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U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
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UNITED STATES DISTRICT COURT F(
WESTERN DISTRICT OF MICHIGAN

JEFFREY RYAN FENTON, PLAINTIFF V. **VIRGINIA LEE STORY ET AL.,** DEFENDANTS	**CASE NO. 1:23-CV-1097**

DECLARATION IN SUPPORT OF OBJECTION TO 12/13/2023 REPORT AND RECOMMENDATION (REV. 1/19/24)

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

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

1. Please read the following critical declarations, filed along with this document, for clarity prior to deciding to take any negative action against my case (such as dismissing it).

2. "DECLARATION OF MARSHA ANN FENTON REGARDING SON JEFFREY RYAN FENTON AND TENNESSEE LEGAL PROCEEDINGS".

3. "MEMORANDUM OF LAW REGARDING COURT ACTIONS IN TENNESSEE".

4. "DECLARATION ABOUT PHONE CALL WITH TRUSTEE JOHN MCLEMORE".

5. "DECLARATION OF IRREFUTABLE PROOF OF A CRIMINAL

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CONSPIRACY SPANNING STATE AND FEDERAL COURTS".

6. I assure you, despite what it may look like, I'm not doing anything to disparage the courts, or to be disrespectful in any way. I have acted in good faith repeatedly, despite… see record to date.

7. This case has a vast amount of documentation because it is subsequent to a RICO scam between state and Federal courts in the State of Tennessee, where the members of the court strategically obfuscated the facts, the laws, and their crimes in the gap between the state and federal courts records, as they deceptively shuffled documents back and forth between the state and federal courts, while each acted as though they were acting upon some lawful directive of the other court, when in fact neither court acted lawfully, or had the jurisdiction or authority to do what they did despite having no such lawful jurisdiction or authority.

8. Had the bankruptcy proceeded in proper form, then I would have been served notice and a hearing in either Federal District Court or in Federal Bankruptcy Court, long before I ever met the actors in the Chancery Court.

9. The Federal Courts had both Original and Exclusive Jurisdiction over my marital residence, because my ex-wife's counsel had secretly included it as a part of my ex-wife's bankruptcy estate 39-days before any action was ever filed in the chancery courts.

10. I don't want to over explain, because I can get unconsciously repetitious, so if I accidentally fail to provide you with some critical or needed information, please just let me know, and I can redundantly clarify.

11. Needless to say, everything involving the deprivation of my property needed to be

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handled by one court, to prevent the confusion, the provide transparency, to follow the federal rules of bankruptcy procedure and subsequent federal bankruptcy laws, while that should have ben in the federal courts, and I should have been notified and allowed to participate, but I was strategically prohibited, and then forbidden, by the use of a fraudulent Order of Protection. I was expressly prohibited from contacting my mortgage companies and even attempting to save my critical and even essential property interests by the Chancery Court.

12. Both state and federal court records are necessary in this case, to understand what really transpired between the two courts, while honestly the entire case should have had "case management", where someone took a more wholistic approach that slicing and dicing my life and our property up, with fraud based upon fraud.

13. The interests of justice requires the truth to be uncovered and breathed into by the court, which to date has never been done.

14. The truth can only be uncovered by putting all the facts together, to see how the actions in the state court were gamed against the actions taken in the federal court, and vice versa.

15. Please understand, though the lawsuit has 2,000+ pages of documents, I am very specifically citing supporting evidence throughout my pleadings, so the number of pages should not be so overwhelming. Yet without the record containing both actions, there can be no intelligent discovery of what the members of both courts in fact did.

16. Similarly, as you can see, I have never failed to plead in the State of Tennessee. I have over 1,000 pages on court records in Tennessee State Courts while to date not one word has ever been used to my benefit outside the court process itself.

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17. While my life has been arbitrarily and unnecessarily destroyed by unsolicitous "default judgments", when in good faith no default judgement could have ever been ruled.

18. It's not my fault that I have plead a thousand pages of honest hard fought sworn testimony combined with clear and convincing evidence and not one prestigious "members" of the court have heard or used one work to benefit my life.

19. All that I can do, as long as courts continue to refuse their lawful and ethical duty, is keep rolling the paper trail into the next lawsuit, to try to hold the negligent and criminal parties accountable. That is not my wish, my wish was to never have my life destroyed or to need to "fight for my life" for four years since. What I have experienced is literally beyond words, while there is no good faith cause for any of it.

20. While the parties who have wounded me are known throughout middle Tennessee for shenanigans such as I have experienced. This is not out of character for them, it is just unusual for them to get caught.

21. The reason they are getting caught, is because I was pro se and they didn't even try to pretend to do anything lawful. Once I could no longer afford counsel, they took the gloves off, forcefully took my home, had me literally evicted by the Sherriff's office with a five day notice, knowing that would force me to seek emergency replacement shelter in the State of Michigan, after which they refused to provide me notice, motions, anything except their illegal "default" orders.

22. I have a slew of stuff to file today, and I've been working constant on this all day every day for weeks... I need to bow out on the explanations and get this filed before traying to explain more.

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23. I swear under the penalty of perjury, I am operating in good faith, in full honor, integrity, honesty, and that nothing I have filed is for any improper purpose. Even if I don't have time to explain that to you in every circumstance throughout my record at this time.

24. My apologies, this is a bit of a regurgitated mess. I'm in the process of trying to articulate and write shorter distinct declarations, which as I complete, I will delete the sections from being restated herein.

25. Unfortunately, unless the courts demands I drop working on my first amended complaint to drastically improve this declaration immediately, I don't have time to focus on this at the moment, because I'm exceeding critical deadlines, which I believe I need to prioritize first, to return to working on and complete my first amended complaint and get my lawsuit served without further delay.

26. Needing to respond to this Report and Recommendation was the equivalent of me running full speed toward the finish line, in an attempt to file my first amended complaint and serve the parties by January 11th, which I believe was my 90-day deadline per the federal rules for serving this lawsuit. While I was giving it all I had, the court unfortunately had me tackled (by the Report and Recommendation, seeking to have my lawsuit dismissed, before I even got it served), costing me 20 days of productivity or more to date.

27. I was basically tackled, sabotaged, and defeated by the Report and Recommendation, seeking to dismiss my case. Which then forced me to divert from working on my First Amended Complaint, to purely working on trying to respond to the Report and Recommendation with hopefully enough supporting declarations, to show you the felonious

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misconduct of the courts and counsel to date, so that you will understand that despite my case being against numerous parties, that my case in fact has merit. I do in fact have a very legitimate cause of action, and it would be obscenely contrary to the interests of justice, while likely also criminal, to dismiss my case without allowing me to litigate it, be heard, and seek some level of needed relief.

28. Hence the Report and Recommendation in this case, was as near polar opposite of an "ADA Accommodation" as I can imagine, with my specific set of disabilities.

29. I have been working 12-16 hours per day, at least 6-days per week, on writing my "Frist Amended Complaint", upon the completion of which I planned to serve the defendants.

30. I recognized some of the errors you cited in your report… because I filed so many documents at one time when I filed my lawsuit, while I filed it at the end of the day in a rush before the court closed, I carried a large tote to the court to file my documents, and when I got back home I had several pages which I discovered got ripped off of my complaint and remained in the bottom of the tote.

31. I have known that I need to fix my complaint, and I have been diligently working as much as humanely possible on doing so.

32. Since I am only allowed one amended complaint, I am of the belief that I should rush in an amendment with missing pages or just to fix the errors mentioned, but I should wait until I am able to submit the most thorough amended complaint for all parties, to be able to litigate my lawsuit moving forward.

33. If the court prefers to allow me two amended complaints, I am perfectly agreeable

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to doing this in smaller stages, so not to have a "broken" non-sensical complaint. Please advise.

34. I been working 12-16 hours per day since I filed my lawsuit (October 13th), to fix the problems that you noted in your report, amongst others.

35. The first thing that popped in my head was, "I thought that the courts were supposed to be impartial arbitrators of justice. Why is the court itself once again against me, along with an unfathomable horde of powerful judges and attorneys to date." Just once, I would like for the court itself not to be on the side of the litigants who have unnecessarily injured me to date.

36. This complaint seeks a cure for two fraudulent[1] predatory actions in Middle Tennessee during 2019 (four substantially fraudulent and vexatious legal attacks intertwined), allegedly on behalf of my wife (at that time), "Fawn Tiffany Fenton". (Hereinafter "Ms. Fenton", "wife", or "ex-wife".)

37. Though we were both financially destroyed as a result. Solely to the benefit of outsiders.

38. The genesis of this complaint came colored as a domestic divorce action (with no children), executed in the Williamson County Chancery Court in the State of Tennessee. Bundled along with a completely unnecessary, strategically engineered, precisely timed, fraudulent federal bankruptcy filing, to cheat the me out of his property interests, while alleviating my former spouse of all financial responsibility for paying the significant "transitional alimony" as we had repeatedly agreed upon.

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[1] Fraud on the Court(s), by Members of the Court(s)

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DISABILITIES

39. I am a qualified Americans with Disabilities Act (hereinafter "ADA") party and requests any accommodations[2] which the court can provide, to help me fully participate in, benefit from, and receive justice through the federal judiciary.

40. I suffer from the following cognitive disabilities: Obsessive-Compulsive Personality Disorder (OCPD) DSM-5 301.4 (F60.5), Generalized Anxiety Disorder (GAD) DSM-5 300.02 (F4L1), Attention-Deficit Hyperactivity Disorder (ADHD) DSM-5 314.01 (F90.2).

41. I take medications[3] to help with my disabilities, but they can not be cured.

42. My cognitive acuity diminishes greatly without the medications. I have unfortunately lost access to many of the medications which I took in the State of Tennessee for the decade prior, to help me operate at my full potential, being able to focus, articulate more clearly, and complete complicated challenging tasks.

43. As a result of the move, I have lost both my privileged healthcare of years past, as well as access to the well-established support systems I had bult throughout my life. At no fault of my own.

44. My most significant challenges—in addition to living in extreme poverty caused by the defendants in this case, are being very slow, meticulous, and repetitious in research and writing.

45. I have significant difficulty articulating succinctly; overly complicating most life activities; and having an inability to effectively multi-task, which includes handling multiple

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[2] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-38, PageID.2032-2045

[3] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-38, PageID.2039

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concurrent legal tasks.

46. Letters regarding my disabilities are included in this federal case, as well as my request for modification to help accommodate my disabilities, so that I can mutually participate in and benefit from our justice system.

47. I'm currently still using my "request for modification" which I filed in the State of Tennessee until I can find the time to draft one more specific to this case. I ask that you please read and honor my Tennessee Request for Modification filed in this federal case at Case 1:23-cv-01097-PLM-RSK, ECF No. 1-38, PageID.2032-2045.

48. As a result of the forced dislocation from my support base in Middle Tennessee for 25-years, I lost a primary care physician who I had for about 20 years, as well as a terrific psychiatrist who I had worked with since 2012. I also lost the best psychotherapist who I have ever had the privilege of knowing in my life, Terry M. Huff.[4]

49. Mr. Huff has ADHD himself, while that is one of my primary disabilities, so he is able to help patients in more than a scholastic capacity, with his real-life experiences, managing the condition and challenges himself. That was priceless in my experience, and something I will likely never be able to replace.

50. Mental healthcare is one of the most difficult healthcare fields to find people who really are competent, understand, and come from the same worldview, to where they are positioned to truly make a meaningful difference in the lives of their patients. I had a well-

[4] Author of "LIVING WELL with ADHD" and founder of the "ADDNashville" Support Group (https://terrymhuff.com)

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established support system in Brentwood Tennessee, the likes of which I will be surprised if I ever am fortunate enough to rebuild and enjoy again.

FINANCIAL STRUCTURE OF FAMILY

51. Ms. Fenton and I lived under the spiritual principle of **"two becoming one at marriage".** Throughout the entire duration of our marriage. (Despite the deceptive narratives fabricated by her counsel, which began after Ms. Fenton chose to obtain a divorce.)

52. **All of our marital assets and debts** (with Ms. Fenton) **were always held as one "tenancy by entirety"**[5]**.** Regardless of whose name either were technically in. Those choices were strategically for the benefit of both parties. Whether for preferential interest rates, risk mitigation, etc... Account ownership, positions, and titling **were equally for both of our benefit.**

53. Everything was a matter of whether our family held and carried it "in our left pocket" or "in their other pocket".

54. Except for an insignificant amount of premarital and/or sentimental property, nothing was a matter of "hers" or "his". Such language had more to do with respect and planned usage, than actual ownership interests or rights.

55. Ms. Fenton is an MIT educated, licensed Tennessee Professional Architect[6] (ID Number: #102945), who is a "LEED Accredited Professional", certified by the U.S. Green Building Council, as well as a "Certified Document Technologist" by the Construction

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[5] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.541-542

[6] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1444

Specifications Institute.

56. Ms. Fenton also has a decade of leadership experience in the ACE Mentor Program, teaching high school students about careers in Architecture, Construction, and Engineering.

57. Ms. Fenton was voluntarily the primary breadwinner[7] throughout our 13-year marriage, and during some short seasons she was our only breadwinner for a period of time, due to her own demands and priorities, about how she felt that my time could best contribute and serve our family.

58. Ms. Fenton has two to three times the earning potential that I do.

59. Ms. Fenton was voluntarily our family's primary breadwinner from 2011-2019.

60. On page 529 of the Chancery Court record in docket #48419B, defendant Story stated in court on 8/1/2019, as recorded on page-6, lines 3-6 of the official Transcripts of Evidence from that hearing, the following, **"He is very intelligent. He has a high school education, but he is a self-taught genius."**[8]

61. That statement is absurdly false. **I am no sort of "genius"**, while I'm not even qualified to continue working in computers.

62. I got the job maintaining the IT systems in my wife's small 5-6 person architectural office purely due to my relationship with my wife, because they were paying roughly $125 per hour (while I only charged them between $25 - $45 per hour). Before me, my wife's employer paid

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[7] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1444

[8] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1189

I believe this single compliment by defendant Story was to cloud the fact that they were discarding me with no job, no support, while depriving the only stream of financial support I had at that time (tenants/roommate rents of $1,400 per month), while literally rendering me forcibly homeless.

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substantially more for a different 20 something kid, recently out of college, to perform emergency triage on their office network, whenever they had an emergency. While they had absolutely no continuity of care and no preventative maintenance.

63. I was able to save her employer tens of thousands of dollars in multiple IT related capacities over roughly a decade of her employment.

64. For a long time maintaining the IT systems at my wife's architectural office was a "win/win" both for our family as well as for her office. But I do not have the knowledge, education, experience, or skill to obtain another job in IT or computers (in any known capacity or field), without some vocational rehabilitation and possibly obtaining a tech certificate.

65. Also said by defendant Story during that same testimony in court on 8/1/2019, page-6 lines 2-3 of that same "Transcript of Evidence", defendant Story stated[9], **"Mr. Fenton was the IT person for the firm, and he hacked the emails so he lost that job."**

66. That statement by defendant Story is also an absurd lie.

67. I voluntarily terminated my contract with my ex-wife's employer, because I was frustrated with him making a bunch of hollow promises through the years which never materialized.

68. I was tired of feeling like my ex-wife's employer took advantage of both my wife and I, while due to a recent raise which I had advocated on behalf of my ex-wife with her employer, where my wife was given a $10k[10] raise per year, afterwards her boss started talking trash about me

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[9] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-24, PageID.1189

[10] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1435-1444

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around their office, when all I ever did was save him a small fortune while keeping his office running smooth in a fraction of what anybody else would have charged him.

69. As such, I finally had my fill, as I informed Mr. Ken Adkisson, owner of Adkisson Architects in Nashville Tennessee, in an email[11] I sent him dated April 27th. 2017, which in part stated as follows.

- I stated, "Hello Ken, It doesn't look like this relationship is going to work out anymore…"
- I stated, "One thing that I just won't tolerate is people taking bad about me behind my back… Since you can no longer realize the value which I bring to your organization on my own, **I'm out**…"
- I stated, "Likewise, I'd like to end all of my business with your company… please don't ask Fawn or anyone else to call me. I'm done."
- I stated, "I would like to get all of your digital assets (website/domain names/etc…) off of my servers and out of my accounts as soon as possible. It's not an emergency, I think that probably a month should be a reasonable amount of time for you to have that work completed…"
- I stated, "I will be returning to your office ALL of your DISASTER RECOVERY DRIVES from my fire vault…"
- I stated, "I hope for nothing but the best for you and your business in all your future endeavors."

[11] https://rico.jefffenton.com/evidence/2017-04-27_voluntarily-terminated-contract-with-wifes-firm.pdf

➢ To which Mr. Ken Adkisson responded shortly thereafter, that same day, **"Thank you Jeff, we certainly appreciated your efforts. Good luck in the future."**

70. I need to make a very serious point here, throughout defendant Story's case she has portrayed me as a monster, while writing an overwhelming litany of fraud specific to Ms. Fenton's employer, accusing me of all sorts of misconduct, sabotage, evilness, painting me as a putrid person. While it is almost without exception a completely fraudulent fabrication by the defendants herein, for purposes contrary to the pursuit of justice, as required by the federal rules of every pleading.

71. Because Defendant Story is buddies with presiding Judge Binkley, while the Clerk and Master for the Chancery Court, Elaine Beaty Beeler[12] has literally been a close family friend of Defendant Story for over forty years, since she was in law school. All of defendant Story's fraud is written directly into the court records as if **fact.** While not only is it not fact, but hardly a word of it is remotely **true.**

72. Yet that is the burden of proof which has been put upon me. Guilty until redundantly proven innocent, if ever I can find a court who is not friends with any of the bad actors within my case, who will obey their oath of office over "professional courtesy".

73. Again, this was written in the court records as if a matter of fact (as was everything in #48419B) when it is not only false, but it is the absolute **opposite of the truth.** Meaning that it was presented by the defendants in about the most fraudulent context which could be (but isn't)

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[12] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-16, PageID.627

realistically plausible.

74. This is the overwhelming theme throughout all of defendant Story's filings in Chancery Court docket #48419B. Simply a cruel and unconscionable level of abuse by process, also known as stalking or harassment by the courts. (In the end it got a **lot** worse, but I will wait to **show** you what is likely otherwise "unbelievable".)

75. I have probably tried to correct this one statement in four separate courts now, some of them twice over, entirely based on an almost exclusively fraudulent narrative fabricated by defendant Story, accepted along with everything by defendant Binkley, as if it were a matter of fact, ignoring the evidence of his own eyes in my court records.

76. Purely so defendant Story could assassinate my character (literally as a strategic distraction) before I ever walked into court. Where I discovered that I was "guilty until proven innocent" and have been unlawfully deprived of my rights, my property, my liberty, and certainly my pursuit of happiness, while I have suffered from "official oppression" for over four years now.

77. Over a twelve hundred days of work later, with tens of thousands of hours of work, to prove what is obviously evident and true, as was filed but ignored in the Chancery Court, while every court since has covered for their "friends" and refused to even use common sense to my benefit, to act upon evidence or pleadings, no matter how absurd and unnecessary my injuries are and exponentially compound with each day. Nearly every document filed by defendants Story and Yarbrough in docket #48419B is almost entirely devoid of any **truth.**

78. Yet I will continue to prove that the earth is round one more time, and pray that somebody this time decides to uphold their oath of office and the true purpose of the judiciary, to

parse the truth from the lies, and apply the law to the truth, for the evenhanded protection and just deprivation of every man, woman, and child in our nation.

79. Every sentence of defendant Story's filings and testimony are like this.

80. If ever in one angry, distressed, outraged moment I said or did something "over the top", which was clearly inappropriate, even if just **one** time, then defendant Story took that one time, cherry picked that situation, then portrayed it as if I did that bad behavior on multiple occasions, if not routinely. While again, that is so obscenely false and unethical, in violation of the Federal Rules as well as the State of Tennessee's Rules of Professional Conduct, but then so was literally everything that she did in my case.

81. For example, I called my ex-wife a "bitch" once. I honestly don't remember the circumstances, and I offer no excuses for my unacceptable name calling. That is not the type of person that I am, but I screwed up, let myself down, and called the person who I honestly love the most in the world, a name once.

82. To be honest, I never remember her calling her names (except "pet names") on any other occasion during our fifteen years together, but one time I did call her a "bitch".

83. There is an obscenely false and fraudulent statement that my wife was filed by my wife's counsel, alleging to be her personal testimony in her petition for the "Order of Protection Ex parte", which was simply a tool for leverage for criminal purposes beyond your wildest imagination.

84. I need to come back and address that entire "unsigned personal statement" later, because it takes me a long time whenever I try to provide testimony in regards to it, because nearly

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every sentence is false, and carefully crafted to fraudulently portray me as a monster, to fit in with defendant Story's "strategic distraction" in this case, from the fact that not one legal, lawful, honest, just, equal, impartial, ethical, good faith action took place in a court who had the lawful jurisdiction to hear and dispose of the matters before it, ever took place in Williamson County Chancery Court docket #48419B. (I can redundantly prove every word of that.)

85. But I just want to quickly point out the part of that "unsigned personal testimony" portrayed as if written by my ex-wife, where they call me out for inappropriately calling Ms. Fenton a "bitch" **one** time. Again, I'm trying to paint a picture for the court, to understand how language has been used and manipulated throughout docket #48419B, for the most fraudulent portrayal as I can conceivably imagine (within the realm of plausibility).

86. Here is what is stated about me calling Ms. Fenton a "bitch" once, *"In addition, Jeff continues to send me numerous text messages, some very lengthy. in some of the texts he uses derogatory language, calling me a "bitch.""*

87. "In some of the texts he uses derogatory language, calling me a "bitch.""

88. That statement is a lie!

89. The word "some" defines a plural context, taking what could have otherwise been true, from one incident, and fraudulently manipulates it to say something which is instead false.

90. This is a core underlying tactic of everything written in this case by defendant Story.

91. That which is not 100% fraudulent (while most is), is overleveraged to present an untruth as though it were a fact. I swear under the penalty of perjury that I only remember calling Ms. Fenton a mean name once throughout 15-years.

92. While though not at all an "excuse", this flaw in temperament is not only a flaw which caused me to stumble.

93. falsity as though fact, puts that in a plural context, while again as I mentioned this is prased as though it happens

94. has coached my did something inappropriate **once**, for example I called my ex-wife a "bitch" one time in my life that I know of, and though I agree that is 1 00% inappropriate and unacceptable, and I accept responsibility for my actions even in my worse moments, I don't believe in using scapegoats by blame casting my bad choices on what someone else did to potentially provoke me. I still am an adult who is responsible for my own words and actions.

95. do not scapegoat my actions and words on what others have done to me immediately precding called my ex-wife a name for example, I in an angry moment cursed once, it was portrayed in her court filings as if I did it everyday.

96. Everything that she wrote, she took the most extreme cherry picked claims of evidence as the baseline, by which she fabricated a whole outrageous abomination of unethical fraud on the court and fraud against my person. I can not literally articulate how abusive this has been. She not just relentlessly insults me, so takes my greatest strengths, like my management of our income taxes, and proclaim that I am a villain in that exact area. Claiming that my ex-wife could probably be an abused spouse.

97. That is the tone and pace of every word she has written throughout the entire case, without an ounce of truth, or a motive which is not whole repugnant of the rule of law, the codes of conduct, and the federal rules that all pleadings must seek justice.

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98. Absolutely nothing filed by defendant Story ever once in this case sought justice or was for the true purposes claimed.

99. It is overwhelming, while time and time again I provide evidence that almost every word she wrote is obscenely fraudulent, yet nobody fixes it and provides me a cure. Nobody releases me from the outrageous deprivation of my constitutional rights which she and defendant Binkley have and continue to fraudulently hold hostage, year after year, while literally not one good faith action took place in Chancery Court docket #48419B, while the evidence has been on the record of every single court my cases has been in, but nobody has given me the benefit of a single word or pleading filed.

100. Why should I need to be arguing over what is true and false for four years, in an effort to just have my person restored?

101. Here it is, prepared and posted on the web, with the truth highlighted, showing Ken Adkisson's clear response: https://rico.jefffenton.com/evidence/2017-04-27_voluntarily-terminated-contract-with-wifes-firm.pdf

102. So please take a marker and cross-out every foul word spoken by my ex-wife and her counsel related to my ex-wife's employer, because it clearly is not true, and they have already compromised the integrity of their testimony, so the truth needs to replace the lie.

103. If that is done one sentence at a time, I will prove in an obscenity undeniable way that not one legal, lawful, ethical, action was taken in Chancery Court #48419B, nor was **anything** based upon the real "merits" of my marriage or subsequent divorce from my wife.

104. While the most obscenely overwhelming fact is, that I have proven this irrefutably

so many times over… I don't know how I can say it or prove it more clearly, without allowing me any opportunity to cross examine all the fraudulent claims, which I was fraudulently denied due process and any chance to do.

105. I had no idea, information, nor notice that a single mortgage payment for our marital residence had ever been so much as late, let alone missed.

106. Ms. Fenton and I had a verbal contract[13] (an "interim agreement"), that she would pay all of our bills during that season, while we tried to obtain a divorce.

For more facts related to our family's finances, the agreed roles between myself and Ms. Fenton, and what we had agreed to regarding alimony prior to the involvement of the defendants within this case, please see my "DECLARATION ABOUT ARONS & ASSOCIATES DIVORCE PLANNING[14]".

107. I can't communicate to you how offensive and scary it is, to once again realize that it's not just me against the other litigants who have savagely injured me. Granted, there are five judges between them, state of Tennessee Court of Appeals Judges, one federal bankruptcy court judge, and one Tennessee Chancery Court judge, but I can definitively prove to you how each of them knowingly participated in felonious criminal misconduct to earn a spot in my lawsuit.

108. The bankruptcy court completely ignored the federal rules of bankruptcy procedure and multiple sections of federal bankruptcy laws (most concisely F.R.B.P. Rule 7001 and 11 U.S.C. § 362), regarding my property interests, while refusing to even notify me or my two legal

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[13] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-26, PageID.1343-1344

[14] https://www.rico.jefffenton.com/evidence/2018-07-12_arons-and-associates-divorce-planning.pdf

tenants/roommates who had legitimate federally protected leasehold property interests in my marital residence. that an abhorrent horde of counsel created a conspiracy spanning both State and Federal Courts, with the sole purpose of cheating me out of my property interests, which first meant denying my natural, state and federal constitutional, 4th, 5th 14th Amendment rights not to have my property unlawfully seized.

109. I remember when I first contacted the Acting United States Trustee for Region 8, Paul A. Randolph, over the federal judicial districts of Kentucky and Tennessee to request that they perform a bankruptcy fraud investigation and provide me some information about who dropped the ball in my ex-wife's secret bankruptcy, strategically denying me notice that the whole of my life's work and investments was in jeopardy, while I didn't know that a single mortgage payment was late or had ever been missed.

110. You see I knew from grade school, that via my 5th and 14th Amendment Rights were violated, depending upon whether we want to blame the federal judiciary or the state judiciary, when really it was both of them acting together, committing fraud on the court which spanned both State and Federal Courts, for the intentional purpose of obfuscating the crimes committed between the two.

111. While obtaining a cure has reminded me of a lawsuit I had once with a negligent general contractor, who hired subs who had most of my attic open to the elements as a thunderstorm rolled through and rained right inside our attick, just weeks after we had purchased our marital residence, forcing us to move back into my premarital duplex from April of 2011 until November of 2011, while fighting for our lives to get our home repaired, then our roof replaced,

our interiors fixed, followed by almost two years of legal battles trying to get the general contractor (who gave us his one or two million dollar insurance policy when we handed him half down on a $25k custom re-roof), but he refused to file an insurance claim to pay for our damage, and we had to learn the hard way that a contractor's insurance doesn't protect the customer, it protects the contractor from the customer.

112. Anyhow, in that two plus year legal nightmare that almost brought our family to the brink of bankruptcy, while we had to pay two mortgage payments and three sets of utility bills on credit cards while needing to pay not only to repair our home, but to replace the custom roofing materials they installed incorrectly, the holding costs alone were insane. That was where the real stress in our marriage was born of, but we survived that after a few years, I finally beat the money out of them, and we went on with life. But we never got back that 2+ years of our lives, or all the money I could have earned if I could have kept my job, instead of becoming a full time project manager and construction grunt, because we were losing more money faster in holding costs, than I could earn working a "job".

113. My point in mentioning that was the relationship between the General Contractor and the Subcontractors who we had no relationship with, but unbeknownst to us originally, the GC hired. So once the damage was done to their home, it ended up with me trying to hold them both accountable, along with both of their insurance companies, and their subcontractors insurance broker, with two billion dollar insurance companies who both blamed the other for other damage.

114. That is what it has been like between the State of Tennessee and the Federal Government in this case.

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115. Nothing that either of them did was remotely legal, lawful, ethical, of good repute, nor in alignment with the federal rules, that all pleadings must seek justice. Not one in either case ever did. In truth it was entirely a crime.

116. While seeking help from the DOJ/USTP, the FBI, the Cour to Appeals and the Tennessee Supreme Court, everybody blame shifts and nobody has been willing to take responsibility and simply help the injured party. Intervene and save someone's life.

117. Why was this case filed in Michigan? As you can see, on the face as stated I originally had planned to file it in Tennessee.

118. But I've also spent the past four years fighting for my life, first through the Chancery Court which was point blank corrupt. No two ways about it. All the players were close family friends, one even in excess of forty years, unbeknownst to me at the time.

119. Probably looking at the documents in my case, you may think I'm out digging for gold, trying to capitalize on some… I don't know if you can see the real damage caused yet or not. I hope not. If you could see the damages and still were seeking to discard my case I would need to file for a recusal, because to know what I have survived and lived through "under color of law", while not having the moral fortitude to try to help me instead of further harm me, would be deeply disappointing.

120. I hope that you aren't threatening to throw out all the work I have done, which has taken me well over 1200 days working 10-16 hours per day, at the very least six days per week, and wanting to non-solicitously discard my case without due process, before I even get the parties served, again, this is where in each and every case to date I have given the court the benefit of the

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doubt. While unfortunately the trial court this all started out in, should have never been given the benefit of the doubt, but I didn't know the players, I knew almost nothing about the legal system. I was just trying to survive. Unfortunately, they literally had no plan which included allowing me to survive, or at least not helping me to survive in any way.

121. I'm hopping around a little bit here, please forgive me, I've been awake for a couple of days, it is Tuesday morning at 4am right now. My whole world was sidetracked with the possibility of dismissing my case. I don't have the ability to not be completely sidetracked by such a proposal.

122. I can promise you, that dismissing my case would be impossible short of literal racketeering, corruption, and government coverup. I can prove that to you, but I will need time to.

123. I can't do it all today, despite spending the past four days completely hijacked and working around the clock on this endeavor, I have less than two weeks left to complete my "First Amended Complaint" and serve all of the parties.

124. My point earlier when I began to mention my bankruptcy referral/investigation with the DOJ/USTP, was after Paul A. Randolph Acting United States Trustee for Region 8 transferred my case to USTP Megan Seliber, a Trial Attorney for the DOJ in Nashville, she didn't really want to investigate my fraud complaint. Her excuse was that it had "been so long". This also relates to your comment about all the pages that I've filed in this case, and the absurd number of parties.

125. There is nobody in the world who doesn't know, hate, and isn't unfathomably overwhelmed and further injured every day by how long I am forced to fight in an attempt to get

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the most tiny, remedial cure. Whie yes, if there wasn't an entire region of "bad actors" working together toward deprivation injury, while weaponizing the courts for their personal gain, without giving a damn about honesty, truth, justice, the rule of law, the rules of conduct, the federal rules, the judicial canons, and heaven forbit my natural or constitutional rights, nobody knowns how obscene the extensive efforts which I have gone through to obtain a cure, and how many years I have had to fight literally 12-16 hours per day, six if not seven days a week, while I have written between 10,000 – 20,000 pages of sworn testimony, with clear and convincing evidence, only a thousand pages of which made my final cut and was actually filed between the Williamson County Chancery Court and the Tennessee Court of Appeal and the Tennessee Supreme Court.

126. While to date I can not see that one single word of those one thousand pages of TRUTH, have ever been used to my benefit outside the court room.

127. My life has been completely destroyed, deprived, officially oppressed under the color of law, which is actually Hobbs Act "extortion" of first my property and then my silence with a fraudulent "Order of Protection" by fraudulent "default" judgments after I was wrongfully evicted from my home without due process and geographically dislocated to the State of Michigan, to obtain emergency replacement shelter with my elderly mother in Linden.

128. While the "kicker" is, that the only reason I am here today filing this lawsuit, has nothing to do with money. It actually has nothing to do with my divorce or even my home which was stolen under color of law. It's worse than that. The only reason why I have been fighting for my life, literally for four years against an obscene number of powerful "members of the court" in Middle Tennessee, is because they put a fraudulent order of protection on me by "default", after

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they had already committed multiple felonies against me, and stolen my property. (That may sound offensive, but I can definitively prove that to you, in a thirty-minute conversation in your court, if you are willing to indulge me.) But it would take me hundreds of pages of writing to **try to articulate** the same thing that I can easily explain and **show** you in 15-30 minutes.

129. So I'm giving you the benefit of the doubt at the moment, that you think I have bad motives, or am a drama queen, or an ass, or that I really lack evidence that this horrifically cruel shit has been done to me by an awful horde of powerful "members of the court", and that you aren't really just operating out of some wrongful motives and seeking to protect the corrupt elitists who have so savagely injured me.

130. I am completely willing to drive to Lansing and meet with you, provided you allow me to be heard, and you let me set all the technical mumbo jumbo aside, because technicalities should never matter for a pro se litigant, at least not more than "justice" matters, while to date every injury against me is do to pretentious "technicality", when in fact, it was all a rouse.

131. I've spent years studying the rules of conduct, the laws, and though I am not and was not perfect, I never once committed fraud on the court. I never once operated in bad faith. I have never once had an ulterior motive. I have never once had malice or acted in any way to interfere with the judicial machinery. But the defendants did almost exclusively.

132. What I have learned was not some populist opinion, I did not pick up someone else's offenses with the judiciary. I am not out to expose every inefficient system, or challenge every tough guy, or person who seems not to quite be shooting straight.

133. To be honest, I was willing to give them everything that I owed for the first two

years, throughout my attempts in the State of Tennessee's Court of Appeals as well as my motion to transfer my appeal to the Tennessee Supreme Court, if they would just remove their noose of corruption from around my neck, but they not only refused... I honestly lack the language to express what they have done to me. It's not believable unless you don't have a bias and simply look, while bearing in mind that everything written in the court records by people other than me, is substantially fraudulent.

134. I'm not here to bring disrepute upon the judiciary. I'm here to help improve it and protect others from what I have experienced.

135. I almost lost my life in what they savagely did to me. It is very likely that I will never recover. But the only chance I have is to fight to get my person and my life back. I don't have a "plan B" if you dismiss my case. I have already lost four years of my life to what I will irrefuat5ably prove to you (if given the chance) is an obscene amount of criminal misconduct without one legal lawful, honest, good faith action. But if you dismiss my case, that means that I will lose another year or two years fighting in other courts just to get back to where I stand today.

136. This is life or death to me. I don't mean that in some spooky or threating way, I just mean that they stole and destroyed who I am. Without me having an opportunity to recover my person, my rights, my dignity, my independence, my self-sufficiency, my manhood, my peace, my life back, there is nowhere for me to go from here except to keep fighting 12-16 hours per day, for years into the future.

137. While just once I would like to walk into a court and not have both the court and the other obscene hoarde of litigants all working against me. That is overwhelming and exhausting

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beyond words.

138. So, I filed my case in your court, because I had my lawsuit filled out to file in Nashville, but I KNOW the conflicts of interest which exist there, which means I have a none-minus chance of probably winning there.

139. In Michigan or Ohio, I probably have a "slim-to-none" chance. In the State of Tennessee, I anticipate that my chance of ever being able to successfully reach justice as probably "none-minus". While I assure you that has absolutely nothing to do with the "merits" of my case, or the truth. It has solely to do with the judicial titans I'm up against, and a system which is known to protect its own. While on top of that, Courts rather universally despise pro se litigants.

140. So, if your concern is the merits of my case, I would love the opportunity to come meet you face to face, without needing to figure out how to articulate it all and write it all out, because I haven't ever been able to completely yet. But I can explain it to you face to face in 15-30 minutes.

141. What I ask in return, if you are agreeable to that, is once I prove to you the merits of my case, and the crimes obscenely committed between the Chancery and Bankrupcy Courts in Middle Tennessee, is once I irrefutably convince you of the guilt and criminal intentions and actions of the defendants in my case (when you see the truth, there literally can be no reasonable excuse for the evidence on record, and it only takes a few minutes to show you, irrefutably.

142. If you will entertain that, then what I ask in return, is once I prove the merits of the criminal damage they have caused me in sharp contrast with all of their oaths of office, is after I prove to you their guilt, I ask for your protection, and a path by which I can litigate my case, without

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needing to fight all these monsters on a slew of technicalities and entertain all of their fraudulent motions to dismiss.

143. Because then you will know they are guilty of what I claim, at least most of it, while yes, the litigation is a challenge to me, but their criminal guilt in an obscene amount of Title-18 felonies I can prove for many in just ten minutes.

144. How they have "gamed" the system and exploited my disabilities in the past, is by hitting me with multiple actions at the same time, with an obscene amount of fraud, and basically overwhelmed my ability to defend myself, while they bulldoze me. (Regardless of merits, right and wrong, injury or relief.)

145. I would really like it… I know they are all going to file ridiculous fraud woven motions to dismiss… because they can… not because of merits. I would request that they be required to back all pleadings and motions with their signatures under the penalty of perjury. While I know that despite the expectation that members of the court tell the truth in court and in pleadings, I promise you they don't even flinch when lying in open court or in pleadings. That is all that they have done with me.

146. I Jeffrey Ryan Fenton swear under the penalty of perjury, of that thousand pages which I have filed on the Court records in the Tennessee State Courts, and throughout four years of figting for my life almost non-stop, I have only told ONE LIE throughout the entire duration, and that was in regards to a $1,000 piece of personal property, which before I left the State of Tennessee I made right anyway, despite how much damage I knew that I suffered at the hands of my ex-wife and her attorneys, I obtained that piece of $1,000 personal property (when it was new,

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three years earlier), and I left it for my ex-wife at our home as a parting gift.

147. Not because any court could make me, not because it was hers, not because I couldn't hand onto it, not because I didn't really like it and want to keep it, despite all the criminal shit they did to me, which was essentially everything they did, at the end, two things really, I love my wife, and I wish I could have given her everything she wanted in life, but I couldn't. And secondly, I had to tell myself "To thine own self be true". No matter what savage lawless crap they did to me. Having it would have been a daily reminder of the life I lost... though just a tiny piece of bling in the grand scheme of things.

148. So, everything else that I have filed in my court record, everything, is the god's honest truth! Under the penalty of perjury. That is light years from the merits of the defendants. Light years!

149. I told the FBI, the same thing, while I told the Special Agent, if I had told them about my one tiny inconsequential lie, they would have crucified me for it, when not one thing they did was ever honest or legal, for the motives claimed.

150. That' s who I am. Far from perfect, but I don't lie to myself or others about who I am. Actually, if you want to learn anything negative about me, read my own pleadings in court. Then you will learn about my real character defects, which I've pleaded myself in the court records, but reading their "monstered" fraudulent narrative, you will never learn any truth about me, not because I'm perfect, but because they never argued one real merit. Except maybe that I write a lot, but my wife knew that when she met me. It was one of the things she liked, while she was typically my proofreader. Not the wounded narrative of being "verbally abused".

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151. I told the Court before, if they took my ten to twenty thousand pages of testimony, (my unfiled drafts, day after day, often rewritten 50-150 times), trying to get them "right", so that maybe something I filed might be used to my benefit for once... if someone just compared my testimony between the hundreds of drafted documents that I have, the statistical probability of me providing essentially the same testimony a hundred different ways would more likely than not be TRUE, simply because it would be unreasonable to think that (short of an eidetic memory, which I certainly do not have), that I could draft lies so precisely the same countless times, day after day, sometimes 50 pages per day, every day, for the first couple of years. Each day I would wake up and forget where I left off and start all over again, never remembering which draft was my best, and never satisfied with any of them.

152. That is what happens, when you are a fighter, a survivor, but a gang of lawless thugs literally overwhelms you ability to defend yourself. You get stuck in a loop... repeating day after day, trying to write something good enough that can finally convey the depth and breadth of the damages which were done to you. When they are powerful enough, nobody even cares what is true. Honestly most people would rather not carry the burden of knowing that you were caused criminal harm by their powerful friends or peers.

153. I'm telling you the truth, and if you have any doubt, I can prove it to you face to face in 15-30 minutes. The same amount of time as the two short hearings which took place under color of law in Williamson Chancery Court, which cost me my entire life and my ability to work, have relationships, be independent, move forward.

154. That's what somebody doesn't do when they are trying to get away with the

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"perfect crime" in a divorce, such as my ex-wife for example. Her attorneys got her exactly what she wanted, even though it was horrifically short sighted, illegal, and terribly detrimental even to herself, there was literally nothing more which she could have hoped for.

155. So, do you know what you don't do when you commit the "perfect crime"? You don't tether yourself to the person you just robbed, who are you trying to allegedly "divorce". Especially when both my ex-wife and I are NRA Life Members, and I have been deprived of my second amendment right without ever a single act of impropriety, violence, danger, none of that nonsense. My point is, that both my ex-wife and I would gnaw off our own legs if we are tethered to a corrupt judge 600 miles away who is denying our second amendment freedoms, under completely fraudulent "default" judgments, which hold no merit or truth whatsoever.

156. To the extent that I would more eagerly sacrifice hundreds of thousands of dollars than allow anyone to degrade my constitutional rights in this great nation. Which my exwife knows irrefutably, while she is the exact same way. So, the act of depriving me of my person and my constitutional rights, is literally the only way that her counsel could literally guarantee that I can never move forward in my life, forcing me to devote nearly every waking minute of my life to exposing their crimes to get my person and my freedoms restored.

157. They did the one and only thing which absolutely guaranteed that they would get caught. Brazen, and frankly sadistic I believe. Defendant Story has literally been playing "Russian roulette" with all of our lives, because I sincerely believe that she thrives on causing me the pain, domination, and punishing me for daring to challenge her and trying to stand up for my rights.

158. I would bet my life on that.

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159. This may sound offensive, I don't say it to be disrespectful, this honestly is what I believe and have testified to since my attempt to appeal to the Tennessee Supreme Court.

160. My ex-wife's counsel is violating their fiduciary duty to my exwife, by holding my constitutional rights hostage. By refusing me any cure within the State, with over two years of fighting all day every day (while that alone should tell you that never were any "default" judgments legal – because I never failed to plead, while I believe that fighting day and night for over four-years while filing over a thousand pages of sworn testimony combined with clear and convincing evidence rather testifies that they wish to defend their case.

161. While no "default" judgment is supposed to stand, even when a pro se party is negligent, provided they are operating in good faith, not trying to jam up the wheels of justice, while I tend ot believe that four years and a thousand filed pages testifies beyond any threshold of reasonableness, that I wish to defnd my case.

162. Yet everything is maintained by "default", not based upon even their character assasingation of me, because they refused to consider my defense which was already all on court record, so they went for the straight "default", never having heard the case, never having allowed my defense, never even providing me notice of their secret hearings or allowing me to participate in any way.

163. While when I was in the Tennessee Court of Appeals, and I found an old newspaper article that showed that both my sadistic opposing counsel and the presiding judge had a long and sordid past, have been a known conflict of interest for decades, while being published in newspapers as vacationing and partying buddies.

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164. I about feel over when I discovered that. After which I tried to file an emergency motion in the Court of Appeal, while I attached the newspaper articles and was finally start to put the pieces together and I was testifying to the Court of Appeals about the mistconduct between the two.

165. That was when Binkley and Story retaliated against me, and hit me with a five-year extension of my fraudulent default "order of protection" from almost 600-miles away, with no notice, no hearing, heck, I've never even once received a motion for the default or for the OP extension, while everybody has refused to even tell me what that insane 5-more years of official oppression is pretended to be based upon.

166. While I testified repeatedcly in the Tennessee Court of App0eals, that I could not even WORK to survive with that fraudulent "Order of Protection" on me. Due to COVID, my elderly mother who I was dumped on, happens to have a life threatening immunity disorder, so we stayed on full quarantine for the first two years of COVID… even one of the Kids for Cash judges got out of prison due to COVID, but these monsters refused to even remove the fraudulent OP so that I could even try to work the most rudimentary job from home, while working from home is the only job that I can still work, so thy have rendered me unable at fifty years old of even being able to buy my own toiletries, after they stole hundreds of thousands of dollars from me.

167. While as I said, my ex-wife is a highly trained, skilled, equipped, licensed handgun trainer! With two obscene assault weapons (I don't even own a rifle), and on the day she moved our ammunition out of our marital residence, she counted it into inventory and she had just over 5,000 rounds of ammo. While they are pretending that I "cyber stalked" her, which is a lie. She

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was literally on friendly terms with me until a couple of days before I was served divorce papers, while they had me served with the fraudulent "Order of Protection" at the same time to bind and gag me, while they throw me out of my home the month after, with just a five day notice. Refusing to even allow me to take my personal property with me… after 25 years of being a hardworking, taxpaying, peaceful Tennessee Resident. Never once in my adult life arrested. Never once touched my ex-wife in anger. Never even got a single traffic citation during my 25-years living in Tennessee.

168. Everything was fraud!

169. They treated me in court like I could not even be trusted with my own home. While I was a licensed real estate agent in Middle Tennessee for 16 ½ years, with access to literally hundreds of millions of dollars, without every one single complaint, in 16 ½ years. With a lifetime handgun license and zero incidents. Without a single call to the police, no domestics, until the night my ex-decided to move out with a police escort, totally unnecessarily, and she called the police playing the "gosh I'm scared game", purely for a strategic advantage. While the officers told me that it was recorded as a "domestic verbal", and told me there was no crime, that it is completely legal to argue with your wife, while that was all it ever was.

170. I have never touched her in anger, nor have I ever threatened to. If you knew how sacred I treated her peaceful enjoyment of her apartment after she moved out, you would understand why that is about the most hurtful allegation that anybody can make about me, and I equate it to the likes of being called a pedophile. It is all fraud, yet it can ruin your life whether there is any truth to it or not.

171. While defendant Story intentionally assassinated my character before I ever entered

the Chancery Court.

172. While my case was in the Chancery Court, I had no idea that defendants Story and Binkley were even friends outside the court room. (Now that I know the rules of conduct as well as the laws involved, Binkley disqualified himself multiple times over, via 455(a), over and over, and over again. While refusing to recuse himself, rending absolutely everything in the Chancery Court irrefutably void… yet I didn't know that language then, while the COA refused to do their job and vacate obviously void judgments where I obviously never failed to plead, yet they allowed completely fraudulent default judgment to continue to rule rather than simply setting me free from his and Story's outrageous official oppression…. Per fraudulent "default" judgments, from 600 miles away, after they already wrongfully evicted me from my home, even though they knew it would literally render me homeless within the State of Tennessee. They didn't care!

173. We never even began "discovery" for the alleged "divorce" they just took my hope, had the Sheriff's Office run me out of my home with an unlawful eviction, then I had to escape to Michigan to obtain emergency replacement shelter, and he knew that I didn't have the resources to fight an out of state judgment.

174. This addresses one of your questions… what interest the Western District of Michigan has in all the misconduct and crimes committed against me by the State of Tennessee.

175. WELFARE. By the criminal misconduct of courts in Tennessee, I have been discarded destitute onto the welfare rolls of the State of Michigan. While if I can obtain no cure, I will inevitably be a liability upon our State and Federal Government for the rest of my life, at absolutely no fault of my own.

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176. From the very beginning I saw and knew how abusive defendant Story was. While I have reported her misconduct to every court while asking them to protect me from her, but nobody has.

177. She is known to host "vacations" with judges throughout middle Tennessee, along with other powerful decision makers. That is why it literally doesn't matter what the truth is in my case. Not one person has ever cared. While now I know that is judicial misconduct to allow her to almost non-stop violate the rules of conduct, literally with almost every sentence that she spoke.

178. Allowing her to make false statements about matters of law, that were about the polar opposite of what the actual law really was.

179. While Binkley not only failed to correct her false statements about matters of law, but he sat at the bench, nodding his head up and down, while grunting sounds of agreement to absolutely false statements of law, after which he literally made completely lawless and unreasonable judgements based upon her false statements of law.

180. You don't need to take my word for anything. I have an absurd amount of evidence, while that is some of her most tame behavior.

181. Or I wouldn't still be fighting to survive exclusively fraudulent "default" judgments.

182. Because contrary to what they may claim, I have never failed to plead!

183. If they just restored my person, expunged the lies, and let me crawl out of the State of Tennessee with my life, liberty, and pursuit of happiness (and my constitutional first and second amendment rights) intact. But they refused to let me.

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184. I'm giving you the benefit of the doubt, that maybe you can't see my injury yet. Maybe with all the obscene documentation in my case and some of the more flamboyant or graphical story telling, that maybe you think that I'm a smart ass, or maybe you think I'm out to disrepute the judiciary, or maybe I'm just out hunting for a payday, none of which I can swear to you and easily prove to you in person, if you are just the tinyist bit equal and "impartial", I can show and explain to you in person, in probably 30 minutes, that at the very least 75% of the parties in my case all have caused me intentional criminal harm.

185. I don't have time to prepare a proper response, but I must file a response to try to protect my case, so please know that due to my disabilities, I am not able to move fast, clearly, and concisely. This will be choppy, but I am doing the best that I can on short notice.

186. I need electronic service. I do not have time to waste waiting on the mail, while if my box is full my mail carrier may not cram extra stuff in my box, so I may not be aware that I ever received a filing by the court.

187. With my disabilities, I have only a fraction of a percent of a chance at ever being able to litigate this case to successful completion, not due to what is right, or true, or just, or legal, but because of the number of power players who I am against, who have already demonstrated their capacity to play the game, without regard for the truth, good faith, just motives, or anything of good and ethical repute.

188. I need every advantage I can get and every chance I can possibly be afforded to try to litigate my case pro se. Electronic notice and filing is absolutely critical to me having any real opportunity to defend my case in federal court.

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189. I did not receive the "Report and Recommendation" by the Western District of Michigan until the evening of 12/27/2019.

190. I have been franticly staying awake for the past two days doing everything in my power to reply to this to protect my case, but I do not have the ability to move quickly. I have "Obsessive Compulsive Personality Disorder" (OCPD) and "Attention deficit Disorder" (ADHD). Time is my greatest liability, and I need every aid possible for me to have any chance at reaching justice in this case.

191. The reason that I filed this in Lansing rather than another Federal Court in the State of Michigan, is because I called the court first, I spoke with a clerk named "Emily" on 10/11/2023, and she told me that I could file it in Lansing, while she specifically told me that if it needed to be forwarded to a different District Court, that the Western District Court would forward my complaint wherever it needed to go, while preserving the filing date.

192. https://www.rico.jefffenton.com/evidence/2023-10-11_usdc-wdm-emily-can-file-in-lansing.mp3

193. I don't have time right now to elaborate a lot, it is currently 1:37PM on 12/29/2023, and today is my final day to drive this to Lansing to file it at the court.

194. I've uploaded the recorded phone call from my conversation with Emily at the Western District of Michigan[15], please listen to it to verify that I did exactly as I was instructed. While I was not informed that there was any deviation or risk of my case not being forwarded to the correct court, let along being dismissed.

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[15] https://www.rico.jefffenton.com/evidence/2023-10-11_usdc-wdm-emily-can-file-in-lansing.mp3

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195. I have been working literally six days per week, 12-16 hours per day, since I filed my complaint on 10/13/2023 to write my "First Amended Complaint", which I hope to have done within the next week and a half to two weeks, so that I can hopefully serve it within the required 90 days. (My "First Amended Complaint" has massive improvements to fix the errors.)

196. I don't have that finished though I have made massive improvements, while I am providing references throughout my 2,000 page record, with great specificity, so that it will be easy to find citations without a need to read a lot of excess documentation.

197. I don't have time to tell you anymore now. I would love to, but I need more time please. I need to get my "First Amended Complaint" done before needing to spend more days simply trying to keep you from dismissing my case.

198. I swear to you that I am not trying to disrepute the judiciary in any way. I have entered each court taking for granted that I would obtain justice. It is only after an absurd amount of crimes have been committed against me by the previous courts that I've been forced to research and learn about the crimes which have sadly been committed against me.

199. I wish I had time to explain more to you. Please give me more time. Justice is dependent upon me having a hearing and due process, which I have yet to be afforded, despite the mountain of "power" which I am up against.

200. I Jeffrey Ryan Fenton swear under the penalty of perjury, that Judge Michael Weimar Binkley, Attorney Virginia Lee Story, Attorney Kathryn Lynn Yarbrough, Attorney Mary Elizabeth Maney Ausbrooks, Attorney Alexander Sergey Koval, and Attorney Henry Edward Hildebrand, III, at the very least, participated in a racketeering conspiracy against my rights and

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my property, between the United States Bankruptcy Court Middle Tennessee District and the Williamson County Chancery Court, under the color of law, office, and official right, though wholly repugnant of the rule of law, both state and federal constitutions, the federal rules of civil procedure, the federal rules of bankruptcy procedure, a multitude of federal bankruptcy laws, along with gross violations of Title-18, Title-28, and Title-42 federal laws.

201. I Jeffrey Ryan Fenton swear under the penalty of perjury, that Judge Michael Weimar Binkley, Attorney Virginia Lee Story, Attorney Kathryn Lynn Yarbrough, Attorney Mary Elizabeth Maney Ausbrooks, Attorney Alexander Sergey Koval, and Attorney Henry Edward Hildebrand, III, at the very least, further violated the federal judicial canons, the State of Tennessee's Rules of Judicial and professional conduct, as well as violating my natural inalienable human rights.

202. I Jeffrey Ryan Fenton swear under the penalty of perjury, the following crimes have been committed against me by those named above and other defendants in this case: Excessive "Fraud on the Court" by Officers of both the United States Bankruptcy Court for the Middle District of Tennessee and the Williamson County Chancery Court; who Conspired together (U.S.C. 18 § 241) to strategically Circumvent & deprive my lawful Rights and Property Under Color of Law (U.S.C. 18 § 242), Office, and Official Right (18 U.S.C. § 1951), using a Fraudulent Bankruptcy petition (18 U.S.C. § 157) where my property investments and interests where falsely denied and fraudulently misrepresented, while intentionally denying me and my two lawful tenants/roommates who had legitimate leasehold property interests, with an adversarial proceeding or at the very least notice and a hearing in Federal District or Bankruptcy Court

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(F.R.B.P. 7001 & 11 U.S.C. § 363), further committing Concealment of Assets; False Oaths and Claims; Bribery (18 U.S.C. § 152) to wrongfully deprive a qualified ADA individual – me (42 U.S.C. §§ 12202, 12203) with the loss of over a million dollars of lifetime enjoyment and net wealth in my property investments (18 U.S.C. §§ 1341, 1957), without notice or opportunity sufficient to save my property interests (42 U.S.C. § 1985), nor to attempt to mitigate my losses (42 U.S.C. § 1986), to the unwarranted, unnecessary, unrecoverable financial detriment of myself, and severe damage to my ex-wife, while it was entirely avoidable.

203. I Jeffrey Ryan Fenton swear under the penalty of perjury, that Judge Michael Weimar Binkley is guilty of "Official Oppression" for placing an unlawful 6-year "Order of Protection" against me based upon the false unsigned personal testimony of my ex-wife, and an almost exclusively fraudulent narrative fabricated by Attorney Virginia Lee Story.

204. I Jeffrey Ryan Fenton swear under the penalty of perjury, that Judge Michael Weimar Binkley and Attorney Virginia Lee Story are guilty of coercion my signature on a listing agreement under the threat of incarceration in Chancery Court on 8/29/2019.

205. I Jeffrey Ryan Fenton swear under the penalty of perjury that Attorney Virginia Lee Story is guilty of extortion by holding my personal property hostage, and even obtaining a federal court order from the United States Bankruptcy Court under fraudulent pretenses, to allow her to "sell" or "discard" my personal property, which she only had possession of due to her own lies and "Obstruction to Justice" in Chancery Court on 8/29/2019.

206. To clarify the extent of the abuse by Attorney Story, this Federal Court order to sell or discard of my personal property, was to intentionally supersede the State of Tennessee's

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"Personal Property Exemption", where any litigant can protect $10k worth of their personal property from forfeiture in any civil suit in the State of Tennessee.

207. Attorney Story intentionally obtained the Federal Court order to supersede Tennessee State law, specifically while threatening to discard or sell my personal property (which she fraudulently forced me to leave behind on 8/29/2019 in Chancery Court), demanding thousands of dollars to pay for storage or prevent her from literally discarding my stuff.

208. This was so obscenely abusive for the sole purpose of causing me further harm. Without it being of financial benefit to any party. Just to further dominate and punish me for trying to stand up for my rights.

209. **I Jeffrey Ryan Fenton swear under the penalty of perjury, that I have been litigiously tortured by Judge Michael Weimar Binkley and Attorney Virginia Lee Story.**

210. I Jeffrey Ryan Fenton swear under the penalty of perjury, that every action in Williamson County Chancery Court Docket #48419B is VOID (not voidable). Due to Judicial Bias, failed Due Process of Law, Jurisdictional Violations, and an excessive amount of "Fraud On the Court by Officer(s) of the Court."

211. Each of which have no "statute of limitations" for seeking corrections and a cure.

212. Executed completely in bad faith by Attorney Virginia Lee Story, an undisclosed close family friend of Presiding Judge Michael W. Binkley. Ms. Story strategically fabricated an almost exclusively "fraudulent narrative", to falsely assassinate my character, before I ever entered the Court. To forcefully take from me nearly everything I spent my life working for, invested toward our retirement, devoted my life to, and cherished. Although of hardly any financial

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significance to her.

213. I Jeffrey Ryan Fenton swear under the penalty of perjury, that Judge Michael W. Binkley refused his Judicial Supervisory Duties (which are not optional) to correct Attorney Story's false statements regarding matters of law, while he also refused to correct her almost non-stop violations of the "Rules of Professional Conduct".

214. I Jeffrey Ryan Fenton swear under the penalty of perjury, that Judge Michael W. Binkley allowed Ms. Story's pleadings to seek further favor, dominance, and depravity, "under color of law", instead of justice, as is required of all judicial pleadings, by the Federal Rules of Civil Procedure, the Judicial Canons, and the Rules of Professional Conduct. None of which Judge Binkley nor Attorney Story showed any care or submission toward, whatsoever.

215. It will require **multiple declarations** for me to articulate the depth and breadth of the crimes which were committed against me and my family "under color of law," in Williamson County Chancery Court and the United States Bankruptcy Court for the Middle District of Tennessee.

216. Along with the damage which we have and continue to daily suffer.

217. I Jeffrey Ryan Fenton swear under the penalty of perjury, that Judge Michael W. Binkley and Attorney Virginia Lee Story have committed Hobbs Act "extortion of my property" followed by "extortion of my silence" against me.

218. I Jeffrey Ryan Fenton swear under the penalty of perjury, that Judge Michael Weimar Binkley and Attorney Virginia Lee Story and ADA "Coercion/Extortion/Threats/Retaliation/and Interference".

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219. I Jeffrey Ryan Fenton swear under the penalty of perjury, that my testimony has never been heard or considered, despite the fact that I have never failed to plead. I had over 250 pages of sworn testimony including clear and convincing evidence that every action brought against me was substantially fraudulent, which I filed in the Chancery Court on 8/29/2019, before they wrongfully evicted me from my home, driving me to the State of Michigan to seek emergency shelter and provision in the 748 SqFt basement of my elderly mother who lives in Linden, Michigan.

220. I have done nothing but been literally terrorized by the court system so far. While not one single action was my fault. While every action is required by the Federal Rules of Civil Procedure to seek justice, yet not one filing by the defendants in this case ever did. Not in state court, not in federal court.

221. I can not respond to anything within 14 days. I don't even have time to do the research and understand what I'm replying to or how I should reply in fourteen days. Right now I will need to stay awake all night working on this, I'm sure that it will be rough at best, but I must drive to Lansing tomorrow to file this at the court in person, since I have been denied electronic filing, and since my 14-day deadline seems to be expiring today, the day that I've received this reply from the court.

222. The genesis of this complaint came colored as a domestic divorce action (with no children), executed in the Williamson County Chancery Court in the State of Tennessee.

223. Bundled along with a completely unnecessary, strategically engineered, precisely timed, fraudulent federal bankruptcy filing, to cheat me out of my property interests, while

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alleviating my ex-wife of all financial responsibility for paying the significant "transitional alimony" as we had repeatedly agreed upon.

224. The Chancery Court usurped—or the bankruptcy court abdicated—jurisdiction[16] over the marital home, in violation of 28 U.S. Code § 1334(e)(1),[17] which states: "The district court in which a case under title 11 is commenced or is pending shall have exclusive jurisdiction—of all the property, wherever located, of the debtor as of the commencement of such case, and of property of the estate."

225. The Williamson County Chancery Court was leveraged by the defendants to literally circumvent the Federal Rules of Bankruptcy Procedure and an outrageous number of Federal Bankruptcy Laws, for the primary purpose of unlawfully depriving my multiple legitimate property interests in our marital residence, along with my two lawful tenants legitimate leasehold property interests in our marital residence, located at 1986 Sunnyside Drive, Brentwood, TN 37027, without equal and due process of law, while denying me the "adequate protection" required by the Bankruptcy Court.

226. To be clear, the United States Bankruptcy Court was required to provide me and my two lawful tenants/roommates with notice and a hearing in either Federal Bankruptcy Court or in the Federal District Court, at the very beginning of the bankruptcy filing.

227. I had possession of the marital residence; my ex-wife had moved out the year prior. The bankruptcy court was required by Rule 7001 of the Federal Rules of Bankruptcy Procedure

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[16] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-34, PageID.1882 (See e.g., In re Palmer, 78 B.R. 402, 405-06 (Bankr. E.D.N.Y. 1987))

[17] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-34, PageID.1882

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and 11 U.S.C. § 363 to provide both myself and my two lawful tenants/roommates with an "adverse proceeding" (or at the very least notice by which I could file an adverse proceeding) in order for the court to determine if the marital residence could be sold as part of the bankruptcy estate, in compliance with 11 U.S.C. § 363, as it was secretly and deceptively listed on my ex-wife's bankruptcy petition, by her bankruptcy counsel, defendant Ausbrooks.

228. Nothing that happened in either court was legal, lawful, honorable, done in good-faith, equal, impartial, ethical, unbiased, fair, for the purposes claimed.

WILLIAMSON COUNTY CHANCERY COURT

229. This case addresses harm caused in **Docket #48419B**[18] filed on **6/4/2019**, by **Story, Abernathy, and Campbell, PLLP** in Williamson County Chancery Court, in the State of Tennessee. The Courthouse is located at 135 4th Avenue South, Franklin, TN 37064.

230. The Chancery Court Clerk & Master was **Attorney Elaine Beaty Beeler** (BPR# 016583), the presiding Chancellor was **Judge Michael Weimar Binkley** (BPR# 005930), while my opposing Counsel was **Attorney Virginia Lee Story** (BPR# 011700) and **Attorney Kathryn Lynn Yarbrough** (BPR# 032789) with **Story, Abernathy, and Campbell, PLLP.**

U.S. BANKRUPTCY COURT - MIDDLE TENNESSEE

231. The actions taken in Williamson County Chancery Court, were directly tied to, in coordination with, and allegedly based upon the **Chapter-13** bankruptcy petition filed by my ex-

[18] https://rico.jefffenton.com/evidence/2019-06-04_fenton-chancery-court-record-48419b.pdf (Case 1:23-cv-01097-PLM-RSK, *ECF No. 1-17, PageID.641 ~ ECF No. 1-26, PageID.1369*)

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wife, in **Case 3:19-bk-02693**[19] in **The United States Bankruptcy Court for the Middle District of Tennessee**. Located at 701 Broadway Ste 260, Nashville, TN 37203-3983.

232. The Federal Bankruptcy Court Judge presiding was **Judge Charles M. Walker** (BPR# 019884). The Chapter-13 Trustee responsible was **Attorney Henry Edward Hildebrand, III** (BPR# 032168). While Bankruptcy Counsel for my ex-wife was **Attorney Mary Elizabeth Maney Ausbrooks** (BPR# 018097) and **Attorney Alexander Sergey Koval** (BPR# 029541) both of **ROTHSCHILD & AUSBROOKS, PLLC.**

COURT OF APPEALS OF TENNESSEE AT NASHVILLE

233. Upon appeal of the actions above in Chancery Court, I was the "Appellant" at the **Court of Appeals of Tennessee at Nashville**, in **No. M2019-02059-COA-R3-CV**.[20]

234. The Court of Appeals dismissed[21] my appeal, without correction, assistance or cure. Refusing to act upon the clearly disclosed judicial and attorney misconduct, either in error, bias, collusion, and/or negligence.

235. The Order dismissing my appeal was approved by the following panel of Judges: **Judge Frank Goad Clement** (BPR# 006619), **Judge Andy Dwane Bennett** (BPR# 009894), and **Judge William Neal McBrayer** (BPR# 013879).

SUPREME COURT OF TENNESSEE AT NASHVILLE

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[19] https://rico.jefffenton.com/evidence/2019-04-26_fenton-bankrupcy-record-3-19-bk-02693.pdf (Case 1:23-cv-01097-PLM-RSK, *ECF No. 1-8, PageID.74 ~ ECF No. 1-11, PageID.478)*

[20] https://rico.jefffenton.com/evidence/2021-01-19_fenton-seeking-help-tnsc-coa-aoc-bpr-fbi-ustp.pdf (Case 1:23-cv-01097-PLM-RSK, *ECF No. 1-29, PageID.1684-1691)*

[21] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1693

236. I attempted to escalate my appeal to the **Supreme Court of Tennessee at Nashville**, in **No. M2019-02059-SC-R11-CV**[22], but my application for permission to appeal was denied.[23]

237. The United States Bankruptcy Court for the Middle District of Tennessee, was **not** allowed by the Federal Rules of Bankruptcy Procedure (Rule 7001) and related Bankruptcy Laws (11 U.S.C. § 362, § 363, § 541, § 542, § 1204, § 1205, § 1206, § 1207, § 1208) to force the sale of my home.

238. This was the strategic purpose for the Chancery Court in this conspiracy. The Chancery Court was literally used to circumvent the Federal Rules of Bankruptcy Procedure and Federal Bankruptcy Laws, to specifically deprive my property interests, though the State Courts were forbidden from exercising jurisdiction over property in a federal bankruptcy estate, especially when that property was core to the bankruptcy estate, as it was, and when the bankruptcy was filed 39-days before ANY action was filed in the Chancery Court.

239. The motion to sell the marital residence was "core" to the bankruptcy, which merely reinforces the fact that a Federal Court was required to hear the property deprivation to provide Plaintiff and his two lawful tenants/roommates with "adequate protection" throughout the bankruptcy.

240. In addition to that, the Bankruptcy Action was on the face fraudulent, with false details about the couple's property interests in the Marital Residence. (Any action planted squarely

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[22] https://rico.jefffenton.com/evidence/2021-01-19_fenton-motion-to-escalate-to-tnsc.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1370 ~ ECF No. 1-29, PageID.1683)

[23] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1692

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inside a fraudulent action in another court, especially for the express purpose of intentionally deceiving both courts while circumventing the rights and protections required to be obeyed in that court prior to the deprivation of the property, is fraud sowed upon fraud and can beget nothing other than fraud compounded.

241. In addition to that, the Motion to Sell the Marital Residence written by defendant Yarbrough and argued in Chancery Court on 8/1/2019 by defendant Story, was highly abusive (harassing and abuse by process) and obscenely fraudulent.

242. There are so many violations of the court's rules of professional conduct, the Federal Rules of Civil Procedure, and the rule of law, the best way that I know to try to describe this is with an extremely heavy markup I did of Yarbrough and Story's motion. I don't do this to be offensive at all, I do this because due to my disabilities, I am not capable of articulating the extent of the fraudulent bad faith claims and actions taken, without using hundreds of pages or losing the attention of my audience, so I have resorted to trying to SHOW what I literally don't have the education, knowledge, legal training, and language to communicate in a non-offensive way which is believable without showing it. I beg the court to please hear this testimony, I call it "testimony in evidence", and absent showing my testimony using graphic arts inline, I know no other way in a static inline format such as this complaint.

243. As long as I could bring our mortgage payments current and keep them current, the Bankruptcy Trustee would have been forced to remove our marital residence from.

244. I had no idea that a single mortgage payment was missed or late.

245. I had a verbal contract with my ex-wife whereby she promised to pay our mortgage

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payments (and had prior to the defendants in this case) until a divorce settlement or decree, or until further notice, while I was never notified.

246. My ex-wife had changed all the financial account credentials, blocking me from having any direct access to our mortgages. She changed her email to one which she alone had access to. She changed the mailing address with our mortgage companies from our marital residence to her apartment which she rented after she moved out.

247. Short of the Bankruptcy Attorney and the Bankruptcy Trustee obeying the Federal Rules of Bankruptcy Procedure and Federal Bankruptcy Laws, or my ex-wife notifying me, I had no means of learning about the defaults, and was unconstitutionally deprived of any opportunity to save my property interests or to at the very least attempt to mitigate my losses prior to the forced deprivation of my property interests.

248. None of the aforementioned parties ever notified me, which I have confirmation from the DOJ/USTP who I requested do a bankruptcy fraud investigation.

249. After a pre-trial conference in the back of the Chancery Court on 8/1/2019, I told my counsel that I could borrow money from my mother to bring our mortgages current and to keep them current (roughly $8k, less than I collectively spent on counsel for that day), provided I could continue living in my home.

250. As I asked my counsel if that might be possible, defendant Story overheard me and stated, **"No. It's already too far along in the bankruptcy."**

251. I was strategically deprived of the lawful notice and adequate protection required by the bankruptcy court.

252. Both my 5th and 14th Amendment rights as a United States Citizen were violated.

253. Furthermore, the Chancery Court placed a restraining order against me specifically forbidding me from contacting the bankruptcy court or our mortgage companies (under the guise that I somehow wished some harm upon my ex-wife's finances).

254. According to Wikipedia[24]: "Williamson County[25] is ranked as the wealthiest county in Tennessee, as well as among the wealthiest counties in the country. In 2006 it was the 17th-wealthiest county in the country according to the U.S. Census Bureau, but the Council for Community and Economic Research ranked Williamson County[26] as America's wealthiest county (1st) when the local cost of living was factored into the equation with median household income. In 2010, Williamson County is listed 17th on the Forbes list of the 25 wealthiest counties in America."

BRENTWOOD MARITAL RESIDENCE WORTH $900K[27] TODAY (ONLY OWED $300K[28] ON MORTGAGES)

255. My wife and I owned a beautiful home,[29] in coveted Brentwood Tennessee, which I had invested everything that I had into (including all my premarital retirement funds along with proceeds from my own premarital home).

256. Further complimented by nearly a decade of my "sweat equity", including thousands of hours of labor, making and supervising roughly $200k of improvements[30] in the

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[24] https://en.m.wikipedia.org/wiki/Williamson_County,_Tennessee

[25] https://williamsoncounty-tn.gov/

[26] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.497-500

[27] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.485

[28] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.505; ECF No.1-13, PageID.567

[29] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.485, 494-512

[30] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.508-511

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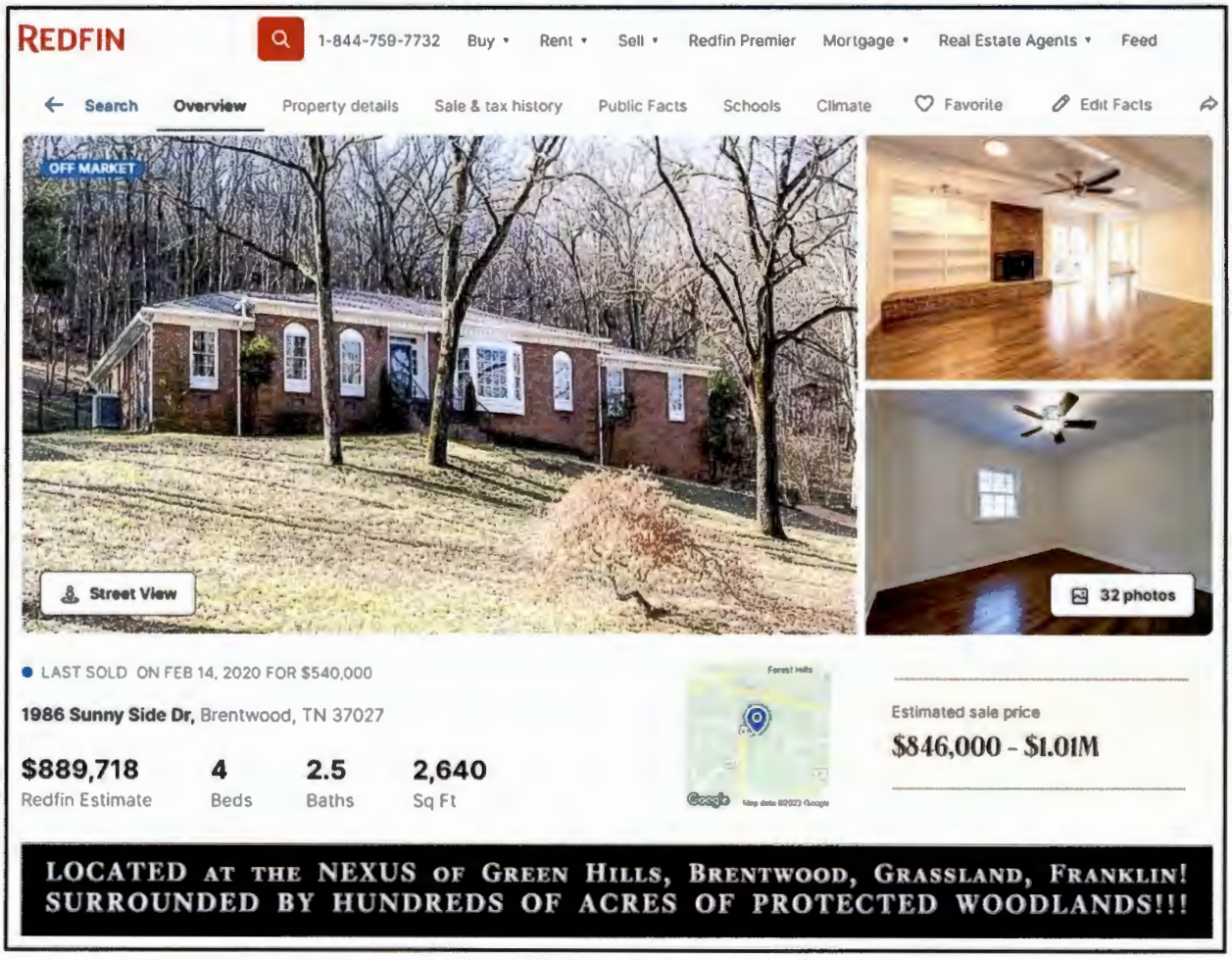
property.

257. We purchased the home on 4/29/2011 for $350k.[31]

258. Together we had roughly $550k invested into the home, while improvements to the property were also my primary work product for much of the time between 2011-2018, during which my wife built her career in architecture.



[31] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1416-1431

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259. The home is currently worth $900,000[32] and our sole asset and retirement investment, while the Chancery Court forced the liquidation of the property for just $324,360.

260. On information and belief, suspiciously, exactly what was due on the mortgages, plus the auctioning fees and closing costs, without one dollar to either myself or Ms. Fenton, for their life's savings, and the sum total of both of their premarital retirement investments.

261. The very first action, the foundation for every crime, unnecessary and unconscionable loss to follow, within this complaint, was a secretly executed, falsified, fraudulent Federal Bankruptcy petition (Case 3:19-bk-02693[33]), executed by bankruptcy specialist Mary Elizabeth Maney Ausbrooks, through her Nashville law firm, "ROTHSCHILD & AUSBROOKS, PLLC", allegedly on behalf of Plaintiff's ex-wife. While I was strategically deprived of lawful notice[34] about this bankruptcy action, which my home was secretly included in, *by special request.*

262. The truth is, that my wife, never needed to file bankruptcy,[35] and actually had a terribly difficult time "qualifying",[36] because she was a highly successful professional with a $116k annual compensation package,[37] before the counsel within this complaint got involved.

263. Entered on 04/26/19 at 13:29:16, on Appendix D, Part 9, "**Nonstandard Plan Provisions**", the following special request was included by defendant Ausbrooks[38]: *"Debtor moves*

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32 Case 1:23-cv-01097-PLM-RSK, ECF No. 1-12, PageID.485, PageID.494-510

33 Case 1:23-cv-01097-PLM-RSK, ECF No. 1-8, PageID.74 ~ ECF No. 1-11, PageID.478

34 Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.565-566

35 Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.569-576

36 Case 1:23-cv-01097-PLM-RSK, ECF No. 1-8, PageID.74 ~ ECF No. 1-11, PageID.478

37 Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1444

38 Case 1:23-cv-01097-PLM-RSK, ECF No. 1-8, PageID.144

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for permission to sell real property located at 1986 Sunny Side Drive Brentwood, TN 37027 Williamson County, within 180 days of confirmation with no payments being made in the interim. The liens of Bank of America, NA and BanCorp South shall be satisfied in full and ***all remaining proceeds after Debtor's homestead exemption and costs of sale shall be paid to the Chapter 13 Trustee for the benefit of the estate.***"

264. To be clear, this language asked for permission to sell real property, owned by Ms. Fenton **and** one other equally deeded party, me, as "Tenancy by the Entirety". Which can be easily verified by checking the property deed and/or the property tax records, where I am clearly named, the same being the legal responsibilities of both defendants Ausbrooks and Hildebrand.

265. Examining this request on the face, imploring no more than common sense and the most fundamental knowledge about natural and constitutional rights in the United States of America, this request does not appear that it could have reasonably been made in "good faith" by defendant Ausbrooks, for at least the following two reasons.

- First, this "special request" sought to sell the property owned by another. (While providing them nothing in return.)
- Secondly, this language promised **all** the proceeds of the sale to benefit only the party making this request (and her creditors). Without any language indicating if or how the proposed sale could be of any benefit to the other equally deeded and mutually interested property owner.

266. That wreaked of foul-play straight off the face, yet defendant Ausbrooks filed it,

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while personally and professional certifying[39] that her request was well grounded in law and made in good-faith. Without bringing any of the obvious concerns and potential conflicts of interest to light. Without performing any due diligence to protect the property interests of Plaintiff and to provide both Plaintiff and his two lawful tenants/roommates with adequate protection, as is required by the bankruptcy code.

267. Defendant Ausbrooks was well aware that Ms. Fenton was still married. She also knew that the State of Tennessee is a "Deed of Trust" state, not a mortgage state. Meaning that the name on a mortgage does not define who owns the property or holds legal title to it, for that the property's "Deed of Trust" is the sole instrument.

268. Furthermore, real property which is owned by husband and wife in the State of Tennessee, is by default held as "tenancy by entirety"[40]. Even if I wasn't named on the deed of trust (which I was), the property still couldn't be sold with a clear title without me signing a Quit Claim Deed or some instrument conveying or forfeiting my "marital interest" in the property. While if that was to be compelled by **any** court, <u>that could not be lawfully or ethically done without due process</u>.

269. I was deprived of equal and due process of law in the Chancery Court.

270. Judge Michael W. Binkley was bias and discriminated against me.

271. Judge Michael W. Binkley and Attorney Virginia Lee Story have been repeatedly

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[39] FRBP Rule 9011 & 11 U.S.C. § 707

[40] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.541-542

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exposed in the Nashville newspapers for being "vacationing" and "partying" friends, though Judge Binkley has insisted this doesn't present a conflict of interest for litigants, that is a lie.

272. Many people have been caused substantial harm by the corruption of Judge Michael W. Binkley.

273. Judge Michael W. Binkley has a reputation for favoring those attorneys who work for the law firm which he originally founded prior to becoming a judge, along with Attorney Virginia Lee Story who Judge Binkley has a sordid past with.

274. There is a Facebook page setup by a litigant wounded long before I even knew his name: https://www.facebook.com/judgebinkley

275. The title of this Facebook page is **"Investigate Michael W. Binkley Circuit Court Judge"**.

276. I never received notification that a single one of our mortgage payments had been missed.

277. Furthermore, it is unreasonable that Attorney Ausbrooks, Attorney Henry Edward Hildebrand, III, the Bankruptcy Court, or Attorney Virginia Lee Story could proport to know or determine what investment or ownership interest I had in the marital residence, based upon the testimony of any one party, other than myself or a judge who had performed equal and due process, heard both sides, and equitably divided out our interests. None of which was done.

278. Prior to a final decree of divorce, marital interests in real property or debts can not be exactly divided between spouses or definitively determined, without complying with the Federal Rules of Bankruptcy Procedure and multiple Federal Bankruptcy Laws which required that both I

and my Tenants be provided with lawful notice and hearings in either Federal District Court or in the Federal Bankruptcy Court, while providing adequate protection to both my multiple property interests as well as the tenants lawful leasehold interests, until an adversarial proceeding or other equal and due process has taken place.

279. Choosing not to notify me[41] or my two lawful tenants, while defendant Ausbrooks had requested that **all** our lawful property interests be deprived, the property liquidated, and the funds disbursed, entirely to the benefit of others, wasn't legal or ethical.

280. 11 U.S.C. § 707(4)(C)[42] The signature of an attorney on a petition, pleading, or written motion shall constitute a certification that the attorney has—

- (i) performed a reasonable investigation into the circumstances that gave rise to the petition, pleading, or written motion; and
- (ii) determined that the petition, pleading, or written motion—
- (I) is well grounded in fact; and
- (II) is warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law and does not constitute an abuse under paragraph (1).

281. The actions between the State and Federal Courts were conducted under the pretense of "legal" actions, under the guise of a "domestic" civil divorce. Except that none of the

[41] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.565-566

[42] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-34, PageID.1894

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actions taken were actually "legal", in accordance with the rules of law.

282. Not state or federal laws, nor either of their constitutions.

283. Nor was any interest or care shown about any real merit involving our marriage or subsequent dissolution of that marriage, through a divorce.

284. In fact, discovery for our divorce was strategically prevented by the Chancery Court, and defendants Binkley, Beeler, and Story, from ever getting started.

285. Once defendants seized possession of the marital residence, they fraudulently terminated all litigation under the guise of "default" judgments, claiming that I chose to relocate to the State of Michigan and had no interest in participating further or defending myself in Chancery Court docket #48419B.

286. That is absurdly false. I've fought day and night for four years straight, filing well over a thousand pages of sworn pleadings combined with clear and convincing evidence between the Williamson County Chancery Court[43] and the Tennessee Court of Appeals at Nashville.[44]

287. None of which is remotely reasonable given the 250 +/- pages of sworn testimony[45] which I had filed in the Chancery Court on 8/29/2019, which included an ad hoc divorce answer and counter complaint, as well as an answer/rebuttal of the egregiously false claims in the "Ex Parte Order of Protection".

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[43] https://rico.jefffenton.com/evidence/2019-06-04_fenton-chancery-court-record-48419b.pdf (Case 1:23-cv-01097-PLM-RSK, ECF No. 1-17, PageID.641 ~ ECF No. 1-26, PageID.1369)

[44] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1370 ~ ECF No. 1-28, PageID.1664
Case 1:23-cv-01097-PLM-RSK, ECF No. 1-29, PageID.1665 ~ ECF No. 1-30, PageID.1793

[45] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-18, PageID.766 ~ ECF No. 1-22, PageID.1038

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288. Defendant Story further accused me of "Dissipating Marital Assets" while demanding that I be forcefully removed from my home with only a five-day notice over a holiday weekend, while demanding that I be removed by the Sherriff's Office.

289. Defendant Story insisted that I not even be allowed to take any of my personal property with me, not even my bed.

290. At 49 years old, after literally 25-years of being a hard working tax paying, peaceful Tennessee resident, without so much as a single traffic citation during all that time, they treated me like a hardcore felon while refusing to even tell me why or by rule, law, or legal code they could justify their actions in open court.

291. Defendants Story and Binkley only allowed me to take with me one carload of clothes, toiletries, and my medications. **That's it.**

292. All under false claims that I was "dissipating marital assets", which wasn't even physically possible in any meaningful capacity, because defendant Story's own complaint for divorce stated on page 2, *"Plaintiff would show that the parties have no assets other than personal property which has been divided with the exception of a few items. Husband and Wife have lived separately since April 2018."*

IV.

Plaintiff would show that the parties have no assets other than personal property which has been divided with the exception of a few items. Husband and Wife have lived separately since April 2018.

Wife's Complaint for Divorce, Page 2, Section IV
Case 1:23-cv-01097-PLM-RSK, ECF 1-17, PageID.648

293. Every attempt by defendant Story to convert Plaintiff's personal property back into

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marital property, without bringing Ms. Fenton's personal property back to the marital residence, was in bad-faith, while the proceeds from the proposed sale clearly stated on the Bankruptcy petition, as follows:

294. *"The liens of Bank of America, NA and BanCorp South shall be satisfied in full and* ***all remaining proceeds after Debtor's homestead exemption and costs of sale shall be paid to the Chapter 13 Trustee for the benefit of the estate."***[46]

295. Absolutely nothing was to benefit me.

296. They all ignored both my critical and essential property interests, my right and means of earning a living (rental income at that time), and my only hope of ever regaining the standard of living which I built by myself prior to the marriage.

297. Let alone the standard of living which we enjoyed throughout our 13-year marriage, or any chance of ever being able to retire.

298. My property was taken and liquidated, while my life was discarded like trash by the defendants.

RELENTLESS SEEKING A CURE TO GET FREE

2019-10-21	Final Decree of Divorce & OP by "Default" (Fraudulent Order of Protection)
2019-10-21	Judge Binkley issued an "Order of Protection" against me from 10/21/2019 – 10/21/2020
2019-10-29	Closing: 1986 Sunnyside Drive, Brentwood, TN 37027
2019-11-20	Tennessee Court of Appeals – Middle Division (Nashville) Divorce Appeal Filed
2019-12-06	Fawn's Bankruptcy Converted from Chapter-13 to Chapter-7 (Case 3:19-bk-02693) Filed on 12/5
2020-02-10	DOJ Disability Rights – No Legal or Financial Assistance
2020-04-15	Debtor Discharged (Disposition: Standard Discharge)
2020-06-15	Tennessee Court of Appeals (Appeal Filed)
2020-07-02	John C McLemore – Chapter 7 Bankruptcy Trustee (Recorded Phone Call)

[46] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-8, PageID.144

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2020-09-24	Order of Protection 5-Year Extension - NO Hearing, NO Motion, NO Notice
2020-11-19	Tennessee Court of Appeals (Appeal Dismissed)
2021-01-04	FBI Call Center – Not a Federal Matter
2021-01-19	Motion to Escalate to the Tennessee Supreme Court Filed
2021-04-07	Tennessee Supreme Court – Application Denied
2021-04-09	Tennessee Court of Appeals – Mandate Issued
2021-12-02	FBI Special Agent Mark Shafer (agent named on Corrupt Nashville Judge Casey Moreland's criminal complaint)
2021-12-16	FBI Special Agent Mark Shafer (Emailed Evidence on Many Dates, through 2023)
2022-01-17	Emailed Paul Randolph[47] – Acting United States Trustee for Region 8, over the federal judicial districts of Kentucky and Tennessee (Requested Bankruptcy Fraud Investigation)
2022-01-18	Reply Confirmation from Paul Randolph[48] USTP
2022-03-10	Megan Seliber – USTP Trial Attorney (Recorded Phone Call)
2022-03-15	Megan Seliber[49] – USTP Trial Attorney (Confirmed BK Court Failed to Provide Notice)
2023-05-10	Board of Professional Responsibility – Sandy Garrett Chief Disciplinary Counsel Refusing to File Complaint against Story (Again)
2023-12-13	Williamson County Sheriff's Office – Complaint #2023-35037, filed with Deputy Brady Cartwright. Spoke to Captain David Beard on 10/15/2023 (615) 790-5554 (Ext. 3227)

FACTS BASED UPON THE REAL MERITS OF OUR DIVORCE (NEVER MENTIONED IN EITHER OF THE CASES OUTLINED HEREIN)

299. This doesn't really matter – they literally didn't address a single honest merit of our divorce. It was all a fraudulent racketeering conspiracy. But for the sake of establishing what real merits would have looked like…

300. Contrary to traditional roles, Ms. Fenton was voluntarily the primary breadwinner[50] throughout our 13-year marriage.

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[47] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.563

[48] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.564

[49] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-13, PageID.565-566

[50] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1444

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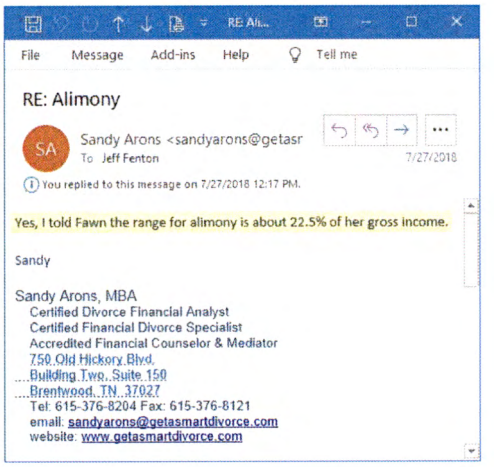
301. Ms. Fenton is a MIT educated, licensed Tennessee Professional Architect[51] (ID Number: #102945), who is a "LEED Accredited Professional", certified by the U.S. Green Building Council, as well as a "Certified Document Technologist" by the Construction Specifications Institute. Ms. Fenton also has a decade of leadership experience in the ACE Mentor Program, teaching high school students about careers in Architecture, Construction, and Engineering.

302. Prior to this action, my ex-wife had agreed that she would pay me "transitional alimony" in the amount of $1,750 per month, for a duration of 6-years.

303. This amount was calculated at 22.5% of my ex-wife's gross income, for a term equal to half the duration of our marriage, as we were advised was "fair" with all factors included.

304. This came at the advice of Ms. Sandy Arons, MBA (Certified Divorce Financial Analyst, Certified Financial Divorce Practitioner, Certified Financial Divorce Specialist, Financial Counselor and Mediator) whom I hired on July 12th, 2018.


RE: Al...
File Message Add-ins Help Tell me

RE: Alimony

SA Sandy Arons <sandyarons@getasr
To Jeff Fenton
7/27/2018

You replied to this message on 7/27/2018 12:17 PM.

Yes, I told Fawn the range for alimony is about 22.5% of her gross income.

Sandy

Sandy Arons, MBA
Certified Divorce Financial Analyst
Certified Financial Divorce Specialist
Accredited Financial Counselor & Mediator
750 Old Hickory Blvd.
Building Two, Suite 150
Brentwood, TN 37027
Tel: 615-376-8204 Fax: 615-376-8121
email: sandyarons@getasmartdivorce.com
website: www.getasmartdivorce.com

[51] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, PageID.1444

Initials: _____

305. In an email[52] to me and Ms. Arons on 8/30/2018, Ms. Fenton stated in part, "**Our office lease is up in March 2020, and Ken** (the owner of her business) **really wants to retire,** and so there's no telling what my job will be after that."

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SANDY ARONS, MBA
Certified Divorce Financial Analyst
Certified Financial Divorce Practitioner
Certified Financial Divorce Specialist
Financial Counselor & Mediator

1932 Bristol Court
Brentwood, TN 37027

615-376-8204
615-376-8121 fax

www.getasmartdivorce.com
sandyarons@getasmartdivorce.com

MISSION STATEMENT

To provide financial consulting services which help clients reach a fair divorce settlement and:

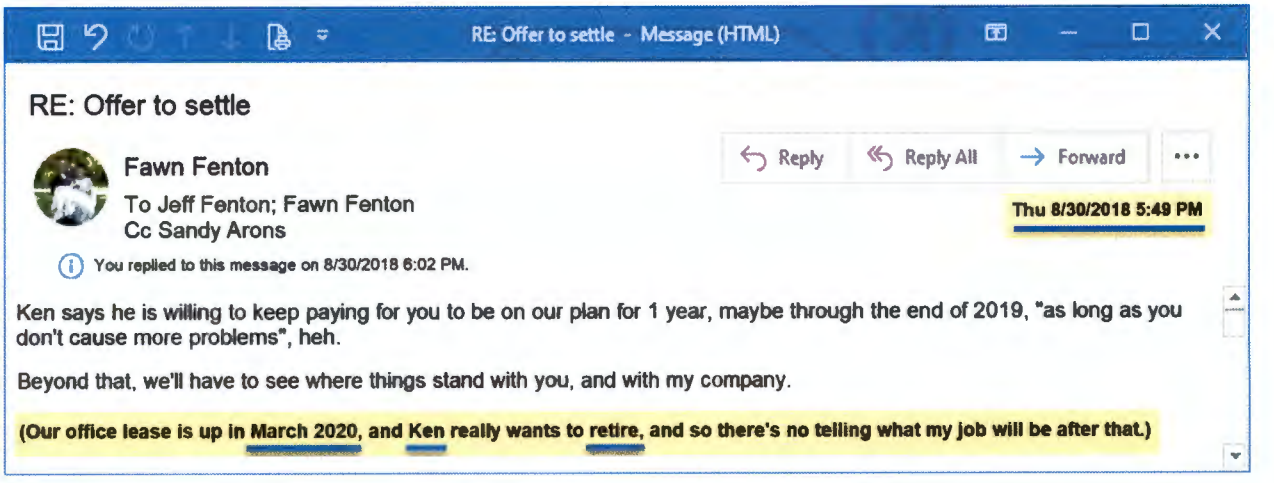
- Avoid unnecessary legal fees
- Reduce conflict
- Minimize the negative impact on your children and family

306. The defendants in this case, waited until Ms. Fenton's boss was about to retire, then they strategically timed the intentional non-payment of our mortgage payments without notice, followed by the fraudulent bankruptcy filing, while they intentionally falsified her bankruptcy petition, by lying about my ownership interests, concealing that I invested my pre-

[52] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-35, PageID.1941 (https://rico.jefffenton.com/evidence/2018-08-30_wife-notifies-about-employers-retirement.pdf)

Initials: _____

marital retirement savings into the purchase of our mutually purchased, jointly purchased, equally deeded as "tenancy by the entirety" marital residence, at 1986 Sunnyside Drive, Brentwood, TN 370127.


RE: Offer to settle - Message (HTML)

RE: Offer to settle

Fawn Fenton
To Jeff Fenton; Fawn Fenton
Cc Sandy Arons

Reply | Reply All | Forward

Thu 8/30/2018 5:49 PM

You replied to this message on 8/30/2018 6:02 PM.

Ken says he is willing to keep paying for you to be on our plan for 1 year, maybe through the end of 2019, "as long as you don't cause more problems", heh.

Beyond that, we'll have to see where things stand with you, and with my company.

(Our office lease is up in March 2020, and Ken really wants to retire, and so there's no telling what my job will be after that.)

307. On January 1st, 2019 the "Trump Tax Reform"[53] went into effect. As a result, the alimony payments for divorces finalized prior to January 1st, 2019 were tax deductible, and were "grandfathered" for the duration of the alimony. Which meant in this case, the difference in Ms. Fenton being able to deduct $21k per year from her gross income of $94k+/- per duration of My ex-wife had previously agreed that she would pay me year, for the next six years, or being taxed upon all that money, as her earnings, as if she had personally benefitted from it.

308. If the divorce could not be finalized by the end of 2018, prior to the Trump Tax Reform taking place, Ms. Fenton calculated her income as follows:

[53] https://rico.jefffenton.com/evidence/2018-12-31_divorce-deadline-for-trump-tax-reform.pdf

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➢ "90k gross – 31k taxes – 21k alimony = 38k net. Plus or minus."[54]

309. In the end, this was what caused Ms. Fenton to become a prime candidate for "predatory litigation". Willing to be exploited while throwing away nearly everything that we owned, in order to evade six years of financial responsibility, needing to earn $90k plus per year, while taking home less than half that amount.

310. This had a tremendous impact upon Ms. Fenton's tax bracket and the amount of income taxes which she was required to pay for the next six years. Because of this, Ms. Fenton absolutely demanded that for any "fair" amicable, uncontested divorce action, that the divorce needed to finalize prior to the end of 2018, or else she refused to cooperate.

311. The problem was, because of this, the Williamson County Chancery Court docket was nearly full for the remainder of the year, by the start of October 2018. (The court was busy with people trying to get their divorces finalized by the end of the year.)

312. Ms. Fenton presented the last proposed MDA which she was willing to entertain on 9/14/2018.

313. Although Plaintiff was very interested in this offer and tried to accept it, Ms. Fenton said it was still subject to review by her counsel as well as by another independent attorney, she hired for a document review, recommended by Sandy Arons, who was helping with the "Collaborative Divorce".

314. The very first paragraph of Ms. Fenton's offer stated, *"This offer is only good if we*

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[54] https://rico.jefffenton.com/evidence/2018-12-22_projected-gross-taxes-alimony-net.pdf

Initials: _____

successfully sign this into a Marital Dissolution Agreement Contract as soon as possible AND ***the divorce Final Order is entered by the court before December 31, 2018.*** *The financial tax incentives integral to this offer will not apply in 2019, and this Agreement is void if the divorce is not final in 2018."*

315. Unfortunately Ms. Fenton's two attorneys shot-down the offer, before Plaintiff was permitted to accept it.

316. In an email from Ms. Fenton on 9/19/2018 she stated, *"I sent my attorney the draft of our contract to review also, and he just told me he thinks this agreement is totally nuts; it's too complicated and is not at all in my best interest, and there are a thousand ways this could go wrong in the future, and he says he will not write it or facilitate it. He says if we do successfully write up an agreement for both of us to sign, we will have to do our best to format it with the structure and language that the courts expect to see for an MDA, and then I will have to file it myself, appending it to my file that is already active at the Williamson County courts, and I will have to get the court clerks to help me request a court date for a judge to look at the contract. My attorney also says, that even though we might both have agreed to this contract and both voluntarily signed it, the judge could still think it is too unequal or complicated and strike it down. My attorney says the judges will refuse to finalize a divorce degree if they personally do not like/agree with the MDA."*

317. On the following day, on 9/20/2018 Ms. Fenton stated in another email, *"Tommy confirmed what my lawyer had said: this agreement is so far out of the ordinary, he thinks that even if we both sign it and agree to it, that the judges will strike it down. Tommy says the main problem is the long timeline, the judges do not want open-ended issues after a divorce. He said that they will either want one person to get the house free and clear from the other, or they will order the sale of the house and tell us to*

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split the proceeds..."

318. Many of the divorce negotiations discussed between Plaintiff and his ex-wife included a means by which Plaintiff could keep the marital residence and continue to live in it, since Ms. Fenton had decided that she did not personally want to keep the home.[55] Despite Plaintiff's offer to give Ms. Fenton his equity for free.[56] So that one of them could enjoy the fruits of both their labor, rather than liquidating the home and losing all that they had worked for and invested.

319. Here is an excerpt of an email[57] written to me by my ex-wife on 8/4/2018: *"Hello, I am not theoretically opposed to you keeping the house, but I don't know how financially we could make that happen. Maybe there is a way we can make a deal like,* ***I keep paying the current mortgage payment and 2nd mortgage payment for the next 6 years or so instead of giving you alimony payments.*** *The financing would have to stay as it is in my name until you can rebuild your credit. When you can re-build your credit and have a job and all, then you could re-fi the house into your own name and cash me out my equity. That plan would suck for the credit card debt, though, as I was counting on the house equity (after sale of the house) to pay off both of our credit card debts. What are your thoughts."*

320. On 8/30/2018 Ms. Fenton emailed me a settlement proposal,[58] which included a budget whereby I could retain the marital residence, but I would need to obtain two roommates, one renting the large (spare) bedroom for **$800 per month**, and another renting the smaller spare bedroom for **$600 per month**. Then Ms. Fenton would pay the remainder of the household

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[55] https://rico.jefffenton.com/evidence/2018-10-09_wife-does-not-want-to-keep-marital-residence.pdf

[56] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-27, 1472

[57] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-26, PageID.1341

[58] Case 1:23-cv-01097-PLM-RSK, ECF No. 1-26, PageID.1336-1337

expenses, and I only needed to earn another $248 per month to support myself.

321. This was to provide me with an opportunity to obtain the needed vocational rehabilitation, and to ease back into the workforce, without needing to immediately sink or swim.

322. I showed immediate interest in this offer and tried desperately to accept it, but Ms. Fenton's counsel advised her against it and she ultimately rescinded the opportunity.

323. I'm sorry I'm out of time. I had to copy and past some parts in, which have the language "Plaintiff" rather than speaking in first person. I understand this error, I just don't have time to fix it and to still make it to the court today. Please read the spirit and excuse my negligence.

324. This is a pro se filing, in which "technicalities" are only allowed to matter to the extent that JUSTICE is still the goal of the court.

325. Justice demands that this case be cured, that these criminals be held to account, and the courts they operate in provide new rules or mechanisms of transparency and accountability to protect the judicial integrity throughout the State of Tennessee, as well as protecting the people.

326. Again, I write none of this for any foul purpose. My goal is as it has been since my first day in court, to testify to the raw truth, despite what light that puts myself or anyone else in.

327. **I Jeffrey Ryan Fenton swear under the penalty of perjury, that I have filed 1,000 pages of cold raw truth in the State Courts of Tennessee, without yet being given the benefit (outside court) of one single word. While almost everything else filed in docket #49418B was substantially fraudulent. (Please help me!)**

328. "Pro se pleadings are to be considered without regard to technicality; pro se litigants' pleadings are not to be held to the same high standards of perfection as lawyers." *Jenkins*

Initials: _____

v. McKeithen, 395 U.S. 411, 421 (1959); Picking v. Pennsylvania R. Co., 151 Fed 2nd 240; Pucket v. Cox, 456 2nd 233

329. "Pleadings are intended to serve as a means of arriving at fair and just settlements of controversies between litigants. They should not raise barriers which prevent the achievement of that end. Proper pleading is important, but its importance consists in its effectiveness as a means to accomplish the end of a just judgment." *Maty v. Grasselli Chemical Co., 303 U.S. 197 (1938)*

DECLARATION

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 19, 2024

JEFFREY RYAN FENTON
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