.
5. **<u>FACT #4</u>** – **<u>Rule 11(a)</u>** asserts that the Court SHALL BE STRICKEN unless promptly corrected after being called to the attention of "*the*" attorney or party. Thus, the following course of events are understood to have taken place "*off the record*" in the course of creating and submitting these overly fraudulent "*Answers*," leading to the conclusion that this filing MUST be stricken for reason of both the attorneys' and the parties' refusals to immediately "*correct*" this formal *submission* to the Court:

a) There are TWO "*parties*" – *prima facie* – each expected to be fully knowledgeable and responsible for the submissions of their attorneys on their behalf;

b) The formal "*Appearance*" of Warren White **("EXHIBIT #2")** makes clear – *prima facie* – that the **full-service and fully-staffed law firm of "Plunkett Cooney"** is acting "*on behalf of Defendants, The Insurance Company of the State of Pennsylvania and American International Group, Inc*." (Bold emphasis)

c) The FACT of the formal "*Appearance*" of Warren White (P73239) **("EXHIBIT #2")** makes clear – *prima facie* – that senior attorney Charles Browning (P32978)[1] holds joint responsibility with his co-writing and co-

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[1] Upon information and belief, senior attorneys at law firms are named with their State BAR of Michigan membership numbers on Defendant government filings for at least two primary reasons: **Firstly, the lower "P-#####" assures the District Court of the United States that all filings "*submitted*" by and/or signed by the junior attorney have been and are being continually and professionally "*supervised*," reviewed, and authorized by the senior attorney who also takes full personal and professional responsibility for the contents of all filings which are submitted by either of them, individually or jointly. Secondly, revealing the State BAR of Michigan membership number identifies to the attorney's peer group of federal judges** – who are also fellow members of that same State BAR of Michigan – **which attorneys are most closely affiliated with seniority of the overall membership of this "*union*" of attorneys,** by comparison to the judge's own BAR membership number; **and thus, which attorneys have the most "*experience*" with the systemic government corruption and racketeering by comparison to the others.**

submitting *partner* as both employed under the umbrella corporation of *professionals* calling themselves collectively "Plunkett Cooney."

d) As such, it is a FACT that there are two listed attorneys – *prima facie* – being represented to this District Court of the United States, as acting on behalf of the entirety of a fully-staffed Plunkett Cooney law firm, being Charles Browning (as the senior attorney with a higher BAR membership number) and being Warren White (as the junior attorney with a lower BAR membership number).

e) The FACT that not one but TWO attorneys from the many State BAR of Michigan attorneys employed at the Plunket Cooney law firm are being represented as having *submitted* the instant "*Answers*" assures the Court – *prima facie* – that **the SECOND attorney has *already* exercised his fiduciary duty to the Court, and to their clients as joint co-Defendants, to review, approve, and jointly submit whatever documentation that carries the names of these two individuals, as well as the name of that law firm.** (Bold emphasis added)

f) Under the light of the above-listed "*prima facie*" FACTS, it is easy for any rational person to deduce that there is literally four (4) levels of protected oversight on any particular filing by Plunket Cooney law firm on behalf of their TWO clients, ICSOP and AIG.

g) Under the light of the above-listed "*prima facie*" FACTS, it is also easy for any rational person to properly infer that the "*failure to sign*" the instant submission of "*Answers*" by "THE" first attorney has already brought to the attention of THE first attorney and/or to their client(s) by the "SECOND" (partnering) attorney under this **Rule 11 of the Federal Rules of Civil Procedure; and thus, their COLLABORATIVE decision to refuse the needed signing and to collaboratively decide, along with and by the added oversight of the co-Defendants as their clients, is wholly sanctionable.** (Bold emphasis added)

Defendants ICSOP, AIG and their "*Plunkett Cooney*" attorneys are committing FRAUD in "*pattern and practice*" by their affirmative acts of submitting – *prima facie* – questionable documents and vague, frivolous and obstructionist claims that "*ICSOP and AIG neither admit nor deny the allegations in Complaint (paragraph #) for the reason that they lack sufficient information or knowledge to form a belief as to their truth*"

6. The fraudulent tactic depicted above – as provided by numerous other examples of the "*pattern and practice*" – is one of tortuous intent to generate documents laced with gross omissions and misstatements, and planting them into the official court record for the purposes of complicating and convoluting the actual issues of a case, and absolving the criminal offenders by later arguments submitted "*under color of*" law and procedure in question of the actual facts and the authenticity of the actual Evidence..

7. In this case, the deceptive intent of Co-Defendants, acting through their Plunkett Cooney / State BAR of Michigan member attorneys, is to *plant* fraudulent statements in 181 paragraphs in 35 pages under the guise that these pages were fully constructed, fully reviewed, fully endorsed and "*submitted*" by not one, but TWO, State BAR of Michigan attorneys as "*judicial officers*" – Charles Browning and Warren White – both being under contract and regulatory oversight of the Michigan Supreme Court. Yet these same documents, by their very nature of intentional vagueness, their redundancy of submission, and being unsigned significantly open the door for authenticity questioning, giving both Browning and White a later opportunity to reject their having personal responsibility or accountability for document construction, review, endorsement, and submission; and thereby by stripping any future accuser of what otherwise is undeniable evidence that both of these State BAR of Michigan attorneys have actually committed this crime of "*fraud*" upon this instant case and *Court of Record*.

8. **FACT #5** – Upon information and belief, the manner in which Plunkett Cooney attorneys have acted, as shown above, follows a familiar *pattern and practice* of their peer group of other State BAR of Michigan attorneys as shown by **"EXHIBIT #3"** and **"EXHIBIT #4,"** as partially explained in sworn and notarized Affidavit of Krystal Price found as **"EXHIBIT #4,"** and as more fully

explained in video format featuring another alleged crime victim and claimant against Defendants Charter County of Wayne, ICSOP, and AIG.[2]

9. **FACT #6** – **"EXHIBIT #3"** consists of two – arguably THREE – judicial Orders, both (and/or all three) issued by 34th District Court "judge" Brian Oakley in 2012, with questionable – *prima facie* – evidence of unethical conduct, **and the criminal deprivation of rights *under color of law***, by the State BAR of Michigan attorneys involved and by Brian Oakley himself.

10. **FACT #7** – The above-referenced Evidence of the unethical conduct and the criminal deprivation of rights under color of law are further supported in the context of **"EXHIBIT #4"** which consists of two letters from the "Court Recorder / Judicial Assistant" to Brian Oakley and pages of the docket sheet for the case and "*orders*" in question that are supposed to pertain to and reflect the events authentically signed by the State BAR of Michigan attorneys and "*judge*" as "*judicial officers*" as shown in **"*Exhibit #3*."**

11. **FACT #8** – Placed in the further context of certain statements found in **"EXHIBIT #5"** as the sworn and notarized "*Request for Inquiry of Administrative Procedures*" (i.e., "*Complaint*") and "*Statement of Facts*" of

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[2] That YouTube video "*channel*" with many segments underscoring corrupt attorneys and judges operating within the territorial boundaries of Defendant Charter County of Wayne can be found at: **https://www.youtube.com/channel/UCd3xqk6Kc778ASLAsRpV5ag**

Krystal Price, the Defendant in that 34th District Court case, it becomes even more clear that **the unauthorized and illegitimate acts of these "*co-conspirators*" are tailored to forcibly coerce government policies and practices in a manner that – by definition of the FBI – reflects "*domestic terrorism*" being carried out within the territorial boundaries of Defendant Charter County of Wayne, the contracted business partner of Defendants ICSOP and AIG.** (Bold emphasis added)

12. **"Facts #6 through #8"** above are explained in further detail below to depict the "*pattern and practice*" of judges and attorneys, as all joint members of the State BAR of Michigan, conspiring – against both state and federal rules of civil procedure and against all judicial canons and rules of professional ethics – to commit criminal acts that go so far beyond "racketeering and corruption" to become genuine acts of terrorism as defined by the FBI. (See **"EXHIBIT #6"** as a copy of the FBI's public website defining "*terrorism*" and "*domestic terrorism*.")

    a) Page 1 of ***"Exhibit #3"*** is a "*Stipulated Order re: Escrow and Scheduling Order*" dated on 3/27/12 and specifically refers to a "*session of said Court*" was purportedly "*held in the 34th District Courthouse, Wayne County, State of Michigan;*"

b) Page 2 of ***"Exhibit #3"*** is page two of the above-referenced "*order*" reflecting that 34th District Court "judge" Brian Oakley signed the document on 3/29/12, after Trott and Trott attorney Matthew Levine (P-62160) had signed the order on 3/20/12, leaving the space for the signature of Defendant Krystal Price's attorney or Krystal Price herself blank and otherwise referencing the words "*See attached*" but without anything else "*attached*" to this document.

c) Page 3 of ***"Exhibit #3"*** is a "*Stipulated Order Transferring and Severing Counter-Complaint to Wayne County Circuit Court* ***and Setting Freddie Mac's Deadline to File*** *a Response to Counter-Complaint.*" The document – *prima facie* – reflects the same case as shown above being represented by a different attorney of the Trott and Trott law firm, as well as another attorney employed by Dykema Gossett law firm. **The top of the document clearly names Federal Home Loan Mortgage Corporation (a.k.a. "Fannie Mae" not "Freddie Mac") as the Plaintiff.** This document is dated 4/3/12 and specifically refers to a "*session of said Court*" was purportedly "*held in City of Romulus, Wayne County, Michigan*." Brian Oakley's name is handwritten with the letters "B-r-i-a-n" all separate, with the dot for the "i" earlier appearing over the "n" and the second number "2" of "2012" sitting just above the line. (Bold emphasis added)

d) Pages 4-5 of ***"Exhibit #3"***, being pp. 2-3 of this this second "*order*" by 34th District Court judge Brian Oakley, are typewritten and unremarkable.

e) Page 6 of ***"Exhibit #3"***, being pp. 2-3 of this this second "*order,*" contains four signatures reflecting that Brian Oakley "*signed*" this document by handwritten signature on 4/3/12 and **after Plaintiff's attorney, Alexandra Wolf (P-75581) signed for ALL of the attorneys of record, including *Counter-Plaintiff* Krystal Price's attorney** Henry Sandweiss (P-19879). The problem here is that – again – neither Krystal Price nor her attorney purportedly knew about this event and never gave such permission for the opposing counsel to sign in consent to this "order" the day prior (on 4/2/12 as shown) to the purported "*session of said Court*." (Bold emphasis)

f) Page 7 reflects a fraudulent replica of page 1 of Oakley's second (i.e., dated 4/3/12) order "*severing*" the counter-complaint. This fraudulent replica of the first order appears to have been fraudulently filed in the U.S. District Court (for the Eastern District of Michigan) just over a month after the initial order. This document is clearly NOT THE SAME as the previous one referenced above as hand-signed by Oakley because the handwritten name of "B-r-i-a-n" is clearly different: This time the "B" touches the "r" and the dot for the "i" earlier appearing over the "n" and the second number "2" of "2012" extends below the line.

g) Page 8 is the additionally reflects fraudulent replica of p.4 of Oakley's second (i.e., dated 4/3/12) order "*severing*" the counter-complaint. This fraudulent document, also reflecting that it had been fraudulently filed in the U.S. District Court (for the Eastern District of Michigan) just over a month after the initial order, is also clearly NOT THE SAME as the previous one referenced above as hand-signed by Oakley. This fraudulent document carries the "*stamped*" name of Brian Oakley, and stamped with a DIFFERENT date of such "*signing*" by Oakley as being on 4/8/12 rather than on 4/3/12 as was the previous *original* or *authentic* order. Like the previous one, this document reflects that Dykema Gossett attorney Alexandra Wolfe signed for all the attorneys, including Krystal Price's attorney.

13. **"EXHIBIT #4"** is even more incriminating than ***"Exhibit #3"*** upon these attorneys and judges as all members of the State BAR of Michigan conspiring to deprive Krystal Price of her rights to due process in order to STEAL title and possession of her sacred property and home.

    a) Pages 1-2 of ***"Exhibit #4"*** are TWO LETTERS, each written to Krystal Price from Paula Moore, the "*Court Recorder/Judicial Assistant*" for 34th District Court "judge" Brian Oakley. The letters were dated 4/8/14 and 4/25/14 respectively.

b) The first of the two (one-page) letters, dated 4/8/12, was in response to Krystal Price's request for transcripts for the two above-referenced hearing dates of 3/27/12 and 4/3/12 as the two dates[3] referenced by **"*Exhibit #3*"** as when events occurred against Krystal Price leading to the two "*stipulated orders*" signed by Oakley. This written response by the 34th District Court "court recorder" clearly shows that "*no record[s] for the case*" to be found for the dates of 3/28/12 and 4/3/12.

c) The second of the two (one-page) letters, dated 4/25/12, was in response to Krystal Price's notice that Paula Moore had referenced the wrong date of 3/28/12 instead of 3/27/12. This second letter reiterated that, even with a search for records for purported "session" dates of 3/27/12 and 4/3/12 as referenced by **"*Exhibit #3*"**, still "*no record[s] for the case*" were ever found.

d) The 3rd through 8th (6 pages) pages of **"*Exhibit #4*"** are a copy of the "*Register of Actions*" for the 34th District Court pertaining to Krystal Price's case. As shown by these records, there was no "session" held – and in fact, no activity whatsoever on that case – on 3/27/12 showing

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[3] NOTE: Due to the gross negligence, dereliction, and/or extreme incompetence of Oakley's "assistant" Paula Moore, the first letter referenced the wrong date of 3/28/12 instead of 3/27/12 as requested by Krystal Price for the ordering of that transcript. Therefore, after Ms. Price took further trouble to bring this to Moore's attention, Moore issued the second letter.

again, *prima facie*, that Brian Oakley's 3/27/12 "*stipulated order*" was fraud on its face.

e) Moreover, there is no indication whatsoever that any such "*session of said Court*" occurred on 4/3/12 either except for the "*appearance*" of Dykema Gossett attorney Alexandra Wolfe and "*filing*" of the Order by fellow State BAR of Michigan member Oakley.[4]

14. **"EXHIBIT #5"** is 14 pages of Krystal Price's signed and notarized statements and Complaint to the State of Michigan's "*Region 1*" Office of the State Court Administrator located in Detroit, operating within the territorial bounds of the Defendant Charter County of Wayne. These 14 pages detail multiple aspects of Ms. Price's complaint including the following significant matters:

a) The first 7 pages of this Complaint – which is dated on 11/2/14 – pertain to the events outlined above in ***"Exhibits #3 and #4"*** above.

b) Pages 8 through 14 include Krystal Price's personalized letter to the State Court Administrator's office ("SCAO") reflecting the number of ways that her follow up phone calls were met with stonewalling, empty promises,

[4] This contention is supported also by the FACT that the Order issued by Oakley on 3/27/12 commanded the scheduling of the next hearing – the "pre-trial date" – for a month later on 5/21/12, a date that Oakley cancelled in lieu of a "stay" on those proceedings (which was sustained for two additional years until 2014 while Krystal Price battled her "Counter-Complaint" in FEDERAL court first, and then in the Wayne County Circuit Court, due to continuing fraud by Trott and Trott and Dykema Gossett attorneys).

runaround, "*lies*" and "*cover-ups*" by those under employ of the State of Michigan's SCAO in Detroit.

c) Pages 8 through 14 also reflect Krystal Price's articulated belief that the clerks of the 34th District Court had criminally embezzled her two years of documented nearly $16,000 in "*escrow*" payments to the court as reflected in the docketing records of **"*Exhibit #4*"** (herein).

15. **FACT #9** – Plunkett Cooney's numbered statements of illegitimate "*Answers*" demonstrate a "*pattern and practice*" of evasiveness, of gross omissions of popularly known and/or public knowledge, of gross dereliction of duty to disclosure. On behalf of the Defendants ICSOP and AIG, Plunkett Cooney has submitted 181 numbered paragraphs in 38 pages of strict redundancy, which all – with very few exceptions – state the following without any variance whatsoever:

> "*To the extent a response is deemed required, Defendants ICSOP and AIG neither admit nor deny the allegations in Complaint paragraph [1] for the reason that they lack sufficient information or knowledge to form a belief as to their truth.*"

16. **FACT #10** – The only variance from the above statement issued for each paragraph in deceptive redundancy is provided as follows:

a) In Defendants' "*Answer*" paragraph 153, the above captioning is preceded by:

> "*ICSOP states that it is a member company of AIG Property Casualty Inc. Answering further, ICSOP is not a proper defendant in this action.*

> *Defendants ICSOP and AIG admit that ICSOP issued Special Excess Liability Policy for Public Entities No. 1130137 to Charter County of Wayne ("Wayne County") for the policy period May 15, 2012, to May 1, 2013 ("ICSOP Policy") subject to all its terms, conditions, limitations, provisions, and exclusions. The ICSOP Policy is in writing and constitutes the best evidence of its terms. Defendants ICSOP and AIG neither admit nor deny....*"

b) In Defendants' "*Answer*" paragraph 21, the above captioning is succeeded only by:

> "*...Answering further, Defendants ICSOP and AIG admit only that the ICSOP Policy is in writing and constitutes the best evidence of its terms*."

c) Defendants' "*Answer*" paragraph 22 as follows in compounded answer:

> "*AIG admits that it is organized under the laws of the State of Deleware. Answering further, AIG is not a proper defendant in this action. Defendants ICSOP and AIG deny the remaining allegations in Complaint paragraph 22*."

Evidence in public records suggests that AIG and its subsidiaries and business partners have long been engaged in questionable practices that constitute fraud upon the public leading up to and throughout the national financial bailout of AIG by the American taxpayers

17. It is well documented that Defendant AIG is the massive insurance company which was bailed out by the government, with the Fed taking 80% ownership stake in 2008. By January 2, 2013 it was reported that two years prior to that the U.S. Treasury had held 92% of AIG's common stock, and that it sold its last shares in December 2012. (See article: http://www.politifact.com/truth-o-meter/statements/2013/jan/02/american-international-group/aig-says-it-has-repaid-government-plus-profit/)

18. Perhaps the best explanation of what occurred with that taxpayer bailout is found in an article written by political strategist, Mark Stoller, who is a senior policy advisor to Congressman Alan Grayson that has long had a focus on financial policy making and Wall Street. **"EXHIBIT #9"** is a copy of that article found online captioned, "*Wait. So THAT'S what the bailouts were about?*" The article begins with the following paragraph which pretty much sums up the situation as it now stands with this instant case naming the Charter County of Wayne and its business partner, AIG, as co-Defendants:

> "*One of the reasons why no one went to jail for the elite control fraud that cause the financial crisis is because of the pervasiveness of the criminality. You couldn't send one guy to jail without having that guy very publicly rat out everone else. To get to a high level on Wall Street you had to be dirty, like in a corrupt police department. No one trusts a guy who won't take bribes. Which brings us to Maurice "Hank" Greenberg, the former AIG CEO who is now, for a lack of a better word, ratting everyone else out*."

19. In short, AIG's financial woes had resulted from its greed in cornering the market on the sale of credit default swaps to all of the "*big players*" at the banks during the mortgage and housing bubble. Consequently, it was left holding the bag of liability, when that bubble burst on mortgage backed securities, on sums of capital that were larger than the parent company could access. AIG is reported to have had serious flaws in its securities lending operation as well as the above-referenced insurance operation. Moreover, as had been coming increasingly to light after all was said and done, it was discovered that even the bailout itself was presented to the public as a "*long and charming set of lies*"

and “*AIG didn’t necessarily need to be bailed out by the United States government*.”

20. As stated by analysis of Mr. Stoller, the Feds “*were probably breaking the law*” by denying private alternatives to the taxpayer bailout, even when considering non-national private investors from China and the Middle East and the rumors of AIG’s involvement with the CIA as presenting national security concerns. The Federal Reserve simply had no authority to buy shares and take a controlling interest in AIG. It was instead action taken to circumvent the limitations on its own authority. This fraud was contributed to by Bernake’s lie to the commercial paper about the need to support TARP (Troubled Asset Relief Program), so to provide the means by which the U.S. Treasury could take the Federal Reserve’s illegally-held AIG shares off their hands.

21. Essentially, “*Paulson, Bernake, and Geithner...exceeded their legal authority to buy AIG for the government and then lied about it before then using the $700 billion for the TARP program to absolve them*” *under color of law*. The Evidence and testimony referenced by Stoller’s article suggests that the government power players’ motivation for doing this was “*to steal AIG from its shareholders, and then funnel money through AIG to banks like Goldman [Sachs]*” and Bank of America that were willing to take “*less than 100 cents on the dollar for counter-party payouts*” on money that AIG still owed to them,

even though Geithner later "*ensured that these banks would get 100 cents on the dollar, as well as legal indemnity*."

22. As the story of AIG goes, the New York "*Fed*" officials "*explicitly tr[ied] to avoid the Freedom of Information Act, as well as SEC disclosure requirements*" so to keep the public from finding out the truth in the FACT that "*A.I.G.'s lifeline [w]as a way to push money into the hands of Goldman Sachs, Deutsche Bank, Societe Generale, and dozens of other big banks around the world*" to keep them from failing. In essence, the bottom line is that "*the corrupt manner in which the bailouts were done turned property rights into an explicit reflection of arbitrarily exercised political power*." And "*because of these bailouts, no one with a straight face [can] claim we live in a culture that enforces property rights as a mechanism to protect individual liberties*."

23. **Thus, AIG's demonstrated long history of greed and corporate fraud are increasingly coming to light as a reflection of oligarchical and fascist power-mongering between banking institutions and governments. Such history of AIG proves its knowledge and its *patterns and practices* of greedily utilizing corporate and government contracts and racketeering schemes structured under *color of law* to defraud the public of their financial resources and property, as well as their dignity, their due process rights, and their civil liberties.** (Bold emphasis)

24. Therefore, claims such as those made by the co-Defendants, in the instant "*Answers*" issued by the State BAR of Michigan attorneys employed under the umbrella "*corporate fiction*" of the Plunkett Attorney law firm – that the co-Defendants "*neither admit nor deny the allegations in Complaint paragraph [x,y,z] for the reason that they lack sufficient information or knowledge to form a belief as to their truth*" – hold no "*water*" and will be deemed *incredible* when presented to the Jury.

The co-Defendants and their attorneys are neither stupid nor ignorant of the certain "*facts*" pertaining to and underlying Grievant David Schied's "*state created danger*" claims against the Defendant Charter County of Wayne (a.k.a., "*Wayne County*") and against Defendants ICSOP and AIG with regard to their fostering "*excess liability coverage*" and protective "*denials*" and legal defenses against allegations and claims of "*[domestic] terrorism*" being carried out by their business partners and clients, Defendant Charter County of Wayne. They instead hide behind a highly sophisticated scheme of protective "*shells*" being deliberately stylized as brokers, independent agents, and special investigators who are governed by corporate *management* experts and BAR attorneys; and who are operating under the veil of local-level corruption by government *usurpers* and their State BAR of Michigan attorneys comprising the "*Wayne County Corporation Counsel*."

25. **FACT #11** – Though co-Defendants claim to "*lack sufficient information or knowledge to form a belief as to the truth*" of the allegations about coercion of domestic terrorism being carried out by the agents of the Defendant Charter County of Wayne, and throughout the territorial boundaries of the same, co-Defendants ICSOP and AIG collectively boast about their maintaining "*a significant number of 'fraud investigators' who are geographically dispersed*

and highly skilled at handling reports of suspicious insurance activity." (See **"<u>EXHIBIT #7</u>"** as a copy of the AIG "*Fraud Warning*" web page.)

26. As shown by **"*<u>Exhibit #7</u>*"** the sole intent of "*<u>AIG's Global Investigative Services</u>*" is to "*safeguard AIG's corporate assets, preserve the Company's reputation, and to improve deterrence*" of what AIG itself deems – along with the corporate charters of government they insure as clients – to be "*fraudulent*" claims. **As such, <u>genuine questions of FACT exist as to the following</u>:**

   a) Whether *<u>AIG's Global Investigative Services</u>* and "*significant number of ['fraud'] investigators who are geographically dispersed and highly skilled*" really are as uninformed and "*lack sufficient information*" as the co-Defendants ICSOP and AIG now purportedly claim to be with regard to "*fraud*" being committed upon the public by their own client, Defendant Charter County of Wayne, and its various agents operating strategically as alleged usurpers of government power and authority and acting primarily on the recommendations and "*orders*" of State BAR of Michigan attorneys employed by the Corporation Counsel and various district court and circuit court judges dispersed around the county and employed both BY and AS the Charter County of Wayne.

   b) Whether, and to what extent, other – perhaps even "*better*" – evidence exists than the written "*ICSOP Policy"* that co-Defendants appear to claim is the

"*best evidence of [the May 15, 2012 to May 1, 2013 policy's] terms*," particularly given the **FACT #12** that **Plunkett Cooney's written "*Answer*" to Grievant's claim in paragraph #153 is grossly misleading and omitting** as **FACT #13** that **co-Defendants issued a subsequent policy that picked up where the co-Defendants' referenced policy coverage left off and extended immediately forward through the following TWO "*coverage years*" and likely further unto the present.** (See **"EXHIBIT #8"** as a copy of the first five [5] pages of an alleged policy issued by co-Defendants to Defendant Charter County of Wayne with a "*Policy Period [f]rom May 1, 2014 [t]o May 1, 2015*")

c) Whether, and to what extent, those under contract with and acting as the "*agents*" for co-Defendants ICSOP and AIG are either conspiring with or seriously lying to the co-Defendants so to "*improve deterrence*" of and thus, seriously impede individual people like Krystal Price who can prove as **FACT #14** that they have gone far beyond reasonable measures with Defendant Charter County of Wayne to establish "*legal*" claims against the "*corporate assets*" and "*company reputation*" of Defendant AIG, its subsidiary of The Insurance Company of the State of Pennsylvania, and it's business partners and clients, the **Department of Management and Budget**, the **Wayne County Commission**, the plethora of State BAR of

Michigan **prosecutors, attorneys, and judges operating the district courts and circuit courts spread around "*3rd Judicial District*" and around the "*Eastern District of Michigan, Southern Division*," and in particular,** the State BAR of Michigan attorneys operating as **the** "**Corporation Counsel**" **for the Defendant Charter County of Wayne**. (Bold emphasis)

CASE #1

Evidence that co-Defendants are aware of the fraudulent ploys used by their insured agents of the Defendant Charter County of Wayne to prevent filing of claims against the usurpers of county government's enunciated privileges to power and authority

27. This section continues with an abbreviated overview of the previous example of Romulus resident Krystal Price's experiences with the Defendant Charter County of Wayne in trying to address what she can prove was fraud by State BAR of Michigan attorneys employed by the *Trott and Trott* and *Dykema Gossett* law firms, and the district and circuit judges of both the state and federal courts in covering up and dismissing her persistent reports about that fraud. As the Evidence and available testimony of Krystal Price demonstrates, after two full years of fighting against the corruption of the courts and the "*judicial officers*" operating in "*Wayne County*," Krystal Price had both good cause and no other alternative but to seek recompense of her incalculable losses

through the filing of an insurance claim against Defendant Charter County of Wayne.

28. Significantly, Ms. Price's plight is well-documented, giving both good cause and no other alternative but to provide that ever-compounding evidence to each successive level of redress that had been provided by Defendant Charter County of Wayne under color of law. The highlights of each such "*appeal*" through the district, circuit, and federal court systems is a matter of public record. Ms. Price's story herein thus picks things up at which point she attempted to file her claims outside of the corrupted courts, and in attempt to avoid State BAR of Michigan "*judicial officers*" employed as the *Wayne County Corporation Counsel*.

KRYSTAL PRICE'S ATTEMPTS TO FILE A DAMAGE CLAIM WITH DEFENDANT WAYNE COUNTY'S OFFICE OF RISK MANAGEMENT ARE PURPOSEFULLY THWARTED

29. **FACT #14** – As shown by **"EXHIBIT #10,"** Krystal Price completed her final appeal to the 3rd Judicial Circuit Court via her "*Appellant's Affidavit in Support of Appeal*" dated 6/16/14 which was subsequently dismissed by "*judge*" Daphne Curtis without litigation of the merits of her sworn and notarized statements. Significantly that document held the following points:

a) That she was the victim of a fraudulent foreclosure process and fraudulent sheriff's deed.

b) That she was never in default on the terms of her mortgage.

c) There was no assignment of mortgage and no notice of foreclosure in the Wayne County Records

d) That the sheriff's deed dated in 2011 reflects the wrongful party name of "*Prince*" and not "*Price*," and that similarly, the summons and complaint on the *eviction* case number filed in the 34th District Court was also listed in the name of "*Prince*" and not "*Price*."

e) That the Affidavit of Sale ("*Affidavit of Posting*") and "*Affidavit of Publishing*" used throughout the non-judicial foreclosure process was in the name of "*Prince*" and not "*Price*."

f) That the "*parcel ID number*" on the sheriff's deed was incorrect and invalid.

g) That the matters handled by "*judge*" Brian Oakley at the 34th District ("trial") Court in 2012 were all conducted without proper hearing and with fraudulently constructed "*official*" judicial documents to deny due process *under color of law*.

h) That the "Escrow Account" to which Krystal Price was paying $15,000 into for two years as fraudulently ordered by Brian Oakley, was opened by the 34th District Court in the name of "*Fannie Mae*" which was not a party to the court action initiated by the *Trott and Trott* law firm on behalf of Freddie Mac.

i) That the final judgment of eviction by Brian Oakley was in the name of "*Prince*" and not "*Price*" and on a case for which Freddie Mac had no rightful standing from the beginning since the *Trott and Trott* law firm had previously executed the non-judicial foreclosure process on the party of "*Prince*" and not "*Price*;" and similarly, two years later when Bank of America purchased the home for $1.00 it too had no standing in the case since the foreclosure two years prior was fraudulent.

30. **FACT #15** – As shown by **"EXHIBIT #11,"** from October through December 2014, Krystal Price sought public Oaths of Office and copies of performance bonds on the public functionaries that caused her harm through operation of color of law during the previous two years of "*judicial*" process in various courts. She did so through her contact with Mary Anne Daskas employed by the Defendants Charter County of Wayne's **Department of Management and Budget, the policyholder for the co-Defendants' ICSOP and IAG's policy** shown page 3 of ***"Exhibit #8"***. She also filed a formal sworn and notarized Complaint (3 pages) with the Defendant Charter County of Wayne's "*Wayne County Clerk*" Cathy Garrett's office. (Bold emphasis added)

31. **FACT #16** – The sworn and notarized Complaint filed with the Defendant Charter County of Wayne's *Wayne County Clerk* Cathy Garrett's office spotlighted the following ***added layer of corruption*** by the State BAR of

Michigan attorneys, clerks, and others operating the "*courts*" of the Defendant Charter County of Wayne as it pertained to Krystal Price's "*cross-complaint*" that was supposed to have been removed from the 34th District Court to the 3rd Judicial Circuit Court in Detroit by the Court Order issued by Oakley on 4/3/12 (i.e., see **"*Exhibit #3*"**):

a) That in the immediate aftermath of Oakley's "*order*" for the transfer of Ms. Price's "*cross-complaint*" to the 3rd Judicial Circuit, the Dykema Gossett attorney, Alexandra Wolfe, unilaterally opened up TWO SEPARATE cases with TWO CASE NUMBERS in the 3rd Judicial Circuit Court.

b) That subsequently, within a couple of days of such filings, attorney Wolfe fraudulently removed one of those two cases to the U.S. District Court for the Eastern District of Michigan in violation of the 34th District Court's court order, without any hearing or order pertaining to such a removal from the 3rd Judicial Circuit, and before either of the payments had been tendered and processed, before the files could be transferred from the 34th District Court to the 3rd Judicial Circuit Court, and even before a case number could be assigned to the (cross-complaint) case removed to the federal court.

c) That despite not having the jurisdiction to do so, despite Ms. Price's attorney not having the authority to practice law in the federal court, and despite Ms. Price's written protests and reports of fraudulence, **for the following two**

years the judges and magistrates operating the federal courts in Detroit and Cincinnati ruled to dismiss Ms. Price – who was operating without an attorney at that time – *under color of law*, and <u>without litigating the merits</u> of Ms. Price's various motions supported by other of her sworn and notarized Affidavits, and without providing her with so much as one hearing during any of those two years. (Bold emphasis added) (See again, **"*<u>Exhibit #11</u>*"** as Ms. Price's filed with the Wayne County Clerk's office in November 2014)

32. Again, further information and evidence, along with more of Krystal Price's own video testimony regarding this **"*chain conspiracy to deprive of rights under color of law*" committed most by those operating through the executive and judicial offices and courts of Defendant Charter County of Wayne** can be found through the investigative journalism segments #2 through #7 of "*<u>RICO Busters</u>*" as found on YouTube: **https://<u>www.youtube.com/channel/UCd3xqk6Kc778ASLAsRpV5ag</u>** (Bold emphasis added)

33. **<u>FACT #17</u>** – As shown in **"<u>EXHIBIT #12</u>,"** by 12/2/14 (December 2, 2014) Krystal Price was jointly denied her request for copies of performance bonds from the co-Defendant's ICSOP and AIG's business partner of Defendant Charter County of Wayne's *Department of Management and Budget* (Mary

Anna Daskas) and the *Office of Corporation Counsel* (whose signature is illegible and name is not written).

34.**FACT #18** – As also shown in **"*Exhibit #12*,"** by the end of December (2014), the Office of the Wayne County Clerk (Cathy Garrett) and the Office of Corporation were still stalling Ms. Price on her formalized Complaint about the "*judicial officers*" operating the courts of Defendant Charter County of Wayne (i.e., see the letter written by county clerk administrator Tracy Gilbert dated 12/22/14 and referencing the Corporation Counsel.)

35.**FACT #19** – By that time Ms. Price had also gotten word that the State Court Administrator's offices in both Detroit and Lansing intended to do nothing about her Complaint there. (*See* the letter compiled in **"*Exhibit #12*"** as written by the John Hohman, Jr. dated 10/2/14 who just six months afterwards in March 2015 announced his retirement from that position, to be replaced – again – by Milton Mac, another corrupt "*judge*" with a 30-year career of employment with Defendant Charter County of Wayne.)

36.**FACT #20** – Also, well under way was Krystal Price's other FOIA requests and her own private investigation into the Office of the Wayne County Treasurer Raymond Wojtowicz, and her suspicion that there was actually no "*escrow account*" set up by the 34th District Court, and that instead, the clerks had embezzled her $15,000 in payments. (*See* the compilation of

documents in **"*Exhibit #12*"** as also including the FOIA documents submitted to the Wayne County Treasurer's office and the letter of denial of such requests by the deputy treasurer David Szymanski on Wojtowicz's behalf.)

37. **FACT #21** – As shown in **"EXHIBIT #13,"** beginning in February 2015, Ms. Price had recruited the assistance of others in submitting FOIA requests for additional Oaths of Offices and reaffirming that none of these public functionaries employed by the Defendant Charter County of Wayne had surety against their violation of such oaths by way of performance bonds.

38. **FACT #22** – Additionally, whereas on December 2, 2014 Mary Anna Daskas was writing as the "*FOIA Coordinator*" for the Department of Management and Budget **("*Exhibit #12*")**, on February 23, 2015 Mary Anna Daskas wrote Krystal Price another letter citing herself to be the "*Director of Administration and Risk Management*" under Warren Evans as the Defendant Charter County of Wayne's "*Wayne County Executive*."

("*Exhibit #13*")

39. In her letter dated 2/23/15, Daskas acknowledged yet another follow-up correspondence she had received from Ms. Price dated 2/17/15. Daskas also acknowledged that both she and Krystal Price had been in touch with Corporation Counsel; and thus, this Director of Administration and Risk

Management therefore intended to stick with the Corporation Counsel's (i.e., State BAR of Michigan attorneys James Surowiec's and Aaron Thomas') directive for Ms. Price to seek her complaint remedy by going back to the same corrupt courts about which she was complaining. (*See* again **"*Exhibit #13*"**)

40. **FACT #23** – By March 2015, Krystal Price had enough evidence to show that there was no Defendant Charter County of Wayne employee or state employee working within the territorial boundaries of that Defendant whose solemn Oath to the state and federal constitutions and to the duties of their said office were guaranteed with the surety of performance bond. Therefore, on 3/3/15, Ms. Price wrote a detailed 9-page letter supported by evidence addressed to Mary Anna Daskas, the co-Defendants' ICSOP's and AIG's business partner and insurance client at the Department of Management and Budget. With that letter, which upon information and belief was submitted by sworn and notarized Affidavit by Ms. Price, Krystal Price initiated her formal request that Ms. Daskas assist her in filing a claim against Defendant Charter County of Wayne's *tort liability* and *errors and omissions* insurance policy. (Once again, see the compilation of documents of **"*Exhibit #13*"**)

41. As also shown by **"*Exhibit #13*,"** over a month later on 4/14/15, Mary Anna Daskas responded to Krystal Price's calculated report of losses occurring

between 2011 through 2015 by a letter of outright denial. Further, touting herself to be this time the "*Director of Risk Management*," Daskas reasoned that Ms. Price is not entitled to file a claim against the co-Defendants' risk management insurance company because *"[Krystal Price] is not a named insured, and [because] the policy does not cover [her]*." Instead, this former "*FOIA Coordinator*"-turned-"*Director of Administration and Risk Management*"-turned-"*Director of Risk Management*" advised Ms. Price to hire another attorney, reiterating that Ms. Price should seek further recourse in the same corrupt courts that she was claiming had damaged her for the previous number of years.

THE HIGHEST CORPORATE OFFICERS REPRESENTING CO-DEFENDANTS *ICSOP* AND *AIG* WERE FULLY AWARE OF THE UNLAWFUL CHARACTER OF THEIR "INSURED" LONG PRIOR TO THEIR PLUNKETT COONEY ATTORNEY FILING FRIVOLOUS STATEMENTS OF FEINTED IGNORANCE IN SUPERFLUOUS REPETITION

42. **FACT #24** – What follows is Evidence that prior to Grievant David Schied filing this instant case in "*complaint*" and "*claim*" for the damages caused to him as a result of the conduct of the collective named as co-defendants, the claim department and executive management for ICSOP and AIG were fully aware that *domestic terrorism* was taking place at the hands of their "*insured*" as their business partners and clients.

43.<u>**FACT #25**</u> – Further, the claim department and executive management for ICSOP and AIG readily demonstrated their willingness to accept responsibility for immediately issuing a "*claim*" number, to right away contact their clients as "*the accused*," and to immediately begin processing the *claim* for damages brought against them by Krystal Price.

44.<u>**FACT #26**</u> – On or about 4/7/15, Krystal Price wrote an email letter to the Director (Zenna Faraj Elhasan), the Chief Litigator (James Surowiec), and the Lead Attorney (Aaron Thomas) being employed by Defendant Charter County of Wayne as "*Corporation Counsel*." (See **"<u>EXHIBIT #14</u>"**) The letter outlined numerous substantial reasons for requesting that Krystal Price's crime report be relayed from the Wayne County Clerk and Corporation Counsel to the "<u>*Wayne County Fraud and Corruption Investigation Unit*</u>" of the Office of the Wayne County Prosecutor Kym Worthy, another agent of Defendant Charter County of Wayne and – according to information and belief – an "*insured*" of the co-Defendants ICSOP and AIG. <u>The reasons outlined by Ms. Price are listed as follows</u>:

a) Krystal Price's previous meeting on 11/14/14 with attorney Patricia Ways as the "*Chief Deputy County Clerk*," and *Department Administrator for the Office of the Wayne County Clerk*, Tracey Gilbert....along with Krystal Price's follow up correspondence dated

11/18/14, 1/13/15, to also include the response letter from the Mary Anna Daskas dated 12/22/14 (i.e., see **"*Exhibit 12*"**) had done nothing to produce results in moving Ms. Price's reports of fraud forward in any type of civil or criminal prosecution.

b) Krystal Price's second and third meeting on 12/22/14 with Ways and Gilbert, and on 1/30/15 with Thomas, resulted only in Ms. Price being informed afterward that those under employ for the Wayne County Clerk are only under Oath and Duty to "*stamp the complaint(s) and forward them to Corporation Counsel*" and NOT to investigate complaints like the fraud being reported by Ms. Price. Meanwhile, after stringing Ms. Price along until 2/20/15, James Surowiec and Aaron Thomas finally explained that, "*Wayne County Corporation Counsel only addresses lawsuits filed against the county; therefore...they will take no action to address the matter [either]*."

45. **FACT #27** – As shown by Ms. Price's email letter **("*Exhibit #14*")** she supported her request that James Surowiec and Aaron Thomas "*forward the complaint, in its entirety, to the Wayne County Fraud and Corruption Unit within the Office of the Prosecuting Attorney [Kym Worthy]*" **while citing several Wayne County ordinances outlining the policies and the**

procedures that these public functionaries are both authorized and under the duty to follow. (Bold emphasis added)

46.**<u>FACT #28</u>** – As also shown by ***"<u>Exhibit #14</u>,"*** before Ms. Price concluded her letter, she did the following:

a) She ordinance Sec. 73-3 (policy established) which stated,

> "*Every elected official, officer or employee shall cooperate with the Wayne County Fraud and Corruption Investigation Unit...if an elected official, officer or employee takes a deliberate action which impedes or compromises an investigation, that person may be charged with obstruction of justice, and prosecuted to the fullest extent that the law allows*."

b) She copied the letter to the following list of public functionaries employed by Defendant Charter County of Wayne – believed to also be "*insured*" members under co-Defendants ICSOP's and AIG's insurance contract – **with similar Oaths and Duties of office to act in some way on this formal "*complaint*" and "*report*" of fraud:** (Bold emphasis)

1) The Wayne County Fraud and Corruption Investigation Unit of the Wayne County Prosecutor's Office;
2) Tish King, Director of the Department of Personnel/Human Resources;
3) Mary Anna Daskas, in whatever she wanted to award herself as official title;
4) Cathy Garrett, Wayne County Clerk;
5) Attorney Patricia Ways, Deputy Chief under Cathy Garrett;
6) Tracey Gilbert, administrator for Cathy Garrett;
7) Robert Colombo, Chief Judge of the 3rd Judicial Court

47.**<u>FACT #29</u>** – As additionally provided in ***"<u>Exhibit #14</u>,"*** on 4/20/15, Krystal Price wrote a fully supported letter of response to Mary Anna Daskas' 4/14/15 *letter of flat denial* (i.e., see again ***"<u>Exhibit #13</u>"***). The 6-page cover letter is included with ***"<u>Exhibit #14</u>"*** which summarily covered the

following as addressed to both Daskas and Lyn Roberts, the Chief Financial Officer for Defendant Charter County of Wayne's "*Department of Management and Budget*":

a) Ms. Price accused Daskas' letter of 4/14/15 as being "*frivolous*" and an obvious attempt to circumvent the legitimacy of Krystal Price's claim against the risk management insurance policy for the Charter County of Wayne;

b) Ms. Price accused Daskas of "*skirting the pertinent issues*" and fraudulently couching them instead as simply being Krystal Price's "*dissatisfaction with the court foreclosure proceedings*."

c) Ms. Price thereafter proceeded in her letter to address each of the following categories of issues related to her *tort liability* and *errors and omissions* claim upon Defendant Charter County of Wayne's insurance policy held with co-Defendants ICSOP and AIG:

    1) Claim Amount;
    2) Proof of Loss Documentation;
    3) Nature of the Claim;
    4) Filing a Claim with Risk Management;
    5) Consideration of the Claim;
    6) The Policy;
    7) Conclusion

48. **FACT #30** – As shown by Ms. Price's 4/20/15 letter (i.e., the second letter of **"*Exhibit #14*"**), **she also copied this correspondence to** the three senior

members of the Wayne County Corporation Counsel named above, and to three representatives of the *errors and omissions* insurance contract between the co-Defendants Charter County of Wayne, the ICSOP, and AIG, being **policy insurance broker/agent Michelle Geitzen of Troy, Michigan, Robert Ulrich as AIG VP, and Jim Drake as AIG Assistant VP.**

49. **FACT #31** – Clearly, at some point in her frustrated investigation of all the corruption surrounding the many key public functionary offices operating as the Defendant Charter County of Wayne, Krystal Price was able to locate a copy of the "*excess liability*" errors and omissions insurance policy Defendant Charter County of Wayne has with co-Defendants ICSOP and AIG. As shown by the first page of four (4) pages of **"EXHIBIT #15,"** by 3/30/15 Krystal Price had made contact with Michael Creamer of the AIG Claims Intake Department in Alpharetta, Georgia, who immediately assigned a claim number of 030-314346 for Ms. Price's claim of damages.

50. **FACT #32** – As found on page 3 of ***"Exhibit #15,"*** AIG Assistant Vice-President for the Claim Intake Department, Jim Drake, also contacted Krystal Price about her claim the very next day after Mr. Creamer, on 4/1/15. Mr. Drake additionally reaffirmed that the claims processing had begun, that a claims representative would soon be contacting Ms. Price, and that "the insured" (i.e., the Defendant Charter County of Wayne) would soon

be also contacted about Ms. Price's direct claim with the insurance company after being given the runaround by the Defendant Charter County of Wayne' "*Risk Management*" department and State BAR attorneys employed as "*Corporation Counsel*" for that Defendant.

51. **<u>FACT #33</u>** – As shown by page 4 of **"*<u>Exhibit #15,</u>*"** the Vice President for AIG's Excess Casualty, Robert **<u>Ulrich</u>**, with a split office in New York and Alpharetta, wrote Ms. Price to notify her that a "*file*" had been established with that same claim number 030-314346, again reassuring Ms. Price that this new claim would be proceeding with the assignment of a claim group managed by Julia **<u>Ulrich</u>** Barrueco.

52. Even at first glance it is clear – *prima facie* – that the Vice President of AIG has a relative under his employ who he seems to have favored with confidence in the handling of this new claim "*filed*" by Crystal Price with exceptional swiftness by AIG's top brass in New York. This begs questioning for future *"discovery,"* about why Ms. Price was made to endure such constructive and legal resistance by the "*insured,*" about why Ms. Price's claim was sent up the corporate chain of commands outside of the claims department to the executive management, and why the claim was issued to a family member of that executive for processing rather than to an ordinary claims processor.

CASE #2

Defendant Charter County of Wayne's "*Prosecutor*" Kym Worthy has, for this past decade under that public functionary position, appeared to be – *prima facie* – adhering to those who make war against The People of the United States, giving them aid, comfort, and safe harbor *under color of law* and by means of *abuse of discretionary privilege*

53. As provided above, Krystal Price's case involves various "*deeds*" and claims of purchase and/or ownership on her home being questionably maintained by the Register of Deeds, **Bernard Youngblood**. It involves the former *sheriff* for Defendant Charter County of Wayne, **Warren Evans**, who is the current "*Wayne County Executive*," and the current sheriff, **Benny Napoleon**. As by the Evidence above, it also involves the office of the county Prosecutor Kym Worthy where, according to Ms. Price, the "*Wayne County Fraud and Corruption Investigation Unit*" operates.

54. **FACT #34** – As shown by **"EXHIBIT #16,"** since 2005 Defendant Charter County of Wayne has boasted – at least by appearance – having a "*Deed Fraud Task Force*" consisting of a collaboration of human and other resources from the offices of the Register of Deeds, the Sheriff, and the Prosecutor. From 2005 then, Kym Worthy and her *agents* have undertaken the duty to have "*Fraud Fighters*" under her employ spending "*100 percent of their time toward investigating mortgage and deed fraud*," while publicly claiming on the county's own website a "*99% conviction rate*."

55. **<u>FACT #35</u>** – Yet by contrast, there is an entirely different story going on beneath these surface features of the county web pages. Clearly, Crystal Price's outspokenness has brought the involvement of the Office of the County Clerk (Cathy Garrett), with the Office of the County Treasurer (Raymond Wojtowicz), the County Executives (Robert Ficano and Warren Evans), the county sheriffs (Warren Evans and Benny Napoleon), and the Office of the Register of Deeds (Bernard Youngblood), the State BAR of Michigan attorneys employed as "*Corporation Counsel*," the (34th) District Court, the 3rd Judicial Court, and the U.S. District Court – which are all operating as *agents* of Defendant Charter County of Wayne. There is no chance whatsoever that Ms. Price's allegations have simply "*fallen through the cracks*."

56. **<u>FACT #36</u>** – Two of these above-referenced offices (Register of Deeds and the county sheriff) are full partners with Prosecutor Kym Worthy on the Deed Fraud Task Force. Krystal Price case meanwhile is all about the report of deed fraud, mortgage fraud, and foreclosure fraud by the famed politician and new Oakland and Wayne County district congressman David Trott and his "*foreclosure mill*", the *Trott and Trott* law firm.

57. **The $100 million question is about why Kym Worth's prosecutor office has not taken appropriate steps to investigate Ms. Price's claims against**

Trott and his agents, against Alexandra Wolfe of the Dykema Gossett law firm, and against the sheriff's office, the deeds office, the 34th District Court judge Brian Oakley, the 3rd Judicial Circuit Court judges that were involved and fully apprised before ruling to dismiss Ms. Price, or any others named by Ms. Price. (Bold emphasis)

Wayne County Auditor General Willie Mayo has just recently (12/3/14) exposed – prima facie – the "*pattern and practice*" used by both Kym Worthy and Robert Ficano to commit crimes against the sovereign People of the county, through fraud, racketeering, and corruption before then taking his own retirement

58. **FACT #37** – The answer to that question begins with the second document included in ***"Exhibit #16,"*** which is captioned, "*Final Report Transmittal Letter*" and "*Follow-Up Review*" of the Wayne County Auditor General (Willie Mayo) in audit report to the Wayne County Commissioners about Prosecutor Kym Worthy's performance and nonperformance pertaining to the *Fraud and Corruption Investigation Unit* referenced by Krystal Price. The "*report*" conveys the following about the Office of the Prosecutor Kym Worthy:

   a) **FACT #38** – That since 1993 the Defendant Charter County of Wayne has had a "*Fraud Investigation Policy*" in place delegating the authority and responsibility for the Office of the Prosecutor (Kym Worthy) to investigate and report "*fraud, waste and wrongdoings*" by county

personnel (and report those findings to the Inspector General of the county). (See bottom of p.3 and top and middle of p.4 of the report.)

b) **<u>FACT #39</u>** – That prior to 2012, Prosecutor Kym Worthy and her agents were found by the Auditor General to be noncompliant with the terms of the Fraud Investigation Policy; and there was some apparent dissonance between that office and the office of the Auditor General in terms of performance. The Auditor General's (modified) recommendation to ensure compliance by the Prosecutor's office was for a full-time experience investigator to be operating within the Office of the Prosecutor. (See p.4 of the report)

c) **<u>FACT #40</u>** – For the Fiscal Year 2012-2013, the Prosecutor Kym Worthy received $200,000 in funding earmarked for the hiring of that full-time experienced investigator, who was to come from the Inspector General's department. (See p.5)

d) **<u>FACT #41</u>** – The Auditor General stated that in 2012 the funding was not provided to the Prosecutor Kym Worthy for that full-time experienced investigator because **Worthy's "*chief of staff did not feel that filling that position was justified since courtroom prosecutor positions were unfulfilled...[and because] the Prosecuting Attorney official indicated this is not a full-time position.*" In fact, the Chief of**

Staff claimed that s/he was then fulfilling that position him/herself and that Worthy and her agents were intending to contract with a "*qualified*" individual for a part-time position at ¼ of the $200,000 budgeted for the full-time recommendation by the Auditor General. (See pp.5-6)

e) The agent for Prosecutor Kym Worthy cited the management success in Worthy's enforcement of the "*Fraud Investigation Policy*" by the prosecutor's office getting three grand jury indictments on the *Wayne County Consolidated Jail Project* debacle. (See pp.6-7)

f) **FACT #42** – The Defendant Charter County of Wayne's Office of Fiscal Agency verified that the investigation position was nevertheless funded – without restriction to usage – to Prosecutor Worthy's office for $200,000 for the 2012-2013 fiscal year; and the Management and Budget Director ***"confirmed an investigative position with the Prosecuting Attorney's Office was funded in the Fiscal Year 2013 appropriation with general fund general purpose dollars. However, the $200,000 was used for general fund general purpose activities within the Office of the Prosecuting Attorney [instead].***" (See pp.6-7)

g) **FACT #43** – Subsequently in 2014, the Worthy's office was appropriated $30 million of which none was earmarked for the

investigative position because the money issued the preceding year was not used for that purpose **(i.e., because the $200,000 was "*wasted*" by Worthy)**. (See pp.6-7)

h) For 2014, between the Department of Personnel/Human Services and the Prosecuting Attorney Kym Worthy, all were satisfied to merely provide a "*fraud hotline*" number to call with the collaborative assistance of the Department of Technology, and at no apparent expense to the $30 million being issued to Kym Worthy. The Auditor General's report determined that, due to a $4 million increase in funding to Worthy for the fiscal year 2014, the $200,000 earmarked amount was still to be included, making it incumbent upon Worthy to follow through with the budgeted and recommended hiring. (See pp.6-7)

i) <u>**FACT #44**</u> – **Though the Auditor General found the above scenario to be problematic in that Prosecutor Worthy was paid the $200,000 to establish a separate Fraud and Corruption Investigation Unit and yet no such position was filled, the Auditor General cited his resolve of the issue by the FACT that the Wayne County Commission's legislative wording had provided the Prosecutor with full discretion over the "*duties and responsibilities*" for conducting compliant investigations.** (Bold emphasis added) (See pp.6-7)

j) **<u>FACT #45</u>** – The Auditor General pointed out that a "*separate business unit*" should be established and funded separately so that such funding would not be intermingled with Kym Worthy's other funding (and so to provide more transparency and control over Worthy's own "*pattern and practice*" of fraudulent spending). (See pp.6-7)

k) **<u>FACT #46</u>** – Additionally, the Auditor General recommended that the Wayne County Commission more closely "*monitor the establishment of the investigator position at the Prosecutor's Office to ensure the funds are spent as appropriated*" (i.e., there needs to be a different "*fox*" to watch the original "*fox*" from Worthy's office that is guarding the "*henhouse*.") (See pp.6-7)

59. **<u>FACT #47</u>** – **"<u>EXHIBIT #17</u>"** shows that within one month after publishing the above-referenced *<u>Final Report Transmittal Letter</u>*" and "*<u>Follow-Up Review,</u>*" the Wayne County Auditor General, Willie Mayo, resigned his job and took retirement. Though Mr. Mayo's tenure in office had reached its maximum allowed by the county's charter, his last year and a half in office were plagued by Kym Worthy and Robert Ficano teaming together to stifle and gag the FACT that Willie Mayo had much more to report to the public, and to the Wayne County Commission, than what was

eventually found in the content of the above-referenced report in "*Follow-Up Review*."

60.**FACT #48** – The 1/12/15 Detroit Free Press article found in ***"Exhibit #17"*** about Mayo's retirement also alludes to other things that his Auditor General's office knew about that was not being made public. The article states in quote of Willie Mayo:

> "*There was a lot of significant information not being disseminated...[O]nce we opened the flood gates, there was no turning back*."

61. **FACT #49** – So there appears to be yet another "*pattern and practice*" about to be exposed that rivals the AIG bailout scandal (i.e., see again ***"Exhibit #9"***) that is only now being slowly revealed, as is the scandal pertaining to the "*botched county jail project*" is being slowly revealed, and as is the scandal pertaining to Kym Worthy's "*non-compliance*" with Defendant Charter County of Wayne has had a "*Fraud Investigation Policy*" is being slowly revealed. It thus, appears that as all this information unravels before the public eye that Defendants ICSOP and AIG are bracing themselves for what will amount to a sudden realization by the public that, in FACT, **the entire *"[Defendant] Charter County of Wayne"* has long been overrun and criminally operating *under color of law* by domestic terrorists.**

Defendant Charter County of Wayne's "Prosecutor" Kym Worthy, "County Executive" Robert Ficano, and "3rd Judicial Circuit Court judge-turned-one-man-grand-jury" Timothy Kenny conspired together to use *color of law* and "*government*" privilege to cover up the "*pattern and practice*" used by Ficano's office to fleece county taxpayers in both the *Severance Scandal* and the *Jail Project Scandal*

62. **FACT #50** – As was verified by the DFP article in **"*Exhibit #17*,"** Wayne County Circuit Court "*judge*" Timothy Kenny was brought in by Kym Worthy last September 2013 to fill the position of Michigan's ludicrous "*one-man grand jury*," indicating that he had enough facts to criminally indict the former County Executive Robert Ficano's "*chief-of-staff*" (Carla Sledge) and "*Assistant Corporation Counsel*" Steven Collins. Interestingly, the article fails to disclose who the third person was that was indicted by the so-called "*grand juror,*" the Chief Judge of the Criminal Division of the (fully corrupted) 3rd Judicial Circuit Court, Timothy Kenny.

63. More interesting is **FACT #51**, that just prior to Worthy appointing Kenny to become the almighty "*one-man grand jury*," Worthy took questionable steps to quash any leakage to the public about the actual scope and breadth of the scandal, and of her office's questionable "*investigation and reporting*" of the "*fraud, waste and wrongdoing*" and her own "*chief-of-staff*'s" claims to Mayo, as published just before he retired, in claim that the "*fox*" was doing an adequate job of guarding the "*henhouse*" by claim it was her own

office that had uncovered the crimes leading to the three indictments on the County Jail Project.

64. **<u>FACT #52</u>** – As also presented by the compilation of documents in **"<u>Exhibit #17,</u>"** Ficano is depicted by CBS News on 8/15/13 as laughing off the FBI's investigation of his office concerning this matter, passing it off as just a "*rumor*," and while arrogantly saying that "*he doesn't thing he should apologize to the taxpayers for the cost overruns*."

65. Ficano made this remark despite the **<u>FACT #53</u>** that it was only two years before that the FBI had indeed been investigation Ficano's role and his office's role in the **"*<u>Wayne County Severance Scandal</u>*"** in which the first to be incriminated were – again – **Ficano's "*Deputy County Executive*" Azzam Elder (who is married to 3rd Judicial Circuit Court "*judge*" and one of Grievant Schied's two divorce judges, Charlene Elder)** and – again – **Corporation Counsel Mariann Talon (who presided over Grievant Schied's lawsuit against Kym Worthy, against Sheriffs Warren Evans and Benny Napoleon, against Worthy's "*operations 'chief'*" James Gonzales, against Worthy's "*assistant prosecutor*" Robert Donaldson, against Worthy's "*media relations*" prosecutor Maria Miller, against the City of Northville Police Department, and against the administrators of the Northville Public School District.)** (See the Detroit

Free Press articles and the Crain's Detroit Business article also provided in ***"Exhibit #17."***)

66. **"EXHIBIT #18"** is yet another article published publicly on 8/20/13, just five days after Ficano unapologetically "*tried to explain the Wayne County Jail Debacle*" and laughed off the FBI's need to be investigating him, showing that another of Ficano's financial benefactors, Kym Worthy, was taking a more serious approach by keeping a protective lid on everything – again providing "*aid and comfort*" to all but the "*tip of the iceberg*" that was exposed through her cohort in criminal court, the "*judge-turned-one-man-grand-jury*" Timothy Kenny.

67. As shown by ***"Exhibit #18,"*** the Auditor General Willie Mayo had completed the rough draft of his report on the "*Wayne County Jail Audit*," having submitted it to Ficano for final approval in accordance with "*auditing standards*" since Ficano's office was being implicated in the criminal findings behind the "*botched jail project*."

68. **FACT #53** – The article alludes that Ficano's spokesperson indicated that Ficano was so concerned about the possibilities that others could be indicted that from his office – possibly him – that he wanted to make the public statement that Auditor General veteran Mayo's report contained "*numerous inaccuracies*" while he tapped the Auditor General personally for any and all

available evidence that me be used against his office to support the content of the confidential "*first draft*" of that report.

69. **FACT #54** – Meanwhile, Ficano's tag-team partner in crime, "*prosecutor*" Worthy, was using her discretion to drop the hammer of secrecy upon Mayo to ensure that the public could not find out the full breadth and scope of this scandal. She used the pretense of an "*ongoing criminal investigation (by her)*" as the reason, despite the obvious protests from Wayne County Commissioner Raymond Basham "*who insist[ed] taxpayers have a right to know what went wrong on a project that cost an estimated $140 million before being scrapped*."

70. **FACT #55** – Included in ***"Exhibit #18"*** is a copy of the letter written to Mayo by Worthy just the day prior to the publishing of the article. Interestingly, Worthy cites the very same Wayne County Code of Ordinances, Ch. 73 "*Fraud Investigation Policy*" about which she has for so long been otherwise found so grossly "*non-compliant*" for years by the Auditor General, by her also stealing from those "*appropriated*" funds in a "*pattern and practice*" that is likely to be behind the spending by Ficano and his "*office*" for the spending on the failed "*jail project*."

71. **FACT #56** – Clearly, Worthy's strategy worked as she was able to use her position of authority in August 2013 to threaten Mayo with criminal

prosecution "*to the fullest extent that the law provides*" if Mayo takes a deliberate action that Kym Worthy – in her (abuse of) discretion (under color of law) – may deem to "*compromise an investigation*" conducted by her office.

72. That executive level "*gag order*" by the prosecutor lasted for the next two years of Mayo's tenure in office, and until he could otherwise complete his December 3, 2014 "*Final Report*" on his own audit of the Prosecutor Kym Worthy herself (as found herein as **"*<u>Exhibit #16</u>*"**) that reveals the hidden "*pattern and practice*" of fraud, racketeering, and corruption being covered up between the *<u>foreign usurpers of public offices</u>*, Ficano and Worthy.

<u>Case #3</u>

Clearly recorded documented history shows that from 2004 through 2012, the agents for the Defendant Charter County of Wayne – being the public functionaries of the Northville Public School District, the Northville City Police, the Office of the Prosecutor Kym Worthy, Corporation Counsel, the 3rd Judicial Circuit Court, the Michigan Court of Appeals, and the Michigan Attorney General operating in their Detroit offices – formed a "*chain*" conspiracy to deprive Grievant David Schied of, minimally, his First Amendment right to *redress of grievances* and his Fifth Amendment right to *due process*.

73. The multiple causes brought forth by Grievant David Schied in the various courts of the 3rd Judicial Circuit and U.S. District is simple at their base. It boils down to the following "*prima facie*" series of descriptive events as articulated below with supporting Evidence.

74. **<u>FACT #57</u>** – As a new teacher applicant to the Northville Public Schools in 2004, Grievant Schied was required by the employer to submit fingerprints under Michigan's Revised School Codes, subject to the federal conditions provided by the Privacy Act of 1974 (Public Law 93-579), as codified 5 U.S.C. §552a and subject to 28 CFR, §50.12 guaranteeing the rights of prospective employees to challenge and correct erroneous fingerprint results. (See **"<u>EXHIBIT #19</u>"** as a copy of <u>28 CFR, §50.12</u>.)

PARTIAL LIST OF CRIMES OF KATY DOERR-PARKER, DAVID BOLITHO AND LEONARD REZMIERSKI OF THE NORTHVILLE PUBLIC SCHOOLS, AND THEIR KELLER THOMA LAW FIRM

75.**FACT #58** – In February 2004, Grievant David Schied went to the Northville Public Schools to apply for a special education teaching position. He informed the HR Director (Katy Doerr-Parker) that the previous November 2003 he had been terminated of his contracted employment as a schoolteacher; and that such firing by "*interim*" superintendent ("*Dr.*") Sandra Harris of the Lincoln Consolidated School District in Washtenaw County was because that previous school district had received an erroneous FBI identification record reporting a *disposition* of "*conviction*" in Texas dating back to 1977 with a current *status* of "*probation*" for which Grievant had received both judicial and executive clemency. Grievant explained to Parker in 2004 that he had been wrongly fired in violation of 5 U.S.C. §552a and 28 CFR, §50.12 and that a lawsuit was soon to be filed. Grievant also explained to Parker that since he had been denied his right to challenge and correct the FBI identification record by "Dr." Harris that the Northville Public Schools was expected to receive the same erroneous results if he were to submit again to fingerprinting as a new teacher to that school district.

76.**<u>FACT #59</u>** – Northville Public School administrator Katy Parker therefore orally contracted with Grievant Schied for services as a substitute school teacher for the following year and a half on the following conditions:

a) That in return for equal employment opportunity to Grievant, Grievant would provide Parker with copies of his judicial and executive clemency documents for safekeeping in a SEALED envelope until such time that Grievant gets his resolve of the erroneous records through his dialogue with his congressman, the FBI, and the State of Texas.

b) That when Grievant gets the matter of his "*challenge and correction*" of the erroneous FBI identification record completed and submits to an updated fingerprinting for the Northville Public Schools reflecting "*no criminal history*", Parker will "*return or destroy*" the clemency documents entrusted to her.

77. **<u>FACT #60</u>** – Grievant's congressional representative wrote to the FBI to inquire about how the erroneous FBI record could be most expeditiously corrected and the FBI reported back that the report stemmed from the records of the Texas Department of Public Safety; and that is where Grievant Schied should apply his challenge. Thus, when contacting the Texas DPS, Grievant was directed to the Harris County court where in 1979 Mr. Schied had received judicial clemency in the form of an "*<u>Early Termination Order Dismissing the</u>*

Cause" consisting of a "*withdrawal of plea*," "*dismissal of [accusation and] indictment*," and "*set aside of judgment*." (*See* **"EXHIBIT #20"**)

78. **FACT #61** – Explaining to the Harris County (Texas) Office of the Prosecutor that he had discovered that the Texas attorney that helped him to receive the "*set aside*" **("*Exhibit #20*")** in 1979 had deceased, he sought help from that county prosecutor's office. Upon expounding his story to the prosecutor's office that in 1983 Mr. Schied had also applied for and successfully received executive clemency – by way of a former "*pardon*" and "*restoration of full civil rights*" by the Texas Governor Mark White in 1983 – the Harris County prosecutor's office determined that the most expedient way of handling the matter of Mr. Schied's "*challenge and correction*" of the erroneous record was NOT to dig into the cause behind the Texas Department of Public Safety maintaining erroneous records for nearly 25 years in blatant violation of Texas Administrative Codes requiring those records to be accurate and updated every six months. Instead, the Harris County prosecutor's solution was to charge Mr. Schied nearly $500 for their help in securing yet another judgment from their court in the form of an "*Agreed Order of Expunction*."

79. **FACT #62** – The process of the State of Texas "*expunging*" from their erroneous records all aspects of whatever also is left of the "*remaining arrest records*" – as a result of Grievant Schied paying for and receiving the "*Agreed*

Order of Expunction" due to his "*eligibility*" from the *pardon* alone – took a full year. During that year, Mr. Schied earned two honorary letters of recommendation from two school principals of the Northville Public School District. (*See* **"EXHIBIT #21"**)

80. **FACT #63** – Notably, by 2004 and 2005, Grievant Schied and his attorney fighting the case of "*David Schied v. Dr. Sandra Harris and the Lincoln Consolidated Schools*" had uncovered – minimally – two Texas attorney general opinions and both state and federal case law detailing the following:

a) **FACT #64** – **That the "*discretionary*" type of "*set aside*" received by Grievant in 1979** – in which the plea was "*withdrawn*," the accusation and "*indictment [was] dismissed*" and judgement was "*set aside*" – **meant "*no conviction exist[ed]*" from point forward. This was "*judicial clemency*."** (See **"EXHIBIT #22"** as the Texas Court of Appeals 2001 case ruling in "*Rudy Valentino Cuellar v. State of Texas*")

b) **FACT #65** – That according to a Texas Attorney General (Dan Morales) Opinion (DM-349) in 1995, anyone receiving the **"*discretionary*" type of "*set aside*" received by Grievant in 1979** – in which the plea was "*withdrawn*," the accusation and "*indictment [was] dismissed*" and judgement was "*set aside*" – **is otherwise NOT eligible for a pardon by**

the Governor for "*lack of an object [i.e., a "conviction"]" to pardon*. (See **"EXHIBIT #23"** as DM-349.) (Bold emphasis)

c) **FACT #66** – That according to a Texas Attorney General (John Cornyn) Opinion (JC-0396) in 2001, for anyone who has received "*executive clemency*" in the form of either a governor's pardon or a judicial "*expunction*" of the remaining criminal history associated with any remaining records of arrest, **the definition of "*conviction*" no longer applies to the underlying offense that has been either pardoned or expunged.** (See **"EXHIBIT #24"** as DM-349.) (Bold emphasis)

81. **FACT #67** – In 2006 – 2008 two tribunals of judges (Hood, Cavanagh, Servitto and Markey, Sawyer, and Bandstra) of the Michigan Court of Appeals – being deemed (by former MSC "*chief*" justice-turned-whistle-blower Elizabeth Weaver) as entirely corrupted by a top-down system in "*pattern and practice*" of tyrannical forces of personal prejudices, bias, philosophies, interests, and ideologies and "*dark money*" governing political partisanship and preferential treatment of special interest groups – created twisted rulings that undermined the above, failed to fully "litigate the merits" of the cases, and "cherry-picked" the means by which schoolteachers, including Grievant David Schied, were denied their due process rights and other rights to compensation from "Dr." Sandra Harris, from the Michigan Superintendent of Instruction, and from the

Michigan Department of Education on their otherwise unlawful dissemination of claims about their being "convicted" without adequate verification of those claims about those Michigan teachers. (See **"EXHIBIT #25"** as a copy of Justice Elizabeth Weaver's 2010 letter of resignation from the Michigan Supreme Court, the ruling in the case of "*Schied v. Sandra Harris and Lincoln Consolidated Schools*," and the class action case of "*Frohriep and others similarly situated v. Flanagan, et al*.")

82. **FACT #68** – Besides having denied Mr. Schied his right to challenge and correct the erroneous 2003 FBI identification record, "*Dr*." Sandra Harris and her *agent* Cathy Secor in the business office at the Lincoln Consolidated Schools had committed multiple counts of criminal MISDEMEANORS against Grievant David Schied, both before and after wrongfully firing him from the Lincoln Consolidated Schools. Those criminal misdemeanors were committed in violation of both the letter and the spirit of both federal and state laws (and of both the states of Texas and Michigan), being the Privacy Act of 1974, Texas and Michigan set aside laws (minimally MCL 320.1230 and MCL 320.1230aa) , and Michigan's Revised School Codes as follows and as provided by Evidence in **"EXHIBIT #26"**:

    a) **FACT #69** – Prior to even confronting Mr. Schied with the results of the FBI report in 11/3/03, Harris had unlawfully FAXED the erroneous FBI

identification record outside of human resources office **(i.e., the first entry of "*Exhibit #26*" consists of MCL 320.1230a of Michigan's Revised School Codes stating that dissemination outside of the hiring office of employment constitutes a criminal misdemeanor and right after that exhibit entry is the Faxed documents sent to the Bessie Elementary School to include a copy of the erroneous FBI report itself issuing statement that Mr. Schied had the right to keep his job while challenging and correcting the contents of the FBI report**);

b) **FACT #70** – During the three-day period in which "Dr." Sandra Harris conducted "*pre-termination*" and "*termination*" meetings in simulated due process and while receiving copies of the clemency documents but firing Mr. Schied anyway, Harris also criminally disseminated two letters around the school district calling Mr. Schied a criminal, revealing the content of the erroneous FBI identification record, and stating that Mr. Schied had "*lied*" on his job application by stating that he had not pled guilty or been convicted. **(See the next documents of "*Exhibit #26*" as copies of Harris' letters dated 11/5/03 and 11/6/03 as well as the three Affidavits and meeting minutes of Linda Soper, Donnie Reeves, and Claudia Gutierrez as witnesses to these two meetings**);

c) **FACT #71** – In December 2003 and again in Ms. Schied's wife submitted a FOIA request to the Lincoln Consolidated Schools and received essentially again the Evidence that Linda Soper of the business office was continuing to maliciously and criminally disseminate the erroneous FBI report outside of the human resources office in spite of court filings in the "*Schied v. Harris and Lincoln Consolidated Schools*" civil case and a crime report made in Washtenaw County focusing on the letter and spirit of MCL 380.1230a and other state and federal statutes protecting Mr. Schied's privacy rights with criminal penalties for violators. **(See the next pages of "*Exhibit #26*" as copies of Linda Soper's December 2003 FOIA request showing is was processed as "*done*" and the FOIA answer provided again to Barbara Schied through the mail in 2006 that included the very same "*personnel file*" documents received by Soper in 2003.)**

83. **FACT #72** – With the above understanding of most of the above-referenced chain of events that had occurred pertaining to the crimes being perpetrated against Grievant David Schied by "*Dr*." Harris and the "*agents*" of the Lincoln Consolidated Schools, Northville Public School District Human Resources Director Katy Doerr-Parker reissued her 2004 oral contract in writing in 2005 through emails sent between her and Grievant David Schied. These emails occurred at about the time that Grievant Schied had provided Parker with a

copy of the Texas "*Agreed Order of Expunction*" in traded return of the copies of the 1979 "*Early Termination Order....*" and the "1983 "*Pardon*" being maintained in a <u>*sealed*</u> file away from the personnel file. (See **<u>"EXHIBIT #27"</u>** as the series of emails detailed further below.)

84.**<u>FACT #73</u>** – The first entry in ***<u>"Exhibit #27"</u>*** is an email dated 5/1/04 from Mr. Schied to the administrative secretary under employ of (now retired) NPS Human Resources Director Katy Doerr-Parker. The letter documents as Evidence that

> "*[T]here is information in [the school district's personnel file in Mr. Schied's name] and substitute teacher employment application that [Mr. Schied] was reluctant to provide to [the] HR department...*"

The letter goes on to state,

> *"[Mr. Schied is] in the process of getting a Texas court order for having those records "expunged" from all public and private agencies that [Mr. Schied] believe[s] has possession of such information. The court representative that is processing [his] 'petition' is requiring the following since over the next several months the original judge's order will be circulating from agency to agency for notice and signatures. Please provide [Mr. Schied] with the following information at [the secretary's] earliest convenience."*

85.**<u>FACT #74</u>** – The first two pages of entry in ***<u>"Exhibit #27"</u>*** reflects that in 2005 Grievant Schied, not having any knowledge of legal processes when this was written in 2004, had naively construed Texas court jurisdiction pertaining to an "*order*" to "*expunge*" records to include the records that Mr. Schied had entrusted to Katy Doerr-Parker and the NPS. His objective therefore, was to have the name and other information of the "*representing attorney*" for the NPS

for proper service of process of the Texas order commanding that the NPS "*expunge*" the information Mr. Schied had entrusted to its possession, which Mr. Schied had – in good faith and based upon Katy Doerr-Parker's oral and written promises – to otherwise keep "*sealed*" in an envelope, far away from any public scrutiny.

86. **FACT #75** – Pages 1-2 of **"*Exhibit #27*"** pertain to an email dated 5/19/04 from NPS Human Resources Director Katie Doerr Parker to Grievant David Schied, written in response to Mr. Schied wishing to include the NPS as the subject of a Texas court order of "*expungement*." Her letter of response clearly demonstrates that at this time over a decade ago, Mr. Schied was using this "*expungement*" process to expeditiously *challenge and correct* the erroneous content of the FBI reports delivered to the Lincoln Consolidate Schools (in late 2003) and the NPS (in early 2004).

87. **FACT #76** – The second entry in **"*Exhibit #27*"** is reflects that Ms. Parker and the (Keller-Thoma law firm) attorney representing NPS did not want Mr. Schied to legally involve the NPS in that out-of-state "*litigation*." So Parker issued the following written promise as indicative of her earlier oral promises to Mr. Schied to "*return or destroy*" the information entrusted to her by Mr. Schied upon his completion of the task of "*clearing*" that erroneous information from the FBI's criminal history report information stemming from Texas.

Parker thus wrote the following while copying this letter to that crooked Keller-Thoma attorney, another State BAR-licensed *domestic terrorist*, Gary King:

> "*I received your paperwork and the request to sign off. Our attorney does not understand why our district should be involved in anything that has to do with expunging the records of your past actions...He does not feel comfortable signing anything....As I understand the documents you initially shared with me [i.e., the 1979 set aside and 1983 governor's pardon being kept by Parker in a 'sealed' envelope under promise of return once the FBI record is successfully challenged and corrected], you were pardoned in Texas for actions in Texas.* ***We certainly can and will destroy or return all implicating documents if your record is expunged by court order....***" (Bold emphasis added)

88. **FACT #73** –**The third and fourth pages of "*Exhibit #27*"** is a series of emails sent back and forth between Grievant David Schied and NPS's Katy Doerr-Parker a full year later (i.e., between 6/14/05 and 8/15/05) and after Mr. Schied had earned two letters of recommendation from two NPS school principals. (see those two letters again in **"*Exhibit #21*"**) This email dialogue reveals Evidence of the following:

    a) That on June 14, 2005, Parker notified Grievant Schied that Keller-Thoma attorney Gary King had wanted Mr. Schied to pay $54 for his own fingerprinting and return of a new FBI report to be sent – at Mr. Schied's own personal cost – to the NPS for purposes of proving that he was successful in "*challenging and correcting*" the erroneous FBI reports

received by the Lincoln Consolidated Schools and the NPS in 2003 and 2004 respectively.[5]

b) As shown the footnote referenced above, the document demonstrates the "*intent*" between Katy Doerr Parker and Keller Thoma attorney Gary King to "*conspire*" to change the earlier "*contract*" between Mr. Schied and the NPS administrative about the terms under which the "*expungement*" information would be treated once Mr. Schied fulfilled his end of this personally sensitive *contractual agreement*.

c) As the time comes for the "*rubber to meet the road*" in Katy Parker living up to her end of the commitment, she strategically dropped out and passed Mr. Schied off to her supervisor, assistant superintendent David Bolitho. [6]

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[5] **Note that, in contrast with the previous page in this exhibit, the attorney Gary King and Parker were no longer promising to "*return or destroy*" the "*incriminating documents*" being held by NPS but instead adopting a new strategic legal position of later "*mak[ing] the determination to remove [the documents] to [the attorney's] office in a sealed envelope or totally destroy any document [they] possess*"....thereby eliminating the earlier promise of the previous email to "*return*" the "*incriminating*" documents (containing the ERRONEEOUS information) to Mr. Schied.**

[6] Parker also subsequently quit working for the NPS and took retirement. She never again assisted Mr. Schied in his efforts to secure proper action on Parker's earlier assurances, despite that she was both named as a principal *defendant* who was served in subsequent state and federal lawsuits filed against the NPS.

89. **<u>FACT #89</u> –The <u>final two</u> pages of "*<u>Exhibit #27</u>*"** is are shown to be two (then unanswered) emails sent from Grievant David Schied to Katy Doerr Parker – written on 6/1/05 and again on 6/14/05 respectively, in which Grievant Schied called attention that his attempts to contact Parker by email and in person were unsuccessful. The two emails also make clear the high level of Mr. Schied's concern that the details of his earlier agreement(s) with Katy Parker, on the exact information that needed to be returned to him or destroyed included ALL records, naming specifically...

> ***"...the copies of the Expungment paperwork that [Parker] copied for the attorney [King] to keep on file...to ensure that all records of my trying to get this [erroneous FBI] record permanently cleared are obliterated"***
>
> (Bold emphasis)

90. **<u>FACT #90</u>** – As presented by **"<u>EXHIBIT #28</u>,"** Mr. Schied left his substitute teaching position shortly after the above-referenced chain of events took place, having received a full-time employment offer from the Brighton Area Schools. In good faith belief that Katy Doerr-Parker and Northville Public Schools would uphold the oral and written promises as detailed above, Mr. Schied completed an "*<u>Applicant Authorization and Release of Information</u>*" form, which was sent with another form and cover-letter paragraph from the Brighton Area Schools administration requesting any information pertaining to allegations of "*unprofessional conduct while under [Northville Public Schools] employ*."

91. **<u>FACT #91</u>** – As presented by **"*<u>Exhibit #28</u>*," In answer to the above-referenced solicitation from Brighton Schools, the Northville Schools administrator David Bolitho acted maliciously – and out of retaliation for Mr. Schied pursuing both civil and criminal remedies against "Dr." Sandra Harris and the Lincoln Consolidated Schools – to send the Brighton Area Schools a copy of the non-public Texas "*Agreed Order of Expuction*" and checking the box on the Brighton form misrepresenting that this document referencing an event that took place 30 years prior in 1977 while Mr. Schied was a teenager was somehow evidence of "*unprofessional conduct*" as a teacher.** (Bold emphasis added)

92. **<u>FACT #92</u>** – In effect, **Northville Public School administration disregarded that Mr. Schied had earned two honorary letters of praise from two Northville Public School principals (see again "*<u>Exhibit #21</u>*"), and disregarded Katy Doerr-Parker's oral and written promises (as provided by "*<u>Exhibit #27</u>*"), and instead committed a criminal misdemeanor against Mr. Schied "under color of law" (being <u>MCL 380.1230</u> as provided by "*<u>Exhibit #26</u>*"). This was done despite the clear wording of the very first numbered paragraph (on page 2 of "<u>EXHIBIT #28</u>" attached herein) which clearly states by Texas court order that "*all release, dissemination, or***

***use of records pertaining to such arrests and prosecutions is PROHIBITED*.”** (Bold emphasis added)

93.**FACT #93** – Subsequently in 2006, Grievant Schied’s then estranged wife was looking for incriminating information to use against Mr. Schied in divorce and child custody proceedings that were underway. Thus, **in response to Ms. Schied sending a public FOIA request for information from the Northville Public School District for everything in their personnel file marked for David Schied, administrator David Bolitho committed his second criminal misdemeanor offense against Grievant by enclosing the Texas “*Agreed Order of Expunction*”.** (See the FOIA request and partial section of documents returned to Ms. Schied by FOIA answer from Bolitho as **“EXHIBIT #29,”**) (Bold emphasis added)

OBSTRUCTION OF JUSTICE BY 3RD JUDICIAL CIRCUIT COURT “JUDGE” CYNTHIA DIANE STEPHENS LEADING TO HER REWARDED PROMOTION TO THE MICHIGAN COURT OF APPEALS

94.**FACT #94** –As shown by **“EXHIBIT #30,”** on or about 12/6/06, Michigan attorney Daryle Salisbury (P-19852) filed a case in the 3rd Judicial Circuit of the Defendant Charter County of Wayne on Mr. Schied’s behalf.[7] That filing

[7] Mr. Schied’s attorney Salisbury had multiple reasons to “*tenderfoot*” this case rather than to call out the state-level deprivation of rights by the **Michigan “*licensed*” BAR attorneys and judges of the Washtenaw County Circuit Court and Michigan Court of Appeals** (i.e., in the case of Schied v. Sandra Harris and

contained a clear request for an Injunctive Order from the 3rd Judicial Circuit Court that would compel the Defendant to stop doing what they continued to be doing in violating the plethora of state and federal statutes referenced by this simple initial filing.

95. **Grievant was simply asking for Defendants to stop "*disseminating*" erroneous and/or constitutionally protected private information and using it to intentionally mischaracterize and injure Mr. Schied's ability to righteously *pursue happiness* and support his dependent family.**

96. The "*Official*" hearing transcript of the 3rd Judicial (Wayne County) Circuit Court in the case of "*David Schied v. Northville Public School District*," shows that Grievant's complaint was presented before "*judge*" Cynthia Diane Stephens and dismissed by her in **literal ruling** that **"*Expungements are Myths*"** and interpreting the *letter* and *intent* of Michigan legislation to mean

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the Lincoln Consolidated Schools) **that had exhibited a very same "*pattern and practice*" of publishing damaging statements in arguments and rulings laced with numerous gross omissions, errors, and misstatements that effectively deprived Mr. Schied of his ongoing rights to due process "*discovery*" of the facts about which he claimed had occurred, and were to continue occurring every single court case filed since 2006, both at the state level and at the federal level.** Though this case was no different, Salisbury's added intent for the tenor of his complaint was to demonstrate Grievant Schied's extreme sensibility and motivation to merely request that the Defendant stop doing what they continue to be doing in violating the plethora of state and federal statutes referenced by this simple initial filing. (Bold emphasis)

“***[T]eachers are subject to a life sentence***” for any type of “*conviction*” they have ever received in life.[8]

97.**FACT #95** –While the oral hearing redactions cover up the high degree in which the Keller Thoma attorney Bruce Bagdady falsified the information being “*expunged*” by the nonpublic document being disseminated by his clients at the Northville Public Schools, the ruling of the judge were fully laced with their own omissions and misstatements in the matters of law.[9] (See pp. 11-12 and p.15 of **“EXHIBIT #31”** for these quotations by Stephens.)

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[8] Here “*judge*” Stephens had the opportunity to do the right thing by questioning the Michigan Court of Appeals’ 2006 ruling against Grievant Schied in his case against the Lincoln Consolidated Schools, as shown by ***“Exhibit #25”***. Stephens knew that the *Frohriep* class action case was still in the Michigan Court of Appeals which underscored the politically charged issue between the Michigan Education Association regarding teachers with unverified “*convictions*.” **Shortly after Cynthia Stephens made her ruling to dismiss Mr. Schied’s case saying at oral hearing that “*expungements are MYTHS*” and interpreting the legislature to mean that *“[T]eachers are subject to a life sentence*” – while refusing to “*litigate the merits*” of the criminal dissemination of the Texas “*Agreed Order of Expunction*” and failing to litigate the relevance of the district agents as co-defendants issuing this material to the public under FOIA answering – Stephens was promoted to sit with these other judges on the Michigan Court of Appeals.**

[9] **Given the level of lunacy by these two 2006 rulings by the Michigan Court of Appeals in the *Schied v. Lincoln Consolidated Schools* case and Stephen in the *Schied v. Northville Schools* case, and given that by this time Mr. Schied had ample evidence that the prosecutors of Washtenaw and Wayne counties and the Attorney General and Governor were also mimicking this *pattern and practice* of “*gross omissions and misstatements*” in blatant abuse of their prosecutorial authority and power, attorney Salisbury and Grievant Schied decided it better to take these issues to the U.S. District Court (i.e., to “*judge*” Paul Borman) and include the Governor and State of Texas’ Department of**

THE NORTHVILLE CITY POLICE DEPARTMENT CONSPIRED WITH THE WAYNE COUNTY PROSECUTOR TO FALSIFY A CRIME REPORT AND ABUSE DISCRETION SO TO CRIMINALLY DEPRIVE GRIEVANT OF HIS CONSTITUTIONALLY STATE PROTECTED VICTIM'S RIGHTS TO CRIMINAL PROTECTION FROM "*THE ACCUSED*"

98.**FACT #96** –On July 17, 2006 the VICTIM, Grievant David Schied, provided oral statements and documents of evidence to support his report to Northville City Police officer Anthony Tilger (Badge #247) that he had been the victim of criminal misdemeanor offenses by Northville Public Schools administrators Katy Doerr-Parker, David Bolitho, and Leonard Rezmierski. [10] [11]

Public Safety in the next lawsuit filed, instead of seeking resolve in the thoroughly corrupted court system in Michigan.

[10] See the details above in this filing as well as the plethora of Evidence submitted in Grievant's original filings of this instant federal case in "*Grievant's Combined 'Response' and 'Reply' to Attorney James Mellon's and Mellon Pries, P.C.'s Fraudulent Conveyances in Their 'Motion to Dismiss in Lieu of Answer' and Their 'MMRMA's Response to Plaintiff's 'Writ' for Change of Judge Based on Conflict of Interest and Change of Venue Based on 'Proven' History of Corruption on Behalf of Defendant Michigan Municipal Risk Management Authority*" as also found online at **http://constitutionalgov.us/Michigan/Cases/2007DavidSchiedvStateofMichigan/**

[11] At the time Mr. Schied made his report, he expressed his worry that the Northville City police department would not provide him with "*equal treatment*" under the law given that the administrative offices of the Northville Public School District was literally within a stone's throw away from the police station, and because Mr. Schied was aware of the close community ties each of the government agencies have with one another in serving the community. In response, Officer Tilger assured the victim that he would receive equal treatment and that the perpetrators would be brought to justice if this investigation found reasonable cause for an arrest warrant.

99.**<u>FACT #97</u>** – On July 28, 2006 the Grievant Schied, sent a follow up crime report written in his own words to reiterate what he had discussed with the Northville City police Officer Anthony Tilger during the meeting on July *17th* when the officer took his oral statements. **Grievant Schied's written crime report made no reference to either the civil or criminal events related to the Lincoln Consolidated Schools case because those events were completely unrelated to the crimes perpetrated by Northville Public School officials.**[12] Grievant Schied's crime report to Officer Anthony Tilger made clear reference to Michigan "*set aside*" and "*expungement*" laws, as well as Michigan's "*<u>Revised School Codes</u>*", which both make it a criminal offense to disseminate criminal history information received by an employer during the course of hiring, particularly when it is known to have been set aside or expunged. (See the first set of pages of the compilation of documents in **<u>"EXHIBIT #32"</u>** as a copy of that follow-up written crime report dated 7/28/06.) [13]

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[12] Note: The Northville City Police report received later by Mr. Schied showed clear reference to the 2006 Lincoln Consolidated Schools civil ruling with an erroneous interpretation of that ruling that supported the prosecutor's decision not to issue warrants for the crimes committed against Mr. Schied.

[13] About this time, Grievant Schied was in close touch with numerous divisions of the Department of the Michigan Attorney General, in complaint about the falsification of a Michigan State Police crime report the preceding year when reporting the crimes of "*Dr.*" Sandra Harris. That complaint included details about the dereliction of Washtenaw County Prosecutor Brian Mackie and his "*assistant*"

100. **FACT #98** –On August 3, 2006, Officer Anthony Tilger faxed a cover letter along with his crime report for a total of twenty-seven (27) pages to the Office of the Wayne County Prosecutor. The Faxed documents were addressed to the office of "*Robert Donnelison.*" **Included on its cover page a personal plea by Officer Tilger that the prosecutor NOT provide the victim in this case with "*equal treatment*" under the law.** Specifically, Officer Anthony Tilger's personal plea read, *"Please consider the reservations we have about handling this case"*.[14] (*See* the second set of documents included in **"*Exhibit #32*"** for Tilger's police report.)

101. **FACT #99** –On August 11, 2006 the victim, Grievant Schied, documented the intentional mishandling of his CRIME REPORT between Northville City

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Joseph Burke, who had both abused their discretion in refusing to acknowledge the Evidence of Harris' multiple crimes committed when disseminating the erroneous FBI report outside of the receiving human resources office as found herein as **"*Exhibit #26*."** By this time, the complaints to Mike Cox were detailing not only the first "*tier*" of FELONY crimes by MSP Detective Fred Farkas, but by his supervisors Lynn Hutchinson and Beth Moranty, but those in charge of the "*internal affairs*" division of the Michigan State Police who altogether assisted Farkas, Mackie and Burke in covering up those crimes by Lincoln Consolidated School District public functionaries in Washtenaw County.

[14] Note that as later shown, though the Fax number was eventually confirmed to be located in the very office of Prosecutor Robert Donaldson, the prosecutor's office claimed to have "*lost*" this entire crime report because it had been addressed incorrectly to "*Donnelison*" instead of "*Donaldson*" by Officer Tilger. This was a clear case of a "*meeting of the minds*" and a "*conspiracy*" to honor Officer Tilger's personal plea that the Wayne County Prosecutor deny Mr. Schied's rights to criminal protection under the law.

Police Officer Anthony Tilger and the "*Public Integrity Unit*" Prosecutor Robert Donaldson when, **in honor of Officer Tilger's personal plea, Prosecutor Donaldson's office "*lost*" the crime report, telling Mr. Schied later that the report must have somehow been "*redirected*" out of the office and subsequently vanished because it had been wrongly addressed by Officer Tilger to Prosecutor "*Donnelison.*"** (Bold emphasis added)

102. **FACT #100** – There are two key pieces of Evidence available to demonstrate that what occurred between the Northville City Police Department and the Wayne County Prosecutor in the "*losing*" of the victim's crime report is more sinisterly motivated and criminal.[15]

103. **FACT #101** – The first key piece of Evidence is the successful Fax transmission on 8/3/06 of the crime report with Officer Anthony Tilger's plea for *"consideration"* of the Northville City Police Department's *"reservations*

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[15] **MCL 768.27** (Code of Criminal Procedure) – EVIDENCE; PROOF OF INTENT OR MOTIVE -*"In any criminal case where the defendant's motive, intent, the absence of mistake or accident on his part, or the defendant's scheme, plan or system in doing an act, is material, any like acts or other acts of the defendant which may tend to show his motive, intent, the absence of, mistake or accident on his part, or the defendant's scheme, plan or system in doing the act, in question, may be proved, whether they are contemporaneous with or prior or subsequent thereto; notwithstanding that such proof may show or tend to show the commission of another or prior or subsequent crime by the defendant."*

about handling this case", which demonstrates felony perjury [16] and a clear hindrance of the legal process and duty of Prosecutor Robert Donaldson.[17]

104. **FACT #102** – Officer Tilger's personal request is also a clear instance of subornation to perjury as it clearly incites or procures another officer to commit perjury[18], a FELONY criminal violation of the victim's right to due process, dignity and equal treatment under the Michigan Rules of the Court.[19]

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[16] **MCL 768.19** – PERJURY; ACTS OF OFFICER UNDER OATH -*"Any officer having taken all oath required by any provision of this chapter who shall knowingly and willfully violate the same or permit the same to be violated, shall, on conviction thereof be adjudged guilty of the crime of perjury and subject to all the pains and penalties thereof.*

[17] **MCL 750.478a** – (Michigan Penal Code) – HINDERING A LEGAL PROCESS; OBSTRUCTION OF A PUBLIC OFFICER OR EMPLOYEE -"(1) *A person shall not attempt to intimidate, hinder, or obstruct a public officer or public employee or a peace officer in the discharge of his or her official duties by a use of unauthorized process.*

[18] **MCL 750.424** – SUBORNATION OF PERJURY – "*Any person who shall be guilty of subornation of perjury, by procuring another person to commit the crime of perjury, shall be punished....*" **MCL 750.425** (Michigan Penal Code) INCITING OR PROCURING ONE TO COMMIT PERJURY – "*Any person who shall endeavor to incite or procure any person to commit the crime of perjury, though no perjury be committed, shall be guilty of a felony, punishable by imprisonment in the state prison not more than 5 years*."

[19] **Michigan Rules of Court (MCR): Rule 6.002:** -PURPOSE AND CONSTRUCTION – *Tile purpose of the Court Rules is to establish uniform rules and procedures for all levels of Michigan's court system. These regulations ensure that cases are resolved without undue delay and that those who appear in court receive due process and equal treatment under the law... .They are to be construed to secure simplicity in procedure. fairness in administration, and the elimination of unjustifiable expense and delay."*

105. **<u>FACT #103</u>** – The <u>second</u> key piece of Evidence is the victim's letter of August 11th documenting the manner in which Prosecutor Robert Donaldson had accepted Officer Tilger's *bribe* [20],

[20] The officer's "*bribe*"—may have been implied and not explicit. As the evidence of the "narrative report – contained in the crime report shows, the Prosecutor received the "*expected return favor*" just a short time later. He had Officer Tilger drive to Detroit on short notice to be present as his so-called "*witness*" when the Prosecutor Donaldson took his own steps to RETALIATE against Grievant David Schied by his having Mr. Schied also drive to downtown Detroit only to be subject to further financial exploitation, abuse of authority and psychological humiliation for having "*postured*" himself (i.e., by Grievant Schied having written to both Officer Tilger's and Prosecutor Donaldson's supervisors about the "*losing*" crime report while copying that August 11th letter to two executive state agents in the Bureau of Government Affairs who were then working for "*Michigan's Chief Law Enforcement Officer*", Attorney General Mike Cox).

Clearly, the "*good ol' boy*" network was in place as Officer Tilger got the help he and the Northville City Police asked for in escaping such an awkward position of having to file a crime report upon the chief administrators of Northville Public Schools right next door to the police station in that very same government complex. The implication of the "*bribe*" was the unspoken "*promise*" that all the parties involved lay within the scope of a mutually beneficial professional network, a CONSPIRACY, of government associates providing reciprocal support for each other in their respective time of need.

NOTE: **<u>MCL 750.117</u>** (Code of Criminal Procedure) -BRIBERY OF A PUBLIC OFFICER –***"Any person who shall corruptly give, offer or promise to any public officer, agent, servant or employee, after the election or appointment of such public officer, agent, servant or employee and either before or after such public officer, agent, servant or employee shall have been qualified or shall take his seat, any gift, gratuity, money, property or other valuable thing, the intent or purpose of which is to influence the act, vote, opinion. decision or judgment of such public officer, agent, servant or employee, or his action on any matter, question, cause or proceeding, which may be pending or may by law be brought before him in his public capacity, or the purpose and intent of which is to influence*** **any** ***act or omission relating to any public duty of such officer, agent, servant or employee, shall be guilty of a <u>FELONY.</u>"***

and complied with a *conspiracy to commit perjury*. [21]

106. **FACT #104** – Grievant Schied addressed his August 11, 2006 letter of Complaint to the supervisor of Officer Anthony Tilger, Captain Michael Carlton, and the supervisor of Robert Donaldson, Prosecutor Kym Worthy. The letter also documented that when Faxing the crime report, Officer Tilger had failed to include a warrant request. Officer Tilger also subsequently left for a three-week vacation without verifying that the crime report had been received by the prosecutor's office.

107. **FACT #105** – That 8/11/06 letter also memorialized how Captain Carlson had initially stated his preference that Mr. Schied, as the alleged VICTIM in this case, simply wait the full three weeks until Officer Tilger returned from vacation so that he can personally resend the crime report. Captain Carlson stated that he preferred to handle the "*mix-up*" that way because he was currently *"understaffed"* in Officer Tilger's absence. (***See* the third set of**

[21] **MCL 767.73** (Code of Criminal Procedure) – PERJURY OR CONSPIRACY TO COMMIT PERJURY AS SUFFICIENT INDICTMENT – *"An indictment for perjury or for subornation of, solicitation, or conspiracy to commit perjury, is sufficient which indicates the offense for which the accused is prosecuted, the nature of the controversy* in *respect of which the offense was committed and before what court or officer the oath was taken or was to have been taken, without setting forth any part of the records or proceedings with which the oath was connected, and without stating the commission or authority of the court or other authority before whom the perjury was committed or was to have been committed or the form of the oath or affirmation or the manner of administering the same.* '.

documents included in "*Exhibit #32*" as Mr. Schied's 8/11/06 copies that went out also to Frank Monticello and Patrick O'Brien of the Michigan Attorney General Mike Cox's office, and to Congressman Thaddeus McCotter who was later removed from office for his own corruption by election fraud.) [22]

108. **FACT #100** – On August 15, 2006, Cpt. Michael Carlson made an entry into the *"narrative report"* portion of Officer Tilger's **crime report** stating that, in follow up to victim David Schied's complaint about the first crime report being "*lost*", he had spoken with "*Assistant Prosecuting Attorney Robert Donaldson*." Presumably in a retaliatory response to the letter of complaint that Grievant Schied had sent to assistant prosecutor Donaldson's supervisor, Prosecutor Kym Worthy[23], Donaldson stated his intention was to meet personally with the Grievant Schied to discuss his complaints.

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[22] **The victim's (David Schied's) August 11th letter was copied to Prosecutor Donaldson's supervisor, Wayne County Prosecutor Kym Worthy who never in any way responded back to Mr. Schied.** The letter was also copied to Frank Monticello and Patrick O'Brien, both working directly for the "*chief law enforcement officer of Michigan*" the Attorney General Mike COX.

[23] Evidence that Prosecutor Donaldson's motive for talking with Mr. Schied was indeed retaliatory and not in the victim's best interest is by the **FACT #101** that, according to Tilger's *narrative* police report, **AP Donaldson called Officer Tilger the morning that he was scheduled to meet with Mr. Schied, explaining to the officer that he wished for nothing more than the officer to serve as his "*witness*"" for personally telling Mr. Schied that he had no intention whatsoever of prosecuting this case.** *(See page 5 of Tilger 's "narrative report" in* **"*Exhibit #32*"**)

109. Captain Carlson wrote in the "*narrative report*" that he intended to have D/Sgt. Greg Hannewald handle the scheduling of the meeting between the victim (Schied) and the prosecutor (Donaldson). (See the narrative of the Northville Police officer Tilger's crime report – **"*Exhibit #32*"** – for the details outlined both immediately above and below.)

110. **FACT #102** – On that same date, August 15, 2006, D/Sgt. Hannewald made a subsequent entry on the "*narrative report*" noting that Officer Tilger had not even contacted the alleged perpetrators named in the complaint (and who were less than a stone's throw away in the building next door to the police station) before forwarding his "*plea*" to the prosecutor. D/Sgt. Hannewald stated that he called the "*accused*", being David Bolitho, and that Bolitho had justified his actions by informing the Northville City police officer that, *"Schied already had a similar complaint against another school district litigated by a circuit court, as well as the Michigan Court of Appeals."*

111. **FACT #103** – Clearly, Det. Hannewald passed that information on to Prosecutor Donaldson, without verifying the accuracy of this misleading claim by "*the accused*," later in the day when he made a subsequent note in the report about calling the prosecutor about scheduling the meeting with the victim, David Schied. *(See* page #4 of the "*Narrative Report*" section of Tilger's crime report in **"*Exhibit #32*"**)

112. Equally clear is that AP Donaldson later took credit for that "*finding*", while stating that he had *"researched"* and *"uncovered the court decision rendered on an earlier prosecution attempt against another school district (and) that (it) made it all the way to the state appellate court and was denied."* [24]

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[24] NOTE: David Bolitho was using this claim to justify and hide his retaliation against his victim, Grievant Schied, for asserting his civil rights to properly fight for his job through the Michigan civil courts; and to pursue criminal charges for the crimes perpetrated against him by Bolitho's fellow school district administrator "*Dr*." Sandra Harris. Nonetheless, **Bolitho's comments were never truly verified by law enforcement for anything other than that both school district cases filed by the victim, Grievant Schied, involved the admitted dissemination of "*nonpublic*" erroneous FBI identification records.**

Neither Officer Anthony Tilger nor D/Sgt. Greg Hannewald, nor even Assistant Prosecutor Robert Donaldson took proper steps to look at the distinctions between the alleged actions and the laws that went unaddressed in the *Schied v. Sandra Harris and Lincoln Consolidated Schools* CIVIL case; nor did they consider those distinctions when weighting the actions for which a completely different ("*public corruption*") *crime report* had been made on the Northville Public Schools administrators.

As the Evidence clearly shows, the Lincoln CIVIL case concerned a judgment on whether or not Sandra Harris had legal justification for terminating Grievant Schied's employment. The CRIMINAL matter in both school district cases concerned the illegal dissemination of criminal history information that was obtained by the school districts during the course of evaluating Mr. Schied's qualifications for employment. The Lincoln Consolidated CIVIL case was supposed to be about the symbiotic significance of Mr. Schied having BOTH a Texas "*set aside*" and a Texas governor's *pardon*. The Michigan Court of Appeals' judgment stated that "*only an expunction*" of the entire criminal record would have wiped away the 1977 "*conviction*" and entitled Mr. Schied to keep his job. The CRIMINAL complaint about the Northville Public Schools administrators concerned the public dissemination of the Texas "*Agreed Order of Expunction*" document.

The FACT is that Michigan law enforcement did nothing more than to first accept then pass along the retaliatory reasoning of the criminal perpetrator from the Northville City police officers to the Wayne County Prosecutor(s). As is later

113. **FACT #104** – D/Sgt. Hannewald also made note in those same pages of the narrative report that he had submitted the required warrant requests on the three perpetrators when resending Officer Tilger's original crime report to the Defendant Charter County of Wayne's **"*public integrity unit*"** assistant prosecutor Donaldson. D/Sgt. Hannewald then made note that, per the request of Prosecutor Donaldson to speak personally with Grievant Schied as the victim, he scheduled a meeting for Mr. Schied to meet directly with the prosecutor.

114. **FACT #105** – On or about August 15, 2006, AP Donaldson's secretarial investigator, Det. Cassandra Brown, called Mr. Schied under the pretense that Mr. Schied would be meeting with AP Donaldson to provide further testimony

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shown in this instant "*Grievant's Objection and Order to Strike*..." filing, that reasoning without verified research was later passed to Wayne County Special Operations Division Chief Prosecutor James Gonzales, who subsequently reiterated David Bolitho's reasoning to the Wayne County Commission when Laura Cox wrote to him on behalf of the Commission, and when the Commission made a formal inquiry into this matter around October 2006. (See **"*Exhibit #35*"**)

In this *PATTERN AND PRACTICE*, so too did Attorney General Mike Cox and his subordinate Bureau Chief Frank Monticello, and his subordinate, Patrick O'Brien (the division chief of Public Employment, Elections, and Tort Division of Monticello's Government Affairs Bureau) use Bolitho's retaliatory line of reasoning. Evidence also shows that David Tanay, chief of the Criminal Division of the Attorney General's office also relied upon the same unsubstantiated claim when asked by Mr. Schied by redress and request to reconsider this injustice**, as it characterized a "*conspiracy of injustice*" between the administration of the local school districts and the local law enforcement officers and prosecutors.**

about his victimization. Subsequently, based on that good faith belief, on August 23, 2006 the *victim*, Grievant Schied, paid one-thousand dollars ($1000) to an attorney for the sole purpose of being present at that meeting in downtown Detroit, to be his own "*witness*" to the victim testimony, and to provide legal counsel in the event that AP Donaldson might attempt to give some legal cause for dismissing Mr. Schied's crime report and follow-up complaint. (See the first page of **"EXHIBIT #33"** as a copy of the retainer contract for the services of State BAR of Michigan *Nazek Saffar* dated 8/23/06)

115. **FACT #106** – Starting on p.2 of **"*Exhibit #33*"** **there is significant additional Evidence of Wayne County "*assistant prosecutor*" for Kym Worthy's "*public integrity unit*" having committed higher-level FELONY crimes against Grievant David Schied.** It is in the form of a letter, written by victim/Grievant David Schied on 8/24/06 to AP Robert Donaldson. The letter was written to memorialize the events that had occurred the previous two weeks, and most notably the events that occurred in the prosecutor's office when Mr. Schied met face-to-face with the Prosecutor Donaldson.

116. **FACT #107** – The letter recounts some questionable actions by Det./Sgt. Greg Hannewald in scheduling the meeting so far into the future that it coincided with Officer Tilger's arrival back from vacation instead of providing service to the victim "*without delay*." The letter complained about how AP

Donaldson's scheduling secretary, Det. Cassandra Brown, had insisted (when talking with Mr. Schied on the phone) that the prosecutor wanted Det. Sgt. Hannewald at the meeting since it was he who had sent the arrest warrant request, but that AP Donaldson then actually had Officer Tilger at the meeting as his *witness*....but then Donaldson refused to wait until the victim's attorney would arrived (so that the Mr. Schied would have his own "*witness*" to the events of the meeting). [25]

117. **FACT #108** – **Mr. Schied's 8/24/06 letter ("*Exhibit #33*") also detailed the fact that when the VICTIM'S attorney arrived she stated that she had been kept purposefully detained on the ground floor of the prosecutor's building for forty-five (45) minutes before being allowed to go up the elevator; and that during that 45 minutes the victim/Grievant David Schied had been ill-treated while attempting to wait for his attorney in the prosecutor's office.** (Bold emphasis added)

118. **FACT #109** – The letter details that when alone in the prosecutor's office, Grievant Schied had told the AP Donaldson that, as a reported crime victim, he

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[25] **What Mr. Schied was unaware of when he was waiting in AP Donaldson's downtown prosecutor's office for his newly hired attorney to arrive was that Donaldson had left instructions at the basement of the building for the building security to prevent that attorney from passing the security station to the elevators for at least 45 minutes after her timely arrival to the building where Mr. Schied was to meet AP Donaldson.**

did not wish to answer questions without his attorney present; and that, in reply, the prosecutor stated **(while questionably knowing that attorney Nazek Saffar was being held up for 45 minutes by building security), "*I don't intend to sit here and debate with your attorney"* while repeatedly trying to conduct questioning anyway with Mr. Schied.** (Bold emphasis added)

119. **FACT #110** – The letter **("*Exhibit #33*")** details that, subsequently, after Mr. Schied had been ushered out of the prosecutor's office to the waiting area of that office to wait for his attorney, instead of calling downstairs to inform the building "*guards*" to allow Grievant Schied's attorney to take the elevator upstairs, **AP Donaldson instead made the Grievant Schied wait in vain only to be told a short while later that "*because the attorney had not shown up"* Donaldson would be denying Grievant Schied's criminal complaint altogether and closing the case.**

120. **FACT #111** – The **("*Exhibit #33*")** letter also noted that when the victim/Grievant's attorney finally was allowed to go up over 45 minutes after her scheduled arrival time, AP Donaldson called the attorney back into his office to talk with her outside of the presence of Grievant David Schied. Then when both of these State BAR of Michigan attorneys came out of Donaldon's office, Donaldson stated his continued refusal talk further with Grievant Schied, even despite that his attorney had arrived as expected (i.e., to the building *on*

time) and right away had claimed to have been held up on the bottom floor of the building by the guards of the building.

121. **FACT #112** – Mr. Schied's letter **("*Exhibit #33*")** was written in protest of the fact that behind closed doors and after the release of Officer Tilger by Donaldson – despite that Officer Tilger was known to be yet still in the building – **AP Donaldson told the attorney (Saffar) that according to Officer Tilger's crime report he "*saw no evidence that a crime had been committed,* while also suggesting that Mr. Schied's attorney should consider working at the further expense to her client so to submit a completely revised crime report that otherwise proved to him that a crime had been committed**. **This Donaldson did, again, without providing Grievant Schied – as the reported crime victim – the opportunity to provide such proof in person as Mr. Schied had indeed come to the prosecutor's office that day with a briefcase loaded with evidence to present to Donaldson whenever his attorney Saffar would arrived.** (Bold emphasis added)

122. **FACT #113** – The acts depicted by the above-referenced "*victim's testimonial letter*" **("*Exhibit #33*")** dated 8/24/06, as addressed to AP Donaldson, greatly showed that Donaldson had intentionally denied Grievant – as a reported crime victim – his right to *due process*, *respect*, and *equal treatment*. **These acts by AP Donaldson also amounted to felony perjury,**

the execution of a *legal act in an illegal manner*, *interference with the administration of justice* [26], preventing the report of a crime[27], and *unlawful defense against the victim's allegations*.[28]

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[26] **MCL 777.49** (Code of Criminal Procedure) – OFFENSE VARlABLE: INTERFERENCE WITH ADMINISTRATION OF JUSTICE – "*(c) The offender otherwise interfered with or attempted to interfere with the administration of justice."*

[27] **MCL 759.483a** (Michigan Penal Code) -WITHHOLDING EVIDENCE; PREVENTING REPORT OF CRIME – "*(1) A person shall not do any of the following: (c) Retaliate or attempt to retaliate against another person (or having reported or attempted to report a crime committed or attempted by another person. As used in this subsection, "retaliate" means to do any of the following: (i) Commit or attempt to commit a crime against any person.* (2) *A person who violates subsection(1) is guilty of a crime ... as follows:* (3) *A person shall not do any of the following: (a) Give, offer to give, or promise anything of value to any person to influence a person's statement to a police officer conducting a lawful investigation of a crime or the presentation of evidence to a police officer conducting a lawful investigation of a crime.·... or... Knowingly and intentionally remove, alter. conceal, destroy, or otherwise tamper with evidence to be offered in a present or future official proceeding. (b) Offer evidence at an official proceeding that he or she recklessly, disregards as false.* (6) *A person who violates subsection* (5) *is guilty of a crime as follows:... the person is guilty of a FELONY punishable by imprisonment for not more than 4 years or a fine of not more than $5,000.00, or both ...* (7) *It is an affirmative defense under subsection* (3), *for which the defendant has the burden of proof by a preponderance of the evidence, that the conduct consisted solely of lawful conduct and that the defendant's sole intention was to encourage, induce, or cause the other person to provide a statement or evidence truthfully.* (11) *As used in this section: (a) "Official proceeding" means a proceeding heard before a legislative, judicial, administrative, or other governmental agency or official authorized to hear evidence under oath, including a referee, prosecuting attorney, hearing examiner, commissioner, notary, or other person taking testimony or deposition in that proceeding."*

[28] **MCL 776.14** (Code of Criminal Procedures) – UNLAWFUL FOR PROSECUTOR TO DEFEND AGAINST ALLEGATIONS" – *"It shall be unlawful (or any prosecuting attorney of this state to defend or assist in the defense*

123. **<u>FACT #114</u>** – Mr. Schied's letter to AP Robert Donaldson dated 8/24/06 noted that this testimonial document was copied and sent to other supervisory law enforcement officers in Michigan such as Donaldson's supervisor, Wayne County Prosecutor Kym L. Worthy, the Government Affairs Bureau Chief for the Attorney General (Mike Cox), who was Frank Monticello; and the Division Chief of the Public Affairs, Elections and Tort Division of the Office of Attorney General, who was Patrick O'Brien....**all without any direct response back from any of these named government agents.**[29] (Bold emphasis)

124. **<u>FACT #115</u>** – On August 24, 2006, **Grievant David Schied also sent a letter addressed to Kym L Worthy, the Wayne County Prosecutor in "*complaint about Prosecutor Robert Donaldson*" of the "*Public Integrity Unit*" of the prosecutor's office.**

125. **<u>FACT #116</u>** – As shown by the third entry of **"<u>EXHIBIT #33</u>"**) unbeknownst to Mr. Schied, around this time of 2006, **the Prosecutor Kym Worthy was in a public battle with the Wayne County Commission over her demanding more money for her office and threatening to: "*a) stop prosecuting official corruption cases; b) reduce prosecutions for drug-related***

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of any person charged with crime within the county of which he is prosecuting attorney."

[29] Note that this letter of complaint included allegations of a conspiracy to violate the Racketeering Influenced and Corrupt Organizations Act (RICO).

crimes and nonfatal shootings; c) charge admission for those attending high profile trials; d) and, sue Wayne County Commissioners for more funds."

(Bold emphasis added)

126. **FACT #117** – The letter sent to Prosecutor Worthy on 8/24/06 described how **AP Donaldson, instead of conducting his own investigation or instead of simply allowing Mr. Schied to present his evidence in the presence of his own attorney, denied him those rights while demanding that "*the victim*" put up the expense to create and then submit an alternate "*crime report*" to the prosecutor to augment the criminal complaint already in his possession by the submission of the Northville City Police.**

127. Mr. Schied referenced an attached copy of the letter he had sent to AP Donaldson dated that same day, sending the correspondence by both Fax and by mail to ensure proper delivery and confirmation of such delivery.[30] This letter to Wayne County Prosecutor Worthy was, again, also copied and sent to state law enforcement officials in the Office of the Attorney General Mike Cox.

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[30] Mr. Schied's documentation, as originally filed with the Ingham County Circuit Court in 2007 when filing his first RICO case against the governor, the attorney general, the Michigan State Police, and others – who were privy to but grossly malfeasant in doing nothing about these chain of events – shows that although Mr. Schied had also tried to send the 8/24/06 letter to AP Donaldson as he had done successfully with his earlier letter dated 8/11/06, Mr. Schied's email that second time around days later was returned back as "*undeliverable*". That indicated to Grievant Schied that Prosecutor Donaldson had listed Mr. Schied's return email address as one marked for being "*blocked*" for email delivery.

128. **<u>FACT #118</u>** – As shown by the final set of pages in **“*<u>Exhibit #33</u>*,”** three days later, on 8/27/06, Grievant Schied sent another complaint letter to Northville Police Officer Anthony Tilger’s supervisor, Cptn. Michael Carlson. The purpose of that letter was to file a formal complaint about Officer Tilger – as the so-called “*witness*” being called by AP Donaldson – **having submitted to Donaldson a version of Grievant Schied’s crime victim’s statement and Evidence, which were otherwise unreliably incriminating beyond reasonable question, that AP Donaldson had yet deemed was “*not enough to show that a crime had been committed by the Northville Public Schools administrators [Parker, Bolitho, and Rezmierski].*”** (Bold emphasis added)

129. **<u>FACT #119</u>** – As shown by the first page of **“<u>EXHIBIT #34</u>,”** on August 31, 2006 (9/31/06), Captain Michael Carlson, as "*acting police chief*" of the Northville City Police Department, wrote a preliminary response to Mr. Schied's 8/27/06 complaint about Officer Anthony Tilger by sending Mr. Schied, as the victim requesting such a copy of Tilger’s crime report, a copy of Officer Tilger's crime report and accompanying "*narrative report(s)*".

130. **<u>FACT #120</u>** – On September 1, 2006 (9/1/06) the crime victim, Grievant David Schied, wrote a second letter of Complaint to Northville City Police Captain Michael Carlson regarding the actual content of the officer Tilger’s original crime report. The letter itemized the complaints about Officer Tilger' s

"gross misrepresentation of the facts" that Mr. Schied had otherwise clearly presented to the officer orally by Grievant David Schied, himself, on 7/17/06.

131. As shown by the 9/1/06 letter (as the second entry in **"*Exhibit #34*"), the letter underscored that Officer Anthony Tilger grossly "*omitted*" certain facts while "*misstating*" other facts so to intentionally "*mischaracterize*" Mr. Schied, and to intentionally lead the prosecutor to question the victim's personal integrity; as well as lead the prosecutor to question the victim's credibility in asserting criminal allegations against high ranking school district administrators. Such a "*false representation*" of the victim's criminal complaint is characteristic of *defamation by false light",* and *perjury* in the filing of an official document that may be used later in a judiciary proceeding.**[31] (Bold emphasis added)

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[31] Officer Tilger's crime report, **without even conducting an interview with the alleged criminal perpetrators, misleadingly focused on Northville Public Schools hiring of Mr. Schied, while *grossly neglecting* to focus on the more significant fact that the hiring "*agreement*" between Mr. Schied and Katy Doerr-Parker included a fraudulent assurance by Parker of *confidentiality* by Katy Doerr-Parker on condition that Mr. Schied provide her with copies of the so-called *"incriminating" set aside* and *pardon* documents. The report should have focused upon the victim's allegation that (as shown in "*Exhibit #27*") Grievant Schied was otherwise fraudulently misled to believe (at the time of hiring by Parker) that, as a condition of hiring, those documents would be *"sealed"* until Mr. Schied obtained a *"correction"* of the FBI's identification record. Tilger neglected to mention that thereafter, the Northville Public School Administration was supposed to have returned or destroyed those documents but had instead publicly disseminated them.** Officer Tilger was also derelict in his crime report to mention that the fraudulent

132. **<u>FACT #121</u>** – Mr. Schied's 9/1/06 letter discussed how Officer Tilger's crime report also demonstrated that Officer Anthony Tilger had committed a felony offense under <u>MCL 750.424</u> as "*subornation of perjury*" when he forwarded his personal plea that AP Donaldson, *"Please consider the reservations we (the Northville City Police Department) have about handling this case."*

133. **<u>FACT #122</u>** – Subsequently, on 9/4/06 Grievant Schied sent AP Robert Donaldson an email with digital attachments that included a copy of the complaint that went to Officer Tilger's supervisor, Captain Carlson, regarding the crime report.[32]

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hiring agreement presented by the school district had been modified to include equal consideration for the Texas "*<u>Agreed Order of Expunction</u>*" document that Mr. Schied had traded to Parker in return for the *set aside* and *pardon* documents; and that Parker's (fraudulent) representation had been consummated as a form of "*contract*" when Mr, Schied paid $54 at the written request of Katy Parker for a new FBI fingerprinting based on those agreed upon condition. The understanding was that once the District had that "*corrected*" and "*cleared*" new FBI report in hand the Northville Public Schools administrators would honor their side of that *contract*. Finally, Officer Tilger's report failed to present the fact that there had been named "*witnesses*" to the criminal event that occurred with the mailing of the Texas "*<u>Agreed Order of Expunction</u>*" document to the victim's new employers (i.e., Brighton Area Schools as shown by **"*<u>Exhibit #28</u>*"** herein; and he further *neglected* to mention the exact Michigan criminal statutes that the victim (Grievant Schied) had otherwise mentioned were at the basis of his crime report (i.e., such as the prima facie statement in paragraph 1 of the "*<u>Agreed Order of Expunction</u>*" that clearly stated the *use or dissemination was PROHIBITED*.

[32] **Other attachments with that 9/4/06 email were copies of Katy Doerr-Parker's two written email assurances, dated a year apart and reiterating her fraudulent promises to keep the "*incriminating*" documents sealed** until the

134. **FACT #123** – The email letter sent to AP Donaldson on 9/4/06 – shown in Evidence herein as the last two pages of ***"Exhibit #34,"*** emphasized, "*There is no 'sameness' between the criminal claims against Northville Schools and the civil claims against the Lincoln Consolidated Schools and their previous administrator Sandra Harris*." The letter pointed out that either Officer Tilger or AP Donaldson could have at any time sought out additional information and evidence if they thought that *"there was not enough evidence that a crime was committed"* [33] and **that Officer Tilger's crime report was blatantly**

Northville Public School District received a "*corrected*" FBI report showing *"no conviction";* and to thereafter return the documents, destroy the documents, or place them outside the school district in the file of their attorney from the corrupted Keller Thoma law firm, Gary King. (*See again* Parker's written promises ***"Exhibit #27"***)

[33] **Prosecutor Donaldson might have easily gotten an "*Investigative Subpoena*" under MCL 767*AA* and MCL 767A.5 before making an arrest, or conduct a *Preliminary Examination* under MCL 767.42** or MCR Rule 6.110 after making the arrest if he had been so inclined. If he had believed this to be a case with a *minor offense* he might have also have issued a "*written order for summons*". *See* MCL 964.9a (Code of Criminal Procedure) – MINOR OFFENSE; WRITIEN ORDER FOR SUMMONS -*"1) As an alternative to filing an order allowing a warrant as provided in section 1 if the arrest is to be for a minor offense, the prosecuting attorney may issue a written order for a summons addressed to a defendant, directing the defendant to appear before a magistrate of the judicial district in which the offense is charged to have been committed at a designated future time for proceedings as set forth in this act.* (2) *A summons shall designate the name of the issuing court, the offense charged in the underlying complaint, and the name of the defendant to whom it is addressed, and shall be subscribed by the issuing magistrate.* (3) *A summons may be served in the same manner as a warrant." **See also*** **MCR Rule 6.103** (Rules of the Court) – SUMMONS INSTEAD OF ARREST -*"(A)* Issuance of Summons. *If the prosecutor so requests, the court may issue a summons instead of an arrest warrant. If an accused fails to*

misleading in having reported an unwillingness on the part of the victim to submit evidence during the interview. [34] (Bold emphasis added)

135. **FACT #134** – On 9/8/06, AP Robert Donaldson wrote a three-sentence letter to the victim, Grievant David Schied. The first sentence acknowledged his receipt of three of the recent letters of complaint from Grievant Schied, as they

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appear in response to a summons, the court, on request, must issue an arrest warrant. (B) Form. *A summons must contain the same information as an arrest warrant, except that it should summon the accused to appear before a designated court at a stated time and place. (C)* Service and Return of Summons. *A summons may be served by* (1) *delivering a copy to the named individual; or* (2) *leaving a copy with a person of suitable age and discretion at the individual's home or usual place of abode; or* (3) *mailing a copy to the individual's last known address. Service should be made promptly to give the accused adequate notice of the appearance date. The person issuing the summons must make a return to the court before which the person is summoned to appear."*

[34] **FACT #135 – When Mr. Schied made his oral crime report a week prior to sending in a written report, Officer Tilger had requested to copy Mr. Schied's Texas '"*expunction*" document. Mr. Schied had declined to provide that document while stating that it was his desire not to have such documentation made part of another "*public record*" by inclusion with the criminal report. However, Mr. Schied offered the suggestion that Officer Tilger instead make a FOIA request to the Northville Public School administration and get a copy from them directly since that would prove by the repeat of the offense that the school district is disseminating the document freely upon request and in violation of MCL 780.623 as well as Texas laws; and the officer would also have a copy of the document for inclusion with his crime report. Instead of following through with that suggestion by the victim, Officer Tilger failed altogether to contact the Northville Public School administration even though it was literally a stone's throw away from this police station; and he thereafter made false notation instead in the "*official*" crime report that Mr. Schied had otherwise refused to provide the requested evidence. Thus, Tilger intentionally meant to FALSELY indicate that the VICTIM was somehow being uncooperative.** (Bold emphasis)

were addressed to AP Donaldson, Captain Carlson, and Prosecutor Worthy. The second sentence stated without support that AP Donaldson somehow had disagreed with the "FACTS" as provided by the victim. **The third sentence stated simply that the crime victim's *"posture"* in dealing with the handling of this complaint played at least some role in Prosecutor Donaldson's *discretionary* decision to deny criminal prosecution on the Complaint.** [35] (Bold emphasis added)

136. **FACT #135** – AP Robert Donaldson's brief letter dated 9/8/06 clearly *"promised"* a denial of the victim's access to any *justice* in this matter by way

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[35] **This letter from the prosecutor to the victim demonstrated that, in addition to being motivated to accept the enticement or *"bribe"* by Officer Tilger to dismiss the crime report, the prosecutor had developed his own motive for RETALIATING due to the victim having documented to State law enforcement supervisors the *"losing"* of the original crime report by the prosecutor's office; and by the victim also having documented the intentional detainment of the victim's attorney at the prosecutor's office, as well as all the other details pointing to CORRUPTION IN OFFICE. Clearly, this letter of denial has long provided some proof – beyond any reasonable doubt – that Assistant Prosecutor Donaldson's *"abuse of prosecutorial discretion"* was motivated as personal retaliation as well as by favor to the request of a fellow law enforcement officer.**

MCL 768.27 (Code of Criminal Procedure) – EVIDENCE: PROOF OF INTENT OR MOTIVE – *in any criminal case where the defendant's motive. intent, the absence of, mistake or accident on his part, or the defendant's scheme, plan or system of doing an act, is material, any like acts or other acts of the defendant which may tend to show his motive, intent, the absence of, mistake or accident on his part, or the defendant's scheme, plan or system in doing the act, in question, may be proved .....whether they are contemporaneous with or prior or subsequent thereto; notwithstanding that such proof may show or tend to show the commission of another or prior or subsequent crime by the defendant.*"

of *"devaluing"* the victim personally as well as his devaluing his important Complaint. The letter not only *"discouraged"* but also *'forbade* the individual from *attending, giving information* or *presenting testimony* at an *official proceeding,* and similarly *forbade* the Complainant from otherwise *using the legal process.* It *retaliated* or *attempted to retaliate* against the crime victim for having submitted statements in report of having *witnessed* a crime first-hand; and the act by the prosecutor of imposing that *discretionary* denial is a *FELONY* offense requiring an *AFFIRMA TIVE DEFENSE* by "*the accused*."

137. **FACT #136 – On 9/12/06, Northville City Police Captain Michael Carlson responded to Mr. Schied's 9/1/06 letter (i.e., see again "*Exhibit #35*) stating that he was placing a copy of the victim's letter into the case file, and forwarding another copy of the letter, along with Officer Tilger's crime report to the instant DEFENDANT Michigan Municipal Risk Management Association.** Captain Carlson's letter informed the victim, Grievant David Schied, that he had determined none of his police officers had committed any errors relative to the Complaint. [36] (Bold emphasis added)

138. **FACT #137** – A second document provided by Carlson with that 9/12/06 letter was a Northville Police Department printout stating that Grievant

[36] Captain Carlson's letter only admitted Officer Tilger's negligence inasmuch as he stated, *'"I do agree that the matter could have been handled in a more expeditious manner.""*

Schied's criminal case had been "*closed*" and **the warrant request was denied by the Wayne County "*assistant*" prosecutor for the "*Public Integrity Unit*," Robert Donaldson.** (See the second two pages of **"*Exhibit #35*."**)

139. **FACT #138** – As shown by the third document entry in **"*Exhibit #35*,"** on October 8, 2006 (10/8/06), Grievant Schied, sent an email letter to Defendant Charter County of Wayne's Commissioner Laura Cox. The letter informed Commissioner Cox that Senator Bruce Patterson had referred Mr. Schied to her, and that **Mr. Schied was writing to inform her about the *facts* revealing *"recent criminal events and a cover up by local Wayne County government officials".*** (Bold emphasis)

140. **FACT #139** – Mr. Schied's 10/8/06 letter to Commissioner Cox also outlined the following in great deal over four (4) full pages of email text:

a) That problems began when the Lincoln Consolidated Schools "*interim*" superintendent denied Mr. Schied his federal right to *challenge* and *correct* an erroneous FBI report in Washtenaw County;

b) That the Lincoln Consolidated School District had been criminally disseminating the FBI identification information and that each occurrence was a criminal misdemeanor violation of minimum the spirit and the letter of (Texas' and Michigan's) state "*set aside*" laws and Michigan's Revised School Codes;

c) That after a full year of dedicated employment as a substitute teacher at the Northville Public School District, the administration of the school district turned around and disseminated the Texas "*expungement*" document (which had been obtained to prove qualification of employment and that the FBI identification record receive by that school administration in 2004 was also erroneous) to a third school district, Brighton Area Schools, and to the public under FOIA request, being criminal misdemeanors at each occurrence.

d) That the events depicted in the pages above as occurring between Northville City Police Department officers and supervisors, and the Wayne County assistant prosecutor Robert Donaldson and Kym Worthy constituted "*tortuous conduct*" with Northville City Police and the Wayne County Prosecutor conspiring to compound the damages to Mr. Schied's career, reputation, family, and his own personal health.

141. **FACT #140** – As shown by the next pages of Evidence in **"*Exhibit #35*,"** Commissioner Cox sidestepped Mr. Schied's request for her own personal assistance in this Defendant Charter County of Wayne matter, by forwarding Mr. Schied's documents to her husband's (Attorney General Mike Cox's) Bureau Chief, Frank Monticello who, by that time had proven himself

absolutely useless to Mr. Schied's plight, even taking on an additional level of criminal cover-up of both the Washtenaw and Wayne County matters.

142. **FACT #141** – When Mr. Schied balked and questioned Laura Cox's motivation for forwarding his request to Monticello, who was otherwise already apprised and doing nothing yet about this matter, Laura Cox invited Mr. Schied to give a presentation to the Wayne County Commission instead.

143. **Fact #142** – As shown by the middle section of pages in **"*Exhibit #35*,"** Mr. Schied prepared a full presentation of his materials along with a 3-page cover letter dated 10/24/06 and addressing Laura Cox and the DEFENDANT Charter County of Wayne's *Committee on Government Operations*. **The captioning of the letter, and the content of the public presentation before this committee that otherwise appeared shocked and speechless by the subject matter, was "*Criminal misdemeanors by Northville Public School Administrators and cover-ups of government crimes by Northville City Police and Wayne County Prosecutor*."**

144. **FACT #143** – The next page of **"*Exhibit #35*"** shows that very shortly after Mr. Schied's presentation to the *Committee on Government Operations*, on 10/26/06 – and with full comprehension of what the problem was all about between the government officials working in the City of Northville and the Office of the Wayne County Prosecutor Kym Worthy (and with the added

understanding that, per the news article about Kym Worthy threatening to stop investigating public corruption and sue the Wayne County Commission for more money as found in **"*Exhibit #33*"** ("*Commissioner*") – **Laura Cox simply forwarded a copy of Mr. Schied's materials to the Wayne County Prosecutor's "*special operations chief*" James Gonzales, while *misrepresenting* that "*Mr. Schied would like a letter of decision from your office…*" rather than truthfully stating that Grievant Schied wanted arrest warrants issued and for his criminal perpetrators, including Robert Donaldson, to be prosecuted for their multi-layers of crimes and conspiracy to deprive of rights.** (Bold emphasis added)

145. **FACT #144** – As also shown in **"*Exhibit #35*,"** **James Gonzales responded to Laura Cox's request with an undated letter addressed to Grievant Schied that was fully laced with *gross omissions and misstatements of facts*.** In fact, the number of misrepresentations embedded in this letter were so many that the address of Gonzales' criminal tort are further summarized below by description of Mr. Schied's letter of response to Gonzales, which appears as the final documents found in **"*Exhibit #35*,"** as dated 11/22/06.

146. As depicted in much more detail in Mr. Schied's 6-page letter dated 11/22/06 to Gonzales (end of documents in **"*Exhibit #35*"**), the problems with

the letter written by Defendant Charter County of Wayne's "*special operations*" *agent* Gonzales can be summed up as follows:

a) **FACT #145** – Gonzales completely disregarded that – given the FACTS as outlined in the presentation – underlying misdemeanor crimes were being committed against Mr. Schied by the Northville Public Schools administrators in violation (minimally) of MCL 380.1230 by dissemination of (erroneous) criminal history that was obtained during the course of qualifying a teacher for employment (by fingerprinting subject to the terms of the *Privacy Act of 1974* as codified, 5 U.S.C. §552a).

b) **FACT #146** – Gonzales completely disregarded the entirety of events that were depicted as having occurred between the falsified crime report by Northville Police officer Tilger, to the initial "*losing*" of that crime report by AP Robert Donaldson, to the retaliatory measures that were carried out by Donaldson upon his being copied with letters of these events going to the Attorney General's "*Government Affairs Bureau Chief*" Frank Monticello and his "*assistant*" Patrick O'Brien, the *Division Chief of Public Affairs*.

c) **FACT #147** – Gonzales had constructed erroneous explanations to support his findings that no warrants would be issued for lack of finding of crimes being committed. **Essentially, in this letter, Mr. Schied called Gonzales out for his exhibiting the familiar "*pattern and practice*" of constructing**

a fraudulent government document ***using intentional misstatements and gross omissions to continue depriving Grievant Schied of his right to remedy under color of law*****.** (Bold emphasis)

d) **FACT #148** – Gonzales had grossly misrepresented the nature of the *Schied v. Lincoln Consolidated Schools* ruling in 2006 by the Michigan Court of Appeals, misconstruing that ruling to having addressed criminal allegations in some way, and claiming *fraudulently* that the Michigan Court of Appeals had ruled that not even the Texas "*Agreed Order of Expunction*" had not erased the existence of the so-called 1977 "*conviction*."

147. As shown on the last page of his letter to Gonzales (**"*Exhibit #35*"**), Mr. Schied copied this document to a laundry list of county and state government officials connected with the Defendant Charter County of Wayne and its varying "*agents*" and incestuous network of "*good ol' (Republican Party) boys*."

<u>ARGUMENT</u>

Given the overwhelming number of FACTS that – *prima facie* – refute the *gross omissions and misstatements* of the criminally corrupted co-Defendant ICSOP and AIG and their terrorist partners employed as the Plunkett Cooney law firm, this section of the "*brief*" will, in fact, be thorough but brief.

First, put simply, there ARE a plethora of "*facts upon which relief can* (and should) *be granted*" which counter Defendant's NONSUBMISSION of "*Answers*" and/or illegitimate "*Answers*" to Grievant David Schied's original "<u>*Complaint and Claim for Damages*</u>*...*"

Second, in proper context – and in light of the overwhelming Evidence – Defendant's mischaracterization of Grievant Schied's "*claim*" as being in any way unintelligible and/or uninformative falls on its face under co-Defendant's so fraudulent as to be laughable "*answers*" that, *prima facie*, nobody at the Plunkett Cooney law firm is even willing to sign their name to having constructed.

Third, **in proper context and in light of the overwhelming Evidence, any future Defendant argument** that Grievant Schied "*fails to state a claim under the 'state created danger' doctrine*" **also falls on its face.**

<u>The FACT is</u>:

a) Co-Defendants ICSOP and AIG, by information and belief that is subject to further discovery and judgment of the facts by a jury of the people, provides financial "*surety*" to its other co-Defendant – being aid and comfort to unlawful acts of corruption, racketeering and terrorism by financial "*coverage*" backing unlawful behaviors.

b) Co-Defendants ICSOP and AIG work to change constitutionally mandated policies and procedures through corruptive financial incentives, which have the effect of detracting away from personal accountability to The People through the government mandated purchasing of "*performance bonds*" that otherwise statutorily guarantee to county and state residents that public functionaries will abide by their solemn Oath and Duties of public office.

c) Grievant Schied has indeed established that co-Defendants ICSOP and AIG co-sponsored and fostered a "*corporate*" environment that is being compelled to adhere to *<u>policies and procedures</u>* that protected the corporate structure rather than to place the highest protection on constitutional guarantees and the rights of The People. In designing such a structure and building this business relationship with the Charter

County of Wayne, co-Defendants ICSOP and AIG helped to nurture the "*patterns and practices*" exhibited by their clients and business partners.

d) The results of the above "*corporatizing*" and *monetizing* of the otherwise straightforward guarantees to government performance – as found in the coupling of Oaths of Office and "*performance bonds*" which represent each government official's personal stake in guaranteeing adherence to their Oaths to The People – are proven to undermine those guarantees with corporate policies and practice which, admittedly by co-Defendants in their marketing platform, place the highest significance on protecting corporate assets, not guaranteeing the rights of The People by individual, accountable government "*servants*."

e) Exposing such *policies and practices* found to be taking place in Wayne County offers clarity to the FACT that co-defendants knew – or should have known – that they would be placing <u>*any*</u> purported or reported government crime victim like Grievant David Schied specifically at risk, as either distinguished from or in conjunction with the risk dangers for the public at large. These co-Defendants "*knew or should have known*" that its actions would specifically endanger Grievant because the state actions themselves constitute "*domestic terrorism*" by the FBI's own definition. These acts of Defendant's *agents,* clients, business partners

were thus intentional acts criminally committed *under color of law*, which clearly were designed to coerce government *policies and practices* in such a way to destroy our civil society as we know it....defining what constitutes "*domestic terrorism*."

f) Grievant Schied's allegations go well beyond the allegation that co-Defendants and co-Defendants' agents have exhibited a "*failure to act,*" as the allegations are that these *special investigative* agents' and business partners of AIG had committed numerous *affirmative* acts that – by design – *either create or increase the risk that an individual will be exposed to private acts of violence...by a third party*;

The anticipated future argument of co-Defendant and their Plunkett Cooney attorneys is two-prong: 1) that no facts exist; 2) for which relief can be granted. However, with Grievant having established that a plethora of relevant facts exist to refute and debunk co-Defendant's and State BAR of Michigan attorneys' contention about the first prong, the remainder of this argument will address, in simple fashion, the second prong of co-Defendant's future argument as follows:

a) The plethora of acts depicted by just those facts listed within this instant "*Grievant's Objections and Order to Strike*" document are not all inclusive of the plethora of other acts committed by the agents and business partners of co-Defendants, being inclusive of those employed by Defendant Charter

County of Wayne. Indeed, there are so many other innumerable facts pointing to "*domestic terrorism*" that, indeed, they might be difficult if not impossible to calculate.

b) Nevertheless, **co-Defendants ICSOP and AIG have contracted with Charter County of Wayne to maintain an insurance policy for which upper management has demonstrated – with the case of Krystal Price – their willingness to be directly involved with and accountable to the victimization by their clients for whom they supply "*excess*" coverage up to $15,000,000 for "*errors and omissions*" and up to $30,000,000 for "*other aggregate liability*" above an initial loss amount of $3,000,000, but also includes up to $100 BILLION in coverage for terrorism (to also include "*domestic terrorism*") as defined by the acts described herein.** (Bold emphasis added)

In sum, it is clear that co-Defendant's instant "*Answers,*" fraudulently constructed and submitted without supporting and accountable signatures from either of the two listed attorneys – for whom only one has filed an appearance – are grossly *frivolous*. Therefore, they should be stricken; and Grievant Schied's "Order for Summary Judgment" against co-Defendants should be honored and the Plunkett Cooney attorneys submitting these

unsigned and frivolous "*Answers*" should be sanctioned for their intentional delay of justice. (Bold emphasis)

The documents herein provide reasonable Evidence that <u>facts</u> can and do show plausible <u>injury</u> directly to Grievant David Schied by cause of "*<u>state created dangers</u>*" specifically targeted at Grievant Schied by agents acting on behalf of themselves and others governed by a corporate interest, and while usurping power and authority through <u>criminal</u> means intentionally enacted by the union of the co-Defendants ICSOP and AIG with Defendant Charter County of Wayne *<u>under color of law</u>*. Thus, **Grievant David Schied hereby *<u>strikes</u>* and *<u>dismisses</u>* Defendant's instant "*answers*" and directs that this Court issue Summary Judgment against co-Defendant ICSOP and AIG directing the remainder of this case to hereby proceed to a Trial by Jury.**

Moreover, as the documents provide reasonable Evidence that <u>facts</u> can and do show a reasonable means by which <u>incalculable injuries</u> can be and are indeed covered by *errors and omissions* insurance coverage, *tort* insurance coverage, and coverage (<u>with "*relief*" ranging from millions of dollars up to $100 billion</u>) for what can be and should be construed as proven *<u>domestic terrorism</u>* being carried out within the territorial boundaries and political "*state*" of Defendant Charter County of Wayne, **Grievant David Schied hereby *orders* and *directs* this instant**

case to hereby proceed to a Trial by Jury for the People to decide and calculate what "*relief*" is to be granted.

<u>Notice of Relief Demanded and Hereby Undertaken</u>

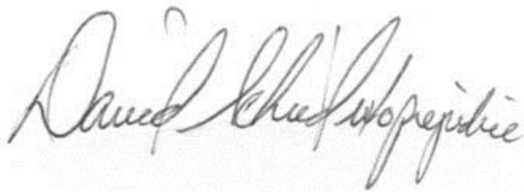
Grievant David Schied demands that the administration of this District Court of the United States to hereby issue stern sanctions against co-Defendants ICSOP and AIG, and its Plunkett Cooney attorneys, as represented by Davidde Stella and Zenna Elhasan. Grievant David Schied, acting in law and under common law, also instructs the administration of this District Court of the United States to issue its own *order* striking Defendant's *Answers* and directing this case forward to a Jury Trial against the co-Defendants ICSOP and AIG.

____

I declare under penalty of perjury that the forgoing is true to the best of my knowledge and belief. If requested, I will swear in testimony to the accuracy of the above if requested by a competent court of law and of record.

Respectfully submitted,

David Schied
P.O. Box 1378
Novi, Michigan 48376
248-974-7703



______________________________ (all rights reserved)

David Schied Dated: 7/31/15

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

David Schied,
Sui Juris Grievant

v.

Karen Khalil, et al
Defendants

Case No. 15-11840

Judge:

CERTIFICATE OF SERVICE

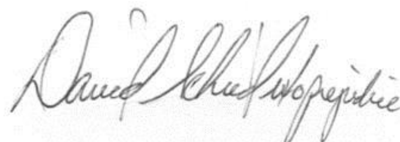
Attn: Clerk of the Court
District Court of the United States
Federal Bldg. & U.S. Courthouse
600 Church St., Rm. 140
Flint, Michigan 48502
313-234-5000

Defendants
The Insurance Company of the State of Pennsylvania
AND
American International Group, Inc.
Plunkett Cooney
Charles Browning
Warren White
38505 Woodward Ave., Suite 2000
Bloomfield Hills, Michigan 48304
248-901-4000

I hereby certify that on 7/31/15, I hand-delivered one "Court copy" and one "judge's copy" of the following documents to the United States District Court in Flint, and sent by first class Priority Mail copies of the following documents to the co-Defendants listed above.

1) "*Grievant's Objections and Order to Strike 'Defendants, The Insurance Company of the State of Pennsylvania ("ICSOP") and American International Group, Inc's ("AIG") 'Answer' to 'Plaintiff's' Complaint" Based on a Pattern of Gross Omissions, Intentional Deception, Frivolous Filing, and Obstruction of Justice (Under F.R.C.P. Rule 11); and for Summary Judgment and/or Declaratory Ruling and Sanctions Against Defendants' Intentional Failure to Answer Within 20 Days (as required under F.R.C.P. Rule 56a)*";
2) Supporting "Exhibits" of Evidence itemized in number as #1 through #35.
3) This instant "*Certificate of Service*"

Respectfully submitted,



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