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**

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US DISTRICT COURT
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DECLARATION EXPLAINING MY PURSUIT OF JUSTICE[1]

This testimony is being brought 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. 3:24-cv-01282, which was previously 1:23-cv-1097 in the United States District Court for the Western District of Michigan.)

2. I am a citizen of the United States of America, born in Washington State.

3. I am domiciled in Genesee County, Michigan.

4. My mailing address is 17195 Silver Parkway, #150, Fenton, MI 48430-3426.

5. My phone number is (615) 837-1300. My email address is contact@jefffenton.com.

[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.

COURT MISCONDUCT

6. Although this lawsuit must repeatedly address what I believe can only be reasonably interpreted as court misconduct, for the purpose of protecting my constitutional and lawful rights to equal protection and due process of law, by an impartial tribunal, through a fair court process, I do not do so with any joy, malice, or disrespect for the court whatsoever. I likewise do not seek to disparage the court or any member of the court in any way.

7. At the same time, I have been placed in a situation, through no fault of my own, where I must speak honestly about and confront the professional and judicial misconduct which I have experienced "under color of law."

8. I am providing this declaration in an effort to clarify my posture, position, and beliefs regarding both attorney and judicial misconduct as well as the role of the courts and the "practice of law" currently in our nation, and specifically within the State of Tennessee.

9. It is my firm and steadfast belief that the institutions of justice are not inherently bad, corrupted, or used for unlawful purposes. Yet it would be naive and illogical for me to blindly accept that what members of the court say is **truth** and what the court orders is **lawful**.

10. I wish that life was that simple, transparent, and honest, but it quite simply is not, as the thousands of pages of sworn testimony and evidence in my case irrefutably proves.

I AM FIGHTING FOR JUSTICE

11. I want to make sure that nobody twists or misrepresents the fact that **I am fighting for justice** in this lawsuit, on many levels, both for myself and my family, but also for the victory of justice over injustice, the truth over the lie, good over evil, right over wrong within our courts, combined with both our state and federal governments in this nation. I believe that what we feed grows. I'm doing everything within my power to feed JUSTICE!

THIS LAWSUIT IS NOT ABOUT MONEY

12. If I never gain a penny from this suit and remain destroyed for my entire life, but the courts in Middle Tennessee are able to disbar, remove, or imprison some of the bad actors in my lawsuit thereby increasing the honest judicial integrity throughout Middle Tennessee—specifically impacting the Williamson County Chancery Court and the Tennessee Court of Appeals in Nashville for the honest lawful benefit of the people who used to be my neighbors and friends—then this lawsuit will have been a success no matter what is ever penned in this case or by whom.

REQUIRE TENNESSEE JUDGES TO OBEY THE COURT'S ETHICAL CANONS

13. One of my greatest hopes is that rules and/or statutes will be created, whether state or federal, which will prohibit the incredibly foolish and incestuous practice of allowing judges to hear and decide matters argued in court by their friends and prior associates, especially without even disclosing their relationship to the litigants or allowing the litigants any opportunity or choice by which they might obtain an honestly impartial tribunal without such obvious conflicts of interest. The current incestuous workings of the Tennessee courts is unconscionable! Now, it simply needs to be outlawed or punished to the point where states around the nation prioritize acting in the honest interests of improving judicial integrity within their courts and disciplining powerful local bad actors to protect the honest interests and rights of the people.

14. The State of Tennessee has chosen to remain silent on this issue[2] despite the

[2] DOC 43, PID 3726-3729 | https://rico.jefffenton.com/evidence/2018-08-30_tennessean-story-hosts-vacations-with-judges.pdf
DOC 44, PID 3740-3741 | https://rico.jefffenton.com/evidence/2018-09-24_tenn-binkley-defends-partying-with-lawyers.pdf

obvious dangers to the honest judicial integrity[3] throughout the entire state in addition to the health and safety[4] of the public at large. It has been my personal experience that the misconduct exhibited in Tennessee goes beyond professional negligence by the Tennessee Supreme Court's supervisory boards and administrative offices as the facts and evidence in my lawsuit unquestionably proves.

WHERE TRANSPARENCY IS LACKING — CORRUPTION INEVITABLY THRIVES

15. In 2019 when I was involved in litigation in Middle Tennessee, the Williamson County Chancery Court did not record audio or video during civil court hearings, thus eschewing transparency and accountability. Everything was based on the "honor" system, trusting the

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[3] DOC 54-1, PID 4355 | https://rico.jefffenton.com/evidence/2010-10-05_reguli-tn-senate-judiciary-comm-retaliation-pt-1.mp4
DOC 54-1, PID 4356 | https://rico.jefffenton.com/evidence/2010-10-05_reguli-tn-senate-judiciary-comm-retaliation-pt-2.mp4
DOC 43, PID 3694-3695 | https://rico.jefffenton.com/evidence/2017-02-01_scene-ethics-complaint-against-two-judges.pdf
DOC 54-1, PID 4358 | https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.mp4
DOC 52, PID 4180-4201 | https://rico.jefffenton.com/evidence/2018-02-28_tn-judge-cason-moreland-fbi-criminal-complaint.pdf
DOC 40, PID 3497-3569 | https://rico.jefffenton.com/evidence/2019-01-14_tn-petition-of-remonstrance-by-john-gentry.pdf
DOC 58-2, PID 4628-4630 | https://rico.jefffenton.com/evidence/2019-07-01_tenn-bpr-targets-whistleblowers-not-corruption.pdf
DOC 54-1, PID 4367 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3
DOC 28, PID 3276-3288 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf
DOC 52, PID 4174-4179 | https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.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

[4] DOC 58-1, PID 4573-4626 | https://rico.jefffenton.com/evidence/2014-09-18_tn-stop-false-allegations-for-protective-orders.pdf
DOC 1-31, PID 1794-1873 | https://rico.jefffenton.com/evidence/2019-10-21_order-of-protection-as-illegal-prior-restraint.pdf
DOC 1-31, PID 1794-1873 | https://rico.jefffenton.com/evidence/2020-09-24_5yr-op-ext-retaliation-no-notice-motion-hearing.pdf
DOC 54-1, PID 4368 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4
DOC 1-14, PID 597-640 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf
DOC 54-1, PID 4360 | https://rico.jefffenton.com/evidence/2017-04-03_wtvf-moreland-tried-to-plant-drugs-on-witness.mp4
DOC 54-1, PID 4362 | https://rico.jefffenton.com/evidence/2017-04-03_wtvf-undercover-fbi-video-of-casey-moreland.mp4
DOC 43, PID 3689-3693 | https://rico.jefffenton.com/evidence/2017-01-31_nashville-judicial-misconduct-leigh-terrys-death.pdf
DOC 54-1, PID 4374 | https://rico.jefffenton.com/evidence/2022-12-22_sgcs-franklin-tn-corruption-abuse-solomon-case.mp4
Reguli – Fake Felony Testimony | https://www.youtube.com/watch?v=-rC6CjUATTk
https://tennesseeconservativenews.com/2022-tennessee-judicial-candidate-sues-public-officials-after-fake-felony-conviction-is-reversed/

judge and the clerks of the court implicitly, without any meaningful mechanisms for transparency or accountability within the reach of the average litigant; otherwise, I would have never needed to bring this lawsuit.

PROTECTING THE PRACTICE OF LAW WITH A MINIMUM OF GRADE SCHOOL LEVEL COMMON SENSE

16. It never should have required the obscene losses which I have experienced and continue to experience and endure each day to convince the State of Tennessee and the Tennessee Supreme Court to proactively exercise grade-school-level common sense for the proactive protection of the people, but now I can definitively prove what should have been "a given" from the start.

17. I'm here to prove that the damage done to me is real, substantial, criminal, and unjustifiable, while much of it was and is preventable—at almost no cost to the state—by enacting simple common-sense policies in alignment with the ethical canons forcing the members of the court to in fact comply with the canons prior to the exercise of power over another person's life, liberty, and property.

COURTS MUST PROTECT LITIGANTS FROM LOSSES WHICH STATES CAN'T AFFORD TO REMEDY

18. In any situation whereby a state cannot realistically afford to remedy the injustices caused under its policies and governance, such as a multi-billion-dollar class action lawsuit by the people against the State of Tennessee and the Tennessee Supreme Court for professional negligence for refusing to use grade-school-level common-sense for the proactive protection of the people, the courts must **stop** the state from causing damage which it cannot afford to honestly cure.

19. The only other lawful option to protect the natural and constitutional rights of the people is to penalize a state so **severely** once its judicial members are caught violating the natural and federal rights of an individual, such as in my Tennessee divorce and in my ex-wife's bankruptcy, that they decide to proactively "raise the bar" for the "practice of law" throughout the state and their courts therein.

COURTS MUST INCENTIVIZE AND PROTECT WHISTLEBLOWERS CHALLENGING CORRUPTION

20. When it costs a state more money to allow its residents to be treated unfairly "under the color of law" within their courts by powerful bad actors, the state will without doubt invest their resources to **protect the people** with the even-handed application of justice as is lawfully required to exercise power instead of protecting the powerful bad actors as they are currently in this lawsuit.

ALL OR NOTHING—THE UNREASONABLE EXCUSE FOR PASSIVITY

21. There are many people in our nation currently who believe that our courts are so corrupt and compromised that they are simply beyond saving, reforming, or being able to improve to honestly be trusted to serve the interests of "we the people" instead of being leveraged by powerful bad actors to prey upon the honest and hardworking people in our country.

22. I see and in fact have experienced what many of these people have. Without question, it is grotesque, horrific, and unjustifiable, yet I have come to a different conclusion.

23. I don't believe it is possible to abolish our courts without causing more harm than good to our nation. At the same time, I don't necessarily believe that our courts are currently providing more benefit than harm to our nation either. I am honestly not in a position, not privy

to enough data, nor have I the education or training necessary to make such a judgment. Personally, this issue is moot for me. I do not consider it a realistic option.

FORCING OUR COURTS TO OBEY THE LAW

24. My belief is that "we the people" along with individuals with integrity and respect for the "the rule of law" within the "legal" industry throughout our nation must force our courts to **obey the law**, whether they want to or not, to whatever extent we are capable. We must simultaneously advocate for common-sense systems of robust transparency and meaningful accountability within the reach of most people, especially injured litigants.

PROSECUTE THE CRIMINALS AND REMOVE THEM FROM PRACTICE

25. Then to whatever extent we are not capable of compelling the courts and bad actors therein to obey the law, we must call them out and prosecute them to the highest extent of the law, while challenging, limiting the constraints of, and ultimately abolishing counterproductive doctrines such as "judicial immunity" for anything intentionally nefarious. Nobody can have power without equally being responsible to exercise it lawfully, honorably, honestly, and fairly. Any precept to the contrary is frankly barbaric, anti-American, oppressive, and unconstitutional.

WHISTLEBLOWERS CHALLENGING GOVERNMENT/COURT MISCONDUCT/CORRUPTION MUST BE PROTECTED

26. We also must ensure that the courts protect (if not encourage) a culture of challenging judicial and professional misconduct as well as all types of corruption.

THE TENNESSEE BOARD OF PROFESSIONAL RESPONSIBILITY HAS BEEN CAPTURED AND WEAPONIZED BY BAD ACTORS

27. When the State of Tennessee decided to weaponize the Board of Professional Responsibility of the Supreme Court of Tennessee, against some of the most honest, ethical, lawful, patriotic defenders of the people, such as *disbarred* former attorney whistleblower Brian Manookian[5] and currently *suspended* attorney whistleblower Connie Reguil[6], it sent a message throughout that state **that anyone who reports or challenges judicial misconduct** as every BAR member is ethically required to do, **will be retaliated against, suspended, and ultimately driven out of the "practice of law" within the State of Tennessee.**

THE TENNESSEE SUPREME COURT IS IN VIOLATION OF THE TENNESSEE STATE CONSTITUTION

28. Allowing the Board of Professional Responsibility to become captured and weaponized toward the interests of lawless corruption was a grave violation of Article I, Section 2 of the Tennessee Constitution *ensuring* that the "practice of law" would remain absolutely *arbitrary* and *oppressive* within Tennessee until the state regulatory boards are taken back by people with ethical and moral fortitude who refuse to protect bad actors while retaliating against their enemies.

29. For any who question my claims, please do the due diligence and verify for yourself *who* the Board of Professional Responsibility for the Supreme Court of Tennessee is

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[5] DOC 58-2, PID 4628-4630 | https://rico.jefffenton.com/evidence/2019-07-01_tenn-bpr-targets-whistleblowers-not-corruption.pdf
DOC 52, PID 4174-4179 | https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf
DOC 58-4, PID 4712-4716 | https://rico.jefffenton.com/evidence/2024-02-16_tnsc-manookian-disbarment-opinion-justice-lee.pdf

[6] DOC 58-5, PID 4718-4722 | https://rico.jefffenton.com/evidence/2024-05-02_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf
Reguli v. Woodruff et al (3:2024-cv-00694) | https://dockets.justia.com/docket/tennessee/tnmdce/3:2024cv00694/99766
Reguli et al v. Hetzel et al (3:2024-cv-00541) | https://dockets.justia.com/docket/tennessee/tnmdce/3:2024cv00541/99331

honestly serving[7], headed by Chief Disciplinary Counsel and Execute Director Sandra Jane Leach Garrett (BRP #013863).

30. I've provided links below for the disciplinary records[8] for every bad actor and defendant in this lawsuit (individual BAR members only). Please bear in mind that the State of Tennessee and the Board of Professional Responsibility—Sandy Garrett specifically—has been redundantly served[9] irrefutable evidence[10] of unconscionable misconduct[11] by many of the defendants herein, some for years, while their public records reflect absolutely none of that. Unfortunately, I do not expect that they soon will either since many of these bad actors are being protected by the current administration, of which this notice shall serve as evidence and public record while retaliating against some of their publicly known enemies[12], as absolutely absurd as that actually is.

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7 https://rico.jefffenton.com/evidence/tnsc-board-of-professional-responsibility-weaponization.pdf

8 See attached Exhibits 'A' through 'R-2'.

9 https://jefffenton.com/digital-service-package-for-lawsuit/

10 https://jefffenton.com/digital-service-package-for-lawsuit/2019-08-01-williamson-county-tn-chancery-court-hearing-package/
https://jefffenton.com/digital-service-package-for-lawsuit/2019-08-29-williamson-county-tn-chancery-court-hearing-package/
DOC 53, PID 4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf
DOC 66, PID 4870-5007 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf
DOC 18, PID 2417-2616 | https://rico.jefffenton.com/evidence/2024-01-16_marsha-fenton-sons-tn-legal-proceedings.pdf

11 DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf
DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

12 DOC 52, PID 4174-4179 | https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf
Brian Phillip Manookian (BPR #026455) https://www.tbpr.org/attorneys/026455
Connie Lynn Reguli (BPR #016867) https://www.tbpr.org/attorneys/016867

BAD ACTORS THE BOARD OF PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF TENNESSEE IS CURRENTLY PROTECTING

Virginia Lee Story (BPR# 011700) https://www.tbpr.org/attorneys/011700 (Exhibit 'A')[13]
Michael Weimar Binkley (BPR# 005930) https://www.tbpr.org/attorneys/005930 (Exhibit 'B')
Kathryn Lynn Yarbrough (BPR# 032789) https://www.tbpr.org/attorneys/032789 (Exhibit 'C')
Elaine Beaty Beeler (BPR# 016583) https://www.tbpr.org/attorneys/016583 (Exhibit 'D')
Mary Elizabeth Maney Ausbrooks (BPR# 018097) https://www.tbpr.org/attorneys/018097 (Exhibit 'E')
Alexander Sergey Koval (BPR# 029541) https://www.tbpr.org/attorneys/029541 (Exhibit 'F')
Henry Edward Hildebrand III (BPR# 004630) https://www.tbpr.org/attorneys/004630 (Exhibit 'G')
Charles M. Walker (BPR# 019884) https://www.tbpr.org/attorneys/019884 (Exhibit 'H')
Samuel Forrest Anderson (BPR# 017022) https://www.tbpr.org/attorneys/0170022 (Exhibit 'I')

James Michael Hivner (BPR# 020405) https://www.tbpr.org/attorneys/020405 (Exhibit 'J')
John Brandon Coke (BPR# 029107) https://www.tbpr.org/attorneys/029107 (Exhibit 'K')
Sandra Jane Leach Garrett (BPR# 013863) https://www.tbpr.org/attorneys/013863 (Exhibit 'L')

Frank Goad Clement Jr. (BPR# 006619) https://www.tbpr.org/attorneys/006619 (Exhibit 'M')
Andy Dwane Bennett (BPR# 009894) https://www.tbpr.org/attorneys/009894 (Exhibit 'N')
William Neal McBrayer (BPR# 013879) https://www.tbpr.org/attorneys/013879 (Exhibit 'O')

BEST-IN-CLASS ATTORNEY WHISTLEBLOWERS WHO CHALLENGED JUDICIAL MISCONDUCT AND CORRUPTION IN WILLIAMSON COUNTY—WHOM TENNESSEE RETALIATED AGAINST/SUSPENDED/DISBARRED

31. Compare the aforementioned to two publicly known attorney whistleblowers who've had the courage to confront judicial misconduct and corruption in Williamson County Chancery Court, who were subsequently retaliated against by Board of Professional Responsibility for the Supreme Court of Tennessee and removed from the "practice of law".

Brian Phillip Manookian (BPR #026455) https://www.tbpr.org/attorneys/026455 (Exhibit 'Q')
Connie Lynn Reguli (BPR #016867) https://www.tbpr.org/attorneys/016867 (Exhibit 'R')

[13] All exhibits are attached.

32. We cannot continue to leave predators in control of our courts and state oversight boards. It is obscene that it has reached this point, but the courts have an obligation to **obey the law**, and in any instance where they refuse, the law must **remove** those individuals from our courts along with every position of power entrusted with the honest administration of justice.

OFFICIALS CAN'T WAR AGAINST THE CONSTITUTION AND REMAIN IN POWER—THE COURT MUST REMOVE THEM

33. Nobody can remain in a position of power while waring against the Constitution and violating the natural and constitutional rights of the people. Is that happening today? Absolutely, all over the place unfortunately. But the Court has a **responsibility** above and beyond all others to **remove** these "misfits of misconduct" and "perverts of power" to restore the even-handed administration of justice to the broader base **of the people.**

> "No state legislator or executive or judicial officer can war against the Constitution without violating his solemn oath to support it." *Cooper v. Aaron*, 358 U.S. 1, 3 (1958)

THE COURT'S REAL ENEMIES ARE MISCONDUCT AND CORRUPTION

34. The only thing which can prevent the court from fulfilling this crucial and core responsibility is misconduct and corruption to whatever depth and breadth which the state and court have chosen to tolerate and allow this misconduct to exist. Regardless, the remedy remains the same and is **required**; those who participate in misconduct must be disciplined and/or removed, disbarred, or prosecuted.

"The exposure and punishment of public corruption is an honor to a nation, not a disgrace. The shame lies in toleration, not in correction." — *Theodore Roosevelt*

35. Corruption must be rooted out of our courts and government bodies at all levels with the same fastidiousness and ferocity as the Department of Justice once exercised to eradicate prohibition era gangsters. Today's *organized crime* looks much different, but it is honestly no more civil or humane than in the days when Tommy guns ruled the streets in most major cities. At least then it was obvious who the criminals, mobsters, and bad guys actually were.

36. The defendants in this lawsuit *forced me* to learn the law, something in which I never had any interest, to have any chance of surviving their crimes against me. Now I will devote the rest of my life to doing everything within my power to *force them* **to obey the law** at any and every lawful and peaceful cost required regardless of what further harm they can and, I expect, will choose to cause me. Unfortunately, that's the price of liberty in the United States of America today. I believe in freedom with every fiber of my being!

THE LEGENDARY FEARLESS ALAMO SCOUTS

37. My grandfather[14] was one of the 138 courageous legendary Alamo Scouts during World War II who rescued prisoners of war from behind enemy lines in small six-man teams. (See attached Exhibit 'S'.)

38. I am also serving my country albeit on a different battlefield—through justice

[14] https://rico.jefffenton.com/evidence/2017-03-24_wwii-alamo-scout-william-r-watson-grandpa.pdf
https://en.wikipedia.org/wiki/Alamo_Scouts

advocacy both in the courtroom and through the media—but I believe it is every bit as essential for the freedom of our country and the generations who follow.

EDUCATING THE PUBLIC ABOUT PREDATORY LITIGATION TACTICS

39. I will continue educating the public[15] about the dangers of predatory litigation by teaching people how to spot predatory practices by comparing what is said and done in court—preferably using the certified original transcripts of evidence—to the court's codes of professional and judicial conduct. Part of this objective means teaching people how to recognize judicial bias by analyzing how strictly a judge requires attorneys to comply with the codes of professional conduct along with how the judge reacts to blatant misconduct. The façade flourishes only because people don't know the codes of conduct. It's time we reverse the burden of proof onto the courts and anyone seeking to leverage the "law" to **take** from others.

40. Judges must do their jobs by calling out, correcting, and disciplining attorney misconduct to maintain an impartial atmosphere in the court where the truth is welcome and can be equally heard without any prejudice improperly instilled by misconduct and predatory practices. Otherwise, the judge simply "plays along" with the misconduct as if the attorney's actions and language are lawful and proper, which is nothing less than bias and judicial impropriety.

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[15] https://tninjustice.org/predatory-litigation-101/

https://tninjustice.org/williamson-county-brentwood-tn-rico-lawsuit-interview-on-slam-the-gavel-podcast/

https://jefffenton.com/predatory-litigation-how-us-courts-were-designed-to-produce-justice-why-they-fail-how-to-restore-justice-again/

PROCESS OVER CONDUCT AND MERITS = "COLOR OF LAW" FELONIES

41. Courts need to recognize and the public needs to learn that whenever licensed attorneys try to defeat *pro se* litigants by the court's rules, processes, and procedures (technicalities), without showing equal or greater care about good ethical conduct and the merits of the matters before the court, most of the time misconduct[16] is afoot. The question then is: how does the judge respond to this misconduct?

MISCONDUCT CANNOT PRODUCE JUSTICE

42. The idea that bad conduct can produce justice is pure folly. Good conduct and judges who require and enforce it, placing merits and conduct over processes and technicalities, are the missing ingredient for everything I experienced throughout Tennessee courts. However, correcting misbehavior isn't optional in the ethical canons, yet it continued to be lacking in the United States District Court for the Western District of Michigan also.

CONDUCT PROVES INTENTIONS AND BIAS

43. From what I have experienced to date, I believe that conduct is the key to reasonably interpreting and proving the motives/intentions/bias of members of the court, both attorneys and judges alike. One benefit of learning to analyze court proceedings based upon conduct is that they can often be evaluated and weighed independently of knowing what is in fact true in the case. Truth can be hard to prove during a hearing, but many types of misconduct can be easily recognized and proved regardless of what anyone claims to be the truth in the matter.

[16] Courts should be keen to "predatory litigation" in any case involving a *pro se* litigant, where counsel tries to elevate court processes and procedures (technicalities), above merits and conduct. That is a tell-tale sign that the council or court's priorities are not in alignment with real justice.

TRUTH DOES NOT REQUIRE MISCONDUCT, ONLY LIES DO

44. Truth does not require misconduct to be heard or proved. In fact, misconduct is more likely to produce a lie, which has been falsely presented as the truth.

45. The truth is absolutely important. I'm willing to die for it. Don't misunderstand what I am saying, but while facts can be argued and uncertain, conduct is often very clear. Even when missed in the moment, the exact language can be captured by the court reporter and plainly evaluated against the court's codes of conduct.

46. This evaluation of the language, claims, and conduct[17] between defendants Story and Binkley is all that is needed to prove that bias and misconduct ruled the docket in Tennessee.....over and over and over again.

TREATING FACTS AND MY PLEADINGS AS BEING ACTUALLY TRUE

47. Upon information and belief, no defendant in this case to date has meaningfully challenged the facts in this lawsuit; the misconduct I prove was committed by defendants Story, Binkley, and the Chancery Court; the content of the prior court records as presented; or the supporting evidence while swearing under the penalty of perjury that their claims are lawful, filed without misconduct in the honest interests of justice, and are actually true. In stark contrast, almost all of my testimony in this lawsuit has been sworn, attested, and certified accurate.

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[17] DOC 22, PID 2818-2862 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf
DOC 19-6, PID 2669-2672 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-court-order-with-counsel.pdf
DOC 33, PID 3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf
DOC 23-4, PID 2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3
DOC 23, PID 2863-2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf
DOC 19-7, PID 2674-2677 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-court-order-once-pro-se.pdf
DOC 68, PID 5009-5029 | https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf

48. Therefore, it would be inappropriate and biased for this court to treat my evidence and sworn testimony as anything less than the actual **truth**, thereby further violating my constitutional right to equal protection and due process by an impartial tribunal.

IMPARTIALITY REQUIRES "THE BENEFIT OF THE DOUBT" TO FOLLOW THE EVIDENCE

49. At this stage, it would be unreasonable for the court to deny me the "benefit of the doubt," since my testimony is both sworn to and largely proven[18] to be true, already in the court record, and supported with evidence that is irrefutable[19], all of which shows the court who the bad actors are regardless of their claims and filings.

50. Especially in the absence of any sworn testimony or evidence challenging my claims, it would be inappropriate for the court to treat my submissions as less than the actual truth.

AN EVIDENTIARY HEARING (IF NEEDED) TO HEAR AND ESTABLISH THE MERITS OF THIS CASE ALONG WITH THE CRITICAL INTERESTS OF JUSTICE

51. If the court still has any doubt about the truthfulness of my claims and evidence as filed in my complaint and declarations throughout this lawsuit, then I move for the court to stay all other

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

[19] DOC 53, PID 4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf
DOC 19-2, PID 2632-2646 | https://rico.jefffenton.com/evidence/2019-04-26_ausbrooks-story-fraudulent-bk-petition.pdf
DOC 48, PID 4019-4029 | https://rico.jefffenton.com/evidence/2019-10-29_closing-for-illegal-auction-wilco-rico-deed-fraud.pdf
DOC 54-1, PID 4367 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3
DOC 28, PID 3276-3288 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf
DOC 51, PID 4161-4168 | https://rico.jefffenton.com/evidence/2021-01-26_trustees-final-account-and-distribution-report.pdf
DOC 52, PID 4208-4210 | https://rico.jefffenton.com/evidence/2022-03-15_ustp-bk-fraud-referral-confirmed-no-notice.pdf
DOC 1-1, PID 34-47 | https://rico.jefffenton.com/evidence/2022-02-01_fenton-affidavit-of-story-binkley-fraud-on-court.pdf

matters while having an evidentiary hearing to determine the critical constitutional merits of this lawsuit.

52. Justice will be impossible in this case if the court doesn't first establish that I'm telling the truth, operating in good faith, and the honest interests of justice require the court to make any accommodations necessary to help this matter proceed toward trial.

SELF-REGULATION OF THE LEGAL PROFESSION REQUIRES THAT MEMBERS INITIATE DISCIPLINARY INVESTIGATIONS

53. Upon information and belief, if members of the court obeyed their oaths of office and reported attorney and judicial misconduct as every BAR member is required[20] and the State of Tennessee acted lawfully and ethically taking responsibility for the criminal damages which I have been caused through its courts and local governance, they would either sanction those involved and require them to provide me a remedy (there are plenty of BAR members who have been deceptively involved that they could sanction), or the state, county, or court would take responsibility for forcing me to participate in and submit myself to what were in fact lawless courts and orders, while refusing me equal protection under the law because both the Williamson County Sheriff's Office (hereinafter "WCSO") and the Tennessee Bureau of Investigation (hereinafter "TBI") have refused to even allow me to press criminal charges against defendants Binkley and Story in this lawsuit.

54. More outrageously, the WCSO was leveraged as the "muscle" by which the felonies against me were both executed and enforced, as demanded in bad faith by defendant

[20] Tenn. R. Sup. Ct. 2.15 (Rule 2.15) Responding to Judicial and Lawyer Misconduct
Tenn. R. Sup. Ct. 2.3 (Rule 2.3) Bias, Prejudice, and Harassment
Tenn. R. Sup. Ct. 8.3 (Rule 8.3) REPORTING PROFESSIONAL MISCONDUCT

Story[21] and ordered[22] in bad faith by defendant Binkley subsequent to my hearing in Chancery Court on September 29, 2019. Both the court[23] and defendant Story's office[24] refused to act lawfully or ethically despite me reaching out to them in desperate attempts to mitigate my damages before I was wrongfully evicted from my home thereby exponentially increasing my damages every day thereafter.

FOURTH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES[25]

> "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized."

FIFTH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES

> "No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to

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21 DOC 23-4, PID 2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3
DOC 23, PID 2863-2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf

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

23 DOC 54-1, PID 4361 | https://rico.jefffenton.com/evidence/2019-08-30_judgment-wrong-emergency-call-to-court.mp3
DOC 57-1, PID 4405-4413 | https://rico.jefffenton.com/evidence/2019-08-30_notified-story-beeler-false-claims-in-court-order.pdf
DOC 57-1, PID 4459 | https://rico.jefffenton.com/evidence/2019-08-30_story-lied-when-notified-false-claims-in-order.pdf

24 DOC 57-1, PID 4394-4404 | https://rico.jefffenton.com/evidence/2019-08-30_emergency-attempt-to-correct-court-order.pdf

25 https://constitution.congress.gov/constitution/amendment-4/

be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation."

55. In the preceding Tennessee matters, the Fourth and Fifth Amendments to the United States Constitution were trampled with a level of violent disregard that is unbecoming of any office of the state or public trust.

56. I was almost instantly deprived of my life, liberty, and property without remotely equal or due process of law. This happened via a court with no lawful jurisdiction[26] to hear or dispose of my property because the federal courts had both original and exclusive jurisdiction over my property at the commencement of my ex-wife's bankruptcy[27], which incidentally preceded any filings in state court, not the other way around as was improperly suggested by counsel for the defendants.

57. My property was forcefully taken against my will by government actors without just cause or compensation.

58. I was not secure in my person, house, papers, and effects against unreasonable searches and seizures. Despite having done everything in my power and to the best of my knowledge, to be secure in my home against all threats.

59. There was no probable cause nor lawful warrant for removing me from my home.

60. Yet it all happened with just a five-day notice over a holiday weekend when no help could be reached, despite my desperate attempts.

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

[27] DOC 38, PID 3445-3496 | https://rico.jefffenton.com/evidence/2019-04-26_bankruptcy-crimes-rules-and-laws-violated.pdf

61. Until there are some mechanisms in place to protect the Fourth and Fifth Amendment rights of the people in Williamson County Tennessee to prevent this **exact same scam** from being executed again, there can be absolutely no discussion or consideration of dispositive motions or immunity. The court's first priority must be to **protect the public** from criminal interference and deprivation under the fraudulent color of law.

62. The State of Tennessee and Williamson County cannot allow armed deputies to be leveraged as the muscle for the execution and enforcement of felony crimes against the people without answering for those actions and taking steps to protect the people from it ever happening again.

FEDERALLY UNCONSTITUTIONAL ACTS — NO STATE OFFICER HAS IMMUNITY

> "When a state officer acts under a state law in a manner violative of the Federal Constitution, he comes into conflict with the superior authority of that Constitution, and he is in that case *stripped of his official or representative character* and is **subjected in his person to the consequences of his individual conduct.** The State has no power to impart to him any immunity from responsibility to the supreme authority of the United States" (emphasis added). *Scheuer v. Rhodes*, 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974)

63. Upon information and belief, as long as the Williamson County Sheriff's Office can be leveraged by lawless judges and attorneys in the commission and enforcement of felonies against the people, but the people can't find any protection or relief through the WCSO from those same corrupt and compromised judges and attorneys (violating their rights), then the State

of Tennessee, Williamson County, and the WCSO are in violation of the Equal Protection Clause of the United States Constitution.

64. It might be appropriate for all federal funding to be withheld from the state and county until they bring their agencies into compliance with the United States Constitution to protect the people's property, lives, and liberty from being arbitrarily destroyed by the criminal interests of corruption.

65. The idea that bad actors can use public resources to harm the public without accountability is absolutely absurd. The same goes for the Board of Professional Responsibility.

66. The idea that the state and county can sit back and refuse to answer for the obviously unethical and unlawful actions of their officers without taking any steps to remedy the damage wrongfully caused to the injured party or to protect the public from the same crimes being committed again by rogue judges and attorneys while trying to claim any sort of immunity for acts which were clearly never performed honestly in good faith in the first place is not only obscenely absurd, but it is without doubt that conduct which has been described as "waring against the constitution of the United States".

> *Note: Any judge who does not comply with his oath to the Constitution of the United States wars against that Constitution and engages in acts in violation of the supreme law of the land. The judge is engaged in acts of treason.* The U.S. Supreme Court has stated that "no state legislator or executive or judicial officer can war against the Constitution without violating his undertaking to support it." *Cooper v. Aaron*, 358 U.S. 1, 78 S. Ct. 1401 (1958); See also *In Re Sawyer*, 124 U.S. 200 (188); *U.S. v. Will*, 449 U.S. 200, 216, 101 S. Ct. 471, 66 L. Ed. 2d 392, 406 (1980); *Cohens v. Virginia*, 19 U.S. (6 Wheat) 264, 404, 5 L. Ed 257 (1821).

INAUGURATION DAY, JANUARY 20, 2025

67. As I finish writing this declaration today, on January 20, 2025, shortly after President Trump was sworn into office, news headlines broadcast how former President Biden has disgustingly granted blanket pardons—preemptive in some instances—to his friends and family[28] for their substantial, and some even unspeakable, crimes against our country. These reprehensible pardons are compounded further by granting a blanket pardon to Dr. Anthony Fauci[29] for his involvement in gain-of-function research after it had been outlawed and improper handling was identified as the most probable cause for the global COVID-19 pandemic that followed.

68. Upon information and belief, on top of all of that, former President Biden granted blanket pardons to many of his treasonous allies in Congress, such as members of the "Select Committee to Investigate the January 6th Attack on the United States Capital[30]", who misused government offices, resources, and assets to advance private and party interests, many of which were substantially opposed to the interests of the constitutional republic which governs this great nation and the constitutional liberties of our people.

69. Upon information and belief, time has proven this to have largely been a false flag initiative by leaders of the Democratic Party secretly staged and supported with untold numbers of federal agents, assets, offices, and actors leveraging materially misleading and dishonest narratives by which our nation has been terrorized and our freedoms have been unlawfully deprived and held hostage while government has allowed the "practice of law" to become

[28] https://www.justice.gov/pardon/media/1385756/dl?inline
https://www.justice.gov/d9/2024-12/biden_warrant.pdf

[29] https://www.justice.gov/pardon/media/1385746/dl?inline

[30] https://www.justice.gov/pardon/media/1385751/dl?inline (https://january6th-benniethompson.house.gov/)

weaponized against the people by the political parties and interests fighting for control throughout our nation.

70. The most horrific part about these pardons is that they reward **loyalty to a person** rather than loyalty to the law, oaths of office, or our nation. These individuals were absolved even if their actions and lies caused catastrophic loss of life, liberty, and property to innocent people—as long as they did not personally do anything violent to them.

71. The message is that it's OK if you give **false testimony** (perjure yourself) before Congress or the January 6th Committee or special courts prosecuting Biden and Pelosi's "political prisoners" no matter how much harm is caused to others and our nation as long as you **stick to the script** for the role you were assigned to **play** and remain **loyal to the leader** of the lies and misconduct.

72. Maybe that makes sense in the realm of politics, but it perverts, dishonors, and invalidates any correlating action, exercise, pretense, or practice of **law**.

73. **Law requires truth to rule**, not loyalty to politicians, political interests, or wealthy and powerful people.

TENNESSEE'S JUDICIAL OATH OF OFFICE

> *I, [Insert Name], do solemnly swear that I will support the Constitution of the United States of America and the Constitution of the State of Tennessee, that I will administer justice* ***without respect of persons****, and that I will faithfully and impartially discharge all the duties incumbent upon me as Judge of the [Insert Court & District], of the State of Tennessee, to the best of my skill and ability, so help me God.* (emphasis added)

74. Actions like these are ushering in a new breed of outlaws in our country whose words cannot reasonably be trusted or accepted as true. They do not speak the truth unless it is complimentary or convenient. They show no interest or respect for the rule of law, except for how they can leverage it to manipulate others and court proceedings to their advantage.

75. Upon information and belief, some, if not many, of the defendants in this matter operate in this polluted paradigm of power, not expecting to ever be justified by any lawfulness of their actions, but rather with full expectation that through a combination of influence and resources at their disposal, they will be pardoned or dismissed from this lawsuit without ever being required to honestly answer for their actions regarding their preceding crimes against me and my family.

76. Upon information and belief, it's obvious even when reading some of the defendants' pleadings—they don't expect their "expertly" crafted motions and briefs to win the day. Some barely put forth any effort at all.

77. Instead, upon information and belief, many expect the "powers that be" inside their regional courts to rule in their favor and in favor of the powerful defendants so as not to upset the balance of power throughout Middle Tennessee, especially due to the claims of an indigent *pro se* litigant whom they have all but silenced. That's one of the benefits of partnering with corrupt judges in the commission of crimes; it virtually eliminates ever being held accountable. Even better, the state pays for their defense while doing most of the heavy lifting.

78. Only the court can cause these people to ever honestly respect the rule of law again. No matter how much that creates a personal conflict of interest for whomever adjudicates this matter, that is what is required by a person's oath of office. Similarly, public confidence in

our judicial system, the "practice of law," and the constitutional mandate of even-handed justice is destroyed more each time these defendants evade accountability for another crime they committed against the people, the State of Tennessee, and/or the United States of America.

THE WILLIAMSON COUNTY SHERRIFF'S OFFICE WILL NOT INVESTIGATE "ELECTED OFFICIALS"

79. During a recorded phone call with Captain David Beard[31] from the Williamson County Sheriff's Office on December 15, 2023, he told me in part as follows:

4:45	"Since you're dealing with an elected official, I would recommend you contact the TBI, because they investigate elected officials."
4:57	"I promise you this, the Williamson County Sherriff's Office is not going to open an investigation into this matter at all."
7:44	"We can only do so much... what you are alleging is outside our purview."
7:51	"When you're dealing with elected officials, you're dealing with court issue related matters, Those things are up to the Tennessee Bureau of Investigation and/or the FBI."
8:01	"The Williamson County Sherriff's Office... [is] not going to go into that area, dealing with elected officials."
11:25	"We don't investigate elected officials. That is entirely up to the TBI."
11:33	"As far as allegations of official corruption, sometimes the TBI waits on a referral from the DA, but the TBI can investigate official corruption without a referral from the District Attorney's Office."

80. Upon information and belief, in Williamson County Tennessee, the Williamson County Sheriff's Office will not intervene to protect the public or investigate the actions or orders by an "elected official" regardless of whether or not their actions and orders are legal or

[31] (615) 790-5554 Ext. 3227

an absolutely sinister criminal deprivation of one's life, liberty, or property.

81. Upon information and belief, the Williamson County Sheriff's Office will even participate in felonies committed against the public as they did in my case—provided it is pursuant to an order by an elected official even when that official is known to be involved in numerous public scandals and misconduct—without taking responsibility for the role played by its officers, ensuring the order is actually legal, or being certain the action is executed in a lawful manner.

82. Upon information and belief, even after having been told that the actions by the Williamson County Sheriff's Office constituted one or more felonies committed against an innocent member of the public, the WCSO refused to help the injured party, investigate the victim's claims in his complaint, or determine whether the orders and subsequent actions by the Sheriff's Office were ever lawful or even theoretically could have been given the circumstances and jurisdiction of the court at that time.

83. Upon information and belief, the Williamson County Sheriff's Office also refuses to provide any protection to victims of crimes committed by or in conjunction with "elected officials." This includes the continued overreach, abuse, intimidation, harassment, and oppression caused by the originally unlawful orders even when they cause years of illegal interference to the innocent party or victim's most basic natural and constitutional rights to life, liberty, and the pursuit of happiness—after having already stolen his property as they did to me.

84. Upon information and belief, in prior matters, the Williamson County Sheriff's Office was illegally leveraged by the defendants as the **muscle** by which they **executed** and

enforced my ***unlawful eviction*** from my beautiful Brentwood home[32], thus allowing them to illegally liquidate my home for pennies on the dollar[33] and disburse those funds in their entirety[34] without one dollar to my benefit[35]. In fact, the Williamson County Chancery Court was prohibited by federal law[36] from even exercising jurisdiction[37] over my Williamson County real estate[38], but nobody cared at that time, nor have they taken responsibility for their crimes against me and my family since.

85. Upon information and belief, in this case, the Williamson County Sheriff's Office was used as an instrument of unlawful intimidation, coercion, extortion, and retaliation by what was essentially **organized crime** in Williamson County Tennessee.

86. Upon information and belief, the Williamson County Sheriff's Office refuses to accept any responsibility for its role in these crimes against me and my family and further refuses to provide me with **any protection** from the defendants, despite being a **victim** of serious **felony crimes** including, but not limited to, racketeering, bankruptcy fraud, false oaths and claims, real estate deed theft, theft of property, financial exploitation, civil rights intimidation; ADA interference, coercion, extortion, and retaliation; coercion or persuasion of witness, aggravated criminal trespass, official misconduct and oppression; fabricating evidence, tampering with government records, and flagrant nonsupport.

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[32] DOC 19-1, PID 2624-2628 | https://rico.jefffenton.com/evidence/2011-04-29_1986-sunnyside-brentwood-tn-deed.pdf
DOC 19-1, PID 2620-2623 | https://rico.jefffenton.com/evidence/2011-04-29_fenton-marital-residence-tenancy-by-entirety.pdf
DOC 52, PID 4211-4217 | https://rico.jefffenton.com/evidence/2023-05-31_1986-sunnyside-brentwood-tn-appreciation.pdf

[33] DOC 1-13, PID 553-556 | https://rico.jefffenton.com/evidence/2019-09-28_illegal-coerced-auction-wilco-rico-deed-fraud.pdf

[34] DOC 48, PID 4019-4029 | https://rico.jefffenton.com/evidence/2019-10-29_illegal-auction-closed-wilco-rico-deed-fraud.pdf

[35] DOC 48, PID 4002-4003 | https://rico.jefffenton.com/evidence/2019-10-10_chancery-no-proceeds-from-forced-auction.pdf

[36] DOC 38, PID 3445-3496 | https://rico.jefffenton.com/evidence/2019-04-26_bankruptcy-crimes-rules-and-laws-violated.pdf

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

[38] DOC 1-12, PID 479-596 | https://rico.jefffenton.com/evidence/2019-10-29_tn-wilco-deed-fraud-ada-financial-exploitation.pdf

87. Referring back to my phone call on December 15, 2023, with Captain David Beard from the Williamson County Sheriff's Office at the 11:25 timestamp, Captain Beard told me, **"We don't investigate elected officials. That is entirely up to the TBI."**

THE TENNESSEE BUREAU OF INVESTIGATION'S POSTURE TOWARD OFFICIAL CORRUPTION

88. I have tried to contact the Tennessee Bureau of Investigation on multiple occasions and have never been able to get past the operator to speak with any officer, agent, detective, or supervisor. I've even asked to speak with department heads by name and been refused.

89. The TBI's website says in part, "Absent a District Attorney's request, the TBI may exercise its **original jurisdiction** on a number of issues, pursuant to TCA §38-6-102(b). Among the areas on which TBI may exercise its jurisdiction include: investigating fugitives from justice; **offenses involving corruption of or misconduct by a public official**[39]..." (emphasis added).

90. This supports what Captain David Beard told me from the Williamson County Sheriff's Office near the 11:33 timestamp above, "the TBI can investigate official corruption without a referral from the District Attorney's Office."

91. The TBI operator has told me the exact opposite repeatedly even while I read her the language directly off of the TBI's own website. (See attached Exhibit 'T' for this audio recording, filed as digital media on a DVD, also available on the Internet at the URL below[40].)

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[39] https://www.tn.gov/tbi/divisions/criminal-investigation-division.html

[40] https://rico.jefffenton.com/evidence/2024-02-26_tennessee-bureau-of-investigation-recorded-call.mp3

3:06	TBI Operator	"We only investigate matters if it is handed over to us by either law enforcement or a district attorney"
7:49	TBI Operator	"It's typically a DA's office that grants us jurisdiction, especially with civilian cases, such as your own."
13:01	TBI Operator	"If we sent civilian calls to the agents, they would be overwhelmed..."
17:31	Jeff Fenton	"So, you don't have any director or anything that's available to the public?"
17:36	TBI Operator	"That would be me, that's what I'm trying to tell you."
17:39	Jeff Fenton	"Ok, what's your name?"
17:41	TBI Operator	"I don't give out my name sir."
17:45	Jeff Fenton	"Can I talk to somebody that will give out their name and be accountable for what they say, and what they say will actually be legal and lawful please?"
17:54	TBI Operator	"Sir, I have tried to help you out. I want to give you our email. **We do not have jurisdiction.**"
18:04	Jeff Fenton	"No you have jurisdiction. It says right on your website you have **original jurisdiction** over public corruption, involving corruption, or misconduct of public officials. It's right there on your criminal-investigation-division.html."
18:32	TBI Operator	"That's what I'm trying to tell you. **We don't file charges here**. We don't do that. That does not go in our jurisdiction. We do human trafficking. We do missing children, silver alerts, amber alerts. **We do not do this private-public matter**."
18:45	Jeff Fenton	"No, no, this says, offenses involving corruption or misconduct by public officials."
18:49	TBI Operator	"**You would report that to your local law enforcement** or your DA. **That is the only two options.**"
19:07	Jeff Fenton	"So, there's not a detective or officer I can speak with anywhere in the Tennessee Bureau of Investigation?"
19:14	TBI Operator	"**We do not do that here.**"

92. For the record, I called the Williamson County District Attorney's Office a few times and found them equally disinterested, evasive, and unhelpful. I have never been allowed to speak directly with Williamson County District Attorney Stacey Edmonson, nor will she even sign for certified notices which I have mailed her.

93. Much of Williamson County Tennessee operates as I would expect for an evasive, shady, unaccountable, criminal enterprise to operate—not what I would expect from the administration of the wealthiest county in the State of Tennessee and one of the wealthiest per capita in our nation.

94. Upon information and belief, the bottom line is **there is <u>no</u> <u>equal</u> <u>protection</u> under the law** for residents of Williamson County Tennessee from **criminal actions** perpetrated by or in conjunction with **elected officials**. Despite having a history of absolutely putrid corruption by elected officials throughout Middle Tennessee, where the "don't help but continue to injure the people" mantra holds true.

95. This is an egregious, unnecessary, preventable, deliberate, and unconstitutional **eminent danger** to and attack upon the **public health** and **safety** of the lives, liberty, and property of American Citizens living in Williamson County Tennessee and likely the public at large throughout the state.

96. This is a direct violation of the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution and an unconscionable betrayal of the public's trust and resources by the State of Tennessee to benefit only a select few.

"**No State** shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction **the equal protection of the laws**[41]" (emphasis added).

97. One cannot ethically use public funds and resources to force the public to submit to the arbitrary and lawless deprivation of what they cherish the most—without any lawful protection within their reach to ensure the actions by elected officials are in fact lawful—or to **prevent** the victims of predatory crimes committed by corrupt officials from surviving and recovering after they are unlawfully destroyed by this privileged class of criminals. Yet this is exactly what the State of Tennessee has done in prior matters which are the genesis to this case and continues to do right here and now.

98. Public tax dollars continue to be wasted to defend the criminals in this matter while the state has refused to investigate or hold any of the bad actors accountable based entirely upon their **names** and **relationships** (in stark violation Tenn. Const. art. I, § 30[42]) without any interest or regard for the crimes they have committed, the danger they continue to pose to public health and safety, or the overwhelming evidence of their misconduct.

99. Even more outrageously, there exists no division of law enforcement or police protection in Middle Tennessee, especially not within the public's reach or available upon demand in an emergency, who can or will **protect the public** from the criminal actions of this

[41] https://en.wikipedia.org/wiki/Equal_Protection_Clause

[42] Tenn. Const. art. I, § 30, "That no hereditary emoluments, privileges, or honors, shall ever be granted or conferred in this state."

privileged class of criminals involving "elected officials." Given their known history, this is not only unreasonable, but it is also irresponsible, unconstitutional, discriminatory, absurdly negligent, reprehensible, and frankly barbaric.

AN ABOMINATION OF INJUSTICE

100. One of the most distressing facts I have learned as a result of this obscene injustice is the following. Even though I have now spent over five years of my life studying state and federal laws, the federal rules, the ethical canons, and the State of Tennessee's Rules of Professional and Judicial Conduct along with a myriad of ways the system was designed to self-police itself and prevent anything like this case from ever happening, if I was in the same situation as I was on August 29, 2019, **I know of nobody within the reach of the public who could protect me from being wrongfully evicted from my home again.**

101. As long as the action was ordered by a sitting judge, the Williamson County Sheriff's Office will execute and enforce the order as if it were law even when it is the furthest thing from the law, actually being comprised of multiple felony crimes being committed against the property owner under the fake and fraudulent "color of law" by influential, compromised, and corrupt officers of the court. Such is executed and enforced by the local sheriff's office and defended thereafter by public tax dollars though being one of the most vile, repugnant, and egregious violations of an American Citizen, property owner, and a long-term, peaceful, hardworking member of the community. This issue demands immediate attention and rectification to **protect the public** health and safety of Williamson County Tennessee residents at the very least.

102. I know now close to fifty combined counts of crimes which were committed

against me, with the vast majority being felonies both at state and federal levels, yet I know of no division of government or law enforcement in Middle Tennessee that I could call, who would in fact protect me from being wrongfully evicted (again) from my own home without any lawful authority, jurisdiction, or grounds whatsoever.

103. I called the court[43] in a panic and tried to find out how to initiate emergency contact with former judge Binkley, which I was denied. I reached out to opposing counsel[44], the court[45], the clerk and master[46], the judge[47] (via the clerk and master), the auctioneers[48], and the closing company[49] and told them **all** that the auction was being **illegally** forced against my will, demanding they stop the auction and not go through with the sale. The officers of the court all reasonably had to have known that they were not proceeding legally[50], in proper form, but they demonstrated no care and showed zero concern about consequences.

104. When a Tennessee sitting judge is involved in crimes against the public, especially against a small, isolated, and underfunded person, family, group, or entity, there is almost no chance of getting caught. The judge's wrongful orders cover for the illegal actions by other court officers while they outrageously leverage publicly funded resources such as the Sheriff's Office in the execution and enforcement of the crime.

105. I was destroyed almost instantly without due process by a group of bad actors who

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43 DOC 54-1, PID 4361 | https://rico.jefffenton.com/evidence/2019-08-30_judgment-wrong-emergency-call-to-court.mp3

44 DOC 57-1, PID 4394-4404 | https://rico.jefffenton.com/evidence/2019-08-30_emergency-attempt-to-correct-court-order.pdf

45 DOC 57-1, PID 4481-4483 | https://rico.jefffenton.com/evidence/2019-10-10_notice-to-court-and-title-co-auction-was-illegal.pdf

46 DOC 57-1, PID 4405-4413 | https://rico.jefffenton.com/evidence/2019-08-30_notified-story-beeler-false-claims-in-court-order.pdf

47 DOC 57-1, PID 4452-4459 | https://rico.jefffenton.com/evidence/2019-09-23_notified-binkley-false-claims-in-storys-order.pdf

48 DOC 57-1, PID 4442-4450 | https://rico.jefffenton.com/evidence/2019-09-21_notice-listing-agreement-coerced-null-and-void.pdf

49 DOC 57-1, PID 4478-4480 | https://rico.jefffenton.com/evidence/2019-10-10_notified-bankers-title-sale-illegal-unauthorized.pdf

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

should rightfully be disbarred and prosecuted. Some should even be in prison for the crimes they committed. The courts must deincentivize this type of organized, collaborative, lawless, unrestrained, misconduct to protect the public, judicial integrity, and the rule of law, yet so far, my family and I are the only ones who have suffered in this case, or likely ever will, short of an act of extraordinary justice.

106. I know the entire scam now, **but I still couldn't stop it from happening again** because there is no meaningful protection against this type of crime or criminals in Middle Tennessee. That's negligence by governance far beyond the threshold of social tolerance.

107. Upon information and belief, if the preceding courts and Middle Tennessee governance operated honestly, ethically, and lawfully, I wouldn't even need this lawsuit to receive a rightful remedy.

108. The State of Tennessee can't continue to maintain a police force used by corrupt politicians to illegally deprive the public of their property and rights **while refusing to protect the public from those same corrupt politicians.** That is an insanely unconstitutional, heavy-handed abuse of police powers, and that is exactly what is happening in Williamson County Tennessee right now. Remedying this to protect the public's health and safety throughout Williamson County Tennessee from the unlawful exercise of power by "elected officials" **must be one of the highest priorities of this court.**

109. Upon information and belief, instead of holding the bad actors accountable or taking responsibility for their actions and my damages, the State of Tennessee and Williamson County are misappropriating tax dollars to pay legal counsel to protect bad actors by covering-up crimes and corruption. They are fighting the honest interests of justice in more than just my

case. That is both unreasonable and unacceptable. I demand a remedy!

18 U.S. CODE § 4 - MISPRISION OF FELONY

> "Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both."

110. There isn't an attorney or law firm involved in this lawsuit amongst the primary defendants or their counsel who should not be cognizant of their responsibilities to report both felonies committed by the defendants along with attorney and judicial misconduct[51] to the proper authorities. Similarly, anyone working to conceal the multiple felonies committed by the defendants and counsel in this lawsuit will be called-out, exposed, and possibly added as joinders to this lawsuit and/or be subject to a subsequent lawsuit later. This cause of action will continue to "snowball" until the officers of the court quit committing crimes against me and my family and begin holding the bad actors accountable.

111. The only way to escape this action unscathed is to obey the law, the federal rules, the ethical canons, and the State of Tennessee's Rules of Professional and Judicial Conduct. I cordially invite all to please do so.

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

THIS LAWSUIT EXISTS TO FIGHT FOR JUSTICE

112. I understand that the courts have taken an adversarial position against this lawsuit so far to date, which is unfortunate and contrary to the honest interests of justice in the matters before the court. It is important to me that any honest, lawful overseers of our courts and Tennessee's governance along with advocates and administrators of justice know that I have brought this lawsuit for the express purpose of fighting **FOR JUSTICE**, not against it.

113. To that end I have committed my life. No matter how big of a battle is waged against me, no matter how violently the enemies of justice choose to dissect and continue destroying my life, no matter how cruel and lawless their tactics, no matter how much power and influence they wield, I will persist until justice is served or I am buried. That is my love and commitment to **freedom**, the United States of America, the great State of Tennessee, **and the justice necessary for anyone to be secure in their rights.**

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.

Executed on January 20, 2025

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