UNITED STATES DISTRICT COURT FOR THE

WESTERN DISTRICT OF MICHIGAN

FILED- LN
September 11, 2024 10:08 AM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: eod scanned by:

JEFFREY RYAN FENTON,

PLAINTIFF

v.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

CASE NO. 1:23-CV-01097

LAWSUIT SERVICE PACKAGE DETAILS[1]

Plaintiff brings this testimony pursuant to 28 U.S. Code § 1746.

I, Jeffrey Ryan Fenton, declare under oath as follows:

1. I am the plaintiff in this federal lawsuit (Case No. 1:23-cv-01097).
2. I am a citizen of the United States of America.
3. I was born in Washington State during 1969.
4. I am domiciled in Genesee County, Michigan.
5. My mailing address is 17195 Silver Parkway, #150, Fenton, MI 48430-3426.
6. My phone number is (615) 837-1300. My email address is contact@jefffenton.com.
7. I am filing this document with the court to clearly specify the documents and resources physically served to each defendant in this lawsuit.
8. In compliance with the court's rules, I did not execute service myself, my mother

[1] Citations to the court record in this lawsuit will be notated without the case name or number, using the starting ECF Number, followed by both the beginning and ending Page ID, which is abbreviated as "PID."

did, who will be filing the PROOF OF SERVICE upon completion. I am merely itemizing the contents of the service packages, which I provided to my mother, to serve to each defendant.

PRO SE LITIGANT - MERITS RULE OF LAW OVER TECHNICALITIES

9. I am acting in a *pro se*[2] capacity in this lawsuit by necessity and entitled to a liberal reading and less stringent standards since my filings have heen prepared without assistance of counsel. See *Haines v. Kerner,* 404 U.S. 519, 92 S. Ct. 594 (1972).

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10. To clearly abate any confusion, while hoping to reasonably satisfy every requirement of service to the best of my ability, with the resources available to me, this package received by the court, includes the lawsuit service package as served to each defendant, with only a couple of minor differences, as detailed herein.

11. Some of the documents served to the earliest defendants were printed prior to having been file stamped by the court, with the ECF number and PageID printed at the top of each page.

12. This was done to expedite the service of these documents in an attempt to comply with the deadline provided by the court.

13. Once I received the file stamped documents as filed by the court, I began printing them and worked them into the service cycle, as soon as I was practically able.

14. There are two minor file changes on the included flash drive, served to each defendant, but before delving into that I will itemize the hard-copy printed documents physically served to each defendant.

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[2] ECF 1-35, PID.1960

HARD COPY SERVED TO EACH DEFENDANT ON PAPER MEDIA

(1) U.S.D.C. Western District of Michigan Summons

(2) DECLARATION CERTIFYING TESTIMONY IN VIDEO IS ACCURATE AND TRUE[3]

- Filed in W.D.M. on 7/15/2024 in ECF 59, PID.4723-4735.
- This included the DVD and video[4] filed in ECF 59, PID.4724.
- This is a short 3-minute video introduction to this lawsuit, providing a high-level overview of the conspiracy between bad actors spanning both state and federal courts in Middle Tennessee. This video also shows my Brentwood (Williamson County) residence, located at 1986 Sunnyside Drive, Brentwood, TN 37027.

(3) DECLARATION OF IRREFUTABLE PROOF OF A CRIMINAL CONSPIRACY SPANNING STATE AND FEDERAL COURTS (REV. 3/13/24)[5]

- Filed in W.D.M. on 3/25/2024 in ECF 53, PID.4258-4349.

(4) AMENDED COMPLAINT FOR TORTIOUS CONDUCT AND INJUNCTIVE RELIEF[6]

- Filed in W.D.M. on 8/21/2024 in ECF 66, PID.4870-5007.

(5) PLAINTIFF FLASH DRIVE-1 INFORMATION[7]

- Filed without document title as "Evidence Title: 1-23-cv-01097_plaintiff-flash-drive-1.zip" on 8/19/2024 in ECF 65, PID.4794-4820.

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[3] https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-video-declaration.pdf

[4] https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4
https://rico.jefffenton.com/youtube/1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4

[5] https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf

[6] https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf

[7] https://rico.jefffenton.com/evidence/1-23-cv-01097_plaintiff-flash-drive-1-info.pdf

(6) INDEX OF DOCUMENTS FILED IN THIS FEDERAL LAWSUIT[8]

- Filed in W.D.M. on 8/19/2024 in ECF 65-3, PID.4822-4850.

(7) 8/1/2019 CHANCERY COURT HEARING PACKAGE

- 8/1/2019 Chancery Hearing Transcripts of Evidence[9]
  - i. Filed in W.D.M. on 1/19/2024 in ECF 22, PID.2818-2860.
  - ii. 3/31/2020 Chancery Court Certificate of Appellate Record[10]
  - iii. Filed in W.D.M. on 1/19/2024 in ECF 22, PID.2861-2862.

- 2/18/2020 Chancery Court Notice of Filing[11]
  - i. This is a notice of filing the 8/1/2019 Transcripts in Chancery Court by Sara B. McKinney D.C.
  - ii. Filed in W.D.M. on 10/13/2023 in ECF 1-23, PID.1084.

- Chancery Court Order from 8/1/2019 Hearing[12]
  - i. Filed in W.D.M. on 1/19/2024 in ECF 19-6, PID.2669-2671.

- Rule 11. Orders and Judgments, Section 11.01 Preparation and Submission[13]
  - i. Rules of the Circuit and Chancery Courts for the Twenty-First Judicial District in Tennessee.
  - ii. Filed in W.D.M. on 1/19/2024 in ECF 19-6, PID.2672.

(8) DECLARATION ABOUT PROFESSIONAL AND JUDICIAL MISCONDUCT DURING MY 8/1/2019 HEARING IN CHANCERY COURT[14]

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[8] https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-document-index.pdf

[9] https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf

[10] https://rico.jefffenton.com/evidence/2020-03-31_chancery-certificate-of-appellate-record.pdf

[11] https://rico.jefffenton.com/evidence/2020-02-18_notice-of-filing-transcripts-from-2019-08-01.pdf

[12] https://rico.jefffenton.com/evidence/2019-08-01_chancery-court-order-with-counsel.pdf

[13] https://rico.jefffenton.com/evidence/2019_tn-21st-district-court-rule-11-preparation-of-orders.pdf

[14] https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf

- Filed in W.D.M. on 3/25/2024 in ECF 33, PID.3310-3391.

(9) 8/29/2019 CHANCERY COURT HEARING PACKAGE

- 8/29/2019 Chancery Hearing Transcripts of Evidence[15]
  i. Filed in W.D.M. on 1/19/2024 in ECF 23, PID.2863-2892.

- DECLARATION CERTIFYING THE AUTHENTICITY AND ACCURACY OF 8/29/2019 TRANSCRIPT OF EVIDENCE AND AUDIO RECORDING OF HEARING[16]
  i. Filed in W.D.M. on 1/19/2024 in ECF 23-1, PID.2894-2905.

- Court Rules Violated by Chancery Court, filed in W.D.M. on 1/19/2024 in ECF 23-2, PID.2907-2916.
  i. Tenn. R. Sup. Ct. 2.11 Disqualification (ECF 23-2, PID.2907-2910).
  ii. 28 U.S.C. § 455 - Disqualification of justice, judge, or magistrate judge (ECF 23-2, PID.2911).
  iii. Tenn. R. Sup. Ct. 3.4 - Fairness to Opposing Party and Counsel (ECF 23-2, PID.2912-2913).
  iv. Tenn. R. Sup. Ct. 8.4 – MISCONDUCT (ECF 23-2, PID.2914).
  v. Tenn. R. Sup. Ct. 3.5 - Impartiality and Decorum of The Tribunal (ECF 23-2, PID.2915-2916).

- Cover Page of 8/29/2019 Transcript of Evidence, originally filed in W.D.M. on 10/13/2023 with the entire Chancery Court Record, in ECF 1-24, PID.1154-1183 proving that rather than recording this document correctly as a

[15] https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

[16] https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

"Transcript of Evidence" the Chancery Court instead buried it amongst hundreds of pages, in Volume-4 of my Technical Records, in Pages 495-523.

i. Filed in W.D.M. on 1/19/2024 in ECF 23-3, PID.2918.

ii. I believe this was to intentionally obfuscate and hide the criminal misconduct by defendants Story and Binkley during this hearing.

iii. Every court I have been before in Tennessee has refused to correct this filing to distinguish it as a *Transcript of Evidence*, despite defendant Binkley having physically left the court room and procured the licensed court reporter who recorded this hearing *himself*, at which point I hired her.

iv. I believe this clearly shows malicious intent by Beeler, court staff, and others throughout the Tennessee Court System.

- Digital Media Exhibit[17]: "2019-08-29_chancery-hearing-audio-recording.mp3"
  i. Filed in W.D.M. on 1/19/2024 in ECF 23-4, PID.2920.

- Chancery Court Order from 8/29/2019 Hearing (TIE[18] with markup)[19]
  i. Filed in W.D.M. on 1/19/2024 in ECF 19-7, PID.2674-2676.

- Rule 11. Orders and Judgments, Section 11.01 Preparation and Submission[20]
  i. Rules of the Circuit and Chancery Courts for the Twenty-First Judicial District in Tennessee.
  ii. Filed in W.D.M. on 1/19/2024 in ECF 19-6, PID.2672.

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[17] https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

[18] "Testimony in Evidence" exhibit, explained on pages 3 and 5 of the Lawsuit Document Index (ECF 65-3, PID.4824 & 4826). https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-document-index.pdf

[19] https://rico.jefffenton.com/evidence/2019-08-29_chancery-court-order-once-pro-se.pdf

[20] https://rico.jefffenton.com/evidence/2019_tn-21st-district-court-rule-11-preparation-of-orders.pdf

(10) MEMORANDUM OF LAW REGARDING VOID TENNESSEE COURT ORDERS[21]

i. Filed in W.D.M. on 8/26/2024 in ECF 68, PID.5009-5029.

(11) FLASH DRIVE (padded and sealed in a mylar bag to protect it during shipping).

i. Filed in W.D.M. on 8/19/2024 in ECF 65, PID.4796.

15. On the included flash drive above[22], "l-23-cv-01097_plaintiff-flash-drive-1.zip", documented in ECF 65, PID.4794-4820, there were two files added to later batches of drive cloning and service, for the benefit of the defendants, which weren't available when service began, due to the time constraints ordered by the court.

[21] https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

[22] ECF 65, PID.4796

16. Those two documents later added in PDF format, to the flash drives being served to the remaining defendants, are the file stamped "AMENDED COMPLAINT FOR TORTIOUS CONDUCT AND INJUNCTIVE RELIEF[23]" filed on 8/21/2024 in ECF 66, PID.4870-5007 and the file stamped "MEMORANDUM OF LAW REGARDING VOID TENNESSEE COURT ORDERS[24]" filed on 8/26/2024, in ECF 68, PID.5009-5029.

17. Those documents technically weren't needed as digital media exhibits on the flash drives, because a hard copy of both printed documents was served to every defendant, either before or after being file stamped by the court. Regardless, once I had the electronic files available to share, I added them to the flash-drives which I continued to clone, for the convenient ease of use by all.

18. Since these two documents were not available at the start of service, the checksums were not included in the Hash List[25] that I filed with the court on 8/19/2024 in ECF 65-2, PID.4799-4820.

19. The purpose of this Hash List is to provide the defendants with an easy and practical means of verifying that the digital media files, they receive from me, both on the flash drives as well as online at my website, are **identical** to those documents **filed in advauce** with the **court**.

20. This is an intentional step of transparency by myself to help the court maintain a secure and consistent chain of custody over the evidence, documents, and exhibits I have filed with the court and distributed to the defendants in this lawsuit.

21. HashMyFiles[26] is a very small, light-weight, widely accepted, easy to use,

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[23] Available online at: https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf

[24] Available online at: https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

[25] Source File Hash List for Verifying Endpoint Data Integrity

[26] https://www.nirsoft.net/ntils/hash_my_files.html

application distributed online as "freeware", which was used to create these hash lists.

22. Hash lists are widely used to verify data integrity, especially when downloading files over the Internet. Verifying checksums can be done with a wide variety of software applications, several of which are freely available online, without the need for proprietary licensing, or the use of the same software product.

23. Anyone interested in using HashMyFiles[27], can download it online for free with instructions available at: https://www.nirsoft.net/utils/hash_my_files.html

24. I am including here the checksums for these two additional digital files, to complete the hash lists filed in ECF 65-2, PID.4799-4820, so that the endpoint file integrity of every PDF served to the defendants on the flash drives[28] can be verified with those filed in court.

25. "AMENDED COMPLAINT FOR TORTIOUS CONDUCT AND INJUNCTIVE RELIEF[29]" filed on 8/21/2024 in ECF 66, PID.4870-5007.

- Full Path: W:\PFD1\2-DOCS\1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf
  i. File Size: 14,677,223
  ii. Modified Time: 8/31/2024 3:06:16 PM
  iii. SHA-256: 33e241854728a1202402f6e0cae5dca467c35badba71a1288df7d8cca9d3c548

[27] https://www.nirsoft.net/utils/hash_my_files.html

[28] https://rico.jefffenton.com/evidence/1-23-cv-01097_plaintiff-flash-drive-1-info.pdf

[29] Available online at: https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf

26. "MEMORANDUM OF LAW REGARDING VOID TENNESSEE COURT ORDERS[30]" filed on 8/26/2024, in ECF 68, PID.5009-5029.

- Full Path: W:\PFD1\2-DOCS\[NEW FILINGS]\2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf
  - i. File Size: 8,216,195
  - ii. Modified Time: 9/3/2024 12:48:42 PM
  - iii. SHA-256: 6b6fd7afd604065b345c37b6526c39d4828c90ca0282ca72bcff470260adedaa

SERVED AS RECEIVED IN THIS FILING

27. To reiterate, this filing received by the United States District Court for the Western District of Michigan via U.S.P.S. is the same as the packages provided to each of the defendants in this lawsuit, with the exception of the fact that no summons has been sent in this package to the court (while a summons was sent to each defendant), and this document, "LAWSUIT SERVICE PACKAGE DETAILS[31]" was not sent to any of the defendants.

28. This is to help clarify exactly what was served to each defendant in this lawsuit, and by what media formats and delivery mediums these documents and digital exhibits were served.

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[30] Available online at: https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

[31] Available online at: https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-service-pack-details.pdf

DECLARATION

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

Executed on September 9, 2024

JEFFREY RYAN FENTON, PRO SE

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LANSING, MI 48933-1514

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