

<b>Colorado State Supreme Court</b> <b>Commission on Judicial Discipline</b> 2 West 14 <sup>th</sup> Street Denver, Colorado 80203	
STEVE D. GARTIN, Petitioner v. LELAND PAUL ANDERSON, Respondent	<b>▲ Court Use Only ▲</b>
Relator in Propria Persona: Steve D. Gartin P.O. Box 16700 Golden, Colorado 80402 Email: <a href="mailto:sheriffsteve@justice.com">sheriffsteve@justice.com</a>	Case Number: _____  Division _____  CourtRoom: _____
<b>Original Action in the Nature of:</b> <b>In RE: PEOPLE v. STEVE D. GARTIN 00CR3371</b> <b>Forfeiture of Salary pursuant to C.R.S. 13-5-136</b>	

Steve Douglas, Gartin, *child of יהוה* (YHVH-The EverLiving God of Israel), a sovereign Inhabitant of the California Republic, currently unlawfully incarcerated in Colorado on constitutionally forbidden excessive bond; First Secured Party of the "strawman defendant" - *a cestui que trust*, in the above captioned matter and "attorney-in-fact" firmly established pursuant to U.C.C. Private Security Agreement #SDG09112000-SA, registered, *and uncontested*, with the Secretary of STATE U.C.C. Division, appearing by special visit, *not general appearance*, in propria persona (pro-se); who is of legal age, sound mind, speaks the truth and has first hand knowledge of the facts contained herein; affirms and attests that the following information is true, correct, complete, not misleading and is made under the penalty of perjury, under **duress** and by **threats** and **coercion** hereby states for the record:

Pursuant to Colorado Revised Statutes §13-5-136 Party Aggrieved has been prejudiced by extended unlawful incarceration in the Jefferson County Detention Facility and subjected to draconian, overcrowded prison conditions, poisoned water and air, denial of proper nutrition and exercise, and the deprivation to due process of law by virtue of an intentional deprivation of communication with the "outside" world and most critically Advisory Attorney and Private Investigators.

The extended unlawful incarceration is directly attributable to the fact that the Honorable Leland P. Anderson has refused or neglected to rule on Habeas Corpus Petitions and on several outstanding motions to dismiss due to lack of jurisdiction and the deprivation of the Right to Speedy Trial and Prosecutorial Malfeasance and deliberate and on-going violations of the Rules of Discovery among other fatal flaws in the *unauthorized* prosecution, to-wit: **not authorized by Governor Bill Owens as required for all prosecutions by the COLORADO STATE ATTORNEY GENERAL'S OFFICE.**

On January 4, 2002 the Petitioner was handcuffed and directed into the First Colorado Judicial District CourtRoom 5-A before the Honorable Leland P. Anderson. The court's

agenda was to rule on the Petitioner's competency and to rule on outstanding motions before the Honorable Court, about 33 motions in all, some emergency motions dealing with subpoenas, Private Investigators, witness protection and other time-critical issues.

The Honorable Leland P. Anderson, relying on the official report by the Colorado Mental Health Hospital Psychologist Henry Tobey, declared the Petitioner: "Competent to Proceed" in Propria Persona and set an arraignment for 1 February, 2002.

The Petitioner then directed the Honorable Court's attention to the outstanding motions that required hearing prior to arraignment and provided the Court with an original to copy, although the motion had been sent to the court prior to this appearance.

A lull in the action provided an opportunity for an assistant to the Acting County Attorney, William Tuthill, III, Esquire, **Lilly Oeffler**, *Esquire* to barge into the proceedings, *for the third time since September 10, 2001*, in an effort to revoke the Petitioner's extended law library access granted by the Honorable Leland P. Anderson on May 7, 2001 by verbal order and ultimately on 22 July, 2001 by official written order due to the fact that the Jefferson County Detention Facility Staff had refused to comply with the order until it was written.

The Acting County Attorney, nor their client, the Jefferson County Sheriff is party to the case at BAR, to-wit: 00CR3371. Yet, the Honorable Leland P. Anderson sua sponte ruled in favor of the Sheriff by revoking Party Aggrieved's law library privileges without hearing any arguments from either side.

The Honorable Court was then adjourned without hearing any of the motions that had been outstanding since June 2001 or setting a date to hear any such motions.

The lower court has refused to rule<sup>1</sup> upon Petitioner's Constitutionally secured right to speedy trial. Petitioner has been unlawfully incarcerated since 13 March, 2001.

Petitioner has consistently asserted his constitutional right<sup>2</sup> to speedy trial in Jefferson County Case #00CR3371 and has been denied that right by the trial court.

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<sup>1</sup> Mandamus proper remedy, where court has abused its discretion. Relief in the nature of mandamus under this rule is a proper remedy in a case in which a district court has abused its discretion in exercising its functions. *Gonzales v. District Court*, 198 Colo. 505, 602 P.2d 857 (1979)

<sup>2</sup> Trial courts have jurisdiction to determine Federal Constitutional questions, and it is their duty to do so by virtue of paragraph 2 of article VI of the United States Constitution, which provides that the constitution of the United States and all laws made in pursuance thereof shall be the supreme law of the land and the judges of every state shall be bound thereby and by §8 of Article XII of the Colorado Constitution requiring officers to take an oath to support the constitution of the United States and of the state of Colorado, notwithstanding the provisions of the 1913 amendment to this section which provided that the supreme court should have exclusive jurisdiction to determine such matters. *People v. Western Union Tel. Co.* 70 Colo. 90, 198 P.146 (1921).

On or about **22 June 2001**, Defense again requested all unlawfully seized documents and specified a list of particular documents, receipts, contracts and notebooks particularly germane to the Defense and a Speedy Trial. The Honorable Court was assured by COLORADO STATE ATTORNEY GENERAL'S OFFICE Prosecutor Marleen M. Langfield, Esquire that ALL DISCOVERY had been provided to the Defense.

On **10 September 2001**, the Defense AGAIN requested Speedy Trial and specific Discovery by reading the items listed in the prior motion into the Honorable Court's Record. COLORADO STATE ATTORNEY GENERAL'S OFFICE Investigator **Gary Clyman** testified under oath that he was unaware of any of those items and did not inventory or note the items he, **Donald L. Estep** and **Curt Maleri** seized on 20 September 2000 by defective warrant at Petitioner's business location during that midnight raid conducted in surreptitious haste. Mr. Clyman testified that he did not know what items were seized by Mr. Estep and Mr. Maleri and that NONE of the items were inventoried as they were seized, but later logged into evidence by another party, currently unnamed. **No such listing has yet been provided to the Defense!**

On **September 19, 2001** – exactly one year from the date the Lakewood S.W.A.T. Team, *deployed without authorization by the Governor or the Legislature*, **under the unauthorized supervision of Colorado State Attorney General Investigator Gary Clyman**, and unlawfully assaulted, threatened, menaced and unlawfully arrested the Petitioner and two other innocent bystanders, *relative to the matter captioned above* – the Petitioner received another package, delivered by Jefferson County Detention Facility Staff Deputy, in an **overcrowded cell** in the Jefferson County Detention Facility and purporting to be "Discovery." This package contained: "Documents 695-700, D001-D051 and 2 Avdis Tayes (Gartn & Flemiy & Sisson/otteo)" Enclosed, were several papers identified as "REPORT BY Inv. G. Clyman." The first REPORT DATE is 5/7/01 and is purportedly an INTERVIEW OF FRANK BOAGLIO conducted on date May 2, 2001. The next dated report appears to be 7/23/01 and is entitled CONTACT WITH CHARLES CLEMENTS and purports to be relative to the unlawful arrest and incarceration of Mr. Charles Harry Clements and the ensuing custodial interrogation, extortion and threats that resulted in Mr. Clements aiding the efforts of Mr. Estep & Clyman to locate the Petitioner in the above captioned matter as a "deal" for which he would receive a Personal Recognizance Bond from the Prosecution. According to the text of the "report" the "interview" of Mr. Clements was conducted at the Jefferson County Detention Facility on February 28, 2001. Another purported "REPORT BY Inv. G. Clyman" is dated 8/24/01, which indicates an intentional breach of the requirements of Rule 16, *as this report was conducted on 8/22/2001*, and is also in violation of the 20 day rule and again **intentionally prejudices the Defense**.

As of Tuesday, October 09, 2001 the Prosecution continued to withhold pertinent information relevant to the Defense's case, such as **statements by Eric Gordon Mitchell**, who is another co-defendant in this matter and **statements of other witnesses** such as Terrell Wayne Sisson, James Perrin, James John Jorrissen who were purportedly "expert witnesses" who accused Petitioner of being a "patriot" and others, such as Deputy

Schideman, the computer expert who has spent over a year investigating Petitioner's business computers.

The COLORADO STATE ATTORNEY GENERAL'S OFFICE Investigator Gary Clyman and F.B.I./Jefferson County Sheriff's Deputy Donald L. Estep have sworn oaths as to the existence of such statements in **Affidavits for Search Warrants, Grand Jury Testimony and Affidavits for Issuance of Arrest Warrants**, but AFTER OVER A YEAR that this case has been in progress, **FOR THE PURPOSES OF SPEEDY TRIAL**, this **mandatory Discovery has NOT been provided as is required by Law** – Professional Ethics– and a Direct Standing Court Order from the **Honorable Leland Paul Anderson, presiding judge**.

**Therefore, the Defense specifically requested immediate production the following Discovery:**

1. **Governor's written authorization** for the COLORADO STATE ATTORNEY GENERAL'S OFFICE to investigate Steve Douglas, Gartin.
2. **Governor's written authorization** to Impanel a Statewide Grand Jury concerning this matter.
3. COLORADO STATE ATTORNEY GENERAL'S OFFICE affidavit establishing probable cause to bring this matter before the Statewide Grand Jury and showing that it could not be effectively handled by the Denver County Grand Jury, *the county in which the majority of the alleged violations occurred*.
4. Colloquy between the Prosecution and the Grand Jury.
5. Governor's written authorization for the COLORADO STATE ATTORNEY GENERAL'S OFFICE to prosecute case #00CR3371.
6. Judge Phillip's Venue Order establishing Jefferson County as the place of trial.
7. Jefferson County District Attorney's Authorization "deputizing" COLORADO STATE ATTORNEY GENERAL'S OFFICE agent Marleen M. Langfield, Esquire as "Prosecutor" in case #00CR3371.
8. **All sworn Affidavits by Expert Witnesses**, to-wit: Terrell Wayne Sisson, James Perrin, and James John Jorressen which COLORADO STATE ATTORNEY GENERAL'S OFFICE Investigator Gary Clyman enumerated in his purported Affidavit in support of issuance of search warrant FAXed to Judge Jack Berryhill at 1:06 AM on 20 September 2000.
9. **Mr. Clyman's service record, establishing 15 years of "patriot investigations" experience** as sworn to in that purported Affidavit in support of issuance of search warrant.
10. All sworn Affidavits supporting Mr. Clyman's Affidavit in support of issuance of search warrant which was FAXed to Judge Berryhill on 20 September 2000.
11. **Mr. Clyman's service record, establishing 15 years of "patriot investigations" experience** as sworn to in a purported Affidavit in support of issuance of the search warrants for 20 September 2000.
12. All sworn Affidavits supporting Mr. Estep's Affidavit in support of issuance of arrest warrant which was presented to the Recused Charles T. Hoppin on 21 September 2000.

13. **Mr. Estep's service record, establishing 28 years of "patriot investigations" experience** as sworn to in that purported Affidavit in support of issuance of that arrest warrant.
14. A complete Inventory Listing of ALL ITEMS seized by defective warrant during the midnight raid on Petitioner's business location of 20 September 2000.
15. All Discovery the Defense is not cognizant of at present.

The Defense petitioned the Honorable Court for a First Amendment Redress of Grievance based on egregious violations of the Rules of Discovery and the grievous damage inflicted on the Petitioner, to-wit: unlawful arrest, unlawful imprisonment in draconian prison conditions amounting to cruel and unusual punishment, loss of business consortium, loss of family and friends, mental anguish, physical deterioration caused by unlawful imprisonment, and pain and suffering; to impose **Dismissal** as the proper sanction in this matter for the continuing intentional failure of the Prosecution to rise to minimal standards of professional performance and Ethical Standards and callous and deliberate indifference to the Petitioner's Constitutionally secured Rights.

The Prosecution deliberately failed to comply with the Honorable Court's order to provide Discovery in compliance with the Special Duties of the Prosecutor, to-wit: *within 20 days of first appearance*. The Prosecution is **STILL** withholding exculpatory evidence, **unlawfully seized**, that is identified by the testimony of COLORADO STATE ATTORNEY GENERAL INVESTIGATOR Gary Clyman on 15 December, 2000 before the Grand Jury, and by affidavits to the court, to-wit:

- statutes and legal study material relating to liens
- expert witness statements, establishing "Patriot" connection
- legal correspondence with Bonilla's attorney
- computer expert reports of contents of unlawfully seized computers

On June 11, 2001 Marleen M. Langfield, Esquire swore that the Prosecution had "turned over" all documentation that had been seized pursuant to the search of 20 September, 2000 on what the Defense maintains is a defective warrant. On June 20, 2000 a very large box full of copies of "seized documents" was delivered to the Defense at the Jefferson County Detention Facility. Mr. Gary Clyman made reference during Grand Jury Testimony of other documents NOT "turned over" yet to the Defense. The Defense asserts that this is just one more violation of the Ethical Rules, to-wit: **ER 4.1 Truthfulness in Statements to Others:**

In the course of representing a client a lawyer shall not knowingly:

- (a) make a false statement of material fact of law to a third person; or
- (b) fail to disclose a material fact to a third person when disclosure is necessary to avoid assisting a criminal or fraudulent act by a client, ...

Wherein this particular matter, **Gary Clyman and Donald L. Estep have been formally charged by the Defense in State and Federal jurisdictions with making false statements, tampering with evidence and withholding evidence in defiance of a direct court order.**

And it is the Prosecution's responsibility by direct court order to:

(d) make timely disclosure to the defense of all evidence or information known to the prosecutor that tends to negate the guilt of the accused or mitigates the offense, and, in connection with sentencing, disclose to the defense and to the tribunal all unprivileged mitigating information known to the prosecutor, except when the prosecutor is relieved of this responsibility by a protective order of the tribunal; and

☞ **Sanction as to lost evidence.** Suppression of reference to the lost evidence by the prosecution held to be a proper sanction. *People v. Reese*, 670 P.2d 11 (Colo.App. 1983)

☞ Negligent destruction of evidence is tantamount to suppression. ***People v. Harmes*, 38 Colo.App. 378, 560 P.2d 470 (1976)**

☞ **The conduct of the prosecution** may be taken into account when fashioning a remedy for the governmental destruction of evidence. *People v. Collins*, 730 P.2d 293 (Colo. 1986)

☞ **Dismissal of charges is an appropriate sanction** to the governmental destruction of evidence when no other remedy would produce a fair result; however, a less drastic solution can often be adopted. *People v. Collins*, 730 P.2d 293 (Colo. 1986)

☐ And where in this matter the **Prosecution is stonewalling and stalling with the Grand Jury Impaneling information requested by the Defense MONTHS ago**, in order to extort a “waiver of the right to challenge the Grand Jury” in order to secure a “speedy trial.”

(c) not seek to obtain from an unrepresented accused a waiver of important pretrial rights, such as the right to a preliminary hearing

Wednesday, September 19, 2001 – exactly one year from the date the Lakewood S.W.A.T. Team, *deployed without authorization by the Governor or the Legislature*, **under the unauthorized supervision of Colorado State Attorney General Investigator Gary Clyman**, unlawfully assaulted, threatened, menaced and unlawfully arrested the Petitioner and two other innocent bystanders, *relative to the matter captioned above* – the Petitioner received a package, delivered by Jefferson County Detention Facility Staff Deputy, in an **overcrowded cell** in the Jefferson County Detention Facility.

The package bears marks indicating that it is from STATE OF COLORADO - Office of the Attorney General - Marleen M. Langfield Senior Assistant Attorney - General Special Prosecutions Unit - Criminal Enforcement Section. No U.S. Postage stamps are visible. A “Discovery Receipt” was found within the package which enumerated several items in rather cryptic handwriting that requires considerable interpretation and appears to relate to items contained within the package.

On, or about **Tuesday, October 23, 2001** the Petitioner, *unlawfully incarcerated on bogus and fraudulent pretenses*, received a package from a Jefferson County Detention Facility Staff Deputy, in an **overcrowded cell** in the Jefferson County Detention Facility.

The package indicated that it was from STATE OF COLORADO - Office of the Attorney General - **Marleen M. Langfield**, Esquire Senior Assistant Attorney - General Special Prosecutions Unit - Criminal Enforcement Section. No U.S. Postage stamps were

visible. A "Discovery Receipt" was found taped to the package which enumerated "Documents designated as 700 thru 726" and appeared to relate to items contained within the package. Within the package documents were numbered as follows:

1. Document 700-701 identified as "REPORT BY Inv. G. Clyman." REPORT DATE is 8/24/01 and is purportedly an INTERVIEW OF TED GARCIA conducted on date August 22, 2001.
2. Document 702-711 identified as FEDERAL BUREAU OF INVESTIGATION from Squad 17B Oakland RA Drafted by SA David W. Carroll concerning the FEDERAL BUREAU OF INVESTIGATION investigation immediately subsequent to Petitioner's unlawful arrest in Fairfax, California on 13 March, 2001. The date of the report is 03/19/2001 - indicating that the prosecution has had this report in her possession since before the Petitioner was kidnapped from California and transported in interstate commerce to Colorado and subsequently unlawfully imprisoned in the Jefferson County Detention Facility.
3. Document 712-713 is identified as FEDERAL BUREAU OF INVESTIGATION report by Thomas Gordon at the San Francisco Counterterrorism Task Force dated 05/02/2001 relating to the arrest of Eric Gordon Mitchell and is directed to SA Mark Holstlaw at Squad 5 / Denver Joint Domestic Terrorism Task Force.
4. Document 714 is FEDERAL BUREAU OF INVESTIGATION date of transcription 06/13/01 File #266C-DN-59244 by Mark A. Holstlaw dictated telephonically regarding an interview with William C. Godbey, a witness in case #00CR3371.
5. Document 715-716 is FEDERAL BUREAU OF INVESTIGATION report dated 06/22/2001 drafted by Holstlaw and approved by Fuselier G Dwayne to the Civil Rights Coordinator and addresses a "change" in status and reveals the fact that the Civil Rights Complaint SA Mark A. Holstlaw promised the Petitioner to have filed by 24 October, 2000 had, in fact, been filed on 30 April, 2001 - the date bogus case #00CR2419 was dismissed. Mr. Holstlaw asserts that a copy was sent to Marleen M. Langfield, Senior Assistant Attorney General, Special Prosecutions Unit, Criminal Enforcement Section, COLORADO STATE ATTORNEY GENERAL'S OFFICE. Mr. Holstlaw confirms reception of the Criminal complaint pursuant to C.R.S. 18-5.5-102 concerning the malicious virusing of Petitioner's computer by agents of the prosecution on or about 30 August 2000. No mention was made if charges had been filed.
6. Document 717-719 is Petitioner's criminal complaint and proof of mailing.
7. Document 720 is FEDERAL BUREAU OF INVESTIGATION report received on August 17, 2001 and dictated on 8 September, 2001 by SA Mark A. Holstlaw concerning a report by Arabella T. Bonilla about hang-up phone calls and some unknown motorcycle rider in her neighborhood and inquired about the STEVE GARTIN prosecution.
8. Document 721-723 are copies of FEDERAL BUREAU OF INVESTIGATION report by SA Mark A. Holstlaw and INV Donald Estep of the Denver Joint-Jurisdictional Domestic Terrorism Task Force dictated on 09/04/2001 and received by the COLORADO STATE ATTORNEY GENERAL'S OFFICE on September 26, 2001 relating to an interview with Willem de Thouars wherein he regurgitated lies, slander and falsehoods.
9. Document 724 is a Supplement report #0017401 by JCSO reporting officer Larry Scheideman concerning a Victim named as State of Colorado dated July 17, 2001 classified as Fraud and describing the implementation of the Honorable Judge Leland P. Anderson's court-ordered computer and completion of the project on June 28.
10. Document 725-726 is a copy of #1 FEDERAL BUREAU OF INVESTIGATION interview of Ted Garcia.

The Defense moved the Honorable Court to take Judicial Notice that all of these reports are mandatory discovery pursuant to Rule 16 and were required to have been tendered **immediately** to the Defense by the Prosecution.

Proof is overwhelming that the Prosecution is intentionally delaying, denying and circumventing full discovery in a deliberate attempt to maintain the Petitioner in draconian, overcrowded prison conditions, without recourse, due to excessive bond in

violation of the Eighth Amendment. Petitioner again asserted the constitutional Right to Speedy Trial and demanded full discovery as required by law.

Thursday, October 25, 2001 – the Petitioner had been unlawfully imprisoned for over Seven Months, and the Prosecution continues to withhold pertinent information germane to the Defense's case, such as **letters and legal process between Roscoe G. Anstine II, Esquire attorney for the Bonilla Crime Family and the Petitioner** that was within the "**Bonilla File**" admittedly seized, *by defective warrant*, by the COLORADO STATE ATTORNEY GENERAL'S OFFICE and the FEDERAL BUREAU OF INVESTIGATION on 20 September, 2000 *during an unlawful midnight raid on Petitioner's business location*, **statements by Eric Gordon Mitchell**, who is another co-defendant in this matter and **statements of other witnesses** such as Terrell Wayne Sisson, James Perrin, James John Jorrissen and others. The Prosecution has alluded to the existence of such statements in **Affidavits for Search Warrants, Grand Jury Testimony and Affidavits for Issuance of Arrest Warrants**, but AFTER OVER A YEAR that this case has been in progress, FOR THE PURPOSES OF SPEEDY TRIAL, this **mandatory Discovery has NOT been provided as is required by Law, Professional Ethics, AND a Direct Standing Court Order from the Honorable Leland Paul Anderson, presiding judge.** This pattern of conduct indicates another knowing and intentional breach of the requirements of Rule 16, *as these reports were all conducted over a month ago and some as much as SEVEN months AGO*, and ALL are in violation of the 20 day rule and the Honorable Court's standing order and again **intentionally prejudices the Defense with extended incarceration in draconian, overcrowded prison conditions and limited access to the tools of a proper defense.**

The Defense has consistently petitioned the Honorable Court<sup>13</sup> to set a date certain<sup>14</sup> for trial by jury.

The Defense has consistently demanded full discovery from the Prosecution in order to properly prepare for a just and speedy trial by jury. The Prosecution continues to fail to comply, even after repeated direct Order by the Court.

**The Grand Jury proceedings in this matter are SO irregular and bizarre** as to demand inspection by the Defense and by the Honorable Court, so as to prevent or correct any potential **FRAUD upon the Court.**

The reluctant piecemeal compliance by the Prosecution to provide properly discoverable Grand Jury information, such as the Showing of Probable Cause to Impanel a StateWide Grand Jury in the above captioned matter creates an impasse for both the Defense and the Honorable Court.

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- <sup>13</sup> Defendant must assert right. A criminal defendant has no duty to bring himself to trial; but he does have a responsibility to assert his right to a speedy trial. *People v. Small*, 631 P.2d 148 (Colo.) cert. denied, 454 U.S. 1101, 102 S.Ct. 678, 70 L.Ed.2d 644 (1981).
  - <sup>14</sup> **It is duty of both prosecutor and trial judge to secure and protect defendant's right to speedy trial.** *People v. Chavez*, 779 P.2d 375 (Colo.1989); *Fisher v. County Court*, 796 P.2d 65 (Colo.App.1990).



**The Defense cannot, in good faith, proceed<sup>15</sup> by waiving any constitutionally secured Rights and the Honorable Court cannot rule on issues that are not properly before it.** Again, the Prosecution has deliberately failed to rise to minimal standards of professional performance and has knowingly and intentionally impeded and obstructed justice in order to gain an unfair advantage in the several Federal Civil Rights Actions against STATE ACTORS for which the COLORADO STATE ATTORNEY GENERAL is acting as Defense Attorney.

The Defense in this matter has consistently, *as a matter of record*, asserted **called for and relied upon the right to a speedy trial** and has repeatedly petitioned the Honorable Court to set a **“date certain”** absent any plea that would entail or require the **waiving of any constitutionally secured or guaranteed right**, such as the right to challenge an improperly impaneled or fraudulently manipulated Grand Jury, which is manifestly obvious in this matter.

Pursuant to the **Ethical Rules**, the threatening of criminal prosecution must not be used to gain an advantage in a civil case. In this matter, the Honorable Court must note that the numerous governmental Defendants in Federal Civil Rights Cases #**97-N-1501, 97-D-1036, 97-S1523 & 01-ES-1145** are all represented by the COLORADO STATE ATTORNEY GENERAL.

The Honorable Court must also take judicial notice of the ultimate and uncontestable fact that the COLORADO STATE ATTORNEY GENERAL is acting in the capacity of Prosecution in the above captioned case, to-wit: 00-CR-3371. It cannot escape the attention of any reasonable person that such a concentration of power represents a **prima facie conflict of interest**.

The Petitioner has been intentionally and **selectively** singled out for prosecution on matters that the STATE has shown **NO COMPELLING INTEREST** in and **no probable cause** for impaneling a State-wide Grand Jury.

It is exceedingly clear that the COLORADO STATE ATTORNEY GENERAL’S Office is presently engaged in an on-going and continuing **malicious, vindictive and retaliatory prosecution** of the Petitioner in order to unlawfully gain an advantage in several civil rights cases and to protect their governmental clients by unlawfully incarcerating the Plaintiff in those several suits in draconian prison conditions, limiting his access to the courts, limiting his access to the tools of basic communication, destroying his financial base, **threatening, intimidating** and alienating **witnesses** and in all nefarious ways endeavoring to gain an unfair advantage in those above enumerated cases.

The Prosecution in the above captioned matter has callously and deliberately utilized their position of power to **abuse and violate the Ethical Rules** by which attorneys are regulated to the **severe prejudice and grave damage** of the Defense in the above captioned matter, and the continued unlawful incarceration of the Accused.

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• <sup>15</sup> Court’s practice of postponing arraignment until all pretrial matters are concluded thwarts purpose of this section and Crim.P.48 (b). People v. Chavez, 779 P.2d 375 (Colo.1989)

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This California Inhabitant was unlawfully assaulted and unlawfully arrested on a **defective warrant** by the heavily armed **F.B.I. S.W.A.T. Team** at his place of business in Fairfax, California on **13 March 2001** and has been unlawfully incarcerated since that time; first in California, *without charges*, until **4 April 2001** and then in Jefferson County Detention Facility, *without charges*, until 10 April, 2001.

The Prosecution in case 00CR3371 continues to withhold exculpatory evidence, refuse to disclose the identity, charter and jurisdiction and authority of the clandestine Multi-jurisdictional Joint Domestic Terrorism TaskForce, the **Showing of Probable Cause for the impaneling of the Grand Jury** and the ATTORNEY GENERAL's specific authorization by the Governor or the Legislature to prosecute this case as is required by law and statute.

The Prosecution has had over a year to prepare and complete the necessary elements of a special prosecution outside their statutorily defined powers and outside of any Colorado Constitutional authorization.

More specifically, the Prosecution has failed to fulfill the professional and ethical responsibility of the prosecution in balancing the factors defined by Baker v. Wingo 407 U.S. 514, 533 92 S.Ct., to wit:

1. Length of Delay: This is the triggering mechanism where as no single factor is determinative. The length of delay is presumptively prejudicial, no further balancing is necessary. People v. Small 631 P.2d 148 Colo. If the delay is inordinate, Baker v. Wingo, purposeful or oppressive it is deemed prejudicial. Pollard v. U.S. 352 U.S. 354, 361 77 S.Ct. 481 1 L.Ed.2d 393, 399 (1957).
2. Reason for Delay: Prosecution has not brought forth a valid reason for a delay.
3. Defense's assertion of the Right to speedy trial: The Defense has consistently, on the record, asked for Speedy Trial and to set a DATE CERTAIN without waiver of any constitutionally secured rights.
4. Prejudice of the delay to Defendant: Moody v. Corsentino 843 P.2d 1355 (Colo.1993). The Prosecution has demonstrated undue prejudice toward the Defense in this matter by all the foregoing deprivations and others that the on-going deprivations directly and intentionally caused by draconian imprisonment prevent bringing before the Honorable Court, but the Honorable Court is aware of other grounds for dismissal and is hereby enjoined to add those to the factors enumerated herein in the interest of substantial justice and fundamental fairness.

The Prosecution has chosen to blatantly ignore the Constitutional speedy trial guarantees and their fiduciary responsibility to the Honorable Court and to all parties involved not to create a prejudicial situation to a Defendant. Here the Right to a Speedy Trial operates as a control on the time limits by which charges must be tried and guarantees a criminal defendant the Right to deliberate speed in prosecution of the case. S.E. Ed. S. 2.14 and 9.46 Supra) (C.J.S. Crim.Law 578 & Seq.). This enumerated right protects three basic defense interests:

1. To prevent undue incarceration before trial. The Petitioner has been incarcerated in draconian overcrowded prison conditions, with all

attendant deprivations of constitutionally secured rights to be free from cruel and unusual punishment, for over six-months unable to pay the excessive bond set in this case, there is technically NO difference between \$100,000 and \$50,000 when the Petitioner cannot pay either.

2. Minimize anxiety and concern accompanying public accusation. There has been no minimizing the anxiety in this matter; to the contrary agents for the Prosecution have intimidated witnesses, threatened prosecution of witnesses, intimidated business associates, hacked into and destroyed Petitioner's WebSites utilizing PassWords obtained by the unlawful seizure of Petitioner's business computers, published slanderous and libelous information on the World Wide Web and in local newspapers in Marin County California and endeavored in all ways possible to destroy the Petitioner's business relationships, friendships, family relationships and consortium.
3. Long delays will impair the Defendant's ability to defend against the charges. Although the Honorable Court has endorsed the acquisition of a Private Investigator for the Defense, the Prison Phone System will not permit the calling of any one except those willing to pay exorbitant fees, to-wit: \$2.20 for a local call. Defense has been unable to find such a Private Investigator and all other avenues have failed. Letters to business associates relied upon as witnesses have been returned undeliverable and Defense has no means to determine why. Other Defense witnesses have disappeared or cannot be located. (Smith v. Hovory 393 U.S. 374, 377-79, 89 S.Ct.)

The Defense has been severely prejudiced by the extensive length of delay between the unlawful arrest by Lakwood S.W.A.T. Team on 19 September, 2000 to filing of charges on 18 December, 2000 and the present, when the Prosecution is still withholding information relevant to the initial process of Grand Jury Challenge and other pre-arraignment constitutional and statutory issues.

The Defense establishes a violation of the Right to Speedy Trial simply by asserting that the matter was not brought to trial within required time limits specified by constitution or statute, regardless of prejudice.

The Petitioner has substantially complied with that requirement and established the ultimate fact that the Prosecution has deliberately created this prejudicial situation in order to gain an unlawful advantage by maintaining the Petitioner in draconian imprisonment and under control of the very Actors named as Defendants in the several Civil Rights Actions enumerated and incorporated herein by reference.

⇒ The Defense has NEVER WAIVED the Right to Speedy Trial.

⇒ The Defense has ALWAYS DEMANDED a Speedy Trial at each court session.

⇒ The Defense has been severely PREJUDICED by the Prosecution's Delays.

Petitioner has consistently requested and has been denied full Discovery and information relating to Grand Jury process and impaneling as necessary for an action to Quash an indictment for prosecutorial and grand jury misconduct prior to arraignment.

Petitioner has continuously and forcefully asserted Constitutional Right<sup>3</sup> to Speedy Trial since 22 May, 2001.

The above noted case, for the purposes of the **Constitutional Right<sup>4</sup> to Speedy Trial**, began on 19 September 2000 with another **lawless governmental act in furtherance of a cover-up** of the unlawful arrest forming the genesis of several malicious and retaliatory prosecutions against the Petitioner, to-wit: **26 February, 1997** when the Jefferson County Multi-Jurisdictional S.W.A.T. Team, commanded by **Terry Manwaring** and **Donald L. Estep** deployed on Petitioner's domicile without warrant, probable cause or exigent circumstances – which commenced the malicious, vindictive and retaliatory prosecutions entitled 97M811, 97M812 & 97M472.

Case 00CR3371 commenced with a lawless and unjustified assault by the Lakewood S.W.A.T. Team, void of probable cause, exigent circumstances or a valid warrant and the **unlawful arrest** of the sovereign California Inhabitant and two other innocent bystanders on **19 September, 2000** by a S.W.A.T. Team Assault by Lakewood S.W.A.T. at the command of Donald L. Estep and Sergeant Ed Loar.

The Defense has consistently asserted and relied upon the Constitutional<sup>5</sup> speedy trial mandates<sup>6</sup> required by due process of law. The Court's Record and Transcripts establish this fact.

The Defense is uneducated in the Esquire's Trade regarding statutory language, customs and usages and has therefore provided the Honorable Court and the Prosecution with

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<sup>3</sup> The right of an accused to a speedy trial is an important civil right, and when the constitutional mandate is invoked the matter should receive careful consideration by the courts. Ex parte Russo, 104 Colo. 91, 88 P.2d 953 (1939).

<sup>4</sup> And any attempt to take away this jurisdiction is null and void. When a federal constitutional question is raised in any of the trial courts of Colorado the right is given and the duty is imposed upon those courts, by that instrument itself, to adjudicate and determine it. That right so given can neither be taken away nor that duty abrogated by the state of Colorado, by constitutional provision or otherwise, and any attempt to do so is null and void. Such pretended constitutional inhibition is no part of the constitution of the state of Colorado, and the judge's oath binding him to the support and enforcement of that instrument has no relation to such void provisions. People v. Western Union Tel. Co. 70 Colo. 90, 198 P.146 (1921).

<sup>5</sup> An accused person's right to a speedy trial is ultimately grounded on the federal and state constitutions, and statutes relating to speedy trial are intended to render these constitutional guarantees more effective. Simakis v. District Court, 194 Colo. 436, 577 P.2d 3 (1978).

<sup>6</sup> The constitutional right to a speedy trial derived from the federal and Colorado constitutions, is distinct from the statutory speedy trial right and the determination as to one does not necessarily dispose of the other. People v. Harris 914 P.2d 425 (Colo.App.1995).

proper prior **Notice of Foreign Law** pursuant to the colorable code's requirements from the beginning of the Defense's assertions of the right to speedy trial, both constitutional and statutory as well as the common law protections of due process and the constitutional guarantees provided by the constitutions for the united States, Colorado and the California Republic.

The lower court's record reflects "notice" and full disclosure of the intent of the Defense to rely upon the common law and the "Law of the Land." The Petitioner is a foreign minister and a sovereign Inhabitant of the California Republic. The lower court has failed<sup>7</sup> or refused to rule on those issues. Therefore, the Supreme Court has jurisdiction<sup>8</sup> to address constitutional issues beyond the scope of the lower court.

The Defense has asserted the constitutional right to speedy trial from the first appearance, **by special visit – not general appearance, in shackles and chains** and obviously **not by consent** nor by any waiver of jurisdiction pursuant to any tacit procuracy or by any unintentional default of jurisdictional challenge. If any waiver of jurisdiction has been perceived it is by mistake or lack of legal training and is specifically denied.

Charges in the original case, to-wit: 00CR2419 were filed on 22 September, 2000<sup>9</sup> and later dismissed. Charges in case #00CR3371 were not filed until December 18, 2000<sup>10</sup>, when an insufficient Indictment was returned by the Colorado State Grand Jury, unlawfully impaneled by the COLORADO STATE ATTORNEY GENERAL without written authorization by Governor Bill Owens.

The actual document establishing probable cause and compelling "State Interest" required to Impanel the StateWide Grand Jury has been **denied to the Defense**, even though it has been requested both by oral and formal motions pursuant to Rule 16 on a great many occasions, both verbally in open court and by formal motions.

**The length of delay<sup>11</sup> in this matter is solely attributable to the surreptitious manner in which the Prosecution<sup>12</sup> has conducted every phase of this prosecution,**

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<sup>7</sup> Application must show prima facie circumstances justifying jurisdiction. A party seeking to invoke the original jurisdiction of the supreme court under this rule, must be able to show, prima facie at least, circumstances justifying the exercise of such jurisdiction. Groendyke Transp., Inc. v. District Court, 140 Colo. 190, 343 P.2d 535 (1959)

<sup>8</sup> The Application to invoke original jurisdiction is fatally defective in that there is no allegation that sets forth the circumstances which rendered it necessary or proper that the supreme court exercise its original jurisdiction. Rogers v. Best, 115 Colo. 245, 171 P.2d 769 (1946)

- <sup>9</sup> **When right to speedy trial attaches. The constitutional right to a speedy trial attaches when a defendant is formally accused by a charging document, such as a criminal complaint, information, or indictment.** People v. Velasquez, 641 P.2d 943 (Colo.)
- <sup>10</sup> **Right to speedy trial attaches with filing of a formal charge.** People v. Chavez, 779 P.2d 375 (Colo. 1989)
- <sup>11</sup> **Computation of length of delay is not subject to specific limitations or exclusions, such as the fixed time periods established by statute or rule.** People v. Small, 631 P.2d 148 (Colo.), cert. denied, 454 U.S. 1101, 102 S.Ct. 678, 70 L.Ed.2d 644 (1981).

from the highly questionable secret investigation prior to the unlawful S.W.A.T. Team assault by overwhelming force in Lakewood and the subsequent unlawful arrest of three innocent Citizens, to the unlawful police interrogation that formed the basis for perjurious affidavit in support of the issuance of the **unlawful search warrants** which were issued void of probable cause and without lawfully sworn affidavits, in the middle of the night; to the unlawful execution of those irregular warrants and the seizure of lawfully registered business property which is still being unlawfully held by the COLORADO STATE ATTORNEY GENERAL in order to prevent the Defense from conducting lawful business in order to pay extortion for Constitutionally guaranteed freedom, in the form of EXCESSIVE BOND. [*Excessive Bond is being addressed by Habeas Corpus action*]

After the third unlawful assault on 13 March, 2001 by F.B.I. S.W.A.T. Team in Fairfax, California – 21 days of unlawful incarceration in California and an unlawful kidnapping by Jefferson County Sheriff Agents - Petitioner was deprived of the Constitutionally secured right to be taken without delay before a magistrate of competent jurisdiction until **12 April 2001**; eight days after being kidnapped and incarcerated in the Jefferson County Detention Facility. This was first appearance. Defense requested Discovery and counsel other than the Public Defender.

**Background of lower court actions:**

On or about 23 April 2001, Daniel Edwards, *Esquire* was appointed as Advisory Counsel and the Defense again requested all Discovery and a Preliminary Hearing.

On or about 9 May 2001 COLORADO STATE ATTORNEY GENERAL'S OFFICE Prosecutor Marleen M. Langfield, *Esquire* sent purportedly complete Discovery to the overcrowded one man cell where Petitioner was being unlawfully incarcerated. This consisted of approximately 1000 pages of reports and an incomplete set of copies of Petitioner's unlawfully seized documents.

On or about 7 May & 22 May 2001 Defense again requested Discovery, including all seized documents and papers and a Speedy Trial.

On or about **11 June 2001** COLORADO STATE ATTORNEY GENERAL'S OFFICE Prosecutor Marleen M. Langfield, *Esquire* testified in open court that she had provided ALL DISCOVERY to the Defense.

On, or about **20 June 2001** a box of papers *unlawfully seized by defective warrant on 20 September 2000* by COLORADO STATE ATTORNEY GENERAL'S OFFICE Investigator Gary Clyman, F.B.I. Agents Donald L. Estep and Curt Maleri was delivered to the Petitioner's overcrowded single cell, *bunking two inmates*. That box contained only a small portion of the papers and documents unlawfully seized.

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- <sup>12</sup> Right to a speedy trial has been formulated to force the prosecution to try a defendant promptly in compliance with the statutes, rules, and constitutional requirements of each case. *People ex rel. Coca v. District Court*, 187 Colo. 280, 530 P.2d 958 (1975).

The right of a person who is accused of an offense other than a noncriminal traffic infraction or offense, or other than a municipal charter or ordinance violation as provided in section 16-10-109

(1), to have a **trial by jury is inviolate and a matter of substantive due process of law as distinguished from one of "practice and procedure"**. The people shall also have the right to refuse to consent to a waiver of a trial by jury in all cases in which the accused has the right to request a trial by jury.

**The Defense has been grievously and tortiously prejudiced** by the fact that **three** of this California Inhabitant's businesses have been totally obliterated and completely destroyed by intentional, direct, knowing and deliberate actions of the Prosecution and instruments of the Prosecution, to-wit: **Gary Clyman, Donald Estep, Curt Maleri, Maurice Knaizer and the California F.B.I. S.W.A.T. Team**. Continuing damages are perpetrated upon Plaintiff by deliberately erroneous information published on the World Wide Web by the California FEDERAL BUREAU OF INVESTIGATION.

This wanton, deliberate and callous disregard for the constitutionally secured right to be secure in person and papers and to conduct lawful business without government interference has **aggrieved and prejudiced the Defense<sup>16</sup>** in this matter and has artificially and deliberately **caused hardships and obstacles to the mounting of a vigorous defense** and has IN FACT **grievously damaged** the mounting of any kind of a defense by an intentional, reckless and callous disregard for this sovereign California Inhabitant's constitutionally secured and guaranteed rights in order to gain an unfair advantage in the above captioned matter and in several pending Civil Rights Actions before the Tenth Federal District Court.

The unlawful (*on defective warrant*) seizure of this California Inhabitant's computers and refusal by Gary Clyman to return them, even when the Defense stipulated that he could retain the mirrored images for his "fishing expedition," constitutes a blatant and reckless deprivation of this California Inhabitant's constitutionally secured rights to conduct lawful business without governmental interference and has ultimately resulted in the Petitioner being unable to pay the Constitutionally forbidden **excessive bond** required by the Prosecution in this matter, to-wit: \$50,000.00 – a higher bond than many murderers, sex offenders and armed robbers charged in the same District!

Malicious, vindictive, selective and retaliatory prosecutions are forbidden by all law and morality. Constitutional safeguards include, but are not limited to: the Right to Speedy Trial. Federal and State Statutes re-enforce constitutional guarantees but are separate and independent thereof.

**18 USC Sec. 3161 TITLE 18 - CRIMES AND CRIMINAL PROCEDURE**  
**PART II - CRIMINAL PROCEDURE CHAPTER 208 - SPEEDY TRIAL Sec. 3161.**  
Time limits and exclusions

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<sup>16</sup> A defendant's constitutional right to a speedy trial cannot be established by any inflexible rule, but can be determined only on an ad hoc balancing basis in which the conduct of the prosecution and that of the defendant are weighed. The court should assess such factors as the **length of and reason for the delay**, the defendant's assertion of his right, and prejudice to the defendant. In this case, the **lack of any serious prejudice** to petitioner and the fact, as disclosed by the record, that he did not want a speedy trial outweigh opposing considerations, and compel the conclusion that petitioner was not deprived of his due process right to a speedy trial. Pp. 519-536.442 F.2d 1141

(a) In any case involving a defendant charged with an offense, the appropriate judicial officer, at the earliest practicable time, shall, after consultation with the counsel for the defendant and the attorney for the Government, set the case for trial on a day certain, or list it for trial on a weekly or other short-term trial calendar at a place within the judicial district, so as to assure a speedy trial.

(b) Any information or indictment charging an individual with the commission of an offense shall be filed within thirty days from the date on which such individual was arrested or served with a summons in connection with such charges. If an individual has been charged with a felony in a district in which no grand jury has been in session during such thirty-day period, the period of time for filing of the indictment shall be extended an additional thirty days.

(c) (1) In any case in which a plea of not guilty is entered, the trial of a defendant charged in an information or indictment with the commission of an offense shall commence within seventy days from the filing date (and making public) of the information or indictment, or from the date the defendant has appeared before a judicial officer of the court in which such charge is pending whichever date last occurs. If a defendant consents in writing to be tried before a magistrate on a complaint, the trial shall commence within seventy days from the date of such consent.

(2) Unless the defendant consents in writing to the contrary, the trial shall not commence less than thirty days from the date on which the defendant first appears through counsel or expressly waives counsel and elects to proceed pro se.

As **Fruit from the Poisonous Tree**, a State sanctioned action cannot lawfully be maintained which is based upon the **lawless acts** and **criminal actions** of the **governmental agents** conspiring to institute that action. In this matter, the **outrageous, egregious and lawless conduct** of the many governmental actors participating in the several unlawful arrests; the unlawful searches and seizures; the unlawful incarcerations; the deprivations of Constitutionally secured Rights; the malicious, vindictive, selective and retaliatory prosecutions, to-wit: 97M811, 97M812, 97M472, 00CR3371 & 00CR2419; the criminal extortion by imposition of excessive bonds; the on-going defamation of character [*Offer of Proof: type in "steve gartin" at the Yahoo Search Engine on the WorldWideWeb*] and destruction of consortium all combine to define a Prosecution gone berserk and run amuck – totally out of control and destructive of all the honorable ends of justice and law and order.

To allow such a lawless, vindictive, malicious, and retaliatory prosecution to continue constitutes yet another travesty of justice, therefore the Defense Petitions the Honorable Court for a **Redress of Grievance** in the nature of an **Order to Withhold Judge Leland P. Anderson's Salary**<sup>17</sup> on the grounds of failure to provide a **Speedy Trial** and Failure to Rule on outstanding motions since June 2001, any other grounds which the Honorable Supreme Court's Commission on Judicial Discipline deems just and proper in light of the outrageous conduct of STATE and FEDERAL government agents and actors in bringing and pursuing this unauthorized prosecution and the lack of supervisory power of the Honorable Court to rule on existing motions and/or to dismiss the case in the interest of Justice, fundamental fairness, judicial integrity, judicial economy and to correct and prevent a **FRAUD** upon the Honorable Court.


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<sup>17</sup> **When more than preventive relief available.** Ordinarily, relief only lies to prevent the lower court from proceeding further with the cause, but where this would not give the relator the relief to which he is entitled, it may direct that all proceedings had in excess of jurisdiction be quashed and the order entered which should have been. *People ex rel. Lackey V. District Court*, 30 Colo. 123, 69 P.597 (1902).



Petitioner wants to make it perfectly clear that he has a great respect and admiration for the **Honorable Leland P. Anderson**, *presiding judge* in this instant matter. It is the studied opinion of the Petitioner that pressure has been brought to bear upon the Honorable Judge by the Prosecution and instruments of the Prosecution to cause him to abandon the neutral and detached role of a judicial officer and to act instead as a pawn of the Prosecution. Relator will be pleased to present further testimony or evidence to support that belief.

Humbly Submitted in expectation of Equal Protection of the Law,

  
Steve D. Gartin – In Propria Persona – Sui Juris

Tuesday, January 08, 2002

### **CERTIFICATE OF SERVICE**

*This is a True Copy of Forfeiture of Salary pursuant to C.R.S. 13-5-136 to the Supreme Court Commission on Judicial Discipline for the STATE OF COLORADO Court VIA deposited in the Jefferson County Jail Mail with sufficient postage attached and addressed to:*

**The Honorable Leland Paul Anderson**  
STATE OF COLORADO—First Judicial District  
100 Jefferson County Parkway  
Golden, Colorado 80401

**Clerk of the Court Mac V. Stanford**  
Colorado State Supreme Court  
2 East 14<sup>th</sup> Street – 4<sup>th</sup> Floor  
Denver, Colorado 80203

**Sheriff John P. Stone**  
200 Jefferson County Parkway  
200 Jefferson County Parkway  
Golden, Colorado 80401

**Colorado State Attorney General Kenneth Salazar**  
c/o **David J. Thomas**, Esquire  
200 Jefferson County Parkway  
Golden, Colorado 80401

# DECEMBER 31, 2001 NOTICES & PETITIONS FILED IN CASE #00CR3371

Numbered Items Require Hearing or Ruling = Tagged Items provide Notice to Court

- Affidavit of Expatriation
- Affidavit of Tax Exempt Status
- Affidavit of Factual Events – Search Warrant Application by Clyman
- 1. Declaratory Judgment – Fictions of Law
- 2. Non-Statutory Abatement – **Entry of Plea**
- 3. Petition – **Vindictive Prosecution** – Personal Recognizance Bond
- 4. Petition – **Selective Prosecution** – Personal Recognizance Bond
- 5. Petition to Issue Selective Prosecution Subpoenas
- Second Petition for Prosecutor's Grand Jury Colloquy
- 6. Petition for Competency Hearing
- 7. Second Petition for Defense Witness Protection
- 8. Emergency Motion to Appoint Pugliese as P.I.
- 9. Motion to Appoint Pugliese as Private Investigator
- Notice of Prosecutorial Misconduct – December Discovery
- Affidavit of Competency Evaluation
- 10. Petition for Recording of PsychEvaluation
- 11. Demand for Speedy Trial: Objection to PsychEvaluation
- 12. Speedy Trial: Notice of demand for Speedy Trial
- CSAG Misconduct Final: Continuing Prosecutorial Misconduct documented
- 13. Certificate of Compliance: Another Request for Complete Discovery
- Salazar/Langfield Attorney Grievance
- Notice of Mistake: Re-Statement of Court's lack of jurisdiction
- Conspiracy to Commit State & Federal Crimes: Criminal Acts Documented and conspiratorial nexus drawn between various government actors
- 14. PsychWitnesses: Petition for Private Investigator, Advisory Counsel & tape recording of Psychological examination ordered by Court.
- 15. Witness Protection: Injunction to prevent Clyman & Estep from terrorizing Defense Witnesses
- 16. Habeas Corpus: Release on Personal Recognizance
- 17. Spurious Liens: Lien Statutes and notice of improper application by Prosecution
- C&E Criminal Complaint: **Clyman & Estep terrorizing Defense Witnesses**
- Prosecutorial Misconduct: Rule 16 Violations, Perjury and subornation to perjury
- Due Process Violation 8-31: Rule 16 Violations
- Due Process Violation 8-22: Rule 16 Violations
- Due Process Violation 8-15: Rule 16 Violations
- 18. Response to People on Grand Jury: Rebuttal to Prosecution's Reply
- CSAG Misconduct - Discovery: Rule 16 Violations
- CSAG Misconduct – Discovery IV: Rule 16 Violations
- Outrageous: Notice of bizarre government criminal actions
- Affidavit-Computer Crime Clyman-Estep: Destroying Plaintiff's Websites/Email
- CSAG Clements Prosecution: Malicious Prosecution
- Affidavit-Intimidating Witnesses: Clyman & Estep State & Federal Crimes