IN THE UNITED STATES COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
or perhaps:
IN THE COUNTY COURT OF THE TENTH JUDICIAL CURCUIT, CRIMINAL DIVISION
IN AND FOR POLK COUNTY, FLORIDA

Gordon Wayne Watts, et al., on behalf of themselves and similarly situated citizens Plaintiffs, vs. Lakeland, Florida Police Department; POLK County State Attorney's Office, State Attorney, Jerry Hill in his official capacity, CITY of Lakeland, et al. Defendants	)	No.: _____ **COMPLAINT** **Note to self:** Spell-check is not working ***Do it manually.~-G.W.W.***

This is not a lawsuit, but since the complaints of myself and many others were ignored, probably due to social status, documentation is being documented in 'Lawsuit' format so that the chess game of justice is foreseen several moves ahead. From here on out, I will be writing in first-person, for 'colloquial' ease of reading -even though most (if not all) court briefs are written in third person.-gww

INRODUCTION

Since many violations of law which occurred to 'defendants' are very grievously egregious -even when each one is taken separately -then the needs of the many outweigh the needs of the few -or the one, concerning the various threats made by officials in their official capacity.

While many close friends feel that I can not get a 'fair hearing' of my grievances against cops and other officials who break the law, and I admit I am not objective (since much of the violations happened to me), nonetheless, my mother and father raised me to stand up for what is right -no matter the costs -and my religious beliefs, honouring my God, concurring, I feel an obligation, so here goes - A synopsis of the more major offense include the following:

***-1-* MANY HOMELESS PEOPLE whose Civil Rights were violated** by Lakeland Police -even after the police department was repeatedly warned not to do so by the court system;
***-2-* PERJURY** by several police officers (this is documented);
***-3-* FALSE ARREST & Malicious Prosecution, both based on perjured testimony;**
***-4-* POLICE BLOCKING peoples' telephones** from calling the police department (yes, you read me correctly: This is documented);
***-5-* Lack of DUE PROCESS** Even if I were guilty of harassing phone calls to LPD, they acted as judge, jury, and executioner, and denied me my 'day in court,' in other words, LPD violated my Civil Rights & denied me Due Process: –oh, and a:
***-6-* Widespread Refusal to comply with numerous PUBLIC RECORDS requests** –audio records (conversation with a dispatcher who told me to call IA), which would show that my phone was not 'blocked' from calling police until only **after** I called the IA Sergeant -which I did because I was told to do so -and which I had a right to do; Thus my phone was blocked not for harassing phone calls, but rather whistle-blower retaliation. Lastly,
-7-* ILLEGAL THREATS, and more 'WHISTLEBLOWER' retaliation/intimidation:** ***see below

One chief threat needs to be dealt with immediately is number 7 here: When trying to gather documentation under Fla chapter 119 Freedom of Information laws to show the reason for my delay -and to show why I qualify for an exception in the event that statute of limitations questions are raised, one stop was the POLK County (Florida) State Attorney's Office, and I spoke with Sam Cardinele, the 'Director,' asking him to release records showing I had contacted them in the past. Sam admitted that he remembered at least 2 of my complaints against the police department, but he said he did not want me to ask him to lie (or words to that effect). --When I assured him that I was not asking him to lie, only document what he did recall, he *(for reasons still unclear)* refused and said that the Mike Cusick, the assistant state attorney with whom I recall speaking also likewise refused. ***IMPORTANT*** Like a chess player who sees several moves ahead, I anticipated this refusal to comply with ch. 119 laws (even if the records were merely 'mental recollections,' I think that they qualify under ch.119), and I tape-recorded the conversation, only letting Mr. Cardinele know about it after I had all the information I needed. Predictably, he was quite upset, but what I did was not illegal, and I shared this with him (thinking maybe they, there, are the SAO, were smart enough to know the law!) --Anyhow, Sam threatened me with all kinds of things. listen to the audio here or here:

- LOCAL DIRECTORY: /SamCardinele-Wed01Aug2010.mp3
- off-site:

* http://GordonWatts.com/LPD/SamCardinele-Wed01Aug2010.mp3

alt:

* http://GordonWayneWatts.com/LPD/SamCardinele-Wed01Aug2010.mp3

He threatened to give instructions to his secretary to refuse all my phone calls (which, of course. is a violation of my Redress & Due Process rights), but he is wrong. State and Federal courts have consistently held that my behaviour is not illegal. *See for yourself:*

* It's not illegal to tape record a phone call to the State Attorney's office (or even a private citizen's place of work) -- Florida courts have consistently held that the constitutional protections of a reasonable expectation of privacy do not extend to an individual's place of business. Morningstar v. State, 428 So. 2d 220 (Fla. 1982); Cohen Bros., LLC v. ME Corp., S.A., 872 So. 2d 321 (Fla. 3d DCA 2004); Jatar v. Lamaletto, 758 So. 2d 1167 (Fla. 3d DCA 2000); Adams v. State, 436 So. 2d 1132 (Fla. 5th DCA 1983). An expectation of privacy in a business is not one which society is willing to protect. Morningstar, 428 So. 2d at 221 (citing Katz v. United States, 389 U.S. 347 (1967); Hill v. State, 422 So. 2d 816 (Fla. 1982)).

The United State Supreme Court, in Katz, holding that The Fourth Amendment prohibits surveillance by government –not individuals, held: "The Fourth Amendment does not protect against unreliable (or law-abiding) associates. Hoffa v. United States, supra. It is but a logical and reasonable extension of this principle that a man take the risk that his hearer, free to memorize what he hears for later verbatim repetitions, is instead recording it or transmitting it to another." Katz v. United States, 389 U.S. at 364 (1967)

The courts, in Cohen, quoting Morningstar, held that:
("[F]or an oral conversation to be protected under section 934.03 the speaker must have an actual subjective expectation of privacy, along with a societal recognition that the expectation is reasonable."). Society does not recognize an absolute right of privacy in a party's office or place of business. See Morningstar v. State, 428 So. 2d 220, 221 (Fla. 1983) (finding that although defendant may have had reasonable expectation of privacy in his private office, that expectation was not one which society was willing to accept as reasonable or willing to protect); Jatar, 758 So. 2d at 1169 ("Society is willing to recognize a reasonable expectation of privacy in conversations conducted in a private home. However, this recognition does not necessarily extend to conversations conducted in a business office.") Cohen Bros., LLC v. ME Corp., S.A., 872 So. 2d 321 (Fla. 3d DCA 2004); Cf: Jatar v. Lamaletto, 758 So. 2d 1167 (Fla. 3d DCA 2000); Adams v. State, 436 So. 2d 1132 (Fla. 5th DCA 1983). – **Even private property is not totally protected:** In Hill v. State, 422 So. 2d 816 (Fla. 1982), the Courts affirmed, "holding that the dictates of State v. Sarmiento, 397 So.2d 643 (Fla. 1981), do not preclude the admission into evidence of appellant's confession made to an informant in appellant's backyard and recorded by police with electronic surveillance equipment." How much less protected is one's place of business. In

WILLIAM G. AVRICH, vs. State of Fla., No. 3D05-1100 (Fla. 3rd DCA, Opinion filed August 23, 2006), the court held: "Based on the record before us, it is evident that the defendant made telephone calls to the victim's business telephone line, located in the victim's home where he conducted his business. Although the victim may enjoy a reasonable expectation of privacy in his home, that expectation is not extended to his business. See Morningstar, 428 So. 2d at 221 (holding that the constitutional protection of an individual's reasonable expectation of privacy in his or her home does not extend to a place of business). We find that there was insufficient evidence to satisfy the elements of section 365.16(1)(a) because the defendant only made calls to the victim's business telephone line." -- http://www.3dca.flcourts.org/opinions/3d05-1100.pdf

Furthermore, even if I had committed a violation of some obscure Florida law (such as: Fla Law 934.03), such a thing would be a criminal law, and since both State and Federal holdings clearly are on my side (and Federal Law trumps state law under the Supremacy Clause), is would be next to impossible to prove criminal intent on my part. (This assumes any judge hearing such a complaint against me is honest, and as we will find out today, many officials -even cops and judges -have been found to violate the law, thinking they are above the law.)

Moreover, there are also cases which state the recording of a phone call, even without the consent of the party, may be admissible in Court if the recording involved the planning or perpetrating of a crime The Courts have clearly said that "right to privacy" concerns are outweighed by the fact that the person is planning to commit a crime --and the recording may be admissible. In State v. Inciarrano, 473 So. 2d 1272 (Fla. 1985), the Florida Supreme Court held that there may be circumstances under where a reasonable expectation of privacy will not be justified. The concurring opinion points out that the majority opinion holds that if someone is committing a crime, they do not have a privacy right. Sam, in refusing to comply with chapter 119 laws –and in refusing to address the perjury charges I brought --even though the FDLE in their letter, below, clearly said it was the SAO's duty, obviously was minded to commit (or aid and abet) no less than several crimes I notice (and a few more that I probably miss).

FDLE Response, showing it was the SAO's duty to investigate:

- LOCAL DIRECTORY: /FDLE-Response.pdf
- off-site
- http://gordonwatts.com/LPD/FDLE-Response.pdf
- http://gordonwaynewatts.com/LPD/FDLE-Response.pdf

compare with the SAO's claim that this is not true -'passing the buck' back to the FDLE:

- LOCAL DIRECTORY: /SamCardinele-Wed01Aug2010.mp3
- off-site:

* http://GordonWatts.com/LPD/SamCardinele-Wed01Aug2010.mp3

alt:

* http://GordonWayneWatts.com/LPD/SamCardinele-Wed01Aug2010.mp3

If both sides are passing the buck back to each other, who is right??

In State v. Inciarrano, 473 So. 2d 1272, 1275 (Fla. 1985), The Florida Supreme Court held that "Section 934.02(2) in defining oral communication, expressly provides: 'Oral communication' means any oral communication uttered by a person exhibiting an expectation that such communication is not subject to interception under circumstances justifying such expectation . . . . From this language, it is clear that the legislature did not intend that every oral communication be free from interception without the prior consent of all the parties to the communication."

The Eleventh Circuit federal appellate court that governs federal law in Florida has held that because only interceptions made through an ""electronic, mechanical or other device"" are illegal under Florida law, telephones used in the ordinary course of business to record conversations do not violate the law: The court

found that business telephones (such as the SAO) are not the type of devices addressed in the law and, thus, that a life insurance company did not violate the law when it routinely recorded business-related calls on its business extensions. Royal Health Care Servs., Inc. v. Jefferson-Pilot Life Ins. Co., 924 F.2d 215 (11th Cir. 1991). Since this is Federal law, it places limitation on any Florida State law which might make it illegal to record conversations without all parties consent. – One other thing: Since the "place of business" was to an arm of the government, such a call to that place is de facto Public Record, there is no expectation of privacy, since, of course, phone calls to the Police Department and other arms of the government are routinely recorded anyhow -all without any notice to any of the parties, which implicates Equal Protection.

Lastly, even if my actions were illegal (they are not -at least for law-abiding citizens who recognize that the Federal Courts' rulings are binding here), they shouldn't be -since those in authority committing crimes pushed me to defend myself (and others), and these criminals should not 'get off on a technicality.' TRANSLATUON: If you defend Sam Cardinele and Mike Cusick here, public opinion will rightly hold you out as 'circling the wagons' to defend your friends when they break the law. (Both of them refused to release a record of my last contact with their office, and both refused to act on the illegal acts of Lakeland Police Officers, as they are sworn to do -even though the FDLE says this their duty.) Sam's threat to me amounts to nothing more than ignorance of the law at the least –or 'Whistle Blower' retaliation at the worst. --- OK: Now, to the other complaints...

***-1-* MANY HOMELESS PEOPLE whose Civil Rights were violated** by Lakeland Police -even after the police department was repeatedly warned not to do so by the court system;
See either of these links: LOCAL: /LedfordViolations.pdf
http://GordonWatts.com/LPD/LedfordViolations.pdf
http://GordonWayneWatts.com/LPD/LedfordViolations.pdf

***-2-* PERJURY** – ('Perjury - Part I': by several police officers) this is documented;
First the facts -- Claims made by the police LOCAL: /PerjuredAffidavitsOf2Officers.pdf
http://gordonwatts.com/LPD/PerjuredAffidavitsOf2Officers.pdf
http://gordonwaynewatts.com/LPD/PerjuredAffidavitsOf2Officers.pdf

Next, compare these claims with what actually happened:
LOCAL: /30April2003_0311am_GWattsCallToLPD.mp3
http://GordonWatts.com/LPD/30April2003_0311am_GWattsCallToLPD.mp3
http://GordonWayneWatts.com/LPD/30April2003_0311am_GWattsCallToLPD.mp3

Here's what the the public will say if no one has the 'balls' to confront bad police, who broke the law:

“Momma, when I grow up, I want to be a cop (or judge), so I can break the law & get away with it.”

Now, compare this to the law –to see if the cops broke the law:

The 2010 Florida Statutes
Title XLVII: CRIMINAL PROCEDURE AND CORRECTIONS
Chapter 914: WITNESSES; CRIMINAL PROCEEDINGS

914.13
Commitment for perjury.
—
When a court of record has reason to believe that a witness or party who has been legally sworn and examined or has made an affidavit in a proceeding has committed perjury, the court may immediately commit the person or take a recognizance with sureties for the person’s appearance to answer the charge of perjury. Witnesses who are present may be recognized to the proper court, and the state attorney shall be given notice of the

proceedings.
History.
—
s. 15, ch. 1637, 1868; RS 2882; GS 3941; RGS 6043; CGL 8344; s. 106, ch. 70-339; s. 38, ch. 73-334; s. 1525, ch. 97-102.
Note.
—

***-2-* PERJURY – ('Perjury - Part II & III': By the SAO & Court - Aid and Abet)** The courts, when they saw the record, had a duty to arrest and charge the cops, according to fs.914.13 above, but if you will examine the record, you will see that, when it "came out in court" that the cops' "perjured" testimony did not square with the facts, both the State Attorney Office and the court (Honourable Anne Kaylor, Circuit Judge, presiding) not only refused to go after the law-breaking cops, but she yelled at me for approaching the bench; however, I approached the bench because I was told to do so –it was in response to a request to approach and give some sort of paperwork to the judge.

***-3-* FALSE ARREST & Malicious prosecution, both based on perjured testimony;**
Since the cops' claims that I had been warned to stay out of a certain area was false, and I had no idea a police investigation was underway, then there was no criminal intent on my part to interfere.

Put another way, testimony upon which the arrest was illegal, and thus the arrest was also illegal. (Even had I known I was breaking the law, I could 'get off on a technicality,' and honestly I may have had bad judgment to be out late at night in the same section of town where I knew something had happened earlier that night, but had I seen police or knew some police action were going on, I would have done like I always do -and give the police a wide breath.) Lastly, since the State **knew** that the arrest was based on perjured testimony, this gives rise to a malicious prosecution tort.

***-4-* POLICE BLOCKING peoples' telephones** from calling the police department. Yes, you read me correctly, and testimony is that it was a widespread phenomenon -not just to me: This is documented:
Phone company documentation: /PhBlock.pdf *(being unable to report things to the police is dangerous!)*
http://gordonwatts.com/LPD/PhBlock.pdf
http://gordonwaynewatts.com/LPD/PhBlock.pdf

My personal documentation: I was unable to call in from my home phone (I had to use my expensive, pre-paid cell phone) to report a dangerously-parked bus on the evening of Monday, 23 Jan 2006, right after I got off work from my security guard job: /23Jan2006_circa1130pm_GWattsCallToLPD.wma
http://gordonwatts.com/LPD/23Jan2006_circa1130pm_GWattsCallToLPD.wma
http://GordonWayneWatts.com/LPD/23Jan2006_circa1130pm_GWattsCallToLPD.wma

Police Department documentation: A Friday, 19 Jan 2006 Memo which implies that they may have given the 'OK' to block my phone, probably in response to my phone call at about 11am, on Thursday, 18 January 2006, in which the dispatcher told me that I could not speak to the Police Chief, and that, instead, I had to go through the "chain of command" and speak with the IA Sergeant, Debra More. So, in response, I did as I was told, and called IA but got the voice mail. My phone was NOT blocked on the morning of Monday, 23 Jan 2006, and I know that because I left a message on the voice mail for IA, as the dispatcher told me*(*)* when we spoke, but my phone was blocked, and I was unable to call in to report a dangerously-parked bus on the evening of Monday, 23 Jan 2006, right after I got off work from my security guard job. So, whatever phone call I did that was offensive occurred that morning, and since it was not illegal, it can only be construed as 'Whistle-Blower' retaliation to my reporting perjury to IA (Internal Affairs) -- /Private-Memo.pdf
http://gordonwatts.com/LPD/Private-Memo.pdf
http://gordonwaynewatts.com/LPD/Private-Memo.pdf

(*)The LPD had released prior phone records under ch.119 Public Records Law, but apparently because they remembered how the last record I got almost got them in trouble for Perjury charges, they refused to release this record unless I paid $2,000.oo. Since my phone was blocked only after I called IA, then this was the reason. So, since, I can't prove my phone was unblocked at this point, I am unable to prove the timing issue, which I would need to do to show that my phone was blocked in retaliation for doing as I was told my the dispatcher -instead of making harassing phone calls, like LPD is likely to say. ***Therefore,*** *the LPD's refusal to grant this latest ch.119 Public Records request constitutes irreparable harm, in other words, applicable Civil Right damages for their actions here.*

My own father's testimony: (I recorded his phone call at work, as I did with Sam Cardinele)
'LOCAL' COPY: /Sat25Apr2009-dad-at-2min-35sec.mp3
off-site: http://gordonwatts.com/LPD/Sat25Apr2009-dad-at-2min-35sec.mp3
http://gordonwaynewatts.com/LPD/Sat25Apr2009-dad-at-2min-35sec.mp3

Notice if you would, my phone is documented to be still blocked as recent as Saturday, 25 April 2009, which would constitute 'continuing wrong' in a legal sense:

250 MB *.mpg 'MPEG' file /IllegalPhoneBlock-MPG.mpg
http://gordonwatts.com/LPD/IllegalPhoneBlock-MPG.mpg
http://gordonwaynewatts.com/LPD/IllegalPhoneBlock-MPG.mpg

213 MB *.avi 'MOVIE' file /IllegalPhoneBlock-AVI.avi
http://gordonwatts.com/LPD/IllegalPhoneBlock-AVI.avi
http://gordonwaynewatts.com/LPD/IllegalPhoneBlock-AVI.avi

68.4 MB 'MP4' file /IllegalPhoneBlock-MP4.mp4
http://gordonwatts.com/LPD/IllegalPhoneBlock-MP4.mp4
http://gordonwaynewatts.com/LPD/IllegalPhoneBlock-MP4.mp4

21.4 MB Apple Quick-Time 'Movie' file /IllegalPhoneBlock-MOV.mov
http://gordonwatts.com/LPD/IllegalPhoneBlock-MOV.mov
http://gordonwaynewatts.com/LPD/IllegalPhoneBlock-MOV.mov

The clip is 3 min, 38 sec, but forward to 0:11 to get to relevant part.
*(**Careful:** This is a huge file, and may download slowly on slow Internet connections.)*

Police department documentation: One would have to depose Detective Elisa Martin and also Public Safety Officer, Ryan Christopher Schuck, who was present when Det. Martin admitted that LPD blocked my phone –to know for sure.

Other documentation: One would have to depose my nutty friend, Robert William Hartung, who says that I can not fight city hall and get a fair day in court: For, Robert told me that in his conversations with his friends at LPD, they told him that the Lakeland Police Department routinely illegally blocks peoples' telephones from calling them -all without Constitutional Due Process or notifying the victims -apparently either because they actually are making harassing phone calls to the department –or (as in my case) in retaliation for getting bad police in trouble –or maybe just because they don't want to be bothered by a lowly citizen asking for them to do their job.

***-5-* Lack of DUE PROCESS** Even if I were guilty of harassing phone calls to LPD, they acted as judge, jury, and executioner, and denied me my 'day in court,' in other words, LPD violated my Civil Rights & denied me Due Process: The people whose phone were blocked did not even know what was going on, and did not have a chance to answer the charges -and in my case, I did nothing to provoke this except, I think, try to report the

perjury to Internal Affairs -I did not make repeated phone calls, and in fact, I was asked to speak with a sergeant in IA, and I spoke with her a sum total of zero times, after leaving approximately 2 voice mails: Since my phone wasn't blocked until then, apparently, this is what blocked my phone: 2-3 voice mails).

***-6-* Refusal to comply with PUBLIC RECORDS requests** –audio records (conversation with a dispatcher who told me to call IA), which would show that my phone was not 'blocked' from calling police until only **after** I called the IA Sergeant -which I did because I was told to do so -and which I had a right to do; Thus my phone was blocked not for harassing phone calls, but rather whistle-blower retaliation. -- LPD has a rich history of denial of Ch.119 Public Records request, mentioned in local news reports, but a small sliver of such denials is mentioned in chapter IV. (pp. 6-9) of this official report to the FDLE:

LOCAL copy: /FDLE-REPORT-Word97-2003.pdf
http://gordonwatts.com/LPD/FDLE-REPORT-Word97-2003.pdf
http://gordonwaynewatts.com/LPD/FDLE-REPORT-Word97-2003.pdf

The violations are so numerous that they would boggle your mind were I to aspire to include them all, but before I address the more serious violations (those done on purpose), let me share one small example that may very well have been an oversight due to human error -a genuine accident:

LOCAL copy: /MiscCh119Contradictions.pdf
http://gordonwaynewatts.com/LPD/MiscCh119Contradictions.pdf
or: http://gordonwatts.com/LPD/MiscCh119Contradictions.pdf

The one that stands out above the rest was this one: Since it was pretty specific, the repeated refusal was **not** a mere accident, and since it carried incriminating evidence, it may have been purposefully denied. (After one records request on my –part see point #2 above –turned up damning evidence of perjury, I fear it gave the Police Department quite a scare, and they were, reluctant to grant me any future request that might be a repeat of that.)

Wed. 25 October 2006 – Request – pretty specific:

LOCAL copy: /Ch119-req.pdf
http://gordonwatts.com/LPD/Ch119-req.pdf
http://gordonwaynewatts.com/LPD/Ch119-req.pdf

27 Oct 2006 – Denial – unless I fork over $2,000.oo – which effectively amounts to a denial of rights:

LOCAL copy: /ch119-denial.pdf
http://gordonwatts.com/LPD/ch119-denial.pdf
http://gordonwaynewatts.com/LPD/ch119-denial.pdf

ROUND II – I make a ch.119 requests again:

Dec. 18, 2006: /Another-119-Request.pdf
http://gordonwatts.com/LPD/Another-119-Request.pdf
http://gordonwaynewatts.com/LPD/Another-119-Request.pdf

Dec. 21, 2006: /Another-119-Reply.pdf
http://gordonwatts.com/LPD/Another-119-Reply.pdf
http://gordonwaynewatts.com/LPD/Another-119-Reply.pdf

(Page 2, point 3, I ask for that particular audio record -and not for any unreasonable $2,000.oo fee; I explain why I think he is just blowing smoke in his claim that he has technical difficulties: They had caller ID to block my phone, so why not to locate the record in question? He lied.)
Jan. 9, 2007, acknowledging my Dec. 18 & 21, 2006 requests, LPD, staff attorney, Roger A. Mallory, denies my main request – again: /AnotherEvenWorse119Answer.pdf
http://gordonwatts.com/LPD/AnotherEvenWorse119Answer.pdf

I give up – for the time being, since I am not getting anywhere.

-7-* ILLEGAL THREATS, and more 'WHISTLEBLOWER' retaliation/intimidation:** ***See above
Is it really the duty of the SAO (State Attorney's Office) to investigate -as both FDLE and myself say? Or, rather, is it merely their option? – Let's look at the laws in place when I was falsely arrested, and which laws haven't changed much (if any) since then:

The 2003 Florida Statutes
Chapter 27 - STATE ATTORNEYS; PUBLIC DEFENDERS; RELATED OFFICES
27.255 Investigators; authority to arrest, qualifications, rights, immunities, bond, and oath.--
(1) Each investigator employed on a full-time basis by a state attorney and each special investigator appointed by the state attorney pursuant to the provisions of s. 27.251 is hereby declared to be **a law enforcement officer** of the state and a conservator of the peace, under the direction and control of the state attorney who employs him or her, with full powers of arrest...

27.251 Special organized crime investigators.--
The state attorney of each judicial circuit is authorized to employ any municipal or county police officer or sheriff's deputy on a full-time basis as an investigator for the state attorney's office with full powers of arrest throughout the judicial circuit provided such investigator serves on a special task force to investigate matters involving organized crime...

Jerry Hill, Mike Cusick, and crew aren't investigating the various allegations of abuse. Note: They do not need to prove that LPD or other parties are guilty before initiating / beginning an investigation. ** After all, that is the whole purpose of an investigation - to prove or disprove any such allegation, huh?!? ~~ The Courts seem to agree with me:

Florida's Second District Court of Appeal held that requiring the State Attorney to prove that an investigative subpoena was necessary would "unreasonably impede the state attorney's ability to conduct investigations into criminal activity." State v. Investigation, 802 So. 2d 1141, 1144 (Fla. 2d DCA 2001) And, The Court goes on to say that the state cannot be required to prove in advance that a crime has occurred since "the entire purpose of the investigative subpoena is to determine whether a crime occurred." Id. at 1145

POINT: State Attorney, Jerry Hill, can order an investigation, but should he? *(According to law, that is.)*

943.10 Definitions; ss. 943.085-943.255.--The following words and phrases as used in ss. 943.085-943.255 are defined as follows:
(1) "Law enforcement officer" means any person who is elected, appointed, or employed full time by any municipality or the state or any political subdivision thereof; who is vested with authority to bear arms and make arrests; and **whose primary responsibility** is the prevention and detection of crime..."

112.19 Law enforcement, correctional, and correctional probation officers; death benefits.-- (1) Whenever used in this section, the term:
(b) "Law enforcement, correctional, or correctional probation officer" means any officer as defined in s. 943.10(14) or employee of the state or any political subdivision of the state, including any law enforcement officer, correctional officer, correctional probation officer, state attorney investigator, or public defender investigator, whose duties **require** such officer or employee to investigate, pursue, apprehend, arrest, transport, or maintain custody of persons who are charged with, suspected of committing, or convicted of a crime..."
CONCLUSION: Jerry Hill and company are/were **required** to pursue/investigate my documented claims.

It is obvious that both the local police and the state attorneys' office have the authority and duty under law to

investigate allegations of crime violations, which are surely the case in this most-well-documented case above. (Probably the county sheriff also have a "primary" duty, which is implied because they have jurisdiction all over the county, and, have in my town, been seen issuing tickets *inside* the city limits.)
They say you can't fight city hall – As Arsenio Hall used to say: "Things that make you go 'Hmm...'."

Lastly, the question is asked: What about the statute of limitations (if any) on any (or all) of these fairly-well documented crimes?

***1* HOMELESS PEOPLE whose 1st & 14th Amendment Civil were repeatedly violated by LPD:** The Statute Of Limitations ('SOL') is moot to me, since these torts did not occur to me, but be that as it may, the SOL for these torts is 4 years, both Federal (42 U.S.C. 1983 Civil Rights Deprivation under colour of law) and State (fs.95.11(o), Other Intentional Torts).

***-2-* PERJURY:**
(-a-) 'Perjury - Part I': by several police officers: fs837.012, 'Simple' Perjury, a 1st Deg. Misdemeanor, 2 years (fs.775.15(c)); Perjury in an 'Official Proceeding' (if LPD notary is taken to be an official), a 3rd Deg. Felony, 3 years (fs.775.15(b)).
(-b-) 'Perjury - Part II': Aid & Abet – State Attorney's Office: 4 years as an intentional tort: See #1 above.
(-c-) 'Perjury - Part III': Aid & Abet – The Court: 4 years as an intentional tort: See #1 above, since court refused to comply with fs.914.13, even knowing that cops had lied under oath when making the arrest report. Furthermore, besides letting the law-breaking cops off Scott-free, the 'cops & courts' and prosecutors continued with their malicious prosecution of defendant (me) -a double tort here. However, fs.95.11 (Limitations other than for the recovery of real property) allows for "Actions other than for recovery of real property shall be commenced as follows: (1)WITHIN TWENTY YEARS.—An action on a judgment or decree of a court of record in this state." Section 3 might also apply to some of these aid and abet acts: "(3)WITHIN FOUR YEARS.— (j)A legal or equitable action founded on fraud. [Perjury is SURE fraud since it resulted in false arrest that extorted monies from me]"

***-3-* FALSE ARREST & Malicious Prosecution, both based on perjured testimony:** 4 years (fs.95.11(o))

***-4-* POLICE BLOCKING peoples' telephones:** 4 years (fs.95.11(o))

***-5-* Lack of DUE PROCESS:** 4 years (fs.95.11(o)), and possibly Federal in nature as it is Constitutional

***-6-* Widespread Refusal *(of many parties)* to comply with numerous PUBLIC RECORDS requests:**
^ fs. 119.07(1), 'Inspection' laws: 1st Deg. Misdemeanor, 2 years (fs.775.15(c))

***-7-* ILLEGAL THREATS, and more 'WHISTLEBLOWER' retaliation/intimidation:**
^ fs. 112.3187 (The 2010 Florida Statutes)
(1) SHORT TITLE.—Sections 112.3187-112.31895 may be cited as the "Whistle-blower's Act."
(7) EMPLOYEES AND PERSONS PROTECTED.—This section protects employees and persons who disclose information on their own initiative in a written and signed complaint...
^ Statute of Limitations here: fs. 112.3187(8)(c) Any other person protected by this section may, after exhausting ***all*** available contractual or administrative remedies, bring a civil action in any court of competent jurisdiction within 180 days after the action prohibited by this section.

THE LAW:

"As a general rule, laches is inappropriate when the controversy is one to which a statute of limitations applies." Graves v. Diehl, 958 S.W.2d 468, 473 (Tex. App.—Houston [14th Dist.] 1997, no pet.).

The statute of limitations begins to run "when the plaintiff knows or has reason to know of the injury which is

the basis of his action." See Kuhnle Bros., Inc. v. County of Geauga, 103 F.3d 516 (6th Cir.1997) (quoting Sevier v. Turner, 742 F.2d 262, 273 (6th Cir.1984)). The claim accrues when the plaintiff "knows or has reason to know of the injury which is the basis of the action." Id. (quoting Norco Construction, Inc. v. King County, 801 F.2d 1143, 1145 (9th Cir.1986)). U.S. Supreme Court rules that the statute of limitations on a federal civil rights claim for false arrest which results in a criminal prosecution starts to run on the date the arrestee is detained. Wallace v. Kato, No. 05-1240, 127 S. Ct. 1091 (2007).

Since it is obvious that some of the statutes of limitations may have run out, what next? What does the law say about that?

"Equitable tolling" is a principle of tort law stating that a statute of limitations shall not bar a claim in cases where the plaintiff, despite use of due diligence, could not or did not discover the injury until after the expiration of the limitations period. **However, I admit that I knew of all the injuries when they happened -not afterwards -so, the SOL began to run immediately.** *(I'm honest: I won't lie & feign ignorance to gainsay those who repeatedly broke the law.) So, what else does the law say about that?*

When pursuing one of several legal remedies, the statute of limitations on the remedies not being pursued will be "equitably tolled" if the plaintiff can show:

1. Timely notice to the adverse party is given within applicable statute of limitations of filing first claim
2. Lack of prejudice to the defendant
3. Reasonable good faith conduct on part of the plaintiff when attempting to pursue that and subsequent remedies.

"Equitable tolling "permits a plaintiff to avoid the bar of the statute of limitations if despite all due diligence he is unable to obtain vital information bearing on the existence of his claim." Cada, 920 F.2d at 451 (citations omitted). This doctrine does not assume a wrongful--or any--effort by the defendant to prevent the plaintiff from suing." Smith v. COCH, 951 F.2d 834 (7th Cir. 1992) – I was ***repeatedly*** unable to obtain information about vital information documenting my claim that my phone was not blocked until **only *after*** I called IA, which was a timing issue -and would show that I was blocked in retaliation for following the dispatcher's orders -not for any harassing phone calls to the police. Furthermore, there ***was*** a very **strong** "wrongful effort" by the Police Department to oppose release of these records -falsely claiming they had 'technical' difficulties -when, in blocking my phone, they clearly demonstrated they had no trouble using caller-id for their own purposes. So, equitable tolling would apply. – I exercised 'Due Diligence' in my continued attempts to report the many lawbreaking acts by the law officers – and in my 'Diligent' attempts to obtain critical ch.119 Public Records.

"But even *if* *Hazel* did not exercise the highest degree of diligence Hartford's fraud cannot be condoned for that reason alone. This matter does not concern only private parties. There are issues of great moment to the public in a patent suit. Mercoid Corporation v. Mid-Continent Investment Co., 320 U. S. 661; Morton Salt Co. v. G. S. Suppiger Co., 314 U. S. 488. Furthermore, tampering with the administration of justice in the manner indisputably shown here involves far more than an injury to a single litigant. It is a wrong against the institutions set up to protect and safeguard the public, institutions in which fraud cannot complacently be tolerated consistently with the good order of society. Surely it cannot be that preservation of the integrity of the judicial process must always wait upon the diligence of litigants. The public welfare demands that the agencies of public justice be not so impotent that they must always be mute and helpless victims of deception and fraud." ***HAZEL-ATLAS GLASS CO. V HARTFORD-EMPIRE CO., 322 U. S. at 246 (1944)***

Here, I diligently pursued my rights by contacting numerous authorities – repeatedly. Based on these and other record facts (see time-line), I ask the Federal District Court – and other authorities – to toll the statutory limitations period for equitable reasons, holding that I had demonstrated the due diligence necessary to invoke equitable tolling. Courts held that, even after 20 years, statutes of limitations are tolled when "violations of his civil rights in several claims, including violation of his right to due process by not being provided the

exonerating DNA kit for over 12 years," and held that "the State cannot create a statutory right and afford for it with procedures that fail to provide due process." Newton v. City of New York, 681 F.Supp.2d 473 (S.D.N.Y. 2010)

Because the applicability of the equitable tolling doctrine often depends on matters outside the pleadings, it "is not generally amenable to resolution on a Rule 12(b)(6) motion." Cervantes v. City of San Diego, 5 F.3d 1273, 1276 (9th Cir.1993). A motion to dismiss based on the running of the statute of limitations period may be granted **only** "if the assertions of the complaint, read with the required liberality, would not permit the plaintiff to prove that the statute was tolled." Jablon v. Dean Witter & Co., 614 F.2d 677, 682 (9th Cir.1980). In fact, a complaint *cannot* be dismissed unless it appears beyond doubt that the plaintiff can prove no set of facts that would establish the timeliness of the claim. Id. (citing Conley v. Gibson, 355 U.S. 41, 78 S.Ct. 99, 2 L.Ed.2d 80 (1957)). For this reason, we have reversed dismissals where the applicability of the equitable tolling doctrine depended upon factual questions not clearly resolved in the pleadings. See Cervantes, 5 F.3d at 1277; Emrich v. Touche Ross & Co., 846 F.2d 1190, 1199 (9th Cir.1988); Donoghue v. Orange County, 848 F.2d 926, 931 (9th Cir.1987). Similarly, we must reverse if the factual and legal issues are not sufficiently clear to permit us to determine with certainty whether the doctrine could be successfully invoked.

- **Supermail Cargo, Inc. v. U.S., 68 F.3d 1204 (9th Cir. 1995)**

I contend that I should not be time-barred from bringing my various due process & other claims under both of two theories: that defendants' actions amounted to fraudulent concealment (continued denial of Public Records requests) and that the various acts (these continued records requests denials -and the continued blocking of my phone -and refusal to consider my allegations of perjury and other crimes) constituted a **"continuing wrong," even in spite of my due diligence to ask these things be looked into.**

This fraudulent concealment, other continuing violations, and other acts by defendants constitutes obstruction of justice, and my treatment by the courts and the State Attorney's Office (refusal to admit cops had committed perjury -and subsequent illegal threats when I had legally taped their conversation) constituted a deprivation of a Constitutional Right of 'access to courts.'

"A continuing violation is occasioned by continual unlawful acts, not continual ill effects from an original violation." Ward v. Caulk, 650 F.2d 1144, 1147 (9th Cir.1981), cited with approval in Sandutch v. Muroski, 684 F.2d 252, 254 (3rd Cir.1982).

No matter how much time had passed, it was impracticable (impossible in practice to do or carry out) to get anything accomplished without either strong news coverage or fair courts -or both. So, any delay in prosecution by me was excusable: "Delay in the prosecution of a suit is sufficiently excused, where occasioned solely by the official negligence of the referee, without contributory negligence of the plaintiff, especially where no steps were taken by defendant to expedite the case." ***Robertson v. Wilson, 51 So. 849, 59 Fla. 400, 138 Am.St.Rep. 128. (Fla. 1910)***

The Lakeland Police Department blocked my phone without affording me Constitutional Due Process: "When facts are to be considered and determined in the administration of statutes, there must be provisions prescribed for due notice to interested parties as to time and place of hearings with appropriate opportunity to be heard in orderly procedure sufficient to afford due process and equal protection of the laws…" ***Declaration of Rights, §§ 1,12. McRae v. Robbins, 9 So.2d 284, 151 Fla. 109. (Fla. 1942)***

We have, then, a case in which undisputed evidence filed with the Circuit Court of POLK County -and known to the prosecutors of the POLK State Attorney's Office –which reveals such fraud, perjury –and arrest based on this perjured affidavit, among other things –on that Court as demands, under settled equitable principles, the interposition of equity despite any statutes of limitations which may have expired. The guilty parties should not, then, have escaped scrutiny of the law. Neither should they *now* be permitted to escape the consequences of their deceptive concealment of the requested Public Records -or the State Attorney and Court's refusal to admit

they committed perjury on the grounds that 'too much time' has passed now to face judgment: **Truth needs no disguise.**

In fact, the repeated and determined official misconduct rises to the level of R.I.C.O. (the Racketeer Influenced and Corrupt Organizations (RICO) Act, Title 18, United States Code, Sections 1961-1968):

- The acts were *and are* criminal in nature-
- Here, I address are long-term, not one-shot, criminal activity-
- While the U.S. Supreme Court has limited civil RICO claims, the 4-year SOL may be 'equitably tolled' as described above-
- These Racketeer Influenced and Corrupt Organizations (each agency covering the backs of its sister agency) to deny redress legally justifies a judgment in the amount of three times the actual damages – plus costs and attorneys' fees. This would include --- Loss of employment due to false arrest, malicious prosecution, and expenses incurred in the preparation and filing of these complaints (both emotional stresses and financial expenses -as well as time lost from employment seeking)-

IMPORTANT CONSIDERATION:

Did I, in fact, take 'reasonable steps' to exercise 'Due Diligence' in giving proper authorities 'sufficient notice' of illegal misconduct of to justify 'Equitable Tolling' of some of the now-expired statutes of limitations?

* Circa March 2002 – I contact Fla Attorney General's office over documented racial discrimination -where a cop admitted the only motive was racial in nature (see supporting documentation)
* April 5, 2002 – Sonya A. Ethride, Esq., of the Fla Attorney General's office falsely claims they have no jurisdiction over racial discrimination issue. (This is why I later don't waste my time reporting Lakeland police violations to the Fla Atty Gen office -it would be a simple waste of precious time.)
* April 30, 2003 – When I was arrested and accused of interfering with an investigation, I told several cops that I had not known there was an investigation, and I invited them to listed to the recording of my phone call to confirm I had not been told there was an investigation there at the time I saw an elderly man walking out at night by himself.
* Circa April – July, 2003 – I repeatedly tell my Public Defender, Justin Gaines that the police officers perjured themselves, and after much effort, he finally convinces the Lakeland Police Department to turn over discovery -in this case the audio which shows the officers committed perjury –but court does not act on this knowledge, and Justin tells me that if I go to trial (my choice), I can do so, but that my Constitutional rights to a Trial Jury will not be honoured. (I still do not know what would prevent me), so (deprived of a trial before my peers, I have no choice and) I accept the deal offered
* May 20, 2003 – Assistant State Attorney, Peter K. Mislovic, claims under oath that he is prosecuting me in good faith -despite the clear evidence the cops' testimony was perjured and false, to cover up a false arrest.
* June 2, 2003 – Assistant State Attorney, Kevin Humphries admit to knowledge of evidences which prove perjury –but never does anything.
* Aug 4, 2003 – I notified the milestones counselor of the perjury, false arrest, and refusal of the courts to try the cops, thinking maybe she could get it looked into. She could not help, but she did acknowledge that many frightening injustices happen in the court system.
* Aug 20, 2003 – I meet with Assistant State Attorney, David E. Stamey, Jr., who makes a pleas deal to me. I vividly remember telling him that the cops had committed perjury, and therefore, I am innocent of the charges, and I ask him to drop the charges against me and charge the cops instead. He dishonestly refuses, presumptively because he's in power, and I'm not.
* Aug 23, 2003, shortly after my arrest (Mar 30, 2003), Ofr. Chuck Dallas yelled & motioned to me and a homeless panhandler, and, in response, we came over to see what he wanted. When it became obvious he was violating the Ledford rulings (regarding panhandlers First Amendment rights), I notified him of this, and, apparently, in retaliation, he gave me a ticket for improper backing (even though I had waited for traffic yo clear before backing up and coming over as he motioned).
* Circa 2004 – I feel afraid to go to court to get the perjury looked into because of the past mistreatment of the court -where they previously refused to look into it; I am afraid I will be fined heavily -no matter if I am innocent, so I can do nothing.
* Aug 25, 2005 – I give Fla Attorney General's office one more chance to see if they will do their job regarding cops who admit to racial discrimination -and nothing more -as reason for asking me to leave a property.
* Sept 22, 2005 – Shanika Graves, of the Fla Attorney General's office falsely claims they have no legal ability address grievances by 'private' citizens in racial discrimination issues -in spite of the fact that they have done so many other times -for Blacks, for example. So, when I have a grievance against Lakeland Police, I do not waste my time with Fla Attorney Generals' office, as they have let me down here.
* Time uncertain circa 2006: Spoke with Lt. Joe Hinson, who promised to get me a copy of the Public Records I mention above. (He never fulfilled.)
* Jan 6, 2006 – I make an Internal Affairs complaint, and tell LPD that the officers falsely accused me of helping a suspect escape, but (due to human oversight) I fail to mention that this, legally, constituted perjury. I also ask for police to go after someone who wrote my father a bad check -and report the refusal to release discovery in a timely manner –and mention other issues, such as abuse of homeless people and a false ticket, which smack of retaliation by an officer who had prior dealings with me.
* Jan 11, 2006 – Lakeland Police Dept staff attorney, Roger Mallory replies to my IA complaint, falsely claiming the courts had looked into all my complaints. (This is false: They never tried the cops for a false report, perjury, false arrest, or tried their fellows for malicious prosecution.)
* Circa mid-day, Jan 21, 2006 – I asked to speak with police chief regarding perjury by officers, but dispatcher told me to use 'chain of command' and

speak with IA (Internal Affairs) Sgt. Debra More. Over my objections, I did as I was asked, but the Sergeant was not in when I called.
* Jan 24, 2006, mid-day – Left a 2nd message on Voice mail for Sgt. Debra More –as dispatcher asked me to –regarding perjury by police officers.
* Jan 24, 2006, evening after I got off Security Guard job, I tried to report a dangerously-parked bus in front of my residence, but my phone was blocked.
* Jan 31, 2006 – After much effort and wrangling, I get documentation from Verizon phone company that my phone really is blocked. (Before and after this, many cops told me that you can't have your phone blocked -that it was illegal or impossible.)
* Feb 1, 2006 – Assistant State Attorney Mike Cusick prints out a Westlaw paper about treatment of homeless people – and asks me to submit any evidence I have of cops committing perjury when I can get it organised.
* At a time shortly before Feb 27, 2006 (referred to in my letter to ASA Cuscik) – I contacted Det. Elisa Martin regarding my phone being blocked (she never told me why it was blocked, but she admitted it was -and said I could call 911: Thanks a lot – you're only depriving me of some of my Civil Rights) –and she asked if I had any 'new' concerns. So, I told her that I had forgotten to include my perjury concern in my initial IA complaint, but she changed her mind (lied) and ran me off the property. PSO, Ryan Christopher Schuck, was a witness to all this.
* Feb 27, 2006 – I gave Assistant State Attorney, Mike Cuscik, prof of my allegations of perjury, which predicated the false arrest & malicious prosecution – as he had asked, but he got cold feet and had a change of heart: His secretary told me he didn't even want to look at it. Huh?
* Mar 6, 2006 – Left message for Kris Khachaturian (spelling uncertain) at ext.8911 regarding my main Public Records request -still unanswered (unless I have two-thousand dollars for a simple audio record).
* Mar 15, 2006 – Letter to local news media (Mike Deeson) asking for help in getting Public Records request –since he said he could get it for me.
* June 22, 2006 – I notify LPD Officer Suggs that the records department refused to locate records, and she helped me get the report numbers –which the records department could have themselves done.
* Oct 25, 2006 – A letter from me in response to LPD's June 9, 2006 letter –in which I am more specific (who/what/when/where/how) about my previous Public Records request. -- (((will show my phone was not blocked until I called IA -as a dispatcher told me to do (thus showing phone block was retaliation)))
* Oct 27, 2006 – LPD denies my main Public Records request -even though they have the technology (see discussion above) unless I pay the prohibitive price of $2,000.oo.
* Dec 18, 2006 – I make a Public Records Request for a private memo which might explain why my phone was blocked -
* Dec 19, 2006 – LPD denies a reasonable Public Records Request
* Jan 9, 2007 – Another exorbitant charge for a small public records request
* Jan 11, 2007 – Sent a detailed letter to FDLE, outlining MANY charged -including the perjury and ch.119 Public Records violations outlined here.
* Jan 31, 2007 – I get a hold of a memo from LPD staff attorney, Roger Mallory, acknowledging that I had attempted to go through the chain of command regarding my complaints that IA had not investigated my complaints.
* Mar 15, 2007 – FDLE responds, and says it can do nothing -but refused to address or speak to my more serious charges, only mentioning a bad police officer, and refers me to the State Attorney's office and Attorney General's Office.
* Circa Sept 2008 plus or minus – I contact several attorney for help on these problems: Lakeland attorney, Bruno DeZayas says he is unable to help me with my police problems. Plant City attorney, Johnnie Byrd, says he is not qualified to appeal an unemployment comp case and suggests I go to a specialist in that area, but he adds that I could not afford him anyhow (on any case, presumably including regarding the police issues). – I also call into WLKF's 'Law Talk' program for help and get a bizarre response from one of the program's lawyers (see documentation).
* Apr 25, 2009 – I get statement from my father documenting our phone line is blocked from calling police department.
* Aug 31, 2010 – I attempt, once again, to get State Attorney's office to do it's job regarding bringing charges against cops who make false reports and perjury.
* Sept 1, 2010 – State Attorney office director, Sam Cardinele, returns my phone call, but he refuses to grant my reasonable ch.119 Public Records request, documenting I had contacted his office -and he once again refused to look into the perjury issues, but he says he thought that he had been successful in helping me with my Public Records request. He also illegally threatens me when I admit I legally tape-recorded him.
* Sept 01 – Sept 15, 2010 – It is taking me this long to put the legal connections together to show whether or not I 'have a case' regarding my various concerns –and I must take special care to make sure I prove I have a legal right to tape Sam Cardinale at his work place to avoid another false arrest. That is why it is taking so long. Plus, no matter how long I have, if I don't get a 'fair hearing,' then any statutes of limitations not being tolled would frustrate justice. That is real hard to overcome, thus the large delay.

<u>IMPORTANT CONSIDERATION: Restatement of Question</u>

Did I, in fact, take 'reasonable steps' to exercise 'Due Diligence' in giving proper authorities 'sufficient notice' of illegal misconduct of to justify 'Equitable Tolling' of some of the now-expired statutes of limitations?

ANSWER: If it is painfully difficult simply to read the 'reasonable steps' above -and compare my notes with the documentation on file, it is painfully clear that I took reasonable steps to invoke 'Equitable Tolling.' – Conclusion of Law below:

"Equitable tolling "permits a plaintiff to avoid the bar of the statute of limitations if despite all due diligence he is unable to obtain vital information bearing on the existence of his claim." Cada, 920 F.2d at 451 (citations omitted). I have shown that I:

1. Gave Timely notice to the adverse party within **<u>all</u>** applicable statute of limitations of filing first claim
2. Demonstrated no evidence of prejudice to the defendant
3. Made 'reasonable good faith conduct' on part of the plaintiff when attempting to pursue that and

subsequent remedies.

Therefore, when pursuing the other of several legal remedies, the statute of limitations on the remedies not being pursued will be "equitably tolled." Unless future courts also lack courage to go charge bad cops & other officials (such as the SAO for Malicious Prosecution) for crimes committed.

In conclusion, three good reasons exist for executing justice in these matters:

Legal – The facts and law support my claims;
Practical – I am not vindictive or violent, and I do not condone such, but some people are, and law-breaking cops and other officials would necessarily increase the odds of this -and, sadly, increase the odds that good cops are the target of retaliation (not to mention distrust by the public). Most cops are 'good,' but sadly most cops are fair weather friends, and do not help people victimised by 'bad cops' when the weather is less than sunny.
Moral – If you owed a traffic ticket -no matter *how* much time went by – even for something this small, the police would go after you, and the State might even take your Drivers' License. (Double standard here?) In any event, there *is* a God, who is displeased at mistreatment of his kids, and time will tell me correct here, so there are rights and wrongs; however, a person must hear the Almighty's voice himself/herself to be convinces, so I will say nothing more.

Respectfully submitted,

X__Gordon Wayne Watts_
Gordon Wayne Watts, Pro Se *(Don't eat me alive because I'm not an attorney, OK?)*
LAKELAND, Florida, U.S.A.

Wednesday, 15 September 2010

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