

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

FILE
NOV 18 2015
U.S. DISTRICT COURT
FLINT, MICHIGAN

David Schied,

Sui Juris Grievant

Case No. 15-11840

v.

Karen Khalil, et al

Judge:

Defendants

GRIEVANT'S "REPLACEMENT OF 'STRICKEN' FIRST 'OBJECTIONS AND ORDER TO STRIKE DEFENDANTS, THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA ('ICSOP') AND AMERICAN INTERNATIONAL GROUP, INC.'S ('AIG') ANSWER TO 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 FULING AND SANCTIONS AGAINST DEFENDANTS' INTENTIONAL FAILURE TO ANSWER WITHIN 20 DAYS (AS REQUIRED UNDER F.R.C.P. RULE 56a)'"

Defendants

The Insurance Company of the
State of Pennsylvania
AND

American International Group, Inc.

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

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 People¹ and having established this case as a *suit of the sovereign*² acting in his own capacity, herein

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...*;"

accepts for value the oaths³ and bonds of all the officers of this court, including attorneys. Having already presented his causes of action to this Article III District

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

Court of the United States as a *court of record*⁴, *Grievant* hereby proceeds according to the course of Common Law⁵.

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 6/1/15**. (Bold emphasis added)
- 3) The 404 pages of “Exhibit #20” as found at:
http://cases.michigan.constitutional.gov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEM/071415_MyRe

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.]

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- 4) *Memorandum of Law and Jurisdiction*” (see “*Exhibit #4*” of the previously filed “*Writ for Change of Judge...and Change of Venue...*” served on these defendants and their attorneys on 6/27/15)
- 5) **All Statements, Affidavits, and Evidence previously filed in this case to include the initial filing to open this case and the previous filings that were subsequently “stricken” by Magistrate Hluchaniuk and by subsequent “objection” and “writ” for Interlocutory Appeal under the “collateral order doctrine” as found in the following sets of documents found in their entirety at the true Court of Record on the Internet:**
 - a) “*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;*” (which is located online at:
http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEM/071415_MyResponse2MMRMA1stMot2Dismiss/071415_MyResponse2Mot2DismissinLieuofAnswr/Response2Mot2Dismiss_EntireFinal.pdf)
 - b) “*Grievant’s Response to Attorney Davidde A. Stella’s, attorney Zenna Alhasan’s, and Wayne County Corporation Counsel’s Fraudulent Conveyances in Their ‘Motion to Dismiss’;*” (which is located online at:
http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEM/070915_MyResponse2WayneCounty1stMot2Dismiss/MyResponse2WayneCountyMot2Dismiss.pdf)
- 6) “*Grievant’s Objections and Order to Strike ‘Defendants, The Insurance Company of the State of Pennsylvania (‘ISCOP’) and the American International Group, Inc’s (‘AIG’s) ‘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)’;*” (which is located online at: **http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEM/073115MyOrder2StrikeAIG&ICSOPNoSignPlunkCoony/Order2Strike&SummJudgmt.pdf**)

- 7) *“Grievant’s Writ of Error and Reversal in Assignment of Magistrate and Engagement of Ex-Parte Proceedings and “Mandamus for Proceeding in Common Law Under the Constitution in an Article III Court of Record.”* (which is located online at: http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/081815_MyWritofError4AssignofMagistrate/EntireWritofError4AssignofMagistrate.pdf)
- 8) *“Grievant David Schied’s ‘Objection’ and ‘Writ of Error’ to Magistrate Michael Hluchaniuk’s ‘Order’ and ‘Amended Order...Striking Responses and Motions (DKT. 36, 38, 58, 63), Granting Motion to Strike (DKT 57), Granting Motion to Stay (DKT 75) and Setting Deadlines’ Based on Constitutional Issues Related to the Supremacy Clause and Due Process Clause of the Constitution of the United States; the Thirteenth Amendment of the Constitution; and Based Upon Grievant’s Previously Filed ‘Writ for Change of...Venue Based on Proven History of Corruption’ and Grievant’s ‘Writ of Error and Reversal in Assignment of Magistrate and Engagement of Ex-Parte Proceedings and Mandamus for Proceeding in Common Law Under the Constitution in an Article III Court of Record.’* (which is located online at: http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/101415_MyObjectioontoMagOrder2Strike/MyEntireFiling_Objection2Order2Strike.pdf)
- 9) The accompanying *“Grievant David Schied’s ‘Writ of Mandamus in Order for Interlocutory Appeal’ With Accompanying ‘Memorandum at Law’ and ‘Questions of Law’ on Action Taken by the Court That Conclusively Resolved a Claimed Right by Procedural ‘Motion’ that is Effectively Unreviewable on Appeal of Final Judgment But Which is Collateral to the Substantive Merits of the Filings ‘Stricken’ and Has a Final and Irreparable Effect on the Case.”*
- 10) The accompanying *“Grievant David Schied’s ‘Memorandum of Law’ in Support of Grievant’s ‘Writ of Mandamus for Interlocutory Appeal’ with Questions of Law Pertaining to Whether Judicial ‘Legislation’ is Constitution; and Whether Judicial Independence Authorizes ‘Bad’ Behavior; and Whether ‘Substantive’ Evidence Can Be ‘Procedurally’ Stricken; and Whether Evidence of a ‘Pattern & Practice’ of Government Coercion Constitutes Treason and/or ‘Domestic Terrorism’*
- 11) The accompanying *“Grievant’s ‘Replacement of ‘Stricken’ First Objections and Order to Strike ‘Defendants, Insurance Company of the State of Pennsylvania (“ICSOP”) and American International Group, Inc.’s (“AIG”) Answer to 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)’’.

**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;** (Bold emphasis added)
- 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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APPENDIX OF EXHIBITS

<u>Exhibit</u>	<u>Document Description</u>	<u>Page #</u>
A	<p>This is the original “<i>Appendix of Exhibits</i>” that was served on the federal Court and to the co-Defendants ISCOP and AIG on 7/31/15 along with “<i>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).</i>” It provides 5 pages of detailed descriptions of 35 itemized exhibits of Evidence against the co-Defendants and their peer group.</p>	3, 7, 22
B	<p>This exhibit consists of an email dialogue between Krystal Price and Defendant AIG’s Michael Creamer, Jim Drake, and Robert Ulrich, making clear that Ms. Price’s “<i>claim of damages</i>” resulting of her victimization by Defendant Charter County of Wayne was being processed by the AIG Claims Intake Department (Creamer). It clearly shows a chain of commands in which Krystal Price’s claim was forwarded upward to AIG top management, and not downward to claims adjusters, beginning with the Claims department in Atlanta, Georgia and Vice-President (Drake) sending it directly to the VP of the Excess Casualty/AIG Property Casualty division (Ulrich) in New York, who then assigned Ms. Price’s claim “<i>to a claim group managed by Julia Ulrich-Barrueco</i>”, who is known also an attorney named as “<i>assistant VP of Complex Casualty Claims,</i>” who is likely also Ulrich’s daughter, working at AIG.</p>	7
C	<p>This is the Defendant CCoW’s “<i>Adopted Budget / Projected Budget</i>” description of the duties of the <i>Prosecuting Attorney</i>. It describes the Prosecuting Attorney Kym Worthy as the “<i>elected constitutional official who is the Chief Law Enforcement Officer of Wayne County.</i>”</p>	8

D	<p>This is the entirety of that final <u>Auditor General’s report</u> on PA Worthy’s office (released on 12/3/14). It was written to ensure future compliance by the Prosecutor Worthy’s office for hiring a full-time experience investigator to be operating within the Office of the Prosecutor. It seemed that Worthy and her “<i>chief-of-staff</i>” both felt that position was either not needed or in part-time need at best. Based upon that assessment, Worthy used for other purposes the \$200,000 that was otherwise distributed to her office during the 2012-2013 budget year for the explicit purpose of hiring someone full-time to carry out those investigations.</p>	9-10
E	<p>This is just a smidgeon of the news articles about a “<i>pattern and practice</i>” of prosecutor misconduct, whereby anyone operating as one of their mafia-style family is NOT prosecuted under the law by Worthy or her assistants. They make the claim that it is because there is too much a political “<i>conflict of interest</i>.” However, when such a refusal to prosecute can clearly result in a public outcry, Worthy will go ahead and prosecute one of her own with watered-down, less serious charges, as has been the repeated case with Senator Virgil Smith, Jr., the wayward <i>brat</i> son of the long-time former “<i>chief</i>” judge of the Wayne County Circuit. This Virgil Smith, Sr. is a man whose roots are embedded in the criminal syndicate of the “<i>Coleman Young machine</i>,” and someone that Grievant and others have been proving for numerous years was unlawfully “<i>usurping</i>” his position on the bench since he clearly viewed himself as above the law.</p>	11, 21
F	<p>This compilation of exhibits shows that the local area Detroit news has long been spotlighting the criminal links to the former Coleman Young political machine and crime syndicate, more recent corruption, and FBI’s lame investigations of the former Wayne County Executive (Ficano) in search for the reasons for the financial woes to this county, and the proverbial “<i>elephant in the room</i>” as cause for Defendant Charter County of Wayne working through the new County Executive (i.e., the former county Sheriff and Detroit Police Chief) to request that the Michigan Governor declare “<i>Wayne County</i>” in a “<i>fiscal state of emergency</i>.” Moreover, these documents show that the corruption has not gone unnoticed on the national level either. These past few years the Center of</p>	12

F	<p>Public Integrity has also been pointing out that, when compared to the rest of the states of the nation, the State of Michigan ranks dead last – at the very bottom of the 50 States – in both ethics and transparency. Altogether, this – along with former Michigan Supreme Court Justice Elizabeth Weaver’s 2012 publication of “<i>Judicial Deceit: Tyranny and Unnecessary Secrecy at the Michigan Supreme Court</i>” – help to explain, with specificity, how this level of corruption, particularly in the judiciary of Wayne County and at the Supreme Court of Michigan goes beyond racketeering and corruption to become <i>tyranny, sedition, treason, and domestic terrorism</i>.</p>	12
G	<p>This set of exhibits show 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, the U.S. Treasury had held 92% of AIG’s common stock, and that it sold its last shares in December 2012. It includes a copy of that article found online captioned, “<i>Wait. So THAT’S what the bailouts were about?</i>” 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: “<i>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 everyone 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.</i>”</p> <p>These exhibits also explain that AIG’s financial woes had resulted from its greed in cornering the market on the sale of credit default swaps to all of the “<i>big players</i>” 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</p>	14

<p>G</p>	<p>was said and done, it was discovered that even the bailout itself was presented to the public as a <i>“long and charming set of lies”</i> and <i>“AIG didn’t necessarily need to be bailed out by the United States government.”</i></p> <p>As stated by analysis of Mr. Stoller, the Feds <i>“were probably breaking the law”</i> 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.</p> <p>Essentially, <i>“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”</i> under color of law. The Evidence and testimony referenced by Stoller’s article suggests that the government power players’ motivation for doing this was <i>“to steal AIG from its shareholders, and then funnel money through AIG to banks like Goldman [Sachs]”</i> and Bank of America that were willing to take <i>“less than 100 cents on the dollar for counter-party payouts”</i> on money that AIG still owed to them, even though Geithner later <i>“ensured that these banks would get 100 cents on the dollar, as well as legal indemnity.”</i></p> <p>As the story of AIG goes, the New York <i>“Fed”</i> officials <i>“explicitly tr[ie]d to avoid the Freedom of Information Act, as well as SEC disclosure requirements”</i> so to keep the public from finding out the truth in the FACT that <i>“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”</i> to keep them from failing. In essence, the bottom line is that <i>“the corrupt manner in which the bailouts were done turned property rights into an explicit reflection of arbitrarily exercised political power.”</i></p>	<p>14</p>
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G	And “ <i>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.</i> ”	14
H	This is a snapshot of one of AIG’s website pages showing that although co-Defendants claim to “ <i>lack sufficient information or knowledge to form a belief as to the truth</i> ” of the allegations about population intimidation, racketeering, government coercion and 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 “ <i>a significant number of ‘fraud investigators’ who are geographically dispersed and highly skilled at handling reports of suspicious insurance activity.</i> ” It also shows that the sole intent of “ <i>AIG’s Global Investigative Services</i> ” is to “ <i>safeguard AIG’s corporate assets, preserve the Company’s reputation, and to improve deterrence</i> ” of what AIG itself deems – along with the corporate charters of government they insure as clients – to be “ <i>fraudulent</i> ” claims.	18
I	This is a copy of the first five [5] pages of an alleged policy issued by co-Defendants to Defendant Charter County of Wayne with a “ <i>Policy Period [f]rom May 1, 2014 [t]o May 1, 2015</i> ”. It provides coverage of <i>excess</i> insurance on blanket insurance for <i>errors and omissions</i> and other <i>tort</i> claims such as brought by Grievant. (These are documents for which co-Defendants ICSOP and AIG already have a full set as they were served in their entirety along with Grievant’s filing of “ <i>Writ of Error and Reversal in Assignment of Magistrate and Enlargement of Ex-Parte Proceedings and Mandamus for Proceeding in Common Law Under the Constitution in an Article III Court of Record</i> ” served upon co-Defendants attorneys at the Plunkett-Cooney law firm on 8/18/15 as certified.)	19
J	This is the “ <i>Index of Exhibits</i> ” that was already provided to co-Defendants, as well as all other parties to this case, when Grievant filed his original “ <i>Writ of Error...in Assignment of Magistrate...</i> ” with the Court on 8/18/15. It consists of 2 pages listing descriptions for the 24 “ <i>exhibits</i> ” that we served in full copies upon all of the co-Defendants, including ISCOP and	24

	AIG.	
K	This is the entirety of Grievant’s final arguments from his previous filing (and otherwise “ <i>stricken</i> ” filing) of “ <u><i>Grievant’s Objections and Order to Strike...and for Summary Judgment...and Sanctions Against Defendants’ Intentional Failure to Answer Within 20 Days</i></u> ” as served long ago upon the federal Court and upon co-Defendants ISCOP and AIG.	25

SUMMARY OVERVIEW:

PLUNKETT COONEY’S “(NON-)ANSWER” FILING ON BEHALF OF THEIR CLIENTS, ICSOP and AIG, EXHIBITS THE PATTERN AND PRACTICE OF “FRAUD UPON THE COURT” BY THEIR GROSS OMISSIONS, INTENTIONAL DECEPTION, FRIVOLOUS FILING, AND OBSTRUCTION OF JUSTICE

1. **FACT #1** – Initially, Plunkett Cooney 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. Such failure by co-Defendants and their representative attorney(s) to sign papers and their written “*representations to the court*” blatant violated F.R.C.P. Rule 7(b)(3) and Rule 11 and undermined the integrity and basis for creating a “*Court of Record*.”
2. **FACT #2** – Though the law firm much later submitted a “*Duplicate... ..Answers...With Signature*,” those “*non-answers*” were not sent until after this *forma pauperis* Grievant was compelled to file his first “*Grievant’s Objections and Order to Strike....*” at his own cost to have this federal District Court “*litigate the merits*” of Grievant’s objections to Plunkett-Cooney’s frivolous filing on behalf of their clients, the ICSOP and AIG.

3. **FACT #3** – While the “Duplicate...Answers...With Signature” were no less categorically “*non-answers*” and yet another frivolous filing of bare assertions and conclusory statements chocked full of gross omissions and misstatements, the District Court’s magistrate “*struck*” Grievant’s objections rather than to litigate those objections and Grievant’s position that Defendants’ frivolous answers are to be stricken.
4. Given that Grievant has filed initial “Objections... and...Reversal” to Magistrate Hluchaniuk’s unlawful “*striking*” of Grievant’s initial filing of “Objections and Order to Strike Defendants’ Unsigned (non-)Answers” – to include a follow-up filing of Grievant’s “Writ of Mandamus in Order for Interlocutory Appeal’ With Accompanying ‘Memorandum at Law’” (served upon co-Defendants along with this instant “Grievant’s Replacement of First Objections and Order to Strike...”) – Grievant relies upon this instant filing to prompt litigation on the merits of Grievant’s earlier filing, as reiterated herein.
5. As such, Grievant incorporates by reference the entirety of the “*stricken*” filing of documents that the co-Defendants continue to have in their possession, as if written again herein verbatim and supported by the Evidence already provided. Such evidence was detailed in the previous filing, labeled as the “Appendix of Exhibits,” which is also provided again herein in its entirety (minus the exhibits themselves

because of their burden of cost to replicate when they are also readily accessible online as shown below by URL location) as **“EXHIBIT A.”**

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 the truth” even after they received Grievant’s first filing of “objections” with “sufficient information” about the 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 and their redundancy of submission is undeniable evidence that both of these State BAR of Michigan attorneys are intentionally filing frivolous statements so to delay justice by confusing and misleading this *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 the evidence previously submitted by Grievant in his first (i.e., the “*stricken*”) filing of “*Objections and Order to Strike Defendants’ Unsigned (non-)Answers*,” which presented Evidence showing other acts of *domestic terrorism* being carried out by the Plunkett-Cooney attorneys’ fellow BAR members of other attorneys and judges. **Such was the case with Krystal Price’s story⁶, who is another claimant against the \$15,000,000 “errors and omissions” and up to \$30,000,000 for “other aggregate liability” and \$100 Billion “terrorism coverage” insurance policy against Defendants Charter County of Wayne, ICSOP, and AIG.** (Bold emphasis added)

⁶ Krystal Price’s 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>** in multiple video segments exhibited on the “RICO Busters” YouTube video “*channel*.”

9. **FACT #6** – While co-Defendants “ICSOP” and “AIG” make the claim that they “*lack sufficient information or knowledge to form a belief as to the truth*” about Grievant’s claims about corruption, racketeering, and domestic terrorism being carried out by co-Defendants’ business client(s), the Defendant Charter County of Wayne, the Evidence previously submitted (and subsequently “*stricken*” by U.S. District Court Mag. Hluchaniuk) proves otherwise. In Fact, co-Defendants ICSOP and AIG are fully aware of the problem because, along with their representative attorneys at the Plunkett-Cooney law firm, they both foster and instrumentally facilitate the problems, depriving and coercing the population of what is known as “Wayne County” *under color of law*.

THERE IS NO EXCUSE FOR CO-DEFENDANTS TO “NOT HAVE SUFFICIENT INFORMATION AND KNOWLEDGE” SINCE THEY ARE SO INTEGRALLY LINKED TO THE CORRUPTION, RACKETEERING, AND DOMESTIC TERRORISM AS PROVEN BY THREE CASE STUDIES ⁷

10. In Grievant’s previous “Objections and Order to Strike Defendants’ Unsigned (non-)Answers,” Grievant provided THREE CASES, illustrating each one in detail to demonstrate the manner in which their client, Defendant Charter County of Wayne (“CCoW”) criminally operates, with those cases spotlighting the proven

⁷ The first two of these case studies involve third parties proving that Grievant Schied’s case is not by far an “*isolated incident*.” These other two cases centering on the domestic terrorism that is proliferating throughout Wayne County are summarized right away in this legal brief. The third case – as presented in the direct experiences of Grievant David Schied – appears in another section further on in this document under a different subheading.

unlawful actions of judges, attorneys, and their operative “*assistants*,” surrounding staff, and servicing employees. These three cases were categorized as follows below in brief summary, and showing clearly how the co-Defendants ISCOP and AIG play into and help to foster the government unaccountability that goes along with this criminal picture.

11. **CASE #1** – The details of this case are supported with a plethora of itemized and labeled Evidence, which was found in the previous filing as “*Exhibits #3*” through and including “*Exhibit #16*” as served upon the Co-Defendants and their attorneys on 7/31/15.⁸

It is the case of Krystal Price, a woman of color who, like so many other urban dwellers in the Detroit area, have long been without proper remedy to the massive foreclosure fraud and criminal property grabs being perpetrated *under color of law* by foreclosure mills like the *Trott & Trott* law firm, with the instrumental help of county government employees insured for their “*errors and omissions*” by the co-Defendants, such as those under employ at the County Prosecutor’s office, the Register of Deed’s office, the Wayne County Treasurer’s office, the County Clerk’s office, the County Executive’s office, the Sheriff’s

⁸ See again, “*Exhibit A*” to this filing for a complete list and brief descriptions of all of the documents submitted as exhibits in that previous filing.

Department, the Defendant Charter County of Wayne’s “*Corporation Counsel*,” and the various local district courts and Wayne County Circuit Court.

One important *exhibit* of Evidence provided in that previous filing (submitted previously as “*Exhibit #15*”) consisted of an email dialogue between Krystal Price and Defendant AIG’s Michael Creamer, Jim Drake, and Robert Ulrich, making clear that Ms. Price’s “*claim of damages*” resulting of her victimization by Defendant Charter County of Wayne was being processed by the AIG Claims Intake Department (Creamer), and forwarded by that department’s Atlanta, Georgia Vice-President (Drake) directly to the VP of the Excess Casualty/AIG Property Casualty division (Ulrich) in New York, who assigned Ms. Price’s claim “*to a claim group managed by Julia Ulrich-Barrueco*”, who is known also as an attorney named as “*assistant VP of Complex Casualty Claims*,” and likely Ulrich’s daughter, at AIG. (See **“EXHIBIT B”**)

Notably, despite the extensive paper trail dating back to 2011⁹ leading to Defendant CCoW’s “*risk management office*” and the office of the Corporation Counsel, as well as most every other office of the clerk, treasurer, deed office,

⁹ Krystal Price’s case is so extensively documented, it took full the first half of all the Exhibits presented in Grievant’s first (i.e., the “*stricken*”) filing of this “*Grievant’s Replacement of First Objections and Order to Strike...*” Because of the page restrictions of this instant filing, the recommendation for familiarizing oneself with the details of that case is to review the document descriptions for “*Exhibits #3 through #15*” as found marked in the attachment to this instant filing, labeled “**“Exhibit A.”**”

sheriff's office, and judges' offices, and ultimately to the office of the "*excess coverage*" offices of AIG and its purported subsidiary ICSOP, as of today's writing, **co-Defendants are still stalling incessantly and for no good reason failing to pay Krystal Price directly on her compounded claims against Defendant Charter County of Wayne.**

12. **CASE #2** – This case built upon the Evidence provided in "Case #1" in that it provided Evidence of local news stories showing the high level of criminal corruption being both looked at by the Federal Bureau of Investigations (FBI) and reported on by local newspapers and television news stories as occurring in association with co-Defendants' ICSOP's and AIG's insured client and co-Defendant Charter County of Wayne. ¹⁰

This second case focused upon Prosecutor Kym Worthy as the so-called the "*elected constitutional official who is the Chief Law Enforcement Officer of Wayne County.*" (See **"EXHIBIT C"** as the Defendant CCoW's "*Adopted Budget / Projected Budget*" description of the duties of the "*Prosecuting Attorney.*") The crux of this case is in the presentation of a just a smidgeon of the plethora of

¹⁰ Note that all of the documents submitted to the federal District Court detailing all of the efforts of Krystal Prince in successfully exposing the "*pattern and practice*" of countywide *racketeering* and *corruption*, and her experiences with this *domestic terrorism* can all be found online at:
http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/073115MyOrder2StrikeAIG&ICSOPNoSignPlunkCoony/Exhibits/

Evidence showing that Kym Worthy has been more a part of the problem than the solution by her dereliction in failing to “*clean up*” the vast amount of *corruption* and *racketeering* crimes occurring within the territorial boundaries of Defendant CCoW. This includes her “*collaboration*” with other county department providing fraud oversight and supervision, and includes her managing of the Wayne County’s “*Mortgage and Deed Fraud (‘Task Force’) Unit*” and the “*Fraud and Corruption Investigation Unit*,” **which was responsible for investigating the Defendant CCoW’s own fraud, waste and wrongdoing but had been reported by Michigan’s Auditor General in 2014 to have been out of compliance and remiss on providing corrective action since the inception and allocation of funding for that “*Fraud and Corruption Investigation Unit*” in 2010.** ¹¹

13. **FACT #7** – Grievant had submitted a small mound of Detroit area news stories pertaining to or surrounding an apparent dissonance between that Kym Worthy office and that Auditor General (Willie Mayo) pertaining to Worthy’s uncompliant performance. The Auditor General’s (modified) recommendation to ensure future compliance by the Prosecutor’s office was for a full-time experience investigator to be operating within the Office of the Prosecutor. It seemed that Worthy and her “*chief-of-staff*” both felt that position was either not needed or in part-time need at

¹¹ Grievant had provided the entirety of that final Auditor General’s report on Worthy’s office (released on 12/3/14) as “*Exhibit #16*” in the “*stricken*” filing still in the possession of co-Defendants. It is provided again herein as “**EXHIBIT D**”.)

best. Based upon that assessment, Worthy used for other purposes the \$200,000 that was otherwise distributed to her office during the 2012-2013 budget year for the explicit purpose of hiring someone full-time to carry out those investigations. (See also, **“EXHIBIT D”**)

The news articles previously served upon co-Defendants clearly demonstrated a pattern of county management corruption with a “*Severance Scandal*” and “*Wayne County Jail Debacle*” both leading to the firing of Wayne County Corporation Counsel attorneys (Marianne Talon in the former “*scandal*” and Steven Collins in the latter “*debacle*”) and local FBI investigations that appeared to have not gone far enough into the activities of the County Executive Robert Ficano, despite clear Evidence that numerous of Ficano’s political action committee donors were the recipients of significant business contracts with the Defendant CCoW. Of course, all that information was “*stricken*” from the federal court record by Mag. Hluchaniuk; however, those documents can all still be accessed online at:

http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/073115MyOrder2StrikeAIG&ICSOPNoSignPlunkCoony/Exhibits/

Herein, Grievant adds to that previous documentation in support of the FACT that Prosecutor Kym Worthy’s intentional dereliction, gross negligence and malfeasance are, by design, good cause and reason to believe that Worthy and her

entourage of “*assistant prosecutors*” are NOT enforcing the written laws as their “*constitutional*” duties require; but instead, are exercising their “*prosecutorial discretion*” through unwritten political bias, agendas, and favoritism. The proof is in “**EXHIBIT E**” as again, just a smidgeon of the news articles about this “*pattern and practice*” whereby anyone operating as one of their mafia-style family is NOT prosecuted under the law by Worthy or her assistants by claim that there is too much a political “*conflict of interest.*”

“**Exhibit E,**” on the other hand, when such a refusal to prosecute can clearly result in a public outcry, Worthy will go ahead and prosecute one of her own with watered-down, less serious charges, as has been the repeated case with Senator Virgil Smith, Jr., the wayward *brat* son of the long-time former “*chief*” judge of the Wayne County Circuit. **This Virgil Smith, Sr. is a man whose roots are embedded in the criminal syndicate of the “*Coleman Young machine,*” and someone that Grievant and others have been proving for numerous years was unlawfully “*usurping*” his position on the bench since he clearly viewed himself as above the law.** ¹²

¹² See “**Exhibit E**” as illustrative in telling the story that: a) Virgil Smith’s son has long been pampered and given preferential treatment by Prosecutor Worthy acting politically outside of the law; because, b) Virgil Smith Sr. has roots in the politics of the Coleman Young crime syndicate of a quarter century ago; and because, c) this is plainly and simply the way of corruption, fraud, racketeering, and other crimes associated with *population intimidation* and *government coercion* takes place in Wayne County.

14.**FACT #8** – Notably, the local news has long been spotlighting the criminal links to the former Coleman Young political machine and crime syndicate, more recent corruption, and FBI’s lame investigations of the former Wayne County Executive (Ficano) in search for the reasons for the financial woes to this county, and the proverbial “*elephant in the room*” as cause for Defendant Charter County of Wayne working through the new County Executive (i.e., the former county Sheriff and Detroit Police Chief) to request that the Michigan Governor declare “*Wayne County*” in a “*fiscal state of emergency.*” (See “**EXHIBIT F**” as a compilation of documents covering the subject matter of both this and the next paragraphs.)

The corruption has not gone unnoticed on the national level either. These past few years the Center of Public Integrity has also been pointing out that, when compared to the rest of the states of the nation, the State of Michigan ranks dead last – at the very bottom of the 50 States – in both ethics and transparency. Altogether, this – along with former Michigan Supreme Court Justice Elizabeth Weaver’s 2012 publication of “*Judicial Deceit: Tyranny and Unnecessary Secrecy at the Michigan Supreme Court*” – help to explain, **with specificity**, how this level of corruption, particularly in the judiciary of Wayne County and at the Supreme

Court of Michigan goes beyond racketeering and corruption to become *tyranny*, *sedition*, *treason*, and *domestic terrorism*.¹³

15. **FACT #9** – Hence, 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, collectively known as the Defendant Charter County of Wayne.

As is found below, co-Defendants ICSOP and AIG have been known to operate a comparable unlawful scheme on a national and international scale. Their crimes lay hidden behind a highly sophisticated scheme of protective “*shells*” being deliberately identified and stylized as brokers, independent agents, and special investigators who are governed by corporate *management* experts and BAR

¹³ Note that Justice Weaver’s book goes into depth on numerous high profile Michigan cases of the past, showing a distinct pattern that shows most of the Michigan Supreme Court judges having past employment as judges of the Wayne County Circuit Court, or strong links to Wayne County. The recently disgraced former MSC Justice Diane Hathaway is but one example, with numerous family members and in-laws being employed as judges of the highly corrupted Wayne County Circuit Court. “*Justice*” Hathaway resigned from her position just before she was convicted in 2012 of bank fraud.

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*” and others operating in the same criminal fashion, such as those of the Plunkett-Cooney law firm.

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

16. **FACT #10** – 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, the U.S. Treasury had held 92% of AIG’s common stock, and that it sold its last shares in December 2012.¹⁴

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 G”** 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

¹⁴ See article found at: <http://www.politifact.com/truth-o-meter/statements/2013/jan/02/american-international-group/aig-says-it-has-repaid-government-plus-profit/>

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 everyone 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.”

17. **FACT #11** – 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.*”

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.

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.”*

As the story of AIG goes, the New York *“Fed”* officials *“explicitly tr[ie]d 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.*”

18. **FACT #12** – 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. Undoubtedly, more about this will be brought out through further “discovery” as this case moves forward in the federal court.** (Bold emphasis)

19. **FACT #13** – Though co-Defendants claim to “*lack sufficient information or knowledge to form a belief as to the truth*” of the allegations about population intimidation, racketeering, government coercion and 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 **“EXHIBIT H”** as a copy of the AIG “*Fraud Warning*” web page.)

Genuine Issues for Litigation and Questions of Fact Exist that Need to be Answered Through Discovery Proceedings

20. **FACT #14** – As shown by **“Exhibit H”** the sole intent of “*AIG’s Global Investigative Services*” 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, genuine questions of FACT exist as to the following:**

a) Whether *AIG’s Global Investigative Services* 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. This would be in particular regard to “*fraud*” being committed upon the public by their own insurance client, Defendant CCoW, 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, being both employed by and as the Defendant CCoW.

- 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 that **Plunkett Cooney’s written “Answer” to Grievant’s claim in paragraph #153 is grossly misleading and omitting as FACT 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 I**” 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 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 its 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)

Therefore, based on the above, claims such as those made by the co-Defendants, in the “*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.*” Such claims will be deemed *incredible* when presented to the Jury.

Case #3

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*.

21. **FACT #15** – Co-Defendants clearly recognize that Grievant David Schied has filed multiple cases in the various courts of the 3rd Judicial Circuit and U.S. District. Put simply, the filings of these cases provide a plethora of “*prima facie*” Evidence that supports the “*case study*” provided publicly by **“Exhibit E”** pertaining to the corruption surrounding the father and son duo, both named “*Virgil Smith*,” one being a usurper “*chief judge*” and the other being a serial petty criminal, drunk driver, and violent Michigan “*senator*,” both residing within the territorial boundaries of Defendant CCoW.
22. **FACT #16** – Where the co-Defendants lack “*information and knowledge*” about Grievant’s legal cases in the Wayne County Circuit Court, there is no doubt that the Plunkett-Cooney attorney are well-apprieved about the underlying causes for Grievant’s numerous cases. The Plunkett-Cooney law firm was the one to originally set the stage for the next decade of so-called “*litigation*” through the deceit of their partner attorney, Michael Weaver, who has

defrauded various state and federal courts to “win” his cases¹⁵ against Grievant’s repeated claims of Evidence, since 2004, showing that these Plunkett-Cooney “government” clients have continually committed crimes against him over a successive number of years, without either the judiciary (i.e., all levels of civil courts) or the prosecuting attorneys (at the county or state level) properly recognizing and assertively addressing these multi-level crimes. On the contrary, each time these State BAR of Michigan attorneys, judges and prosecutors have had the opportunity to do the *right* thing on those multiple cases brought in some way to Defendant CCoW and Detroit (and in Lansing), they have done the *wrong* thing instead, along with Weaver and his fellow Plunkett-Cooney attorneys.

23. As shown in “**Exhibit A**” attached, in Grievant’s original (i.e., the “stricken”) filing of “Grievant’s Replacement of First Objections and Order to Strike...” Grievant brought a full “paper cart” of information *sufficient* enough to fully

¹⁵ See: 1) “David Schied v. Dr. Sandra Harris and the Lincoln Consolidated Schools, et al. (Wash. Cnty. C.C. No. 04-577-CL; COA No. 267023) which was dismissed at a hearing of the Michigan Court of Appeals in Detroit; 2) David Schied v. Sandra Harris and the State of Michigan, et al (Ingham Cnty. C.C. No. 07-1256-AW; COA No. 282804); David Schied v. Thomas Davis, Sandra Harris, Fred Williams, (of Lincoln Consolidated Schools), Leonard Rezmierski, and Jennifer Granholm (U.S. District Court No. 08-cv-100005); and, 3) David Schied v. Lynn Cleary and the Lincoln Consolidated Schools et. al (Wash. Cnty. C.C. No. 09-1474-NO; U.S. District Court No. 10-10105); which all involved attorney Michael Weaver or his agent at the Plunkett-Cooney law firm.

inform these co-Defendants about the underlying issues pertaining to the above-referenced preceding cases that unfolded – more accurately were procedurally “*dismantled*” and dismissed unlawfully *under color of law* and without *litigation of the merits* – due to fraud by the State BAR members involved.

24. All of those previously-filed documents, though stricken from the U.S. District Court’s record, remain however, in the Court of Record that is being otherwise maintained outside of the territorial boundaries of the Defendant CCoW, out of state on an independent server. Those files, which co-Defendants have already been served with and which are therefore incorporated herein in their entirety, can be found at:

http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/073115MyOrder2StrikeAIG&ICSOPNoSignPlunkCoony/Exhibits/

25. Additional documents are available depicting the exact nature of co-Defendants own attorneys who are operating the Plunkett-Cooney law firm as domestic terrorists, having a long history of intimidating and terrorizing Grievant and unlawfully coercing the state and federal judiciary’s policies and practices through the force of their own crimes upon these courts and upon Grievant himself.

26. The details of those Facts, as submitted to this U.S. District Court – and subsequently “stricken” by Mag. Hluchaniuk – as they were furnished to other co-Defendants of this case, though too voluminous to be included and explained in their entirety here, are indeed available as “*facts upon which relief can be granted.*” Until those facts can be more fully recognized and explored as Evidence of the corruption, racketeering, and domestic terrorism associated with co-Defendants ISCOP and AIG’s own attorneys, and with their association of other attorneys and judges carrying out these terrorist acts upon Grievant and others within the scope of *coverage* by co-Defendants’ *terrorism* coverage of *excess* insurance on blanket insurance for *errors and omissions* and other *tort* claims such as brought by Grievant, it should suffice to also admit yet another “*Appendix of Exhibits*”¹⁶ with short descriptions for those additional documents (i.e., see “**EXHIBIT J**”) which can also be found online in their entirety at:

http://cases.michigan.constitutionalgov.us/david-schied/2015_SchiedvJudgeKarenKhaliletalinUSDCEDM/081815_MyWriteError4AssignofMagistrate/

¹⁶ These are documents for which co-Defendants ICSOP and AIG already have a full set as they were served in their entirety along with Grievant’s filing of “*Writ of Error and Reversal in Assignment of Magistrate and Enlargement of Ex-Parte Proceedings and Mandamus for Proceeding in Common Law Under the Constitution in an Article III Court of Record*” served upon co-Defendants attorneys at the Plunkett-Cooney law firm on 8/18/15 as certified.

ARGUMENT AND DEMAND FOR RELIEF

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, 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 “*Complaint and Claim for Damages...*” **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.**

Grievant incorporates by reference the entirety of his final arguments from his previous filing otherwise “*stricken*” but included again herein by reference to **“EXHIBIT K”** as if written herein in its entirety verbatim.

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,



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