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

JEFFREY RYAN FENTON, PLAINTIFF V. **VIRGINIA LEE STORY ET AL.,** DEFENDANTS	**CASE NO. 3:24-CV-01282**

RECEIVED
FEB 27 2025
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

— NOTICE TO ALL BAR MEMBERS[1] —

Every bar defendant, their counsel, the management and owners of each of those law firms, every federal district judge and magistrate judge working in the United States District Court for the Middle District of Tennessee (recused or otherwise), along with all staff attorneys, licensed court clerks, and law clerks who have contact with this case including judges and other bar members chosen, appointed, or assigned to hear and/or administer this case hereafter by the court, every bar member and judge in the Sixth Circuit Court of Appeals who has knowledge of, contact with, or involvement with this case, every judge and attorney who has contact with, knowledge of, or involvement with this case who is employed or contracted by Williamson County or the State of Tennessee, including the Tennessee Supreme Court, the Tennessee Court of Appeals Middle

[1] This lawsuit was originally filed on October 13, 2023, in the United States District Court for the Western District of Michigan (hereinafter "MIWD") as case no. 1:23-cv-01097. On October 25, 2024, MIWD transferred this lawsuit as ordered in ECF 127 to the United States District Court for the Middle District of Tennessee (hereinafter "TNMD") as case no. 3:24-cv-01282. The language used in the file stamps of each page filed is slightly different between the two courts. MIWD uses the term "ECF No." (which I abbreviate as "ECF"), while in place of that, TNMD uses the term "Document" (which I abbreviate as "DOC"). Both courts use the term "PageID" (which I abbreviate as "PID"). Citations to the court record in this lawsuit will be notated without the case name or number, using the starting DOC/ECF number, followed by both the beginning and ending PID. The Notice of Electronic Filing for this transfer is recorded in TNMD DOC 131, at which point the DOC/ECF number from MIWD was retained and continued, but the PID was reset after DOC 130, PID 5727, to restart at zero.

Division, the Board of Professional Responsibility for the Supreme Court of Tennessee, and the Tennessee Administrative Office for the Courts, along with any other bar members who learn about the facts and misconduct documented in this lawsuit—including the supporting documents, declarations, evidence, and court records from the precipitating matters—is hereby given legal notice.

Depending upon your role in the Federal or Tennessee state court systems, and whether you are a judge, a supervising judge, or an attorney, each of you has a **duty** or **obligation** to report, inform, address, confront, correct, or discipline both attorney and judicial misconduct. It is not even a reasonable question to ask *whether* or not misconduct "that raises a substantial question regarding the lawyer's **honesty**, **trustworthiness**, or **fitness** as a lawyer[2]" (emphasis added) has taken place by (at the very least) defendants Story and Binkley in this case[3], after viewing the filings in this matter.

CLAIMING NOT TO SEE OR KNOW THE FACTS, EVIDENCE, DAMAGES, OR LAW TO ALLEVIATE LIABILITY

Attorneys are keen observers of the world around them. Many are slow to speak about facts and laws they claim to know, especially about matters which they are not getting paid to represent or to provide an opinion. Being an attorney is an occupation of arguing words, which often includes manipulating language in an attempt to make it best serve their interests in a matter.

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[2] Tenn. R. Sup. Ct. 2.15

[3] DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf
DOC 24, PID 2921-2947 | https://rico.jefffenton.com/evidence/2019-08-29_authentic-chancery-transcript-and-audio.pdf
DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

TENN. R. SUP. CT. 2.15

(Responding to Judicial and Lawyer Misconduct)

(A) A judge having **knowledge** that another **judge** has committed a violation of this Code that raises a substantial question regarding the judge's **honesty, trustworthiness,** or fitness as a judge in other respects **shall** inform the appropriate authority (emphasis added).

(B) A judge having **knowledge** that a **lawyer** has committed a violation of the Rules of Professional Conduct that raises a substantial question regarding the lawyer's **honesty, trustworthiness,** or **fitness** as a lawyer in other respects **shall** inform the appropriate authority (emphasis added).

(C) A judge who **receives information** indicating a substantial likelihood that another judge has committed a violation of this Code **shall** take appropriate action (emphasis added).

(D) A judge who **receives information** indicating a substantial likelihood that a lawyer has committed a violation of the Rules of Professional Conduct **shall** take appropriate action (emphasis added).

Comment

[1] Taking action to address known misconduct is a **judge's obligation.** Paragraphs (A) and (B) impose an obligation on the judge to **report to the appropriate disciplinary authority** the known misconduct of another judge or a lawyer that raises a substantial question regarding the **honesty, trustworthiness,** or **fitness** of that judge or lawyer. Ignoring or denying known misconduct among one's judicial colleagues or members of the legal profession **undermines a judge's**

responsibility to participate in efforts to ensure public respect for the justice system. This Rule limits the reporting obligation to those offenses that an independent judiciary **must** vigorously endeavor to prevent[4] (emphasis added).

[2] A judge who does not have actual knowledge that another judge or a lawyer may have committed misconduct, but receives information indicating a substantial likelihood[5] of such misconduct, **is required** to take appropriate action under paragraphs (C) and (D). Appropriate action may include, but is not limited to, communicating directly with the judge who may have violated this Code, communicating with a supervising judge, or reporting the suspected violation to the appropriate authority or other agency or body. Similarly, actions to be taken in response to information indicating that a lawyer has committed a violation of the Rules of Professional Conduct may include but are not limited to communicating directly with the lawyer who may have committed the violation, or reporting the suspected violation to the appropriate authority or other agency or body (emphasis added).

[4] Involving honesty and trustworthiness – exactly what is repeatedly shown and violated in the precipitating matters by defendants Binkley and Story (amongst others).

[5] **Everyone** on page one of this notice, has **"receive[d] information indicating a substantial likelihood of such misconduct."** Anyone who claims otherwise is either lying or only had very brief exposure to this case, without ever reading, or having a responsibility or duty to read, the documents served with this lawsuit to each and every defendant. I intentionally served these documents in my "lawsuit service package" (DOC 69, PID 5030-5042) to each defendant, for exactly this purpose.

TENN. R. SUP. CT. 8.3

(Reporting Professional Misconduct)

(a) A **lawyer** who **knows** that another **lawyer** has committed a violation of the Rules of Professional Conduct that raises a substantial question as to that lawyer's **honesty**, **trustworthiness**, or **fitness** as a lawyer in other respects, **shall inform** the Disciplinary Counsel of the Board of Professional Responsibility (emphasis added).

(b) A **lawyer** who **knows** that a **judge** has committed a violation of applicable rules of judicial conduct that raises a substantial question as to the judge's **fitness** for office **shall inform** the Disciplinary Counsel of the Board of Judicial Conduct (emphasis added).

Comment

[1] Self-regulation of the legal profession **requires** that members of the profession initiate disciplinary investigation when they **know** of a violation of the Rules of Professional Conduct. Lawyers have a similar obligation with respect to judicial misconduct. An apparently isolated violation may indicate a pattern of misconduct that only a disciplinary investigation can uncover. Reporting a violation is especially important where the victim is unlikely to discover the offense (emphasis added).

[3] ...The term "substantial" refers to the seriousness of the possible offense and not the quantum of evidence of which the lawyer is aware. Similar considerations apply to the reporting of judicial misconduct.

DEFINITIONAL CROSS-REFERENCES "Substantial" See RPC 1.0(l)

TENN. R. SUP. CT. 1.0
(Terminology)

(f) "Knowingly," "known," or "knows" denotes actual awareness of the fact in question. **A person's knowledge may be inferred from circumstances** (emphasis added).

(j) "Reasonably should know," when used in reference to a lawyer, **denotes that a lawyer of reasonable prudence and competence would ascertain** the matter in question (emphasis added).

(l) "Substantial" or "substantially," when used in reference to degree or extent, denotes a material matter of clear and weighty importance.

(o) "Material" or "materially" denotes something that a **reasonable person** would consider important in assessing or determining how to act in a matter (emphasis added).

THREE PRIMARY DOCUMENTS ITEMIZING MISCONDUCT

Any licensed bar members who has read my "DECLARATION ABOUT PROFESSIONAL AND JUDICIAL MISCONDUCT DURING MY 8/1/2019 HEARING IN CHANCERY COURT[6]", my "DECLARATION CERTIFYING THE AUTHENTICITY AND ACCURACY OF 8/29/2019 TRANSCRIPT OF EVIDENCE AND AUDIO RECORDING OF HEARING[7]", or my "MEMORANDUM OF LAW REGARDING VOID TENNESSEE COURT ORDERS[8]" and claim that they have **not** "receive[d] information indicating a substantial likelihood of such misconduct[9]" is behaving in a manner which "raises a substantial question regarding [their own] **honesty** [and] **trustworthiness**[10]" (emphasis added).

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6 DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf

7 DOC 24, PID 2921-2947 | https://rico.jefffenton.com/evidence/2019-08-29_authentic-chancery-transcript-and-audio.pdf

8 DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

9 Tenn. R. Sup. Ct. 2.15, Comment [2]

10 Tenn. R. Sup. Ct. 2.15 (A), (B)

For any bar member who has not specifically read any of these three documents, please do so. You are hereby given *notice* that the three documents named above (at the links provided in footnotes 6, 7, and 8 on the prior page) contain irrefutable evidence and testimony itemizing **substantial attorney and judicial misconduct**, including violations in compliance with the law; supervisory duties responding to judicial and lawyer misconduct; impartiality and preventing harassment; ensuring the right to be heard; candor toward the tribunal; fairness to opposing party and counsel; impartiality and decorum of the tribunal; truthfulness in statements to others; false statements of law in open court; fraud on the court; and even outright obstruction of justice by defendants Story and Binkley between my August 1, 2019, and August 29, 2019, "hearings" in Williamson County Chancery Court. Those are the only two hearings in which I was ever allowed to participate. The individual counts of misconduct are spelled out, while simultaneously proving my claims with the official transcripts of evidence[11] and specifying the exact violations of the codified State of Tennessee Rules of Professional and Judicial Conduct[12] showing those rules in context.

You have **now** "receive[d] information indicating a substantial likelihood of such misconduct[13]" which "raises a substantial question regarding [defendant Story's and Binkley's] **honesty** [and] **trustworthiness**[14]". Upon information and belief, your refusal to read, consider, and act upon that information is a violation of your oaths of office, court rules, and is sanctionable

[11] DOC 22, PID 2818-2862 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf
DOC 23, PID 2863-2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
DOC 23-4, PID 2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

[12] DOC 41, PID 3570-3608 | https://rico.jefffenton.com/evidence/tennessee-rules-of-judicial-and-professional-conduct.pdf

[13] Tenn. R. Sup. Ct. 2.15 (C), (D)

[14] Tenn. R. Sup. Ct. 2.15, Comment [2]

to compensate for my continued damages as a result and/or to pay for counsel to help me obtain an honest lawful remedy, made more difficult by more misconduct.

DECLARATION ABOUT PROFESSIONAL AND JUDICIAL MISCONDUCT

- **DECLARATION ABOUT PROFESSIONAL AND JUDICIAL MISCONDUCT DURING MY 8/1/2019 HEARING IN CHANCERY COURT**[15]
  - https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf
- August 1, 2019, Chancery Court Hearing Transcript of Evidence[16]
  - https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf
- Court Order from August 1, 2019, Hearing in Chancery Court[17]
  - https://rico.jefffenton.com/evidence/2019-08-01_chancery-court-order-with-counsel.pdf

DECLARATION CERTIFYING THE AUTHENTICITY AND ACCURACY OF 8/29/2019 TRANSCRIPT OF EVIDENCE AND AUDIO RECORDING OF HEARING

- **DECLARATION CERTIFYING THE AUTHENTICITY AND ACCURACY OF 8/29/2019 TRANSCRIPT OF EVIDENCE AND AUDIO RECORDING OF HEARING**[18]
  - https://rico.jefffenton.com/evidence/2019-08-29_authentic-chancery-transcript-and-audio.pdf

MEMORANDUM OF LAW REGARDING VOID TENNESSEE COURT ORDERS

- **MEMORANDUM OF LAW REGARDING VOID TENNESSEE COURT ORDERS**[19]
  - https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf
- August 29, 2019, Chancery Court Hearing Transcript of Evidence[20]
  - https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
- August 29, 2019, Chancery Court Hearing Audio Recording[21]
  - https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3
- Court Order from August 29, 2019, Hearing in Chancery Court[22]
  - https://rico.jefffenton.com/evidence/2019-08-29_chancery-court-order-once-pro-se.pdf

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15 DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf

16 DOC 22, PID 2818-2862 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf

17 DOC 19-6, PID 2669-2672 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-court-order-with-counsel.pdf

18 DOC 24, PID 2921-2947 | https://rico.jefffenton.com/evidence/2019-08-29_authentic-chancery-transcript-and-audio.pdf

19 DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

20 DOC 23, PID 2863-2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf

21 DOC 23-4, PID 2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

22 DOC 19-7, PID 2674-2677 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-court-order-once-pro-se.pdf

Due to the abundance of evidence, prior court records, and testimony filed in this lawsuit, it was not physically or financially possible (without substantial help) for me to serve each defendant *every* page filed in this matter, printed on *paper* media. That was estimated to cost tens-of-thousands-of-dollars in printing alone, which is far more money than I had access to. To compensate, while providing every defendant with *notice* of every document filed in this matter, I served the defendants a hybrid "lawsuit service package[23]", using a combination of *printed paper* and *digital media.*

In doing so, I did my best to ensure that the *most important* documents in this lawsuit, such as my amended complaint[24], were served to *every* defendant on printed paper and digitally.

EVERY DEFENDANT WAS SERVED SWORN TESTIMONY AND EVIDENCE OF SUBSTANTIAL FRAUDULENT ATTORNEY & JUDICIAL MISCONDUCT

Amongst those most important documents, which I served to *every* defendant in this lawsuit, on *printed* paper media, as part of my *lawsuit service package*[25], were every document itemized on the previous page, reporting, outlining, testifying, and proving nearly non-stop *attorney* and *judicial* misconduct by the defendants, specifically the unconscionably biased misconduct, executed with substantial fraud on the court and obstruction of justice, performed by and between defendants Story and Binkley, along with the Chancery Court.

Therefore, *every* defendant (and most likely their counsel) has already "receive[d] information indicating a substantial likelihood of such misconduct[26]" which "raises a substantial question regarding [defendant Story's and Binkley's] **honesty** [and] **trustworthiness**[27]".

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23 DOC 69, PID 5030-5042 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

24 DOC 66, PID 4870-5007 | https://rico.jefffenton.com/evidence/3-24-cv-01282_fenton-vs-story-first-amended-complaint.pdf

25 DOC 69, PID 5030-5042 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

26 Tenn. R. Sup. Ct. 2.15 (C), (D)

27 Tenn. R. Sup. Ct. 2.15, Comment [2]

Upon information and belief, all counsel for the defendants is hereby *noticed* that the defendants have each received this information, which all defendant counsel and the court has also been made aware of and directly served in this notice, making all bar members involved in this matter, and the law firms employing them, jointly and severally liable for taking the **appropriate actions**, required by the relevant court rules, codes of conduct, canons, and laws, along with **reporting this misconduct** to the appropriate authorities, rather than denying it, hiding it, or working to cover it up, to evade responsibility and/or liability.

Upon information and belief, there are way too many attorneys in this matter, willing to completely ignore their oaths of office, the critical constitutional and justice merits of this lawsuit, the court's ethical canons and codes of conduct, while elevating the courts **technical rules of process** and procedures over all the aforementioned, when in fact both merits and conduct are required to **trump** process and procedures, especially in cases involving *pro se* litigants.

Upon information and belief, elevating rules of process over conduct and merits is both professional misconduct and professional negligence. This unlawfully refuses to intervene or help mitigate damages for the injured party (me), causing my damages to continue to multiply instead. This is a violation of F.R.Civ.P. Rule 11(b)[28]. This is sanctionable to recover damages and/or the costs of counsel to help me receive a remedy which I am lawfully due, should the defendants refuse to concede and accept responsibility for their actions, without requiring substantial litigation which is beyond the reasonable reach of most *pro se* litigants.

[28] https://www.law.cornell.edu/rules/frcp/rule_11

Upon information and belief, the **defendants** caused the damage, the defendants are **responsible** for providing a reasonable remedy, regardless of how unfair the odds are in this case, as **public funds**[29] are being leveraged **against** the honest interest of **justice** to protect bad actors, in the matters before this court.

Upon information and belief, just because the defendants and their counsel make a remedy more difficult to reach does not make it any less required by the law and the honest interests of justice. While the defendants and their counsel are responsible for all additional damages I am caused and continue to suffer since the service of this lawsuit, while I am herein notifying **all** are **substantial**, unlawful, unconstitutional, criminal, abusive, and inhumane. Having had and continuing to daily have a **serious detrimental impact** upon my employability, my shelter, my ability to support myself, my ability to ever retire, along with my physical, mental, and emotional health.

MORE DOCUMENTED EVIDENCE OF MISCONDUCT

- Declaration of Irrefutable Proof of a Criminal Conspiracy Spanning State and Federal Courts[30]
  - https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf
- Declaration of Facts About Fenton Family Financial Structure and Roles During Mariage, Entirety Property, Education, Vocational Experience, and Financial Capacity[31]
  - https://rico.jefffenton.com/evidence/fenton-family-finances-property-education-experience.pdf
- Declaration About Phone Call with Trustee John McLemore F.R.B.P Rule-7001 & 11 United States Code § 363[32]
  - https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf
- Audio Recording of Call with Bankruptcy Trustee John McLemore[33]
  - https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3

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[29] Please see my "DECLARATION EXPLAINING MY PURSUIT OF JUSTICE" filed in TNMD on 2/6/2025 in DOC 207. DOC 207, PID 583-685 | https://rico.jefffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

[30] DOC 53, PID 4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf

[31] DOC 37, PID 3398-3443 | https://rico.jefffenton.com/evidence/fenton-family-finances-property-education-experience.pdf

[32] DOC 28, PID 3276-3288 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf

[33] DOC 54-1, PID 4367 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3

- Lawsuit Service Package[34]: https://service.jefffenton.com
- **AMENDED COMPLAINT FOR TORTIOUS CONDUCT AND INJUNCTIVE RELIEF**[35]
  - https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf

- October 13, 2020, Affidavit of Marsha Ann Fenton[36]
  - https://rico.jefffenton.com/evidence/2020-10-13_affidavit-of-mother-marsha-ann-fenton.pdf
- January 16, 2024, Declaration of Marsha Ann Fenton Regarding Son Jeffrey Ryan Fenton and Tennessee Legal Proceedings[37]
  - https://rico.jefffenton.com/evidence/2024-01-16_marsha-fenton-sons-tn-legal-proceedings.pdf

Upon information and belief, **there is absolutely nothing "discretionary" here.** At some point the bar members involved need to do the right thing or forever be implicated in serious felony racketeering crimes with respect to their subsequent failures to intervene, their failures to "take appropriate action", their failures to "inform the appropriate authority", combined with actions to deflect, evade, or cover-up the defendant's egregious felony crimes committed, along with "substantial" court misconduct.

Many racketeering court cases don't begin as true RICO cases but become RICO cases due to the unlawful refusals to intervene by friends of the original offenders throughout the court system as they cover up felonies, commit *more* fraud on the court, and continue to falsify government and court records, and much more.

This case actually *began* as a *true* RICO action from the start: neither court action, not state nor federal, could stand on its own as a lawful, properly administered action. They both relied upon the racketeering between the two courts to enable each other (each pretending they were acting upon the lawful orders of the other court, when in fact neither court had the lawful jurisdiction and authority for taking my real property), while obfuscating the court records and

[34] DOC 69-1, PID 5030-5042 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

[35] DOC 66, PID 4870-5007 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf

[36] DOC 1-2, PID 48-63 | https://rico.jefffenton.com/evidence/2020-10-13_affidavit-of-mother-marsha-ann-fenton.pdf

[37] DOC 18, PID 2417-2616 | https://rico.jefffenton.com/evidence/2024-01-16_marsha-fenton-sons-tn-legal-proceedings.pdf

hiding the crimes committed by both, lost in the gaps between state and federal court records.

Upon information and belief, now, the RICO counts keep multiplying as officers of the court *keep choosing* to deny or dismiss my claims for basic technicalities without ever addressing the critical merits of this case or forcing a single defendant to answer for their unlawful actions.

How much more should I have "reasonably" tried in my desperate attempts to reach help and justice to receive *equal protection* under the law? I've done *everything* within my power, knowledge, and reach to try to obtain justice and hold the bad actors accountable **for years**, which is far more than most people could do, yet I've been denied the slightest ethical, humane consideration by the defendants and the State of Tennessee in this matter. That is frankly *unreasonable*!

TENN. R. SUP. CT. 8.4
(Misconduct)

It is professional misconduct for a lawyer to:

(c) engage in conduct involving **dishonesty**, **fraud**, **deceit**, or **misrepresentation** (emphasis added);

(d) engage in conduct that is **prejudicial to the administration of justice** (emphasis added);

(f) knowingly assist a judge or judicial officer in conduct that is a violation of applicable rules of judicial conduct or other law;

Comment

[2] ...Although a lawyer is personally answerable to the entire criminal law, a lawyer should be professionally answerable only for offenses that indicate lack of those characteristics relevant to law practice. Offenses involving violence, **dishonesty**, **breach**

of trust, or serious **interference with the administration of justice** are in that category. ...a pattern of repeated offenses, even ones that are of minor significance when considered separately, can indicate indifference to legal obligation (emphasis added).

[3] A lawyer who, in the course of representing a client, knowingly manifests, by words or conduct, bias or prejudice based on race, sex, religion, national origin, disability, age, sexual orientation, or socio-economic status violates paragraph (d) when such actions are prejudicial to the administration of justice...

Upon information and belief, it is prejudicial to the administration of justice to file a motion to dismiss for any defendant in this matter without first reporting the **known** misconduct (or "reasonably should know") which they participated in, as evidenced by the documents in this lawsuit, to the court or the appropriate authorities.

TENN. R. SUP. CT. 1.2

(Scope of Representation and Allocation of Authority between Client and Lawyer)

(d) A lawyer shall not counsel a client to engage, or assist a client, in conduct that the lawyer **knows** or **reasonably should know** is *criminal* or *fraudulent*, but a lawyer may discuss the legal consequences of any proposed course of conduct with a client and may counsel or assist a client to make a good faith effort to determine the validity, scope, meaning, or application of the law.

Comment

[10] ...In some situations the lawyer may be permitted or **required** by Rule 1.6 **to reveal the client's wrongdoing**. See RPC 1.6(b)(1) and (c)(1). In any

case, however, the lawyer is required to avoid assisting the client, for example, by drafting or delivering documents that the lawyer knows are fraudulent or by *suggesting how the wrongdoing might be concealed.* A lawyer may not continue assisting a client in conduct that the lawyer originally supposed was legally proper but then discovers is *criminal* or *fraudulent.* The lawyer must, therefore, withdraw from the representation of the client in the matter. See RPC 1.16(a). In some cases, withdrawal alone might be insufficient. It may be necessary for the lawyer to give notice of the fact of withdrawal and to disaffirm any opinion, *document*, affirmation or the like. See RPC 4.1.

TENN. R. SUP. CT. 1.6
(Confidentiality of Information)

(b) A lawyer may **reveal information** relating to the representation of a client to the extent the lawyer reasonably believes necessary:

(1) to prevent the client or another person from committing a crime, **including a crime that is reasonably certain to result in substantial injury to the financial interest or property of another**, unless disclosure is prohibited or restricted by RPC 3.3;

(2) to prevent the client from committing a fraud that is **reasonably certain to result in substantial injury to the financial interests or property of another** and in furtherance of which the client has used or is using the lawyer's services, unless disclosure is prohibited or restricted by RPC 3.3;

(3) **to prevent, mitigate, or rectify substantial injury to the financial interests or property of another** that is reasonably certain to result or has resulted

from the client's commission of a fraud in furtherance of which the client has used the lawyer's services, unless disclosure is prohibited or restricted by RPC 3.3;

(c)(3) to comply with RPC 3.3, 4.1, or other law.

NOTICING THE DEFENDANTS ABOUT THE OUTRAGEOUS MISCONDUCT

- https://rico.jefffenton.com/evidence/2019-08-30_emergency-attempt-to-correct-court-order.pdf
- https://rico.jefffenton.com/evidence/2019-08-30_judgment-wrong-emergency-call-to-court.mp3
- https://rico.jefffenton.com/evidence/2019-08-30_notified-story-beeler-false-claims-in-court-order.pdf
- https://rico.jefffenton.com/evidence/2019-08-30_story-lied-when-notified-false-claims-in-order.pdf
- https://rico.jefffenton.com/evidence/2019-09-16_story-letter-demanding-two-grand-for-storage.pdf
- https://rico.jefffenton.com/evidence/2019-09-21_notice-listing-agreement-coerced-null-and-void.pdf
- https://rico.jefffenton.com/evidence/2019-09-21_auctioneer-refused-to-stop-illegal-auction.pdf
- https://rico.jefffenton.com/evidence/2019-09-23_notified-binkley-false-claims-in-storys-order.pdf
- https://rico.jefffenton.com/evidence/2019-09-26_story-letter-demanding-thirty-five-hundred.pdf
- https://rico.jefffenton.com/evidence/2019-09-28_illegal-coerced-auction-wilco-rico-deed-fraud.pdf
- https://rico.jefffenton.com/evidence/2019-10-06_harassing-threatening-stalking-spying.pdf
- https://rico.jefffenton.com/evidence/2019-10-10_chancery-no-proceeds-from-forced-auction.pdf
- https://rico.jefffenton.com/evidence/2019-10-10_notice-to-court-and-title-co-auction-was-illegal.pdf
- https://rico.jefffenton.com/evidence/2019-10-10_notified-bankers-title-sale-illegal-unauthorized.pdf
- https://rico.jefffenton.com/evidence/2019-10-21_fraudulent-final-affidavit-by-virginia-story.pdf
- https://rico.jefffenton.com/evidence/2019-10-21_order-of-protection-as-illegal-prior-restraint.pdf
- https://rico.jefffenton.com/evidence/2019-10-29_closing-for-illegal-auction-wilco-rico-deed-fraud.pdf
- https://rico.jefffenton.com/evidence/2019-11-12_settlement-offer-mitigate-losses-story-refused.pdf
- https://rico.jefffenton.com/evidence/2019-11-12_proof-story-received-my-settlement-offer.pdf
- https://rico.jefffenton.com/evidence/2020-02-13_tnsc-aoc-ada-gc-john-coke-phone-call.mp3
- https://rico.jefffenton.com/evidence/2020-02-13_tnsc-aoc-ada-gc-john-coke-transcript.pdf
- https://rico.jefffenton.com/evidence/2020-05-01_coa-hivner-8-29-19-hearing-transcript-recorded-call.mp3
- https://rico.jefffenton.com/evidence/2020-05-05_notified-story-about-her-fraudulent-affidavit.pdf
- https://rico.jefffenton.com/evidence/2020-07-08_tnsc-coa-ada-request-for-modification.pdf
- https://rico.jefffenton.com/evidence/2020-09-09_tn-aba-free-legal-answers-site-question-closed.pdf
- https://rico.jefffenton.com/evidence/2020-09-24_5yr-op-ext-retaliation-no-notice-motion-hearing.pdf
- https://rico.jefffenton.com/evidence/2020-09-30_wilco-inquiry-about-extended-op-and-sales-records.mp3
- https://rico.jefffenton.com/evidence/2020-10-16_coa-emergency-motion-reporting-misconduct.pdf
- https://rico.jefffenton.com/evidence/2020-10-28_motion-to-supplement-and-correct-the-record.pdf
- https://rico.jefffenton.com/evidence/2020-10-30_storys-objection-to-correcting-the-court-record.pdf
- https://rico.jefffenton.com/evidence/2020-12-29_tnsc-bpr-complaint-against-story-binkley-etc.pdf
- https://rico.jefffenton.com/evidence/2021-01-19_reported-misconduct-sought-help-tnsc-aoc-bpr.pdf
- https://rico.jefffenton.com/evidence/2021-01-19_tnsc-immunity-disorder-strike-expunge-op.pdf
- https://rico.jefffenton.com/evidence/2021-01-26_trustees-final-account-and-distribution-report.pdf
- https://rico.jefffenton.com/evidence/2021-01-27_notified-ausbrooks-fraud-misconduct-damages.pdf
- https://rico.jefffenton.com/evidence/2021-12-02_fbi-mark-shafer-binkley-story-corruption.mp3
- https://rico.jefffenton.com/evidence/2023-12-13_wcso-racketeering-official-oppression.pdf

The information and evidence is here. Upon information and belief, the refusal by anyone to avail themselves of it, to avoid their responsibility to report it, is unlawful conduct in

and of itself. It is certainly an intentional failure to intervene. You have been noticed. You enjoy the prestige and privileges of being bar members, but you have a sworn duty which comes in tandem and cannot be severed or ignored without opening yourselves, your employers, and your law firms up to liability and consequences. This is especially true for Williamson County and the State of Tennessee, which are literally misappropriating tax dollars to cover-up multiple felonies committed against me and my family under their employment and supervision, to continue depriving me of justice.

Upon information and belief, no matter what anyone thinks about this lawsuit or the defendants involved, the evidence about their misconduct is extreme, unconscionable, and actionable as already filed, without needing any more evidence or testimony than is supplied. Attorneys in Tennessee have been sanctioned, suspended, or disbarred for less.

Upon information and belief, I don't see how anything "just" can be done in this matter without the court first addressing the attorney and judicial misconduct which is clearly recorded in the court's records as well as in this lawsuit. Addressing this misconduct is the first step towards becoming **honest** about what actually has transpired so that we can begin to work towards a responsible remedy.

In time, if I am unable to reach a reasonable remedy through the court, I plan to file Freedom of Information Act requests and subpoena defendants, their counsel, and other bar members who have been involved in this case, to determine whether or not those parties have responsibly fulfilled their obligations to report the misconduct by the defendants, which a self-regulated profession, with an independent judiciary, must vigorously endeavor to prevent.

I encourage everyone to retain written evidence they did in fact report this misconduct to the "proper disciplinary authority". For any bar member who has not specifically read either of the aforementioned three documents, please know that those are far from the only documents in my lawsuit which more than reasonably satisfy the criteria for having "receive[d] information indicating a substantial likelihood of such misconduct" which "raises a substantial question regarding [their] **honesty** [and] **trustworthiness.**" Those are just three of the most clear and specific documents about misconduct, which break down the language used by defendants Story and Binkley in court, in some places one sentence at a time, as is proved by the certified original transcripts of evidence specifying the exact codified violations of the State of Tennessee Rules of Professional and Judicial Conduct[38].

RULE 11. SIGNING PLEADINGS, MOTIONS, AND OTHER PAPERS; REPRESENTATIONS TO THE COURT; SANCTIONS

(a) Signature. Every pleading, written motion, and other paper must be signed by at least one attorney of record in the attorney's name—or by a party personally if the party is unrepresented. The paper must state the signer's address, e-mail address, and telephone number. Unless a rule or statute specifically states otherwise, a pleading need not be verified or accompanied by an affidavit. The court must strike an unsigned paper unless the omission is promptly corrected after being called to the attorney's or party's attention.

(b) Representations to the Court. By presenting to the court a pleading, written motion, or other paper—whether by signing, filing, submitting, or later

[38] DOC 41, PID 3570-3608 | https://rico.jefffenton.com/evidence/tennessee-rules-of-judicial-and-professional-conduct.pdf

advocating it—an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

(1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;

(2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;

(3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and

(4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

(c) Sanctions.

(1) In General. If, after notice and a reasonable opportunity to respond, the court determines that Rule 11(b) has been violated, the court may impose an appropriate sanction on any attorney, law firm, or party that violated the rule or is responsible for the violation. Absent exceptional circumstances, a law firm must be held jointly responsible for a violation committed by its partner, associate, or employee.

(3) On the Court's Initiative. On its own, the court may order an attorney, law firm, or party to show cause why conduct specifically described in the order has not

violated Rule 11(b).

(4) Nature of a Sanction. A sanction imposed under this rule must be limited to what suffices to deter repetition of the conduct or comparable conduct by others similarly situated. The sanction may include nonmonetary directives; an order to pay a penalty into court; or, if imposed on motion and warranted for effective deterrence, an order directing payment to the movant of part or all of the reasonable attorney's fees and other expenses directly resulting from the violation.

Upon information and belief, if the court is healthy and operating as designed, there should be two sides to this lawsuit, both a **public side**, where I am representing myself *pro se* in the court room, along with a **private side**, where the court must take action and discipline misconduct which a self-regulated profession, with an independent judiciary, "must vigorously endeavor to prevent".

This notice is in regard to actions by bar members on both sides of this lawsuit, but is likely most critical on the private side, behind closed doors.

In the past, the Board of Professional Responsibility of the Supreme Court of Tennessee has repeatedly tried to deflect responsibility for their failures to act and discipline misconduct on the private side, on my inability to reach justice on the public side. Using the unwillingness of the FBI, DOJ, or other law enforcement agency to press criminal charges, as an excuse presented to argue that no meaningful attorney or judicial misconduct took place, and justification for the board's refusal to discipline defendant Story's misconduct along with others, in the matters before this court.

What I want to make perfectly clear though, is that my success or failure on the public side, in no way, shape, or form absolves any bar members of their obligations to take action and report attorney and judicial misconduct on the private side.

Upon information and belief, my success or failure on the public side could easily have little or nothing to do with the true merits of my lawsuit, or the unconscionable misconduct performed by the defendants in precipitating Tennessee matters.

Upon information and belief, it is me against "all the king's horses and all the king's men." If I reach justice on the public side, it will be because of God's grace and an honest, brave, rare, incredibly honorable judge who is willing to face the fire to stand up for what is true and lawful. I'm praying for this, but I know that the odds are steeply stacked against me, as my experiences to date proves.

My point in saying this is to emphasize that whatever does or does not happen on the public side absolutely does **not** absolve any bar member involved of their oaths of office to comply with these laws, rules, and **obligations** on the private side. It is common knowledge that misconduct reported by bar members, and especially by judges, is taken far more seriously than that reported by the public, and has a far better chance of being acted upon by the state oversight boards.

Upon information and belief, a judge can recuse themselves from the case to avoid the appearance of impropriety, as well as a real conflict of interest. Recusal, however, does not release a judge from his or her oath of office and obligations thereunder, to act upon and report both attorney and judicial misconduct on the private side.

"A judge who receives information indicating a substantial likelihood that another judge has committed a violation of this Code **shall** take appropriate action[39]."

"A judge who receives information indicating a substantial likelihood that a lawyer has committed a violation of the Rules of Professional Conduct **shall** take appropriate action[40]."

RECUSALS DON'T NEGATE RESPONSIBILITIES

In the "ORDER REASSIGNING CASE" (DOC 165) by Chief District Judge William L. Campbell, Jr, filed on November 7, 2024, he stated:

"I hereby recuse myself in this case. As all District and Magistrate Judges of the Middle District of Tennessee have recused in this matter, a District Judge from outside the District will be designated by the Sixth Circuit Court of Appeals. When the designation is made, the case will be reassigned."

I honestly don't know much about how cases are assigned to district or magistrate judges, to what extent each judge reviews the filings in the matter, how they determine if they should recuse themselves from a particular matter and how they communicate that to the court.

Upon information and belief, my take-away after reading the "ORDER REASSIGNING THE CASE[41]" is that every district judge and magistrate judge in the Middle District of Tennessee must have reviewed the filings in my lawsuit. If that is the true, then my logic follows that there should be several reports by the respective federal judges to the "appropriate

[39] TENN. R. SUP. CT. 2.15(C)

[40] TENN. R. SUP. CT. 2.15(D)

[41] DOC 165, PID 139 | https://rico.jefffenton.com/3-24-cv-01282/doc/165.pdf

disciplinary authority" about defendant Story and Binkley's misconduct in the Chancery Court.

Upon information and belief, at the very least, I hope that formal reports have been filed by Chief United States District Judge William L. Campbell, Jr. and Magistrate Judge Barbara D. Holmes about the obvious and overwhelming attorney and judicial misconduct (involving excessive dishonesty, fraud, and untrustworthiness), while I hope that due to the circumstances, the Tennessee Supreme Court or the State of Tennessee is taking action to investigate those reports, **outside the direct supervision of defendant Garrett** and her direct reports.

Upon information and belief, I believe that the other judicial defendants in this matter, from the Court of Appeals and Bankruptcy Court, have the same **obligations** for reporting the misconduct which they have been *noticed* about in this lawsuit. I'm expecting they will claim not to have been party to the criminal misconduct by defendants Story and Binkley in previous matters, but if they are still now failing or refusing to report it (again), after having clearly received legal notice without any ambiguity or lack of knowledge to blame, I believe that their continued failure or refusal to formally take action, to obey their oaths of office and the codes of conduct, by reporting this serious judicial and attorney misconduct to the appropriate authority, will reasonably be the equivalent of affirmatively supporting and participating in this misconduct, becoming a joinder in the crimes committed, even if not previously explicitly implicated by their actions and inactions.

Upon information and belief, if a party wishes to disavow being part of an illegal and unethical action, they must reasonably separate themselves from the perpetrators of that crime by acting differently than the perpetrators, specifically taking action to report and/or discipline that misconduct in accordance with their oaths of office and the codes of conduct thereunder.

Upon information and belief, if this case ends without the Board of Professional Responsibility of the Supreme Court of Tennessee taking serious disciplinary actions against, at the very least, defendants Story and Binkley, to protect the public from the continued criminal misconduct by both, the evidence already filed in this case implicates that organization (and potentially the Tennessee Supreme Court, the Administrative Offices of the Court, along with whomever oversees the top decision makers in both of those divisions) of being corrupted beyond benefit to the people of Tennessee.

Upon information and belief, disciplinary actions[42] by the Board of Professional Responsibility of the Supreme Court of Tennessee should have absolutely nothing to do with who is friends with their leadership or who their enemies are, but unfortunately it clearly does, or defendant Garrett would have taken action against defendants Story and Binkley years ago, when I first reached out to her for help, but she has repeatedly refused.

Upon information and belief, the Board of Professional Responsibility of the Supreme Court of Tennessee has waged war against honest, ethical, patriotic, defenders of justice[43], who have the courage to stand up against and challenge judicial misconduct and corruption in Tennessee. That is abhorrent, unconstitutional, and must be quickly corrected for the honest and ethical "practice of law" along with the public health and safety of the people at large, throughout the State of Tennessee.

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[42] DOC 207, PID 583-685 | https://rico.jefffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

[43] DOC 58-3, PIC.4632-4710 | https://rico.jefffenton.com/evidence/2024-02-16_tnsc-disbarred-whistleblower-brian-manookian.pdf
DOC 58-4, PID 4712-4716 | https://rico.jefffenton.com/evidence/2024-02-16_tnsc-manookian-disbarment-opinion-justice-lee.pdf
DOC 58-5, PID 4718-4722 | https://rico.jefffenton.com/evidence/2024-05-02_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf
DOC 207, PID 583-685 | https://rico.jefffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf

Upon information and belief, my case has an overwhelming abundance of evidence, yet no attorney (I know of) will touch it, not for lack of merit, substance, or potential lawful and equitable remedies, but rather because no attorney is willing to *gamble* their practice and their livelihood on the court honoring the **law** above their **relationships** with some of the powerful and influential defendants in this matter.

Upon information and belief, it is my honest and steadfast belief that in matters involving significant judicial misconduct and court corruption in Tennessee, **attorneys can no longer help protect the people** in a meaningful capacity or provide much real value to the public at all, nor will they be able to **until the people are able to compel the State of Tennessee to quit retaliating against attorneys**, sanctioning them (for miniscule matters far less "substantial" than those herein), suspending, and disbarring those honest, courageous defenders of justice.

It is for that reason and others that I have brought this lawsuit, **to fight for what is just, honest, lawful, honorable, righteous, and true.** To try to demand that the court obey the law and operate honestly and ethically for the substantial protection of the public, not for the benefit of the select few powerful bad actors who have the connections to leverage the "law" or rather the courts to do their bidding, in spite of the law, the ethical canons, the Constitution of this great nation and even the Tennessee State Constitution.

This land is a national treasure not owned by a select few, but by the people at large who inhabit it.

Upon information and belief, some of the courts in Tennessee have clearly lost their way. There is negative peer pressure in Tennessee right now compelling attorneys throughout the state to turn their heads, set their expectations low, not challenge certain attorneys in front of

courts and judges who favor them, while ignoring attorney and judicial misconduct by certain protected parties, in direct opposition of the codes of conduct. For fear of retaliation and retribution by unsavory characters, the likes of Moreland, Binkley, and their brothers in power behind closed doors, who wield substantial influence in Tennessee's shadows but have no honest lawful place in a government for and by the people.

Upon information and belief, the courts have a responsibility to end this depraved injustice and restore honest justice to the "practice of law" throughout the State of Tennessee. This has gone on for too long and cannot be honestly and reasonably justified. The problem as I see it, is that the people making administrative decisions haven't been required to answer for the misconduct or their failures to address it, for way too long. **It is time for that to change.**

The principles which this lawsuit is contending for are at the forefront of the minds of America currently, in a historic capacity. The crimes and corruption currently being exposed, throughout offices of trust in every branch of state and federal government, are bursting at the seams presently with fraud and abuse, the likes of which this nation and possibly the world has never before seen on such a massive scale.

It is time to return honest justice to the practice of law, throughout the State of Tennessee.

I hope that this court and the defendant's counsel will choose to be part of the solution, rather than being the exclamation point ascribed to punctuate the problem.

CERTIFICATION AND DECLARATION

By signing below, I, Jeffrey Ryan Fenton, certify that this document has been executed in good faith, in the honest pursuit of justice, and in strict compliance with F.R.Civ.P. 11(b).

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct, except as to matters herein stated to be on information and belief, and as to such matters, I certify as aforesaid that I verily believe the same to be true.

All rights reserved.

Executed on February 24, 2025

JEFFREY RYAN FENTON, PRO SE

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DOCUMENTS REGARDING (CASE: 3:24-CV-01282):

1. NOTICE TO ALL BAR MEMBERS

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2025, I mailed the foregoing or above-named papers to the United States District Court for the Middle District of Tennessee, at their address below, for filing in case number 3:24-cv-01282.

I further certify that on or before February 28, 2025, I am serving these same documents to the defendants or their counsel by first class or priority mail with postage prepaid at the addresses listed below. If for any reason beyond my control, I am unable to complete either on the date specified, I will do so on the very next business day.

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NASHVILLE, TN 37203-6940

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ELECTRONIC SERVICE OPTIONS

Many of my filings in this lawsuit are also made publicly available on the Internet, through my list[1] of documents filed by myself in this lawsuit, since the release of my lawsuit service package[2]. I typically try to do this as quickly as I can after filing them in court, depending upon my workload. Not every filing warrants being electronically published in this manner, while my time is extremely limited, therefore I cannot provide any guarantees about which documents will or will not be made available online, or exactly when.

For those interested, these files are usually "true" digitally created PDF files, in full color, often with optical character recognition enabled, sometimes with electronic bookmarks, and occasionally with a built-in table of contents which is hyperlinked for easy and efficient referencing, in my largest and most significant documents, such as my amended complaint[3].

CERTIFICATION AND DECLARATION

By signing below, I, Jeffrey Ryan Fenton, certify that this document has been executed in good faith, in the honest pursuit of justice, and in strict compliance with F.R.Civ.P. 11(b).

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct.

All rights reserved.

Executed on February 24, 2025

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[1] https://jefffenton.com/digital-service-package-for-lawsuit/fenton-filings-since-service/

[2] https://jefffenton.com/digital-service-package-for-lawsuit/
ECF 69, PID.5030-5042 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

[3] DOC 66, PID 4870-5007 | https://rico.jefffenton.com/evidence/3-24-cv-01282_fenton-vs-story-first-amended-complaint.pdf

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