ORGANIZE MY EVIDENCE, to WRITE, LABEL, and BIND MY EXPOSE' OF TRUTH (my defense), while staying awake for DAYS, to draft, memorialize, and provide my defense against ALL THE BOGUS CLAIMS I was aware of at that time, and the ABUSIVE and UNJUST ACTIONS taken to date by ATTORNEY STORY, to then argue that I simply QUIT CARING about DEFENDING MY OWN FREEDOMS, my FIRST and SECOND AMENDMENT CONSTITUTIONAL RIGHTS AS A UNITED STATES CITIZEN, claiming that instead I INTENTIONALLY CHOSE NOT TO PARTICIPATE IN THOSE HEARINGS, GRANTING MS. STORY AND MY EX-WIFE DEFAULT JUDGMENTS AGAINST ME! There is nothing MORE ABSURD! NO Person who has EVER KNOWN ME, or which has received a single communication by me before or since (except by FRAUD, COLLUSION, and/or CORRUPTION) would EVER say that I WOULD VOLUNTARILY ABANDON MY RIGHT TO DEFEND MY CONSTITUTIONAL FREEDOMS, WHILE THEY ARE STILL ACTIVELY UNDER ATTTACK! That is the most indecesnt, insane, unplausible, unrealistic, absurd proposal that I've ever heard! While I can provide you with contact information to a HUNDRED other people who will tell you the exact same thing about me! I don't LIE DOWN and ALLOW people to STEAL MY FREEDOM! Placing a NOOSE AROUND MY NECK and UNJUSTLY STEALING MY FREEDOM is the best way to GUARANTEE that I CAN'T AND WON'T EVER LEAVE UNTIL MY PERSON IS RESTORED! While I will scream "BLOODY MURDER" with every legal means that I have access to or can obtain, without care or regard for how high-up the totem pole the POWERFULLY CORRUPT PARTY ABUSING ME IS! I believe in ACCOUNTABILITY! I also believe that it is MY DUTY to hold the PASTOR and the JUDGE "accountable" as it is their job to hold me "accountable". I do not fear PEOPLE or POSITIONS, and I LIVE FOR TRUTH! I KNOW that given enough time, the TRUTH WILL WIN, because I will not QUIT EXPOSING IT, from every roof-top, until the power of the absurd LIES has been EXPOSED and DEFEATED! As for how many corrupt judges and attorneys need to be exposed and find a new line of work afterwards, or how many Local Rules and Procedures need to be BOILER PLATE throughout Tennessee, so that NO JUDICIAL DISTRICT has the CHOICE to enact DISCRIMINATORY RULES and PROCEDURES against their CITIZENS, I have learned the HARD WAY exactly where the CRACKS ARE in the system which allowed a couple of corrupt individuals to perversly harm me while I was litterally rendered DEFENSLESS because of the DISCRIMINATION as well as the CORRUPTION within their County Court!

While if any more adverse actions are taken against me, I will go straight to the FBI, filing Criminal Corruption Charges against everyone involved. There is NO CHANGE in Tennessee's JUSTICE or Judicial System, whether in replacing people, positions, policies, reforming laws, rules, procedures, improving transparency, accountability, reforming the Appellate Court so that a person need not be a LEGAL SCHOLAR to have ANY CHANCE of not being VIOLENTLY CRIMINALLY HARMED BY THE ADMINISTRATION OF "LAW"! I probably have a DOZEN ideas right now, which are simply what most people would consider "COMMON SENSE", and probably they would be SHOCKED to learn that though it is "COMMON SENSE", it is not how Tennessee's Judicial System currently operates. So though I would very much like to MOVE ON WITH MY LIFE and leave this LEGAL CRUSADE BEHIND, I will NEVER stop exposing TRUTH and promoting "COMMON SENSE" Judicial Reform in TENNESSEE, until my CONSTITUTIONAL FREEDOMS AS A UNITED STATES CITIZEN HAVE BEEN FULLY RESTORED, the LIES AGAINST ME (of being an "abuser", a "stalker", a "danger", or having "threatened" or "harmed" or "endangered" the PERSONAL SAFETY OF

ANYONE, EVER) HAVE BEEN REVOKED, DISMISSED, STRICKEN, OVERTURNED, AND PERMANENTLY EXPUNGED!

If that (MY PERSON) can be RESTORED in 1-month, 3-months, 6-months, 5-years, 15-years, then THAT is when **I WILL BE FREE TO MOVE FORWARD WITH MY LIFE.** Meanwhile, any POWER holding my FREEDOM, my REPUTATION, my PERSON and/or my LIFE HOSTAGE, until that day of RESTORATION finally arrives, will be held financially liable for the IRREVOKABLE LOSS of **EACH AND EVERY DAY OF MY LIFE**, and my UNJUSTLY LOST **LIFE, LIBERTY, AND PURSUIT OF HAPPINESS,** along with the IMPACT that DELAY in vocational rehabilitation and professional development has upon my ability to ever RETIRE. **Starting from the date when I was illegally EVICTED FROM MY HOME, by Attorney Virginia Lee Story, Judge Michael W. Binkley, and the Williamson County Sherif's Office (whom they had unconscionably "enforce" their CRIME against me) on 9/3/2019!** Though it certainly could be justified sooner, that shall be the date qthat this TRAVESTY OF INJUSTICE, MALICIOUS LITIGATION, ADA EXPLOITATION AND ABUSE, AND JUDICIAL CORRUPTION

The pattern which I recognized, because I witnessed it just enough times to actually SEE it, was that Ms. Story would handle all the really "DIRTY WORK", providing Judge Binkley just the thinnest vail of "plausible deniability" (though I don't believe that any "impartial" mind would find it wholely UNREASONABLE), Ms. Story would then provide intentionally MISLEADING testimony or an affidavidt in Court, which then left a GAP to traverse to their absolutely incorrect conclusion, which Chancellow Michael W. Binkley would then leap over, as Ms. Story passed him the ball and Judge Binkley SLAM DUNKED IT, with the fully weight of the Williamson County Court System and the WCSO behind him to "ENFORCE" his LITTERALLY ILLEGAL COURT ORDER! Based upon flase and manipulated information, and an UNREASONABLE conclusion, without allowing me any involvement to speak for myself, a crime against the Judicial Canons, every Constitution, and their Oaths of Office.

Causing FURTHER damage my life while they both were already guilty of a litany of Federal Crimes against me, **I believe including violations of the RICO Act, as they have forced me to rely upon the State of Michigan's social services simply to SURVIVE their wholley unjustifiable malicious litigious, exploitation, coercement, abuse, extortion, threats of incarceration, and judicial corruption violently commited against me, while denying me ANY OPPORTUNITY AT DUE PROCESS!** Their will be a time when JUSTICE will hear the crimes of Judge Michael W. Binkley, Attorney Virginia Lee Story, and Attorney Mary Beth Ausbrooks against me, where their answer will need to be MORE than accusing me of being the "MONSTER" they have portrayed me as, although there is NO EVIDENCE of that, while not even having an arrest in my lifetime (which is better than Judge Michael W. Binkley). At some point, regardless of the OUTRAGEOUS LIES which my EX-WIFE has told, or which her COUNSEL has directod her to TELL, no LEGAL TRIAL or HEARING can take place without giving BOTH PARTIES an opportunity for their CASES to be HEARD by an UNBIASED TRIBUNAL! While that's exactly what they CAN'T produce any evidence of, because it NEVER HAPPENED! While I did everything IN MY POWER to BE HEARD, even though I KNEW that it wasn't a "fair" and "IMPARTIAL TRIBUNAL"! There was nothing which I was MORE SURE OF!

ASTHMA, ALLER(

S. Anne, M.D. R. Botta, M.D.

Patient Name: Marsha Fenton
Visit Date: 7/2/2020

Thank you very much for letting me participate in
consultation on 07/02/20. Marsha states that her Ig
respiratory tract infection. She has been following
She is wearing the mask. She is staying home. Her
any fever, chills, or rigors. She denies any upper (

PHYSICAL EXAMINATION: Deferred at this tim

IMPRESSION: Ms. Marsha Fenton has:
1. IgA deficiency, and
2. Chronic rhinosinusitis.

RECOMMENDATIONS:
1. Marsha is prone to develop recurrent infections
exposure to COVID-19 infection.
2. Since her son stays with Marsha, I strongly recc
reduce significantly the risk of exposure of Ms. Fe
3. A follow-up appointment has been scheduled in

I have repeatedly offered to FORFEIT every penny I am due, and even to sign mutual hold harmless agreements with every party who has obviously harmed me, including federal crimes of corruption and obstruction of justice, abuse of process, crimes which could cost them serious prison time, being disgraced and disbarred, and never being able to practice law again (like Casey Moreland), if they would only IF they would drop their BOGUS charges against me, take the NOOSE OFF MY NECK, and allow me to MOVE FORWARD with my life untethered. Clearly I wouldn't have written 250-pages in my defense and then NOT WANTED TO PARTICIPATE after (I KNEW THEY ILLEGALLY) ran me out of my HOME with the Williamson County Sherrif's Office, and subsequently the State of Tennessee, refusing to provide me with ANY substitute shelter or provision whatsoever.

WHERE to Aiding in the "COVER-UP" while denying me any assistance to help mitigate my outrageous damages which are daily increasing exponentially, to SUPPORT AND ENFORCE THE CONSTITUTION of BOTH Tennessee and the United States, or to help DELIVER JUSTICE. Acting as though seeing NOTHING out of the ordinary, while continuing his walk. That COA JUDGE (whether a friend of Binkley's or Story's – which Middle Tennessee is known for and I believe is very likely – seeking to PRETEND to offer HELP by granting extensions of TIME, while refusing EVERY OTHER ACCOMODATION requested (and I thought approved) in my ADA Request for Modifications form (such as to JUDGE by the SPRIT OF THE LAW RATHER THAN to help "Cover-Up" he COA absolutely REFUSED to reach out a hand to help SAVE ME, UNLESS I COULD FIRST DEFEAT ATTORNEY VIRGINIA LEE STORY IN A LEGAL JOUST IN THE COLLESEAM FOR THE JUDGES AMUSEMENT!

The Judicial Canons as well as the Tennessee State Constitution say NOTHING about the need to (be able to) file an APPELLANT BRIEF (procedure) in order to receive JUDICIAL PROTECTION for illegal CORRUPTION, COLLUSION, and UNCONSTITUTIONAL BIAS and HARM. Actually, they say EXACTLY THE OPPOSITE and provide provisions for SETTING ALL RULES AND PROCEDURES ASIDE FOR THE ADMINISTRATION OF JUSTICE TO ANY CITIZEN!

Tennessee Citizens are ENTITLED to EQUAL protection by the LAWS of the State of Tennessee, and illegal HARMS caused by the Court. CLEAR EVIDENCE of JUDICIAL ABUSE, COERSION, NEPITISM, DISCRIMINATION, BIAS, AND COLLUSION (along with likely OBSTRUCTION OF JUSTICE) was clearly evident in that ONE RECORDING, had they simply listened to that one 30 MINUTE AUDIO RECORDING from my abusive trial on 8/29/2019 in Williamson Chancery, while FACT CHECKING EVERY WORD SPOKEN by Judge Michael W. Binkley and Attorney Virginia Lee Story.

I pleaded for an EXCEPTION to the rules, for which there are rules to allow so not to prevent any citizen JUSTICE, while the Court instead chose to HIDE the CORRUPTION while continuing to daily cause me harm by the continued corruption.

JUSTICE delayed is JUSTICE denied! I'm exhausted at begging Tennessee JUDGES to HONOR, RESPECT, and ABIDE BY THE LAW! I will seek Federal Criminal Charges against all parties now, in

addition to public exposure and any real "accountability" provided by your ethics boards (which so far I'm not very hopefull for.)

Anyhow, I need the PANEL the JUDGE was on who handled my case with the COA, as well as the NAME OF THAT JUDGE for the Tennessee Board of Judicial Conduct. SURELY you know and there are SOME records at SOME level for who was assigned to each case, and who DECIDED (and denied) my EVERY REQUEST! Even the attached ADA REQUEST FOR MODIFICATION REQUIRES THE SIGNATURE OF THE PRESIDING JUDGE, UNLESS THEY WERE JUST FAKING IT AND THAT REQUEST FOR MODIFICATION WAS KEPT IN HOUSE AND BURRIED UPON DISMISSAL? Maybe I need to work "backwards" from the AOC director, to see if any such form was ever turned into her. (Even if no "Panel was Assigned", at least a JUDGE was, and I would greatly appreciate their name.)

Where transparency is cloaked, and accountability is unreachable, CORRUPTION THRIVES! It blows my mind how unethical, hidden, and unaccountable our "decision makers" are! And we wonder WHY they are corrupt? Because we paved the way for them! Ridiculous.

Please know that at this point, all information will most likely be made publicly available. It is nothing personal, I really like you, but the absolute INACCESSIBILITY of JUSTICE for the common mane, is totally unacceptable, as we have some litteral MOBSTERS running our Courts, who are "untouchable". That must come into the LIGHT, become EXPOSED, and the infection REMOVED from our JUDICIAL SYSTEM, or JUSTICE is no more guaranteed any man or woman in Tennessee, than the odds of playing DICE or any other gambling fetish.

Please provide me with the name of the JUDGE who DENIED ME JUSTICE, yet AGAIN!

Thanks to COVID, with my mom's immunity disorder, I CAN'T GET A JOB FROM HOME (as needed not to endanger my mother's life), until this absolutely absurd obomination of justice is FIXED! SO all day every say, all that I can do is keep shaking trees and exposing the truth to larger and larger audiences, from State to Federal, until I join up with others who have been similarly injured by Tennessee's broken Judicial System, and our voice becomes much greater, or until somebody hears my cries and uses a little common sense, deducting that it isn't HUMANE to rob my home, every penny I've ever had, force me out without replacement shelter, any healthcare, medication, vocational training, job, or means to survive, WHILE ALSO HARMING MY EMPLOYMENT OPPORTUNITIES WITH A FRAUDULENT OP, WHICH MS. STORY AND JUDGE BINKLEY WERE NOT INTERESTED IN CHARGING ME WITH UNTIL I WAS NO LONGER AN ALIMONY CONCERN FOR MS. FENTON, AND I WAS RUN OUT OF THE STATE OF TENNESSEE, TO BE ON THE STATE OF MICHIGAN'S WELFARE SYSTEM! I see SO MANY potential civil and criminal lawsuits in this matter.... FENTON VS. STATE OF TENNESSEE.... All because some arrogant thug REFUSED TO REMOVE THEIR ILLEGAL NOOSE FROM AROUND MY NECK! Which the World is going to KNOW and think of TENNESSEE as the king of JUDICIAL CORRUPTION once again! PLANTATION LAW.... Where the "MASTERS" still won't let the "SLAVES" be FREE, regardless of what COLOR they ARE!

It's not about race, it is about SOCIOECONOMICS, which the judicial CANONS of TENNESSEE EXPRESSLY FORBID BIAS or DISCRIMINATION BASED UPON!

Yet here we are…. Again…

One part of me says, TAKE IT TO FEDERAL COURT, spend a year on it, and I'll never need to work again! (I have no other chance at "retirement") The people who have CLEARLY UNCONSCIONABLY violated me, have VERY DEEP POCKETS and will eventually be FORCED TO PAY! But I just want to GO ON WITH MY LIFE WITHOUT A FREAKING NOOSE AROUND MY NECK, OR DAILY FEAR FOR ME OR MY MOTHER AT WHAT UNCONSCIONABLE CRIMES OR LIES THEY WILL TELL ABOUT ME NEXT. An embarrassment to ALL of TENNESSEE… MOBSTERS making $200k per year on the TAXPAYERS ROLES, and God only knows how much under the table (since they refuse transparency and accountability). MOBSTERS WHOSE NAMES HAVE BEEN AND WILL AGAIN BY RIGHTFULLY SYNOMONOUS WITH THEIR KLAN LEADER, AND FORMER BENEFACTOR, CASEY MORELAND!

This seems so SIMPLE that anyone with a SIXTH GRADE LEVEL OF "COMMON SENBSE" or even a HOMELESS PERSON, could ADMINISTER JUSTICE IN THIS CASE FAR BETTER THAN THE EGOMANIACS AND BUDDIES MAKING $200k per year to HOLD THE PUBLIC DOWN! It is OUTRAGEOUS!

While taking up the RESOURCES of a dozzen different departments in Tennessee, from the AOC, the COA, the TRIAL COURT, the BOARD OF JUDICIAL CONDUCT, the Supreme Court, the BOARD OF PROFESSIONAL RESPONSIBILITY… all because of one VERY OBVIOUSLY UNJUST RULING, with a MOUNTAIN OF EVIDENCE, but which only requires listening to ONE COURT RECORDING, while FACT CHECKING!

But nobody cares enough to do it…

Thanks.

REFUSED Per my ADA REQUEST – though without acknowledging it:
Judgment Based Upon the LAWS – not just the Technical Codes which I am Knowledgeable about, or able to Research and Cite (ignorance about the law is no excuse for breaking it, hence it shouldn't be for being protected by the law either). Please Judge based upon the SPIRIT of the Law, not just the Technical Manipulation of Words used to Express, Define, and Communicate it. Thank you!

Significant problem and request for Court Oversight, Accountability, Advocacy, and Assistance: I strongly believe that the narrative driving the basis for ALL the actions levied against me so far by the opposing counsel (Ms. Story) has been largely FALSE, Intentionally Deceptive, Bombarding me from every angle simultaneously, specifically to Exploit my Known Disabilities, to Strategically Devastate me, using HARRASSMENT BY LEGAL PROCESS (malicious litigation). Combined with Ms. Story's Reputation, Resources, and Relationships, I don't believe that I ever had a chance at a Fair Trial. Ms. Story BOUND me with an OP obtained under False Testimony, then TOOK and DESTROYED everything of substance, which I have ever owned, in just two months.

JEFF FENTON

Jeff Fenton

From: Jeff Fenton
Sent: Friday, March 17, 2023 10:18 AM
To: Jim.Hivner@tncourts.gov; john.coke@tncourts.gov
Cc: appellatecourtclerk@tncourts.gov; Lisa Marsh
Subject: FENTON INFORMATION REQUIRED: M2019-02059-COA-R3-CV | WILLIAMSON COUNTY CHANCERY COURT #48419B
Attachments: 2020-10-16 AFFIDAVIT of Jeffrey R Fenton - Authenticity of Audio (SENT).pdf; 2020-07-08 ADA Request for Modification due to Mental Health (Under Tennessee Judicial Branch Policy 2_07).pdf; 2020-10-16 EMERGENCY MOTION Notifying of Exigent Circumstances (SENT).pdf; USCOURTS-tnmd-3_15-cv-00127-1 (PRO SE Default Judgment) with Markup.pdf; T.C.A. § 39-16-403 Official Oppression - Markup (A-2b).pdf; Tennessee Court Clerk Guidelines (with markup).pdf; 2020-10-28 Motion to Supplement and Correct the Record.pdf; Cruel and Inhumane - (Binkley, Beeler, Story) Markup (A-2B).pdf

Hello Mr. Hivner!

Congratulations on the promotion Mr. Coke!

I need a file stamped first page of the following documents which I filed through you:

- **2020-10-16 Affidavit of Jeffrey R. Fenton – "Authenticity of Audio"**, which I emailed to you on 10/16/2020, at the same time as I emailed you the "EMERGENCY MOTION Notifying of Exigent Circumstances.
- **2020-10-28 Motion to Supplement and Correct the Record**

My understanding is that all fillings are to be time stamped "filed" within 24 hours of receipt, regardless of how the judge chooses to rule on the matter. So, I need a file stamped copy of the "RECEIVED" Affidavit and Motion proving that I submitted them to the court please.

Also, I should have received (but never did) a fully executed copy of each of my ADA Requests for Modification due to Mental Health (Under Tennessee Judicial Branch Policy 2_07). One for each filing. Showing it time stamped filed/received with each filing, while also notifying me about what accommodations each Judge approved or alternates suggested per the fully executed forms. (Please send me all three fully executed pages for each filing, so that I can try to understand what transpired):

- GRANTED
- OFFER OF REASONABLE ALTERNATE MODIFICATION
- The request for modification is DENIED because:
  - The application is not a qualified individual with a disability.
  - The requested modification would fundamentally alter the nature of the judicial program, service or activity.
  - The requested modification would create an undue financial or administrative burden.
  - The applicant refused to comply with the Policy.
  - The Applicant's failure to comply with the Policy makes impossible or impracticable the ability to provide the requested Modification.
- (Specify)_____
- DATE: _____

- Local Judicial Program ADA Coordinator: _____

With the next page including:

- APPEALS:
- PRESIDING JUDGE REVIEW
- ADMINISTRATIVE OFFICE OF THE COURTS REVIEW

With all dates and signatures for each of my filings, executed. As I understand they are determined individually by the Presiding Judge who reviews each filing.

with an OP obtained under False Testimony, then TOOk, and DESTROYED everything of substance, which I have ever owned, in just two months.

8. To substantiate my claims about legal inequality and unfairness: **During my trial on August 29th, 2019, at "The Old Courthouse" in Franklin, as is recorded in VOLUME-4 of my Technical Record, Page-516, Line-6, the Judge told me, "Fair is something you do in the fall."**

Despite my many requests that the Court Differentiate this as a "Transcript of Evidence", it remains buried in my Technical Record, even though the Judge procured the Court Reporter himself. The remainder of that same transcript clearly reveals how open, objective, and impartial, the Court remained, amidst my Testimony versus Ms. Story's. I beg you look and see for yourself! Your intervention is requested and seriously needed!

Documentation provided by my Psychiatrist and my Psychotherapist is included to prove that I have the disabilities listed, as well as a real need for the modifications sought herein.

My request for a 60-Day extension, for filing my Brief, will follow; but for the sake of TIME, since I am so SLOW at this, I am sending this Request for Modification separately. Thank you!

I hereby certify that the above information is true and correct to the best of my knowledge.

Date: 7/8/2020 _____ (Signature of Applicant)

G The request for modification is **GRANTED.**

G **OFFER OF REASONABLE ALTERNATE MODIFICATION** _____

G The request for modification is **DENIED** because:

___ the applicant is not a qualified individual with a disability
___ the requested modification would fundamentally alter the nature of the judicial program, service or activity
___ the requested modification would create an undue financial or administrative burden
___ the applicant refused to comply with the Policy
___ the applicant's failure to comply with the Policy makes impossible or impracticable the ability to provide the requested Modification

(Specify)_____

DATE: _____ _____
Local Judicial Program ADA Coordinator

APPEALS

G Presiding Judge Review requested. (Specify reason and the remedy you want): _____

_____

_____

DATE: _____ _____
(Signature of Person Requesting Review)

PRESIDING JUDGE REVIEW

I have reviewed the original request for modification, the offer of alternate modification OR the denial of modification and the reason for the denial, and the reason that this review has been requested and find as follows:

_____

_____

DATE: _____ _____
PRESIDING JUDGE

G Administrative Office of the Courts Review requested. (Specify reason and the remedy you want): _____

_____

_____

DATE: _____ _____
(Signature of Person Requesting Review)

ADMINISTRATIVE OFFICE OF THE COURTS REVIEW

I have reviewed the original request for modification, the offer of alternate modification OR the denial of modification and the reason for the denial, and the reason that this review has been requested and find as follows:

_____

_____

DATE: _____ _____
AOC DIRECTOR

Also, please do not destroy any documentation, and please instruct the trial court not to either. I no longer communicate with the Trial Court due to the harsh, bias, collusive, discriminatory, threatening, and retaliatory behavior which they have exhibited against me (all with records). From Clerk and Master Beeler to Judge Michael W. Binkley, to their close family friend of over 40—years across the street, Attorney Virginia Lee Story, who unbeknownst to me wrote my court orders, directly falsifying and coloring them feloniously packed with fraud! (All which you have evidence of on file, yet the truth and evidence have been unfortunately irrelevant to date.)

Please also ensure that this does not get turned into a collection agency or recall it and remove any negative marks on my credit, as this action by Binkle/Story/Ausbrooks/etc... was entirely **Predatory Litigation**, as I have unfortunately had to learn, and due to my disabilities and the fact that it is ME against over a dozen powerful members of the Courts, while everything done to date lacks one good-faith, honest, action in either State or Federal Courts, which I have evidence of. There is no sense in destroying me more than they have already done.

I'm being forced to learn a LOT of law just to be treated as a HUMAN and allowed to proceed with my life without interference, extortion, threats, coercion, but I'm narrowing down my remaining tasks for the next step in litigation. Hopefully when this is all over, there will be greater protection for those in my demographic throughout the State of Tennessee.

Thank you, sirs!
Jeff Fenton

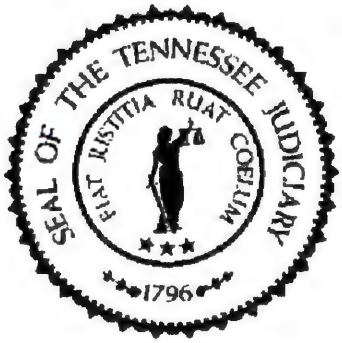
From: Jim Hivner <Jim.Hivner@tncourts.gov>
Sent: Monday, January 4, 2021 1:51 PM
To: Jeff Fenton <jeff.fenton@live.com>
Cc: Lisa Marsh <Lisa.Marsh@tncourts.gov>
Subject: Re: Which COA Judge was Assigned to my Case and which Panel is he/she on?

Mr. Fenton:

The Order dismissing your appeal was approved by the following panel of judges: Judge Frank Clement, Judge Andy Bennett and Judge Neal McBrayer.

Jim Hivner

James M. Hivner
Clerk of the Appellate Courts
State of Tennessee
Supreme Court Building
401 7th Ave. North
Nashville, TN 37219-1407
(615) 741-2681



TENNESSEE APPELLATE COURTS
UNIFORM FACSIMILE FILING COVER SHEET

TO (COURT CLERK): **IN THE COURT OF APPEALS OF TENNESSEE**

WITH (COURT): **MIDDLE TENNESSEE DIVISION (AT NASHVILLE)**

CLERK'S FAX NUMBER: **(615) 532-8757**

CASE NAME: **JEFFREY RYAN FENTON v FAWN TIFFANY FENTON**

DOCKET NUMBER: **M2019-02059-COA-R3-CV**

TITLE OF DOCUMENT: **(ADA) REQUEST FOR MODIFICATION**

FROM (SENDER): **JEFFREY RYAN FENTON**

SENDER'S ADDRESS: **17195 SILVER PARKWAY, #150**

FENTON, MICHIGAN 48430-3426

SENDER'S VOICE TELEPHONE NUMBER: **(615) 837-1300**

SENDER'S FAX TELEPHONE NUMBER: **(810) 255-4438**

DATE: **07/08/2020** TOTAL PAGES, INCLUDING COVER PAGE: **13**

FILING INSTRUCTIONS/COMMENTS (attach additional sheet if necessary):

PLEASE FILE AND RESPOND ELECTRONICALLY, EITHER VIA EMAIL TO JEFF.FENTON@LIVE.COM OR VIA FAX TO (810) 255-4438. MY FAX IS A DEDICATED LINE SETUP SOLELY FOR COMMUNICATING WITH THE COURT, NO COVER PAGE OR SPECIAL INSTRUCTIONS REQUIRED.

THANK YOU!
JEFF FENTON

REQUEST FOR MODIFICATION

Applicant requests accommodation under Tennessee Judicial Branch Policy 2.07

Applicant Information

Applicant is: ____ Witness _____ Juror ____ Attorney __X__ Party _____Other (Specify Nature of Interest):_____

Name: JEFFREY RYAN FENTON
Telephone: (615) 837-1300
Address: 17195 Silver Parkway, #150
Fenton, MI 48430-3426

Court: COURT OF APPEALS OF TENNESSEE MIDDLE DIVISION (AT NASHVILLE)
Judge:
Case No.: M2019-02059-COA-R3-CV

1. Type of proceeding. _____ Criminal __X__ Civil

2. Proceedings to be covered (e.g., bail hearing, preliminary hearing, particular witnesses at trial, sentencing hearing, motion hearing, trial): **Appeal of Forced Sale of Home, Divorce Judgment, Stalking Charge, and Order of Protection**

3. Dates modification needed (specify): **Currently – Throughout Appeal**

4. Disability necessitating modification (specify): **Obsessive-Compulsive Personality Disorder (OCPD) DSM-5 301.4 (F60.5), Attention-Deficit Hyperactivity Disorder (ADHD) DSM-5 314.01 (F90.2), Generalized Anxiety Disorder (GAD) DSM-5 300.02 (F41.1), Circadian Rhythm Sleep Disorder (CRSD) Non-24-Hour Sleep-Wake Disorder (Non-24) DSM-5 307.45 (G47.24), Poverty, Forced Geographic Distance from Court**

5. Type of modification requested (specify): **Procedural and Technical Flexibility, Additional TIME for Deadlines to Self-Represent by Necessity, Communication Modifications due to COVID-19 and Excessive Mailing Times to Michigan, Judgment Based Upon the LAWS – not just the Technical Codes which I am Knowledgeable about, or able to Research and Cite (ignorance about the law is no excuse for breaking it, hence it shouldn't be for being protected by the law either). Please Judge based upon the SPIRIT of the Law, not just the Technical Manipulation of Words used to Express, Define, and Communicate it. Thank you!**

6. Special requests or anticipated problems (specify): **Additional TIME and Patience please. By disorder I'm a Perfectionist who has a nearly impossible time Focusing and Remaining On Task, especially when of Significant Consequence. Yet I can't afford to hire anyone to help Represent me. I also request that all Court Communications please be sent to me Electronically, via Email or Fax (I setup a dedicated fax number for the court), because it often takes a WEEK to receive Mail here in Michigan, plus in-house handling times. My Email is jeff.fenton@live.com, and my dedicated fax number for the court is (810) 255-4438.**

7. Significant problem and request for Court Oversight, Accountability, Advocacy, and Assistance: **I strongly believe that the narrative driving the basis for ALL the actions levied against me so far by the opposing counsel (Ms. Story) has been largely FALSE, Intentionally Deceptive, Bombarding me from every angle simultaneously, specifically to Exploit my Known Disabilities, to Strategically Devastate me, using HARRASSMENT BY LEGAL PROCESS (malicious litigation). Combined with Ms. Story's Reputation, Resources, and Relationships, I don't believe that I ever had a chance at a Fair Trial. Ms. Story BOUND me**

with an OP obtained under False Testimony, then TOOK and DESTROYED everything of substance, which I have ever owned, in just two months.

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Despite my many requests that the Court Differentiate this as a "Transcript of Evidence", it remains buried in my Technical Record, even though the Judge procured the Court Reporter himself. The remainder of that same transcript clearly reveals how open, objective, and impartial, the Court remained, amidst my Testimony versus Ms. Story's. I beg you look and see for yourself! Your intervention is requested and seriously needed!

Documentation provided by my Psychiatrist and my Psychotherapist is included to prove that I have the disabilities listed, as well as a real need for the modifications sought herein.

My request for a 60-Day extension, for filing my Brief, will follow; but for the sake of TIME, since I am so SLOW at this, I am sending this Request for Modification separately. Thank you!

I hereby certify that the above information is true and correct to the best of my knowledge.

Date: 7/8/2020 _____ (Signature of Applicant)

G The request for modification is **GRANTED.**

G **OFFER OF REASONABLE ALTERNATE MODIFICATION** _____

_____

G The request for modification is **DENIED** because:

____ the applicant is not a qualified individual with a disability

____ the requested modification would fundamentally alter the nature of the judicial program, service or activity

____ the requested modification would create an undue financial or administrative burden

____ the applicant refused to comply with the Policy

____ the applicant's failure to comply with the Policy makes impossible or impracticable the ability to provide the requested Modification

(Specify)_____

DATE: _____ _____

Local Judicial Program ADA Coordinator

APPEALS

G Presiding Judge Review requested. (Specify reason and the remedy you want): _____

_____

_____

DATE: _____ _____
(Signature of Person Requesting Review)

PRESIDING JUDGE REVIEW

I have reviewed the original request for modification, the offer of alternate modification OR the denial of modification and the reason for the denial, and the reason that this review has been requested and find as follows:

_____

_____

_____

_____

DATE: _____ _____
PRESIDING JUDGE

G Administrative Office of the Courts Review requested. (Specify reason and the remedy you want): _____

_____

_____

DATE: _____ _____
(Signature of Person Requesting Review)

ADMINISTRATIVE OFFICE OF THE COURTS REVIEW

I have reviewed the original request for modification, the offer of alternate modification OR the denial of modification and the reason for the denial, and the reason that this review has been requested and find as follows:

_____

_____

_____

_____

DATE: _____ _____
AOC DIRECTOR

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

DONALD W. FISHER,	)	
Plaintiff,	)	
	)	
v.	)	**No. 3-15-cv-127**
	)	**Judge Crenshaw**
CHRISTOPHER GATES AND GATES	)	**Magistrate Judge Frensley**
CONSTRUCTION AND DESIGN, LLC,	)	
Defendants.	)	

REPORT AND RECOMMENDATION

Pending before the Court is Defendants' Motion to Vacate Entry of Default (Docket No. 55) and Plaintiff's First Motion for Default Judgment (Docket No. 61). For the reasons stated herein, the undersigned recommends that Defendants' Motion to Vacate Entry of Default (Docket No. 55) be Granted in part and Denied in part; and Plaintiff's First Motion for Default Judgment (Docket No. 61) be Granted in part and Denied in part. Specifically, the undersigned recommends the entry of default as to the individual Defendant, Christopher Gates, be vacated but that the entry of default as to the corporate defendant, Gates Construction and Design, LLC, remain and that the Motion for Default Judgment be Granted as to Gates Construction and Design, LLC only.

Standard of Review

Federal Rule of Civil Procedure 55 (a) requires the clerk of court to enter a party's default when the party "against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend" and "that failure is shown by affidavit or otherwise." Fed. R. Civ. P. 55 (a). Upon entry of default a party may proceed to seek default judgment under Rule 55 (b), either from the clerk of court or the district court. The Sixth Circuit has held that entry of default is a

prerequisite to a default judgment. *Devlin v. Kalm*, 493 F. App'x 678, 685-686 (6th Cir. 2012). "Once a default is entered against a defendant, that party is deemed to have admitted all the well pleaded allegations in the complaint except those relating to damages." *Microsoft Corp. v. McGee*, 490 F. Supp. 2d 874, 878 (S. D. Ohio 2007)(citations omitted). Rule 55 (c) of the Fed. Rules of Civil Procedure allows the district court to set aside an entry of default for good cause. Fed. R. Civ. P. Rule 55 (c).

DISCUSSION

Defendants' Request to Set Aside Default

Following the entry of default in this case Defendant filed an Answer to the complaint (Docket No. 54) and Motion to Vacate Entry of Default (Docket No. 55). Plaintiff has not filed a response to Defendant's motion to vacate.

The Court acknowledges that Defendants are acting pro se in this matter, and their pro se status is a factor for the court to consider in its good cause determination in setting aside a Defendant's default. *Dessault Systemes S. A. v. Childress*, 663 F. 3d 832, 844 (6th Cir. 2011)(Citing *Shepard Claims Serv., Inc. v. William Darrah and Associates*, 796 F. 2d 190, 194 (6th Cir. 1986). Nevertheless, pro se litigants are not exempt from the requirements of the Federal Rules of Civil Procedure. *McNeill v. United States*, 508 U. S. 106, 133 (1980). The Court also notes that "mere negligence or failure to act reasonably is not enough to sustain a default." *United States v. $22,050.00 in United States Currency*, 595 F. 3d 318, 327 (6th Cir. 2010).

While the failure of the individually named defendant to answer the complaint is clearly negligent, nothing before the court suggests that defendant acted to thwart the judicial proceedings or with reckless disregard for the effect of his conduct on the proceedings. *See, Childress*, 663 F. 3d at 841. It is clear from the pleadings that the defendant wishes to defend

against this action. Therefore, the Court recommends that the default against the individually named defendant be set aside.

With respect to the corporate defendant, the Court has been clear that the defendant corporation must retain an attorney to represent its interest in the case. Docket No. 57. Despite being repeatedly advised of this requirement and its consequences, defendant corporation has not obtained counsel therefore the court recommends that the default as to the defendant corporation remain and not be vacated.

Plaintiff's Motion for Default Judgment

Plaintiff has filed a Motion For Default Judgment (Docket No. 61) based upon the previously issued default (Docket No. 51). Defendants have not responded to the Motion for Default Judgment. Plaintiff contends that default judgment is appropriate based upon the corporate defendant's failure to comply with the Court's previous orders requiring that any pleadings be filed by an attorney admitted to practice before this court and that the Answer filed on behalf of the individually named defendant fails to comply with the pleading requirements of Rule 8 (b) and (c) Fed. R. Civ. P.. Docket No. 61, pp. 1-2.

As noted above, the corporate defendant's failure to comply with the rules supports the entry of default under Rule 55 (a) Fed. R. Civ. P. and likewise the entry of default judgment under Rule 55(b). Therefore, the undersigned recommends that the motion for default judgment be GRANTED as to the corporate defendant, Gates Construction and Design, LLC.

With respect to the individually named defendant, the Answer to the complaint states as follows:

> [t]he Plaintiff and only after refusing to perform additional repairs for free on the pool on areas due to damages caused by the mishandling namely freezing of the pool as maintained by the Plaintiff and his pool man who is a disgruntled former employee of the Defendants who was released from Defendants employ

for incompetents (sic) and undesirable conduct, did this action get filed so that the Plaintiff could claim dishonesty on the Defendants part and avoiding the 4 year limitation on his ability to claim.

Defense 1 Failure to State a Claim

Defendant answering the complaint herein, alleges all allegations and counts brought forth therein fails to state a claim for which relief can be granted.

WHEREFORE, Defendant prays that the Plaintiff take nothing and that the Defendant have judgement against the Plaintiff and recover the costs of suit herein, and such other relief that the court may deem proper.

Docket No. 54.

Federal Rules Civil Procedure Rule 8(e) provides that "pleadings must be construed so as to do justice," and the Sixth Circuit has noted that "[t]he drafting of a formal pleading presupposes some degree of legal training or, at least, familiarity with applicable legal principles, and pro se litigants should not be precluded from resorting to the courts merely for want of sophistication." *West v. Adecco Employment Agency*, 124 F. App'x 991, 992-93 (6th Cir. 2005)(quoting *Jourdan v. Jabe*, 951 F. 2d 108, 110 (6th Cir. 1991)).

While it is certainly true that the answer does not respond to each and every specific averment in the complaint, viewing the Defendant's pleadings liberally, as it must for all documents filed by pro se litigants, and mindful of the requirement to do justice, it is clear that the individually named defendant has not failed to plead or otherwise defend against this action and therefore the undersigned recommends that the Motion for Default Judgment for the individually named Defendant, Christopher Gates, be DENIED.

RECOMMENDATION

For the reasons discussed above, the undersigned recommends that the Defendants' Motion to Vacate Entry of Default be Granted as to the individually named defendant, Christopher Gates and be Denied as to the corporate defendant, Gates Construction and Design,

LLC, and that the Plaintiff's First Motion for Default Judgment be Granted as to the corporate defendant, Gates Construction and Design, LLC, and Denied as to the individual defendant, Christopher Gates.

Under Rule 72(b) of the Federal Rules of Civil Procedure, any party has fourteen (14) days after service of this Report and Recommendation in which to file any written objections to this Recommendation with the District Court. Any party opposing said objections shall have fourteen (14) days after service of any objections filed to this Report in which to file any response to said objections. Failure to file specific objections within fourteen (14) days of service of this Report and Recommendation can constitute a waiver of further appeal of this Recommendation. *See Thomas v. Arn,* 474 U.S. 140, 106 S. Ct. 466, 88 L. Ed. 2d 435 (1985), *reh'g denied*, 474 U.S. 1111 (1986); 28 U. S. C. § 636(b)(1); Fed. R. Civ. P. 72.

JEFFERY S. FRENSLEY
U. S. Magistrate Judge

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UST - REGION 8

Federal Judicial Districts Established for the Districts of Tennessee and Kentucky

The United States Trustee Program is a component of the U.S. Department of Justice that supervises the administration of bankruptcy cases. The United States Trustee for Region 8 serves the federal judicial districts established for the Districts of Tennessee and Kentucky. The regional office is located in Memphis, TN. The links on this site contain information about the regional office of the United States Trustee and the field offices within Region 8.

IMPORTANT NOTICES

USTP FORMS FOR THE FILING OF PERIODIC OPERATING REPORTS IN NON-SMALL BUSINESS CHAPTER 11 CASES NOW EFFECTIVE

Wednesday, July 21, 2021

On June 21, 2021, the United States Trustee Program's rule titled Procedures for Completing Uniform Periodic Reports in Non-Small Business Cases Filed Under Chapter 11 of Title 11, (28 C.F.R. § 58.8) became effective. The Final Rule governs the filing of pre-confirmation monthly operating reports (MORs) and quarterly post-confirmation reports (PCRs) by all debtors except those who are small business debtors or who, in accordance with the CARES Act, elect relief under subchapter V of chapter 11. To obtain the required MOR and PCR forms, instructions for completing and filing MOR and PCR forms, and other important information, please visit the United States Trustee Program's Chapter 11 Operating Reports resource page at www.justice.gov/ust/chapter-11-operating-reports.

U.S. TRUSTEE PROGRAM EXTENDS TELEPHONIC OR VIDEO SECTION 341 MEETING

Friday, August 28, 2020

The U.S. Trustee Program has extended the requirement that section 341 meetings be conducted by telephone or video appearance to all cases filed during the period of the President's "Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak" issued March 13, 2020, and ending on the date that is 60 days after such declaration terminates. However, the U.S. Trustee may approve a request by a trustee in a particular case to continue the section 341 meeting to an in-person meeting in a manner that complies with local public health guidance, if the U.S. Trustee determines that an in-person examination of the debtor is required to ensure the completeness of the meeting or the protection of estate property. This policy may be revised at the discretion of the Director of the United States Trustee Program.

U.S. TRUSTEE PROGRAM EXTENDS TELEPHONIC SECTION 341 MEETINGS TO CASES FILED THROUGH MAY 10, 2020

Wednesday, April 1, 2020

The U.S. Trustee Program is extending the requirement that section 341 meetings be conducted only through telephonic or other alternative means not requiring in-person appearance to all cases filed through May 10, 2020. Appropriate notice will be provided to parties in accordance with bankruptcy law and rules.

U.S. TRUSTEE PROGRAM
REGION 8

LEADERSHIP
Paul A. Randolph
Acting United States Trustee

CONTACT
Office of The U. S. Trustee
(901) 544-3251

****

Paul A. Randolph
Forwarded Referral To:

****

Megan Seliber
Trial Attorney, Office of the United States Trustee

(615) 695-4060 (office)
megan.seliber@usdoj.gov

318 Customs House,
701 Broadway
Nashville, TN 37203

****

19-02693 Fenton: Fraud Referral

****

****

Paul A. Randolph (USTP)

Acting United States Trustee
Region 8 (Nashville)

202-590-8690 (work cell)
901-544-3251 (office)
314-539-2990 (fax)
paul.a.randolph@usdoj.gov

Assistant U.S. Trustee
Eastern District of Missouri
(Region 13)

****

19-02693 Fenton: Fraud Referral

****

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U.S. Bankruptcy Courts

Jeff Fenton

From: Randolph, Paul (USTP) <Paul.A.Randolph@usdoj.gov>
Sent: Tuesday, January 18, 2022 11:45 AM
To: Jeff Fenton
Subject: RE: [EXTERNAL] Fraud Upon the Court, Conspiracy Against Rights, Deprivation of Rights & Property Under Color of Law, ADA, FED, & HUD Violations - Protecting Disabled, Vulnerable, and Aged from Financial Exploitation: ALL Started with a Falsified Secret BK

Mr. Fenton:

I have received your six emails and will send them to our Nashville office to review. Please note that neither the U.S. Trustee nor any of its employees can provide you with legal representation or advice. You should take whatever legal steps you deem appropriate to protect your interests. Thank you for your referral.

Paul Randolph

Paul A. Randolph

Acting United States Trustee
Region 8 and
Assistant U.S. Trustee
Eastern District of Missouri (Region 13)
202-590-8690 (work cell)
314-539-2990 (fax)

Fenton 19-02693: sale motion complaint - Message (HTML)

File Message Add-ins Help Acrobat Tell me what you want to do

Save Undo Redo Previous Item Next Item Print Preview

Fenton 19-02693: sale motion complaint

SM Seliber, Megan (USTP) <Megan.Seliber@usdoj.gov>
To Jeff Fenton

Reply Reply All Forward ...
Tue 3/15/2022 6:08 PM

fenton 319-02693 deed.pdf
247 KB

This email is from the **USTP Trial Attorney in Nashville** who was **Assigned to Research my BANKRUPTCY FRAUD COMPLAINT** by Region 8 Acting United States Trustee, **Paul A. Randolph, who is over Tennessee and Kentucky.** Mr. Randolph is who I contacted to **REPORT BANKRUPTCY FRAUD** and **to seek information to help me understand what VIOLATIONS were made by whom.**

Mr. Fenton,

I further investigated your complaint that you were not given notice of the motion to sell 1986 Sunnyside Drive as a co-owner in bankruptcy court. I confirmed that you did not receive notice. ~~Because Judge Binkley gave your ex-wife the power to close the sale in family court, it does not appear that any objection in bankruptcy court would have been availing even if you had been given notice.~~ For your records, I've attached the warranty deed and the family court order that was recorded.

Although you are welcome to seek bankruptcy counsel to investigate the matter further, ~~I believe that because the family court had dual jurisdiction over the property~~, you will need to seek any further remedy in state court. ~~As the property has already been sold to a third-party purchaser, it is also unclear if any remedies would be available.~~

This concludes my investigation into your complaint.

Best,

Megan Seliber
Trial Attorney, Office of the United States Trustee
318 Customs House, 701 Broadway
Nashville, TN 37203
(615) 695-4060

Ms. Seliber ACTS like she is HELPING ME, but she really isn't. She does confirm that the Bankruptcy Court failed to provide me NOTICE about my Ex-wife's Secret Bankruptcy and the THREAT to MY HOME, but then she lies to me, provides me with misinformation, and plays the blame game, between Federal and State Courts being responsible for my damages.

Jeff Fenton

From: Seliber, Megan (USTP) <Megan.Seliber@usdoj.gov>
Sent: Tuesday, March 15, 2022 6:08 PM
To: Jeff Fenton
Subject: Fenton 19-02693: sale motion complaint
Attachments: fenton 319-02693 deed.pdf

IF the BANKRUPTCY COURT had OBEYED the FRBP, then the Bankruptcy Trustee would have been FORCED by the Federal Bankruptcy Court or the Federal District Court to REMOVE the Marital Residence from my Ex-wife's "BANKRUPTCY ESTATE" as a "BURDENSOME ASSET" long before I ever even MET Judge Binkley! BOTH my INTERESTS and my TENANT'S LEASEHOLD INTERESTS were PROTECTED under Federal Bankruptcy Laws!

Mr. Fenton,

I further investigated your complaint that you were not given notice of the motion to sell 1986 Sunnyside Drive as a co-owner in bankruptcy court. I confirmed that you did not receive notice. ~~Because Judge Binkley gave your ex-wife the power to close the sale in family court, it does not appear that any objection in bankruptcy court would have been availing even if you had been given notice.~~ For your records, I've attached the warranty deed and the family court order that was recorded.

Although you are welcome to seek bankruptcy counsel to investigate the matter further, ~~I believe that because the family court had dual jurisdiction over the property, you will need to seek any further remedy in state court. As the property has already been sold to a third party purchaser, it is also unclear if any remedies would be available~~.

This concludes my investigation into your complaint.

Best,

Megan Seliber
Trial Attorney, Office of the United States Trustee
318 Customs House, 701 Broadway
Nashville, TN 37203
(615) 695-4060

The State Court DID NOT have DUAL JURISDICTION, that is a LIE! The Federal Court always has ORIGINAL JURISDICTION, and usually EXCLUSIVE JURISDICTION over all property, where it sits, as it sits, upon the day the BANKRUPTCY IS FILED!

The State Court is actually SPECIFICIALLY FORBIDDEN from taking Jurisdiction over the property because of the circumstances, and the Bankruptcy having been filed **39-DAYS** before the DIVORCE!

REMEDIES are ALWAYS available for RACKETEERING and FRAUD, especially with as many bad-actors, in a **Conspiracy to intentionally CIRCUMVENT the FRBP and FEDERAL BANKRUPTCY LAWS** via **CRIMES UNDER COLOR OF LAW,** without EQUAL or DUE PROCESS, in a Corrupt State Court!

The CRIMINAL EVIDENCE of CONPIRACY AGAINST RIGHTS (AND PROPERTY) UNDER COLOR OF LAW, FRAUD UPON BOTH COURTS, HOBBS ACT EXTORTION, and a BUNCH OF FEDERAL BANKRUPTCY CRIMES is ALL in the TIME-LINE:

DAYS between when BANKRUPTCY WAS FILED on 4/26/2019 and when DIVORCE was FILED on 6/04/2019: 39-DAYS

DAYS between when BANKRUPTCY WAS FILED on 4/26/2019 and when I was SERVED DIVORCE PAPERS 6/15/2019: 50-DAYS

DAYS between when BANKRUPTCY WAS FILED on 4/26/2019 and when fraudulent "Order of Protection Ex Parte was Served on 6/20/2019: 55-DAYS

DAYS between when BANKRUPTCY was FILED on 4/26/2029 and when I had my FIRST HEARING in CHANCERY COURT on 8/1/2019: 97-DAYS (The Bankruptcy Attorney HAD TO KNOW this far in ADVANCE, that Judge Binkley would "PLAY BALL"!) Otherwise the Bankruptcy Attorney would have gotten CAUGHT filing a FRAUDULENT BANKRUPTY PETITION, as would the TRUSTEE. The Bankruptcy Attorney would have been responsible for all losses, faced serious sanctions, and removal from office! She HAD TO KNOW that Judge Binkley would illegally FORCE THE AUCTION OF MY HOME, **on my VERY FIRST DAY in Court,** before she could **WAIT for 97-DAYS** for what she was **REQUIRED to do within the first 14-DAYS of FILING** the FRAUDULENT BANKRUPTCY!

DAYS between when BANKRUPTCY WAS FILED on 4/26/2019 and when I was FORCEFULLY EVICTED from my home on 9/3/2019: 130-DAYS

JEFFREY R. FENTON

17195 SILVER PKWY #150, FENTON, MI 48430-3426

Phone: (810) 735-7456 · Email: jeff.fenton@live.com

GENESEE CO DHS UNION ST DISTRICT
Specialist / ID: M. Client-connection / MDHHS-Genesee-Union
Case Name: Jeffrey Fenton
Case Number: 128998254
Individual ID: 1240737350

DEAR CASE WORKER,

I've been experiencing computer problems and only accessed this letter about a week ago, after it was already past due. I've been working on this for days since. Due to my disabilities, no task is simple in my world. While I've been overwhelmed and swamped for over three years now, fighting a corrupt legal system in Tennessee, who refuses to even acknowledge my most basic human rights.

I've lived at the SAME address as I have since returning to Michigan in 2019, that being the ONLY ADDRESS in the WHOLE WORLD where I can stay for FREE when I need to, which is with my MOTHER, Marsha A. Fenton at [redacted]

When I signed-up for assistance at Union Station at the end of 2019, I specifically requested that **my mother's address be kept confidential**. That was for my safety as well as for my elderly mothers. Because of a corrupt judge, and a bunch of corrupt attorneys, and auctioneers who perform Racketeering (RICO) directly out of the Williamson County Chancery Court, in Middle Tennessee.

They have and continue to threaten my safety, my freedom, my life, my liberty, while they illegally took my property, which was my life's savings, and everything I had saved toward retirement. But they didn't stop there... I wish there was a simple way to explain it to you, but they falsified the Court Records, to make it look like I was an evil monster who deserved nothing, and voluntarily chose to give away my home for free and relocate to Michigan, when I had no plans of ever living in Michigan again. (I planned to continue to visit my mom, but not to relocate here, as I was inevitably forced, purely to survive their illegal schemes.)

No offense, but I had lived in Middle Tennessee for 25-years, the weather was much better, I had a beautiful home, and the economy was thriving. Yet the RICO scam the Court and Counsel played on me, almost instantly (with just five-days notice) left me with no shelter, income, support, provision, or means to sustain myself, amidst a simple divorce with no children. Which I didn't even want, but agreed to, without the need for ANY drama.

I've used a mailing address for everything (including with the State of Michigan), at **17195 Silver Parkway #150, Fenton, Michigan, 48430-3426**. I don't recall giving the address where I physically reside to anyone other than the State of Michigan, yet somehow that was not kept "CONFIDENTIAL" as I requested.

I received some junk mail at my mother's address and became concerned that her address had been compromised. As quickly as I could, I switched my physical address with the State of Michigan to my aunt's house in Fenton, to help provide a tiny buffer or notice should the corrupt Court in Tennessee and over a half-dozen attorneys try to further harm me.

While physically I never moved. I've remained at my mother's home at [redacted] Since they were both located in Genesee County, and I haven't voted since I have been here, I thought it was "the least of greater evils", to help restore some peace, privacy, and protection here at my mother's tiny, open, and exposed home, for us both!

Since 2019, both me AND my mother, have been at FEAR for our SAFETY from a Corrupt Court and a gang of corrupt Attorneys who have repeatedly threatened me, with fraudulent incarceration, financial devastation, and physical harm.

It's not just ME. There are MANY people who literally fear for their safety and some even their LIVES and the LIVES of their family, from this same lawless pack!

I'm not the only person I know who has left the State and **SWORN to NEVER STEP ON TENNESSEE SOIL AGAIN, IN MY LIFE**, because of similar actions out of this same CORRUPT COURT, located in the wealthiest County within the State of Tennessee (unless I need to protect my ex-wife or to testify in a criminal trial against the Judge or Counsel).

The corruption within this Court has destroyed MANY LIVES! While one attorney who stood up to protect a victim I know of, was found DEAD the next day! (Against Judge Michael W. Binkley, the same judge who destroyed my life, in about as much time as his lunch break.)

In late 2019 when I started trying to figure out what in the heck just happened to everything in my life, I began Googling the names of the Corrupt Judge and Counsel, where I found a Facebook page dedicated to exposing the corruption and requesting the Investigation of this exact judge. This was one of my first steps to learning about more evil than I ever wanted to know, while connecting me with other victims: **https://www.facebook.com/judgebinkley**

So, the fact is that my address has NEVER CHANGED. I have no LEASE, I haven't been able to EARN a DOLLAR in the past year, while trying to guestimate a budget for how much MORE IN DEBT that I go to my mother each month to pay for her electric bill tripling since I moved in, and to pay for my toilet paper, soap, deodorant, internet, phone, clothes, car insurance, office supplies for trying to fight this regime of injustice, and software subscriptions like Adobe Acrobat and Microsoft Word, to have the tools to TRY, seems completely pointless.

You can use the same exact budget that you have on file from my last interview over the phone, while to be clear, my mother is not "GIFTING" anything to me, except for RENT while I have

ZERO INCOME. Everything else she is keeping a running tally of, while I probably owe her in excess of $20k currently.

I apologize for missing the due date and I hope that this won't affect my benefits. I only get the FAP for food, which I need, so that I'm not even more of a burden for my mother (she is a retired nurse, who planned retirement for herself, but not to support two people).

She can let me live here for free, when need be, but the additional expenses are really adding up. Especially after so long with no legal remedy or relief in sight. I've finally decided to try to file criminal complaints through the Michigan State Police, which I'm currently drafting documents for. My hope is that the Michigan State Police will work with the Tennessee Bureau of Investigation and the FBI. (Though that is probably a long shot.)

I've considered writing to Governor Whitmer to see if she can provide any assistance. It is hard to convince anyone to intervene with a powerful gang of lawless judges and attorneys, while many federal resources are devoted currently to "Domestic Terrorism" and were previously devoted to COVID.

So far, every judge backs the original judge's order, without even considering the possibility that the Trial Court Judge is Corrupt and the Opposing Counsel is one of his best friends (undisclosed). More absurdly, by "local court rules", my vexatious Opposing Counsel was allowed to WRITE the Court Orders HERSELF! To top it off, the Chancery Court Clerk & Master has literally been a **"close family friend"** of my vicious Opposing Counsel for over FORTY-YEARS. (Try to find any fairness, impartiality, or justice there! The Judge literally told me on Court Record, that **"FAIR is something you do in the fall."**)

Try as I do, each and every day (10-16 hours per day, at least 6-days per week), I've yet to reach **any help**. Unfortunately, I've learned that is common in cases of "Predatory Litigation". Most people have no idea that one corrupt judge can completely destroy their lives and literally render them homeless, broke, and destitute, in just an hour or two. Without being allowed to be heard, to provide evidence, to cross examine the bogus claims made about them, etc.

All these "laws", "civil rights", "constitutional rights", natural inalienable "human rights", and alleged "freedoms" that we were taught in school that we HAVE and honestly believe WILL protect us, until the day you find yourself in a corrupt "FAMILY COURT", up against an army of dirty attorneys, who have already setup a scheme to wipe you out, before you can even figure out what happened! Yet it happens EVERY DAY across our Country! (Actually, it's an epidemic in almost EVERY COUNTRY currently!)

You learn quickly that ANY WORDS ON PAPER (laws, constitutions, rights, judicial canons, rules of professional conduct) are only as good as the people who are appointed to HONOR & ENFORCE them! (We don't need more laws. We need more judges who respect the rights of the people, honor and obey the Law.)

I don't know how to explain what happened to me in Tennessee in a way that is believable and doesn't make me sound crazy. I'm not crazy, I'm just slow, overwhelmed, and a perfectionist (ADHD/OCPD/GAD). They intentionally targeted and attacked my known disabilities.

Recently my mother was doing something online, and one of those people finder ads popped up showing me living HERE at HER HOME, with her address plain as day. A week or two later, I had a similar experience while doing some research online.

Also, since I have decided to try to involve the Michigan State Police for our protection, I decided to change everything with the State of Michigan back to my mother's address, still wanting to keep it as confidential as possible, but knowing that there is no safety or hiding from the criminals who run Tennessee's judicial system! (Again, there have been ZERO changes for me physically or financially, just in the contact information with the State of Michigan.)

I'm providing an abundance of documentation proving my mother's address, and my living here. Such as my mother's property tax assessment for 2023, my voter registration and driver's license at this same address, along with even letters from my psychiatrist in Tennessee and my psychotherapist in Tennessee, who I both trusted enough to give my mother's address to.

I'll try to upload a few documents that SHOW you a tiny glimpse of the battle I have been fighting against a DIRTY JUDGE in Tennessee, Judge Michael W. Binkley, from the Williamson County Chancery Court, along with Attorney Virginia Lee Story, Clerk & Master Elaine Beaty Beeler, etc.

Hopefully this will be sufficient to maintain my benefits.

Please let me know if you need anything further and allow me some extra time to provide it to you. (I'm slow, I spent 9 hours writing this letter alone.)

Thank you,

4/19/2023

Jeffrey R. Fenton

AMENDMENTS

2008—Subsecs. (e) to (h). Pub. L. 110–325 added subsecs. (e) to (h).

EFFECTIVE DATE OF 2008 AMENDMENT

Amendment by Pub. L. 110–325 effective Jan. 1, 2009, see section 8 of Pub. L. 110–325, set out as a note under section 705 of Title 29, Labor.

§ 12202. State immunity

A State shall not be immune under the eleventh amendment to the Constitution of the United States from an action in[1] Federal or State court of competent jurisdiction for a violation of this chapter. In any action against a State for a violation of the requirements of this chapter, remedies (including remedies both at law and in equity) are available for such a violation to the same extent as such remedies are available for such a violation in an action against any public or private entity other than a State.

(Pub. L. 101–336, title V, § 502, July 26, 1990, 104 Stat. 370.)

REFERENCES IN TEXT

This chapter, referred to in text, was in the original "this Act", meaning Pub. L. 101–336, July 26, 1990, 104 Stat. 327, which is classified principally to this chapter. For complete classification of this Act to the Code, see Short Title note set out under section 12101 of this title and Tables.

§ 12203. Prohibition against retaliation and coercion

(a) Retaliation

No person shall discriminate against any individual because such individual has opposed any act or practice made unlawful by this chapter or because such individual made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this chapter.

(b) Interference, coercion, or intimidation

It shall be unlawful to coerce, intimidate, threaten, or interfere with any individual in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other individual in the exercise or enjoyment of, any right granted or protected by this chapter.

(c) Remedies and procedures

The remedies and procedures available under sections 12117, 12133, and 12188 of this title shall be available to aggrieved persons for violations of subsections (a) and (b), with respect to subchapter I, subchapter II and subchapter III, respectively.

(Pub. L. 101–336, title V, § 503, July 26, 1990, 104 Stat. 370.)

REFERENCES IN TEXT

This chapter, referred to in subsecs. (a) and (b), was in the original "this Act", meaning Pub. L. 101–336, July 26, 1990, 104 Stat. 327, which is classified principally to this chapter. For complete classification of this Act to the Code, see Short Title note set out under section 12101 of this title and Tables.

[1] So in original. Probably should be "in a".

CONSTITUTIONALITY

For constitutionality of section 503 of Pub. L. 101–336, see Congressional Research Service, The Constitution of the United States of America: Analysis and Interpretation, Appendix 1, Acts of Congress Held Unconstitutional in Whole or in Part by the Supreme Court of the United States.

§ 12204. Regulations by Architectural and Transportation Barriers Compliance Board

(a) Issuance of guidelines

Not later than 9 months after July 26, 1990, the Architectural and Transportation Barriers Compliance Board shall issue minimum guidelines that shall supplement the existing Minimum Guidelines and Requirements for Accessible Design for purposes of subchapters II and III of this chapter.

(b) Contents of guidelines

The supplemental guidelines issued under subsection (a) shall establish additional requirements, consistent with this chapter, to ensure that buildings, facilities, rail passenger cars, and vehicles are accessible, in terms of architecture and design, transportation, and communication, to individuals with disabilities.

(c) Qualified historic properties

(1) In general

The supplemental guidelines issued under subsection (a) shall include procedures and requirements for alterations that will threaten or destroy the historic significance of qualified historic buildings and facilities as defined in 4.1.7(1)(a) of the Uniform Federal Accessibility Standards.

(2) Sites eligible for listing in National Register

With respect to alterations of buildings or facilities that are eligible for listing in the National Register of Historic Places under division A of subtitle III of title 54, the guidelines described in paragraph (1) shall, at a minimum, maintain the procedures and requirements established in 4.1.7(1) and (2) of the Uniform Federal Accessibility Standards.

(3) Other sites

With respect to alterations of buildings or facilities designated as historic under State or local law, the guidelines described in paragraph (1) shall establish procedures equivalent to those established by 4.1.7(1)(b) and (c) of the Uniform Federal Accessibility Standards, and shall require, at a minimum, compliance with the requirements established in 4.1.7(2) of such standards.

(Pub. L. 101–336, title V, § 504, July 26, 1990, 104 Stat. 370; Pub. L. 113–287, § 5(k)(5), Dec. 19, 2014, 128 Stat. 3270.)

REFERENCES IN TEXT

This chapter, referred to in subsecs. (a) and (b), was in the original "this Act", meaning Pub. L. 101–336, July 26, 1990, 104 Stat. 327, which is classified principally to this chapter. For complete classification of this Act to the Code, see Short Title note set out under section 12101 of this title and Tables.

AMENDMENTS

2014—Subsec. (c)(2). Pub. L. 113–287 substituted "division A of subtitle III of title 54" for "the National Historic Preservation Act (16 U.S.C. 470 et seq.)".

18 U.S.C. § 1951

Section 1951 - Interference with commerce by threats or violence

(a) Whoever in any way or degree obstructs, delays, or affects commerce or the movement of any article or commodity in commerce, by robbery or extortion or attempts or conspires so to do, or commits or threatens physical violence to any person or property in furtherance of a plan or purpose to do anything in violation of this section shall be fined under this title or imprisoned not more than twenty years, or both.

(b) As used in this section-

(1) The term "robbery" means the unlawful taking or obtaining of personal property from the person or in the presence of another, against his will, by means of actual or threatened force, or violence, or fear of injury, immediate or future, to his person or property, or property in his custody or possession, or the person or property of a relative or member of his family or of anyone in his company at the time of the taking or obtaining.

(2) The term "extortion" means the obtaining of property from another, with his consent, induced by wrongful use of actual or threatened force, violence, or fear, or under color of official right.

(3) The term "commerce" means commerce within the District of Columbia, or any Territory or Possession of the United States; all commerce between any point in a State, Territory, Possession, or the District of Columbia and any point outside thereof; all commerce between points within the same State through any place outside such State; and all other commerce over which the United States has jurisdiction.

(c) This section shall not be construed to repeal, modify or affect section 17 of Title 15, sections 52, 101-115, 151-166 of Title 29 or sections 151-188 of Title 45.

18 U.S.C. § 1951

June 25, 1948, ch. 645, 62 Stat. 793; Pub. L. 103-322, title XXXIII, §330016(1)(L), Sept. 13, 1994, 108 Stat. 2147.

HISTORICAL AND REVISION NOTES*Based on title 18, U.S.C., 1940 ed., §§420a-420e-1 (June 18, 1934, ch. 569, §§1-6, 48 Stat. 979, 980; July 3, 1946, ch. 537, 60 Stat. 420).Section consolidates sections 420a to 420e-1 of Title 18, U.S.C., 1940 ed., with changes in phraseology and arrangement necessary to effect consolidation.Provisions designating offense as felony were omitted as unnecessary in view of definitive section 1 of this title. (See reviser's note under section 550 of this title.) Subsection (c) of the revised section is derived from title II of the 1946 amendment. It substitutes references to specific sections of the United States Code, 1940 ed., in place of references to numerous acts of Congress, in conformity to the style of the revision bill. Subsection (c) as rephrased will preclude any construction of implied repeal of the specified acts of Congress codified in the sections enumerated.The words "attempts or conspires so to do" were substituted for sections 3 and 4 of the 1946 act, omitting as unnecessary the words "participates in an attempt" and the words "or acts in concert with another or with others", in view of section 2 of this title which makes any person who participates in an unlawful*

enterprise or aids or assists the principal offender, or does anything towards the accomplishment of the crime, a principal himself.Words "shall, upon conviction thereof," were omitted as surplusage, since punishment cannot be imposed until a conviction is secured.

EDITORIAL NOTES

REFERENCES IN TEXT*Sections 101-115 of Title 29, referred to in subsec. (c), is a reference to act Mar. 23, 1932, ch. 90, 47 Stat. 70, popularly known as the Norris-LaGuardia Act. For complete classification of this Act to the Code, see Short Title note set out under section 101 of Title 29, Labor, and Tables.Section 11 of that act, formerly classified to section 111 of Title 29, was repealed and reenacted as section 3692 of this title by act June 25, 1948, ch. 645, §21, 62 Stat. 862, eff. Sept. 1, 1948.Section 12 of that act, formerly classified to section 112 of Title 29, was repealed by act June 25, 1948, and is covered by rule 42(b) of the Federal Rules of Criminal Procedure, set out in Appendix to this title.Section 164 of Title 45, included within the reference in subsec. (c) to sections 151-188 of Title 45, was repealed by act Oct. 10, 1940, ch. 851, §4, 54 Stat. 1111.Section 186 of Title 45, included within the reference in subsec. (c) to sections 151-188 of Title 45, was omitted from the Code.*

AMENDMENTS1994*-Subsec. (a). Pub. L. 103-322 substituted "fined under this title" for "fined not more than $10,000".*

STATUTORY NOTES AND RELATED SUBSIDIARIES

SHORT TITLE*This section is popularly known as the "Hobbs Act".*

casetext

Tenn. Code § 39-16-403

Section 39-16-403 - Official oppression

(a) A public servant acting under color of office or employment commits an offense who:

(1) Intentionally subjects another to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful; or

(2) Intentionally denies or impedes another in the exercise or enjoyment of any right, privilege, power or immunity, when the public servant knows the conduct is unlawful.

(b) For purposes of this section, a public servant acts under color of office or employment if the public servant acts, or purports to act, in an official capacity or takes advantage of the actual or purported capacity.

(c) An offense under this section is a Class E felony.

(d) Charges for official oppression may be brought only by indictment, presentment or criminal information; provided, that nothing in this section shall deny a person from pursuing other criminal charges by affidavit of complaint.

T.C.A. § 39-16-403

Acts 1989, ch. 591, § 1; 1990, ch. 980, § 11.

casetext

REPORTING ELDER ABUSE AND NEGLECT

According to the National Center on Elder Abuse, only 1 in 14 cases of elder abuse ever come to the attention of authorities.

Tennessee is a mandatory reporting state. If you see abuse — or even suspect that an adult is being abused, neglected or exploited — you must report it. Call the Tennessee Department of Human Services Adult Protective Services unit, toll-free at **888-277-8366**.

WHO SHOULD I TELL?

If the abuse is happening now, call 911.

If you suspect elder or adult abuse, call Adult Protective Services at **888-277-8366**.

If the abuse is physical, call Tennessee Domestic Violence Hotline at **800-356-6767**.

WARNING SIGNS OF PHYSICAL ABUSE

Bruising, especially in the torso or head; frequent injuries from accidents; broken eyeglasses or frames; caregiver's refusal to allow visitors alone with the older person.

WARNING SIGNS OF EMOTIONAL ABUSE

Isolation of the older person or refusing to allow visits alone with the senior; observed threatening or belittling of the older person by the caregiver.

WARNING SIGNS OF NEGLECT

Unusual weight loss; malnutrition; dehydration; untreated physical problems; unsafe and unsanitary living conditions such as dirt, vermin, soiled clothes and bedding; inappropriate clothing for the weather; desertion or abandonment of the older person in a public place.

WARNING SIGNS OF FINANCIAL EXPLOITATION

Significant withdrawals from the vulnerable adult's accounts; sudden changes in their financial circumstances; valuable items or cash missing from their home; increase in junk mail soliciting purchases or payments for sweepstakes money; neglect of the victim, such as no food in the home; and maintenance and repairs of the home are ignored.

TCAD TENNESSEE COMMISSION ON AGING AND DISABILITY
502 Deaderick Street | Nashville, Tennessee 37243 | www.tn.gov/aging | Main Office 615-741-2056
Information and Assistance 866-836-6678 | SHIP Medicare Counseling 877-801-0044

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America v. Cason Moreland *Defendant(s)*	)))))))	Case No. 3:18mj3002

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Feb. 1, 2017 to Feb. 14, 2018 in the county of Davidson in the Middle District of Tennessee, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. 1512	Tampering with a witness, victim, or an informant
18 U.S.C. 1519	Destruction, alteration, or falsification of records in Federal investigations

This criminal complaint is based on these facts:

See the attached Afidavit of FBI Special Agent Mark Shafer.

Managed out of the Memphis Field Office
"Nashville Resident Agency" (Satellite)
2868 Elm Hill Pike, Nashville, TN 37214

FBI Special Agent Mark Shafer
Email: mshafer@fbi.gov
Phone: (615) 232-7513

☑ Continued on the attached sheet.

Complainant's signature

FBI Special Agent Mark Shafer
Printed name and title

Sworn to before me and signed in my presence.

Date: 02/28/2018

Judge's signature

City and state: Nashville, TN

Magistrate Judge Joe B. Brown
Printed name and title

Memphis — FBI

https://www.fbi.gov/contact-us/field-offices/memphis

An official website of the United States government. Here's how you know

MORE > CONTACT US > FIELD OFFICES FBI Search

MEMPHIS

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As the nation recognizes Police Week, FBI Director Christopher Wray expressed his gratitude to law enforcement officers nationwide.

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06.14.2022 Former Memphis Police Officer Indicted for Sexually Assaulting a Female Crime Victim

06.07.2022 Memphis Man Sentenced to 11 Years for Leading Role in Cocaine Distribution Conspiracy

More

Reporting Crime

You can report suspicious activities and crime by contacting your local FBI office 24 hours a day, seven days a week. You can also submit a tip electronically at tips.fbi.gov.

Hiring and Recruitment

Visit FBIJobs.gov for information on current hiring and recruitment opportunities, including internships and collegiate hiring.

Contact Us

225 North Humphreys Boulevard
Suite 3000
Memphis, TN 38120
(901) 747-4300

Special Agent in Charge

Douglas Korneski

Assistant Special Agents in Charge

- Jeremy N. Baker
- Matt Foster
- Bryan McCloskey

Resident Agencies

Along with our main office in Memphis, we have five satellite offices, known as resident agencies, in the area.

Clarksville ▸
Columbia ▸
Cookeville ▸
Jackson ▸
Nashville ▾

Counties covered: Davidson, Sumner, Rutherford, and Williamson

Tweets by @FBIMemphis

FBI Memphis @FBIMemphis

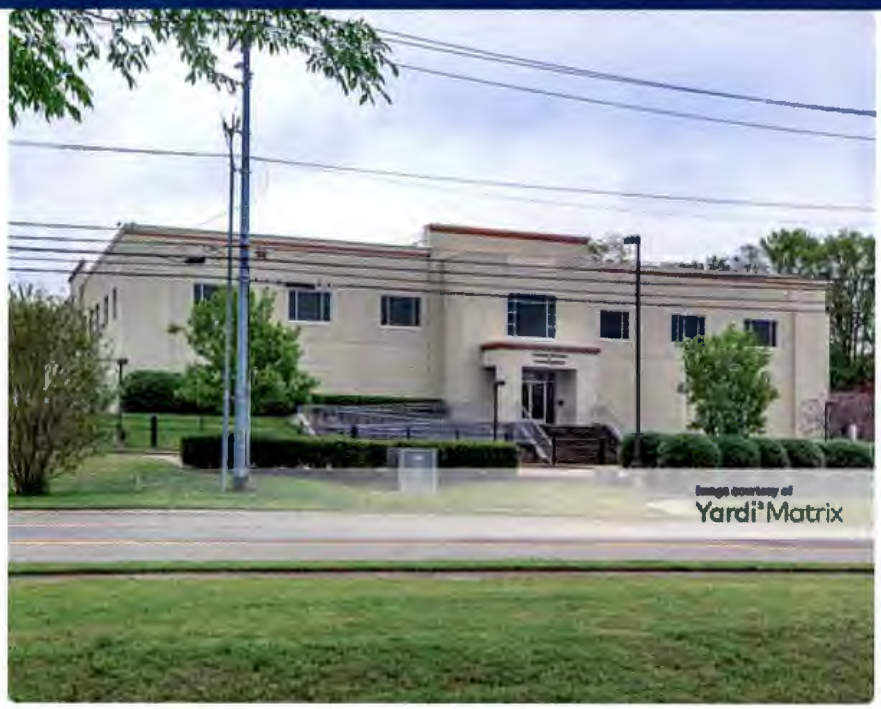
The #FBI wants to prevent you from becoming victims of virtual kidnapping for ransom schemes. Victims get calls from criminals claiming to have kidnapped their loved ones and threaten to harm them unless a ransom is paid. Learn more here: ow.ly/rBAz50JGTKu.

Embed View on Twitter

FBI FEDERAL BUREAU OF INVESTIGATION

FBI.gov Contact Center

CommercialCafe®



Details | Contacts | Documents | Tax | Location

FBI Building Off-Market

2868 Elm Hill Pike, Nashville, TN 37214

Property Type
Office - Government Office

Property Size
31,000 SF

Lot Size
3 Acre

Parking Spaces Avail.
136

Parking Ratio
4.40/ 1,000 SF

Property Tenancy
Single Tenant

Building Class
B

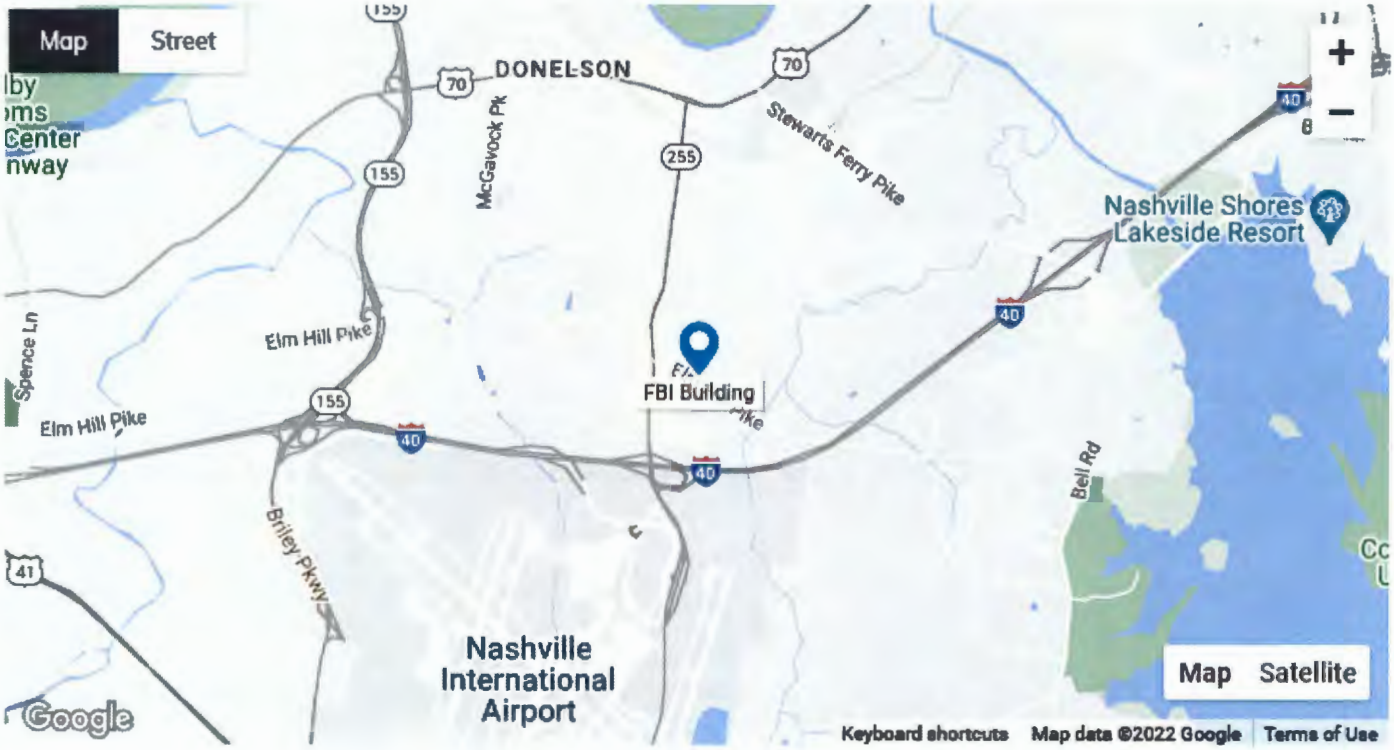
Year Built
2005

Sales

Purchase Date
13 Jan, 2022

Purchase Price

Location



Frequently Asked Questions

What is the total square footage of FBI Building?

FBI Building totals 31,000 square feet.

When was this property built?

FBI Building was built in 2005.

When was FBI Building last sold?

FBI Building was last sold on 13 Jan, 2022.

FBI Building, Nashville, TN 37214 - Office Space

FBI Building is located at 2868 Elm Hill Pike in the Donelson neighborhood, TN, Nashville, 37214. The Class B Office building was completed in 2005 and features a total of 31,000 SF.

Case Summary

3:18-mj-03002 All Defendants USA v. Moreland
Date filed: 02/28/2018
Date of last filing: 03/14/2018

Cason Moreland (1)
Office: Nashville **Filed:** 02/28/2018
County: Davidson **Terminated:** **Reopened:**
Other Court Case: None

Complaint **Citation:** **Offense Level:** 4
18:1512 Tamper with a witness, victim or informant, 18:1519 Destruction, alteration, or falsification of records in a federal investigation
Defendant Custody Status: Custody This Court

Defendant: Cason Moreland	**represented by**	Peter J. Strianse(Designation Retained)	**Phone:**(615) 244-2770 **Fax:** (615) 244-2778 **Email:** pstrianse@tewlawfirm.com
Plaintiff: USA	**represented by**	Cecil W. VanDevender(Designation Assistant US Attorney)	**Phone:**(615) 401-6595 **Fax:** (615) 401-6626 **Email:** cecil.vandevender@usdoj.gov

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America v. Cason Moreland *Defendant(s)*	)	Case No. 3:18mj3002

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

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This criminal complaint is based on these facts:

See the attached Afidavit of FBI Special Agent Mark Shafer.

☑ Continued on the attached sheet.

Complainant's signature

FBI Special Agent Mark Shafer

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/28/2018

Judge's signature

City and state: Nashville, TN

Magistrate Judge Joe B. Brown

Printed name and title

STATEMENT IN SUPPORT OF COMPLAINT

I, Mark Shafer, being duly sworn, deposes and states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for twenty years. As a Special Agent, I am charged with the responsibility of investigating violations of the laws of the United States Code, including, but not limited to, violations of Title 18, United States Code, Sections 666 (federal programs theft/bribery), 1341, 1343, and 1346 (honest services fraud), 1951 (Hobbs Act extortion under color of official right), as well as Sections 1503, 1510, 1512, 1513, and 1519 (obstruction of justice), and collecting evidence in matters in which the United States is or may be a party of interest. I have received specialized training to perform those official duties and responsibilities. I have been exposed to a variety of investigative techniques and resources, which include, but are not limited to, physical surveillance, electronic surveillance, monitoring court-authorized wiretaps, managing the use of confidential sources ("CS"), consensual monitoring of conversations, the use of vehicle tracking devices, conducting searches of physical locations, and conducting searches of electronic storage media, e.g., computers, cell phones, and other digital storage devices, all of which may be utilized to retain information such as, among other things, documents, e-mails, text messages, pictures, voice notes, contact lists and call logs.

2. I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation from discussions with Special Agents and Analysts with the FBI; from my discussions with witnesses involved in the investigation; from my review of recordings made during the course of the investigation; and from my review of other records and reports relating to the investigation. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by an FBI Special Agent or Analyst, or a witness who may have had either direct or hearsay knowledge of that statement and

to whom I or others have spoken or whose reports I have read and reviewed. Such statements are among many statements made by others and are stated in substance and in part unless otherwise indicated. Where statements from recorded calls or meetings are set forth in quotation marks, these quotes represent an attempt at rough transcription based on the recordings, which have not been officially transcribed. This affidavit does not contain all the information known to me regarding this investigation but only what I believe to be sufficient facts for the sole purpose of establishing probable cause for the arrest of Cason ("Casey") MORELAND. Therefore, I have not set forth each and every fact that I have learned during the course of this investigation. Facts not set forth herein are not being relied upon in reaching my conclusion that an arrest warrant should be issued. Nor do I request that the Court rely on any facts not set forth herein.

3. This affidavit is presented in support of an arrest warrant for Cason ("Casey") MORELAND, and a complaint charging that, beginning in or about February 2017 and continuing on through at least February 13, 2018, in the Middle District of Tennessee and elsewhere, MORELAND did knowingly obstruct justice through destruction of records, in violation of Title 18, United States Code, Sections 1519 and 2, and attempt to obstruct justice through witness tampering, in violation of Title 18, United States Code, Section 1512(b)(1).

THE FEDERAL CRIMINAL INVESTIGATION INTO MORELAND

Background of the Investigation & Indictment

4. Until on or about April 4, 2017, MORELAND was a Judge on the General Sessions Court of Metropolitan Nashville & Davidson County, Tennessee. MORELAND presided over Division X of the General Sessions Court and heard civil, criminal, and traffic cases. MORELAND had previously served as Presiding Judge of the General Sessions Court and directed the administration of two specialized court programs—the General Sessions Drug Treatment Court

(now known as the General Sessions Recovery Court), and the Cherished H.E.A.R.T.S. program—until his resignation from those positions on or about February 3, 2017.

5. On or about January 25, 2017, the FBI opened a federal criminal investigation into whether MORELAND and others violated federal anti-corruption statutes, including 18 U.S.C. Sections 1341, 1343, and 1346 (honest services fraud); and 18 U.S.C. Section 1951 (Hobbs Act extortion under color of official right).

6. In or about February 2017, a federal grand jury in the Middle District of Tennessee began to investigate whether MORELAND and others had violated federal anti-corruption laws. The grand jury issued its first subpoena in furtherance of the investigation on or about February 15, 2017.

7. The federal criminal investigation initially centered on allegations that MORELAND solicited, accepted, and extorted things of value—including sexual favors, travel, and lodging—from persons with whom he had close personal relationships, in return for performing official acts that benefitted these persons and their associates. As described in greater detail below, the federal criminal investigation also encompasses allegations that MORELAND participated in a scheme to steal, for his own personal use, funds belonging to the Davidson County Drug Court Foundation (the "Drug Court Foundation"),[1] in violation of 18 U.S.C. Section 666.

8. On or about March 28, 2017, I submitted a criminal complaint in the Middle District of Tennessee, stating that MORELAND had violated 18 U.S.C. Sections 1510, 1512, and 1513; on or about April 26, 2017, a federal grand jury in the Middle District of Tennessee returned a five-count indictment, alleging that MORELAND had violated 18 U.S.C. Sections 2, 1510(a), 1512(b)(3), 1512(c)(2), 1513(e), and 1519 by, among other things, attempting to persuade and

[1] The Drug Court Foundation is now known as the Tennessee Recovery Foundation.

bribe a woman with whom he had had a sexual relationship to sign an affidavit containing false statements, and scheming to plant drugs in that woman's car to discredit her. Specifically with respect to the bribe, the indictment alleges that on or about March 11, 2017, MORELAND provided $5,100 in cash to be used to persuade the woman to sign the affidavit, and that he provided an additional $1,000 in cash later that same day. The indictment is pending in the Middle District of Tennessee.

MORELAND's Knowledge of the Investigation in February 2017

9. There is probable cause to believe that MORELAND was well aware of the federal investigation in February 2017.

10. On or about February 1, 2017, FBI agents, identifying themselves as such, made contact with MORELAND and attempted to interview him. CS-1, discussed in more detail below, was present and observed FBI agents contacting MORELAND. MORELAND advised the agents to speak to his attorney. MORELAND's attorney then contacted the U.S. Attorney's Office.

11. On or about February 23, 2017, MORELAND's attorney met with the U.S. Attorney's Office to discuss the status of the criminal investigation.

12. On or about February 7, 2017, the local media publicly reported the existence of the federal criminal investigation into MORELAND's conduct. *See* Stacey Barchenger, *FBI Looks Into Allegations Involving Nashville Judge Casey Moreland*, THE TENNESSEAN, Feb. 7, 2017; Ben Hall & Phil Williams, *FBI Investigates Nashville Judge's Relationships*, NEWSCHANNEL 5, Feb. 7, 2017.

MORELAND'S RELATIONSHIPS WITH THE DRUG COURT FOUNDATION AND CS-1

The Drug Treatment Court & the Drug Court Foundation

13. The General Sessions Drug Treatment Court was a program designed to address certain criminal defendants' substance abuse issues by, among other things, referring them to, and monitoring their participation in, outpatient drug treatment and counseling programs. MORELAND oversaw the Drug Treatment Court before resigning from that position. Numerous others assisted MORELAND as part of a "team" monitoring Drug Treatment Court participants' progress, including representatives from the local Office of the District Attorney General, the Public Defender's Office, and treatment providers.

14. The Drug Court Foundation was created in or about 2009 as an independent nonprofit entity organized under 26 U.S.C. Section 501(c)(3). Although it was ostensibly managed by a Board of Directors, of which MORELAND was not a member, MORELAND took an active role in the Drug Court Foundation's management. Additionally, MORELAND's judicial assistant (employed in that position by Metropolitan Government of Nashville and Davidson County) was employed by the Drug Court Foundation as its bookkeeper. In that capacity, MORELAND's judicial assistant controlled the Drug Court Foundation's checkbook and had authority to write checks on its behalf.

15. In or about 2012, the Drug Court Foundation launched the Court Foundation Center.[2] The Court Foundation Center was an outpatient treatment facility designed to provide substance abuse counseling services, in the form of group sessions held approximately three times

[2] The Court Foundation Center is now known as the Tennessee Center for Change.

each week. The day-to-day manager of the Court Foundation Center was CS-1, who conducted various administrative and managerial tasks and personally ran some group counseling sessions.

16. The vast majority of participants in the Court Foundation Center's treatment services were referred there by the General Sessions Drug Treatment Court team, over which MORELAND presided. Costs associated with these participants, including an hourly wage for CS-1 (up to an agreed-upon cap based on the availability of funds), were reimbursed by the Drug Court Foundation.[3] Invoices for the Court Foundation Center's costs were routinely submitted to MORELAND's judicial assistant, who would routinely write checks from the Drug Court Foundation in response.

17. In addition to participants referred by the Drug Treatment Court team, the Court Foundation Center treated people who were not before the Drug Treatment Court, such as certain individuals charged with driving under the influence of alcohol who were eligible to participate in an outpatient treatment program in exchange for a reduction in their prison sentences. These individuals, known as "self-pay" clients, were required to pay for their treatment in cash or via money order; self-pay clients were initially charged approximately $500 for a six-month course of outpatient counseling sessions, although at some point that amount increased to approximately $750. However, self-pay clients participated in the same group counseling sessions as participants referred from Drug Treatment Court; thus, expenses associated with their treatment such as rent, utilities, and an hourly wage for CS-1 were effectively paid by the Drug Court Foundation.

[3] For a period after the Court Foundation Center was created, funding from the Drug Court Foundation was occasionally inadequate to cover the costs associated with all participants, and the Court Foundation Center effectively treated some participants for free.

18. Court Foundation Center staff maintained records of attendance at counseling sessions by all participants ("attendance logs"), as well as records reflecting payments by self-pay clients ("receipts").

MORELAND's and CS-1's Arrangement to Keep Cash[4]

19. Until in or about 2016, with MORELAND's knowledge and approval, CS-1 kept the cash paid by self-pay clients for herself in addition to billing the Drug Court Foundation for her time. Between the creation of the Court Foundation Center and the end of 2016, the volume of self-pay clients increased, and by early 2016 CS-1 was keeping thousands of dollars in cash each month.

20. In or about spring 2016, CS-1 became uncomfortable with the large quantities of cash she was taking, and she approached MORELAND with her concerns. MORELAND suggested that CS-1 begin bringing him half of the cash she kept each month: he told her to bring half of the cash in an envelope to his personal office in the General Sessions courthouse. CS-1 complied, bringing MORELAND half of the cash from self-pay clients she received each month, typically leaving a plain white envelope containing the cash on MORELAND's desk while MORELAND himself was not present.

21. Later in 2016, CS-1 returned to MORELAND and again expressed discomfort with the cash she was taking. CS-1 told MORELAND that, instead of keeping cash from self-pay clients, she would prefer to be permitted to submit invoices for all of her hours worked without having to reduce them to a specified limit. MORELAND agreed, telling CS-1 that she could submit invoices for all of her hours worked, and that in exchange CS-1 should begin delivering all

[4] Unless otherwise indicated, the facts recounted in this section are based on CS-1's account of events.

of the cash she received from self-pay clients to him. CS-1 began doing so, again typically leaving a plain white envelope containing the cash on MORELAND's desk while MORELAND was absent from his office.

22. CS-1's payments to MORELAND continued until in or about February 2017, as the federal investigation was underway.

MORELAND's Request that CS-1 Store Cash[5]

23. In or about February 2017, CS-1 and MORELAND were both present in the General Sessions courthouse, having participated in a Drug Treatment Court meeting. MORELAND asked CS-1 to meet him in the building's parking garage following the meeting; in the parking garage, he handed her an envelope full of cash, which appeared to CS-1 to be identical to the envelopes full of cash she had routinely brought to MORELAND's office. MORELAND told CS-1 to hold onto the money, and to buy a lockbox in which to store it. On or about February 15, 2017, CS-1 purchased a lockbox (after texting a picture of the lockbox to MORELAND for MORELAND's approval) and kept the cash MORELAND had given her inside the lockbox, which she stored in a filing cabinet at the Court Foundation Center. CS-1 sought and obtained reimbursement for her purchase of the lockbox from MORELAND's judicial assistant.

24. Several weeks later, in or about March 2017, MORELAND contacted CS-1 and asked her to bring him the cash at his sister's house. CS-1 brought him the cash as requested. MORELAND removed the cash from the envelope and counted it in front of CS-1; the total amount of cash in the envelope came to approximately $6,000, and the denominations of the bills were consistent with the denominations of the bills CS-1 routinely brought to MORELAND's office.

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[5] Unless otherwise indicated, the facts recounted in this section are based on CS-1's account of events.

25. MORELAND told CS-1 that the money would ensure "she told the truth," or words to that effect. Based on the timing and context of that conversation, I believe it is reasonable to conclude that MORELAND was referring to the bribe payment referred to above in paragraph 8 in connection with a draft affidavit.

MORELAND'S SCHEME TO DESTROY COURT FOUNDATION CENTER RECORDS[6]

26. In or about mid-February 2017, MORELAND and CS-1 discussed the records that the Court Foundation Center maintained. MORELAND suggested that CS-1 destroy all records that would reflect cash paid to the Court Foundation Center: specifically with respect to those records, MORELAND told CS-1 words to the effect of: "Make sure everything is taken care of." CS-1 believed based on that conversation that MORELAND wanted those records to be inaccessible to law enforcement.

27. On or about March 2, 2017, CS-1 gathered up the Court Foundation Center's receipts and attendance logs covering the period from approximately 2012 through approximately 2016. CS-1 tore up those records into pieces and deposited the pieces in a dumpster behind the Court Foundation Center building.

28. Following CS-1's destruction of the Court Foundation Center's records, MORELAND and CS-1 had another conversation, during which MORELAND asked CS-1 whether "everything was taken care of over there," or words to that effect. CS-1 informed MORELAND that the records were destroyed, and MORELAND responded approvingly.

29. Following that interaction, CS-1 and MORELAND continued to stay in touch with one another, including on occasion by meeting in person for lunch. These contacts included a

[6] Unless otherwise indicated, the facts recounted in this section are based on CS-1's account of events.

lunch meeting between the two of them on or about December 22, 2017, and a series of text messages regarding a potential future lunch meeting between the two of them on or about January 22, 2018.

MORELAND'S RECORDED CONVERSATIONS WITH CS-1 AND HIS ATTEMPT TO INFLUENCE CS-1'S TESTIMONY

30. Beginning on or about January 29, 2018, CS-1 met several times with FBI agents conducting the above-described investigation. CS-1 agreed to meet and consensually record a conversation with MORELAND. At the FBI's direction, CS-1 arranged to meet with MORELAND for lunch on or about February 9, 2018, by telling him that she wanted to talk about having been approached by federal investigators. CS-1 agreed to tell MORELAND that she had been subpoenaed to testify before a grand jury, and to express concerns that investigators would learn about the cash she had brought MORELAND from the self-pay clients. In addition to that recorded conversation during the lunch meeting, CS-1 consensually recorded a telephone call with MORELAND after their lunch on or about February 9, 2018; exchanged text messages with MORELAND following the telephone call on or about February 9, 2018; consensually recorded a telephone call with MORELAND on or about February 13, 2018; and consensually recorded a telephone call with MORELAND on or about February 14, 2018.

31. On or about February 9, 2018, during their consensually recorded conversation at lunch, CS-1 told MORELAND that she had received a subpoena for the "Wednesday [i.e., February 14, 2018] grand jury." MORELAND repeatedly pressed CS-1 for details of what the FBI had asked her,[7] and during the subsequent consensually recorded telephone call he asked her

[7] In response to one such inquiry, CS-1 told MORELAND that investigators "asked about—they want all the receipts and books and all of that, and the receipt book, of course, is gone, you know, like we talked about last time. But there is an attendance log, and that shows all of the people that—cash people." MORELAND replied, "Just 'cause they came don't mean they paid."

to call him after she testified before the grand jury. MORELAND further requested that she provide him with a copy of all documents she produced in response to the grand jury subpoena. When CS-1 advised him that the full document production would be voluminous, MORELAND asked that she instead provide him with a list of documents produced.

32. During the lunch meeting on or about February 9, 2018, and in various recorded conversations that followed, CS-1 repeatedly told MORELAND that she was concerned about whether anyone else knew that she had delivered envelopes full of cash to his office. At certain points, MORELAND denied any knowledge of these cash payments. At other points, however, MORELAND responded in ways that indicated he was in fact well aware of them. For example:

a. On or about February 9, 2018, CS-1 asked MORELAND whether particular named individuals knew about her bringing cash to him in his office. In response, MORELAND assured her that "not a soul" knew, "not even Jackie." I believe that MORELAND's reference to "Jackie" was a reference to his wife.

b. On or about February 9, 2018, CS-1 told MORELAND that she was worried that there would be "cameras or something" that would show her putting envelopes on his desk. In response, MORELAND stated, "I had stuff put on my desk all the time."

c. On or about February 14, 2018, CS-1 told MORELAND that she had just testified in front of the grand jury and had "told them about me collecting the cash, about me giving you cash, about the lockbox, about me bringing cash out to your sister's

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CS-1 asked, "But what if they know it? What if they contact those people?" MORELAND responded, "That's a lot of contacting."

house. I told them all of it." After a long pause, MORELAND responded, "All right."

33. During the lunch meeting on or about February 9, 2018, and in various recorded conversations that followed, CS-1 also repeatedly asked MORELAND what she should do about the fact that she, while acting at his direction, had destroyed the receipt book containing records of the clients who had paid cash. MORELAND's responses corroborated CS-1's statements that MORELAND had in fact directed her to destroy the receipt book. For example:

a. On or about February 9, 2018, CS-1 asked MORELAND what she should say if "they ask me about the receipt book? Where's the receipt book?" MORELAND responded, "Where is it?" After several seconds during which no intelligible conversation can be heard on the audio recording of their conversation, CS-1 stated, "Yes, it's gone. Just like we talked about." MORELAND stated, "If it's gone, it's gone." CS-1 then asked, "But what are they gonna say? What are they gonna say about why it's gone? 'Well, [CS-1], where are these receipt books?'" MORELAND told CS-1: "Well, just say, look, for the longest time you didn't write receipts. Very few paid. Most people had grants and stuff like that. All that money went to the Foundation."

b. On or about February 9, 2018, CS-1 told MORELAND that the FBI had spoken to her about "all the records I need to bring" to grand jury. CS-1 added, "And of course there's going to be the glaring hole about the receipt book. And that, you know, was destroyed last year. What am I going to say about that?" MORELAND responded, "Well, if it's lost, it's lost. If it's gone, it's gone. Ain't the only thing

to have gone missing down there. I mean, we don't deal with the most honest people in the world to begin with."

c. On or about February 9, 2018, CS-1 again told MORELAND that the FBI "want[s] receipt books, I don't have those." MORELAND responded, "You got some now, though, don't you?" CS-1 acknowledged that she did have new receipts books, but that they only went back to 2017. CS-1 again predicted that she would be asked "what happened to the ones before then?" MORELAND asked her what she would say if asked, and CS-1 responded, "I can't say, well, I destroyed them, because [unintelligible] I was giving money." MORELAND laughed in response, and added, "Well, if they're gone, they're gone. They're gone."

d. On or about February 14, 2018, CS-1 also advised MORELAND that, during her grand jury testimony, she had "told them about you talking to me about tearing up the receipt book. They know all of it now. I couldn't lie." After a long pause, MORELAND responded, "All right."

34. Throughout the conversations between on or about February 9 and on or about February 13, 2018, MORELAND repeatedly suggested various false cover stories that CS-1 could provide to the grand jury to explain what happened to the cash that CS-1 was collecting at the Center, and the receipt books documenting that collection. For example:

a. During the lunchtime conversation on or about February 9, 2018, MORELAND suggested to CS-1 at various points: that many attendees never paid anything; that CS-1 "bought stuff with that cash"; that CS-1 "bought chairs" and "other things" such as "meals for parties and stuff like that"; and that employees at the Center and attendees in the program may have stolen the cash, stating, "Money's been taken

out of drawers down there. And there's cash, there's been cash come up missing. . . . I mean, we are dealing with criminals."

b. In an exchange of text messages on or about February 9, 2018, MORELAND asked CS-1, "Didn't the foundation spend a lot of cash on that family whose house burnt?" CS-1 replied, "Sort of remember that. Why?" MORELAND responded, "Where some of the cash may have went along with helping clients here and there[.]" CS-1 asked, "Is that what I should say?" MORELAND replied, "Just saying the foundation used the money to help clients, cash and checks[.]" CS-1 responded, "Anytime we helped clients it was. With a check. I'm worried about the undocumented cash." MORELAND replied, "We gave cash at times ! I know I dug into my pocket many times[.]" CS-1 responded, "Digging in your pocket doesn't help explain where the foundation cash is." MORELAND reiterated, "I'm just saying we gave out cash here and there many times[.]"

c. During the consensually recorded conversation on or about February 13, 2018, MORELAND told CS-1, "I can't believe you didn't recall that guy whose house burnt!" CS-1 replied, "I mean, that was, that was, like, three years ago. Or way in the past." MORELAND responded, "Well, but I mean, I'm just using that as an example of times that we probably would've used cash. Took 'em on a Walmart spree, things like that. Christmas parties. Thanksgiving."

d. During the lunch meeting on or about February 9, 2018, MORELAND also suggested to CS-1 that she should tell the grand jury that any receipt books prior to 2017 were simply unavailable, repeatedly stating, "If they're gone, they're gone,"

or similar words to that effect. MORELAND further explained to CS-1 that "shoddy bookkeeping" is "not a crime."

35. During the lunch meeting on or about February 9, 2018, MORELAND also asked CS-1 to tell the grand jury that he had no involvement with the Center and did not know about any cash. MORELAND stated, "I don't even know about money. And you can tell 'em that, if you don't mind. That I never had anything to do with any money, because I didn't." MORELAND subsequently reiterated, "I'd appreciate it if you tell 'em I never had anything to do with that place down there. And y'all wouldn't—." CS-1 interrupted to ask, "What, the Center?" MORELAND replied, "Uh-huh."

36. During the lunch meeting on or about February 9, 2018, MORELAND twice assured CS-1 that she could only get in trouble with investigators if she gave them information. At one point, CS-1 told MORELAND, "I'm just, cannot—and plus, you know, I know the Foundation, if this comes out, my life's gonna be destroyed." MORELAND replied, "There's no way it'll come out. Unless you say something." Later during the lunch meeting, CS-1 told MORELAND, "I'm just so scared." MORELAND replied, "They're not after you." CS-1 responded, "They can get after me though." MORELAND told CS-1, "Only if you let 'em."

CONCLUSION

37. The numerous explanations and rationalizations that MORELAND proposed in the above paragraphs to account for missing cash—including the claim that MORELAND had no knowledge of the cash, the claim that receipts were never kept for some participants, the claim that CS-1 did not handle cash for some time, the claim that cash was used to buy office supplies or meals, the claim that cash was used as petty cash, the claim that cash and the receipt book were likely stolen, the claim that bookkeeping was generally shoddy, and the claim that cash was

frequently used to help clients—are all inconsistent with CS-1's recollection. Based on the above-described conversations between MORELAND and CS-1, as well as CS-1's description of her independent recollection of keeping cash from self-pay clients and delivering that cash to MORELAND, I believe there is probable cause to believe that MORELAND attempted to obstruct justice through witness tampering, in violation of Title 18, United States Code, Section 1512(b)(1).

38. Likewise, based on CS-1's independent recollection about the destruction of Court Foundation Center records, as well as my review of the consensually recorded conversations between CS-1 and MORELAND—including MORELAND's repeated acknowledgement that records from the Court Foundation Center were gone, and his reaction when told that CS-1 had told the grand jury that she had destroyed the records at his direction—I believe there is probable cause to believe that MORELAND knowingly directed the destruction of records in a Federal investigation, in violation of Title 18, United States Code, Sections 1519 and 2.

39. Based upon my training and experience, and the totality of the facts described above, I believe there is probable cause to believe that, beginning not later than February 1, 2017, continuing on through at least February 13, 2018, in the Middle District of Tennessee and elsewhere, MORELAND did knowingly obstruct justice through destruction of records, in violation of Title 18, United States Code, Sections 1519 and 2, and attempt to obstruct justice through witness tampering, in violation of Title 18, United States Code, Section 1512(b)(1).

JB

8/29/2019	9:17 AM	HUSBAND'S RESPONSE AND COUNTERMOTION TO WIFE'S MOTION FOR VIOLATION OF THE EX PARTE ORDER OF PROTECTION AND FOR DATE CERTAIN FOR WALK THROUGH OF HOUSE AND MOTION FOR SCHEDULING ORDER	63-PAGES (Primary) TR. v1 (page 119) through TR.v2 (page 181) v1: 124 through v2: 32		TR. v1-v3 (p119 - 380)	v1: 124-155 v2: 2-151 v3: 2-80		Court started at 9am... texted M stayed up several nights in a row p Exhibit-B, had to run out the door minutes AFTER court started, then where I handed Virginia Story Copi copies of my signed and stamped r

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