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Article No.: 7010 1670 0001 9008 0291

April 5, 2012

Ms. Sheryl L. Loesch, Clerk of Court
U.S. District Court, Middle District of Florida
401 West Central Boulevard, Suite 1200
Orlando, Florida 32801-0120

RE: Gillespie v. Thirteenth Judicial Circuit, FL, et al, Case No.: 5:10-cv-00503-Oc-10TBS

Dear Ms. Loesch:

This letter concerns a number of apparent failures by the Clerk in the above captioned case. In addition, the U.S. District Court for the Middle District of Florida does not appear to comply with the Americans with Disabilities Act. (ADA). Some issues beyond the Clerk's authority are presented in this letter for context.

My experience in this case would cause a reasonable person to question the fairness and impartiality of this Clerk and Court. *See* Plaintiff's Response to Order to Show Cause (Doc. 58).

As set forth in the Complaint (Doc. 1), this lawsuit is about the misuse and denial of judicial process under the color of law in the Florida state court action Gillespie v. Barker, Rodems & Cook, PA, et al, case no. 05-CA-007205, Thirteenth Judicial Circuit, Florida. The state court denied me the right to lawfully adjudicate my case due to the conflict of interest of attorney Ryan Christopher Rodems who unlawfully represented his firm, Barker, Rodems & Cook, PA, against me, a former client, on the same matter as the prior representation, the Amscot lawsuit.

This District Court has continued the misuse and denial of judicial process under the color of law when it failed, among other things, to disqualify Mr. Rodems in this action pursuant to the holding of McPartland v. ISI Inv. Services, Inc., 890 F.Supp. 1029, M.D.Fla., 1995. (Doc. 20). McPartland has been a mandatory authority on disqualification in the Middle District of Florida since entered June 30, 1995 by Judge Kovachevich.

The state court action turned into a personal vendetta for Mr. Rodems on January 19, 2006 when he commenced a vexatious libel counterclaim against me, which continued through September 28, 2010 whereupon Rodems voluntarily dismissed the case without prejudice.

Since March 3, 2006 Mr. Rodems directed, with malice aforethought, a course of harassing conduct toward me that has aggravated my disability, caused substantial emotional distress and served no legitimate purpose. (Doc. 36). Mr. Rodems' unprofessional conduct is apparent in his letter to me dated December 13, 2006, copy enclosed. (Exhibit 1). For example:

> "I recognize that you are a bitter man who apparently has been victimized by your own poor choices in life. You also claim to have mental or psychological problems, of which I have never seen documentation. However, your behavior in this case has been so abnormal that I would not disagree with your assertions of mental problems." (P1, ¶3)

> "So, in addition to your case's lack of merit, you are cheap and not willing to pay the required hourly rates for representation." (P3, ¶2).

Mr. Rodems prevented the lawful adjudication of both the state and federal cases through his repeated violation of FL Bar Rule 4-3.3 *Candor Toward The Tribunal*. (Exhibit 1). Mr. Rodems made numerous false statements of material fact to the tribunal, failed to cooperate with opposing counsel, and disrupted the tribunal for strategic advantage. Mr. Rodems failed to disclose to the court legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel. (Exhibit 1). As set forth in my Petition (SC11-1622) to the Florida Supreme Court (Doc. 62), Mr. Rodems made false statements to the tribunal to have an arrest warrant issued for me for the purpose of forcing a walk-away settlement agreement in the state court case, and to force a walk-away settlement agreement in this Court for my federal civil rights and ADA disability lawsuit.

CASE MANAGEMENT

1. Pursuant to Local Rule 3.05, the Clerk designated this action as a Track Two Case September 30, 2010 for case management purposes. Upon information and belief, this case is a Track Three Case pursuant to Local Rule 3.05, complex litigation as set forth in Plaintiff's Response To Order To Show Cause (Doc. 58); see paragraph six (6) below, and paragraph twenty-two (22), which is too large to cite here.

> "6. For case management purposes under Local Rule 3.05, Plaintiff believes this action is a complex litigation case due to the nature of the allegations against a Florida Circuit Court, three circuit court judges, court counsel, the ADA coordinator, the law firm that gives rise to the action, and the attorney and firm hired to represent, and later betrayed, the plaintiff. The Plaintiff, an indigent, disabled, unrepresented, nonlawyer, appearing pro se, alleges misuse and denial of judicial process under the color of law, violation of his Civil Rights, and the Americans With Disabilities Act (ADA). Counsel of record Ryan Christopher Rodems, a one-time defendant himself in this case, made the action impossibly complex by intentionally misleading this Court with false and untrue statements in his pleadings, in violation of Rule 11(b), FRCP."

THE CLERK FAILED TO PUT VITAL DOCUMENTS ON CM/ECF AND PACER

2. The Clerk failed to put vital documents I filed in this case on the Case Management and Electronic Case Filing ("CM/ECF") system to view on PACER. One such document is Doc. 2, Exhibits 1-15 to the Complaint (Doc. 1) filed September 28, 2010 when I personally commenced the case in the Ocala Division and hand-delivered the complaint and exhibits to a deputy clerk.

Doc. 2, Exhibit 4 is my Emergency Motion To Disqualify Defendants' Counsel Ryan Christopher Rodems & Baker, Rodems & Cook, PA submitted July 9, 2010 in the state court action; in this Court the motion is Doc. 2, Exhibit 4 to the Complaint (Doc. 1), but not viewable on PACER. This negatively affected my case because Magistrate Judge David Baker, who is

located in Orlando, could not view the document located in Ocala when he made rulings in the case. The document was only viewable in person in Ocala, or by request to send the physical file to Orlando. There is no evidence that the physical file was sent to Orlando.

I brought this issue to the attention of Chief Judge Anne Conway by letter dated March 22, 2012, see Doc. 68, Motion To Amend The Judgment, the letter is attached as an exhibit to the motion, and contains 33 pages; a three page letter to Chief Judge Conway and 30 pages of enclosures.

PRE-LITIGATION COMMUNICATION WITH JAMES LEANHEART

3. Prior to personally filing this pro se case, I wrote August 30, 2010 to James Leanheart, Court Operations Supervisor, about filing documents on the CM/ECF system and PACER. This is the operative language from paragraph five of the accompanying letter: (Exhibit 2)

> "My…claims…involve documents in the state court record from the Circuit Civil Court of the 13th Judicial Circuit, including…an amended complaint (150 pages), and an emergency motion to disqualify counsel (190 pages). What is the procedure for including or incorporating these numerous and sometimes large documents into my…civil rights complaint?"

Mr. Leanheart did not respond in writing, but we spoke by phone September 10, 2010. Following Mr. Leanheart's instructions, I filed all the documents in paper September 28, 2010. I personally filed the case September 28, 2010 and personally handed the paper documents to a deputy clerk. But the Clerk did not put any of the exhibits on the CM/ECF system and/or PACER, not the amended complaint (Exhibit 3), not the emergency motion to disqualify counsel (Exhibit 4), none of the 15 exhibits were put on PACER. I complained to the deputy clerks in Ocala more than once to no avail. I complained in person a number of times and the error was not corrected. I live in Ocala and almost always hand deliver my documents to a deputy clerk in order to save the cost of postage or courier service as I am indigent.

My letter dated August 30, 2010 to Mr. Leanheart states I planned to file a pro se lawsuit in two weeks or so, but I was delayed until September 28, 2010 due to mental illness and other disabilities, see Doc. 36 for my notice of filing disability information.

NO ADA ACCOMMODATION IN THE MIDDLE DISTRICT OF FLORIDA

4. I provided the Court a comprehensive ADA file on the morning of September 28, 2010 when I personally filed the lawsuit. I believe Mr. Leanheart was present along with a number of deputy clerks and perhaps other court personnel. I was assured that the judge in the case would consider my ADA accommodation request and medical report by Dr. Karin Huffer. I was told there was nothing else to do.

It appears that the Middle District of Florida does not have an ADA coordinator, and does not provide an ADA form to make an accommodation request as is the practice in state court.

Furthermore, the website of the Middle District of Florida does not mention the ADA or how to request a disability accommodation. Among other things, I need to e-file, see below.

My state court ADA file requested designation as complex litigation, case management by the court, protection from harassment (psychological torture) and perjury, and to follow the holding of Haines v. Kerner, 404 U.S. 520 (1971), where the U.S. Supreme Court found pro se pleadings should be held to "less stringent standards" than those drafted by attorneys. And I requested intensive case management of the kind advocated for by the Hon. Claudia Rickert Isom, in her law review *Professionalism and Litigation Ethics,* 28 STETSON L. REV. 323, 324 (1998). Judge Isom is also a defendant in this case.

When a litigant's health is at risk, an opinion decided March 27, 2012 by Judge Richard Posner of the 7th U.S. Circuit Court of Appeals (Chicago) in a civil rights suit brought under 42 U.S.C. § 1983 suggested appointment of counsel because withholding nutritious food would violate the Eighth Amendment. This is what happened in my state court action June 21, 2011, see Doc. 33, Doc. 39, Doc. 47, Doc. 61, Doc. 62. In related case 5:11-cv-00539, *see* First Amended Complaint, Doc. 15, paragraph 16:

> "16. Gillespie is an individual with mental illness as defined by 42 U.S.C. Chapter 114 The Protection and Advocacy for Individuals with Mental Illness Act, § 10802(4)(A) and (B)(i)(III). Gillespie was involuntarily confined in a municipal detention facility for reasons other than serving a sentence resulting from conviction for a criminal offense. Gillespie's involuntary confinement was in the George E. Edgecomb Courthouse, 800 E. Twiggs Street, Tampa, Florida. On June 1, 2011 Judge Arnold issued a politically motivated warrant to arrest Gillespie for the purpose of harming Gillespie by abuse as defined § 10802(1) and neglect as defined by § 10802(5) to force a walk-away settlement agreement in the state action, and to force a walk-away settlement agreement in the federal action, Gillespie's civil rights and ADA lawsuit against the Thirteenth Judicial Circuit, Florida, et al., for the misuse and denial of judicial process under the color of law, and denial of disability accommodation. Gillespie was involuntary confined by two (2) fully armed deputies of the Hillsborough County Sheriff's Office, and involuntarily held during an improper full deposition, post final summary judgment, an open-ended deposition without time limit, with no lunch break, and no meals usually given to an inmate, until Gillespie suffered injury and agreed to sign a walk-away settlement agreement. Gillespie was so impaired when he signed the agreement that the record shows he was unable to make the settlement decision himself."

A copy of the opinion decided March 27, 2012 by Judge Richard Posner of the 7th U.S. Circuit Court of Appeals accompanies this letter. (Exhibit 3). The American Bar Association Journal Law News Now reported this story March 28, 2012. (Exhibit 4).

PUBLIC DISCLOSURE OF PRIVATE MEDICAL INFORMATION

5. It does not appear that Magistrate Judge David Baker, located in Orlando, could read my ADA accommodation request and medical report located in Ocala when he made rulings in the

case. Due to Mr. Rodems' repeated misrepresentation of my disability, I waived confidentiality and filed my private medical information on the public record, see Doc. 36. I found the public disclosure of my private medical information objectionable, revealing mental illness and other disabilities contained in Dr. Huffer's report and my ADA request, just as any reasonable person would find it objectionable, and a wrongful intrusion into my private life. Still, the Court has failed to consider my ADA disability information.

TORTURE - ACT OF INFLICTING SEVERE PAIN - PHYSICAL OR PSYCHOLOGICAL

6. As set forth in Doc. 36 (Notice of filing disability and ADA information), "Since March 3, 2006, Ryan Christopher Rodems, counsel for the Defendants, has directed, with malice aforethought, a course of harassing conduct toward Gillespie that has aggravated his disability, caused substantial emotional distress and serves no legitimate purpose."

Another word for Mr. Rodems' behavior is torture: "Torture is the act of inflicting severe pain (whether physical or psychological) as a means of punishment, revenge, forcing information or a confession, or simply as an act of cruelty." - Wikipedia. (Exhibit 5)

http://en.wikipedia.org/wiki/Torture

The Psychology of Torture: "Torture, whether physical or psychological or both, depends on complicated interpersonal relationships between those who torture, those tortured, bystanders and others. Torture also involves deeply personal processes in those tortured, in those who torture and in others. These interacting psychological relationships, processes and dynamics form the basis for the psychology of torture." - Wikipedia (Exhibit 6)

http://en.wikipedia.org/wiki/Psychology_of_torture

I alleged torture in this federal action, see Doc. 22, notice of voluntary dismissal. Because the Court would not disqualify Mr. Rodems, I had to dismiss my claims or endure further torture, which I could not bear. The Court raised the issue of "extraordinary circumstances" (Doc. 21) and I replied in Doc. 22 beginning on page three (3). Paragraph 12 states:

> "Judge Cook is knowingly and willfully harming Gillespie through a confusion technique. Judge Cook is doing this to help Mr. Rodems and Barker, Rodems & Cook prevail over Gillespie in the lawsuit over which she presides. Judge Cook knowingly introduced false information into the court record and other such as a coercive technique used to induce psychological confusion and regression in Gillespie by bringing a superior outside force to bear on his will to resist or to provoke a reaction in Gillespie. The CIA a manual on torture techniques, the KUBARK manual, calls this the Alice in Wonderland or confusion technique."

http://en.wikipedia.org/wiki/KUBARK#CIA_manuals

A copy of Dr. Huffer's letter is attached to Doc. 22 as exhibit "A". Dr. Huffer wrote:

> "As the litigation has proceeded, Mr. Gillespie is routinely denied participatory and testimonial access to the court. He is discriminated against in the most brutal ways possible. He is ridiculed by the opposition, accused of malingering by the Judge and now, with no accommodations approved or in place, Mr. Gillespie is threatened with arrest if he does not succumb to a deposition. This is like threatening to arrest a paraplegic if he does not show up at a deposition leaving his wheelchair behind. This is precedent setting in my experience. I intend to ask for DOJ guidance on this matter." (Dr. Huffer, October 28, 2010, paragraph 2)

The United Nations (UN) Committee against Torture (CAT) prohibits torture, and torture is prohibited under international law and the domestic laws of most countries in the 21st century, however the United States did not agree to join the UN ban on torture, and the United States claims it's citizens have the U.S. Constitution to protect them. Therefore it is appropriate to seek redress for torture in federal court under 42 U.S.C. §1983.

MOTION TO FILE ELECTRONICALLY DENIED

7. My motion to file electronically (Doc. 6) was denied (Doc. 17) October 17, 2010 by Magistrate Judge Baker. I have maintained a PACER account in good standing since 1999.

My notion to file electronically can also be considered a reasonable accommodation request under the Americans with Disabilities Act (ADA). My request submitted to this Court September 28, 2010, and again in Doc. 36, see Exhibit 2, page 17, states as follows:

> "ADA Request No.6: Mr. Gillespie requests time to scan thousands of pages of documents in this case to electronic PDF format. This case and underlying cause of action covers a ten year period and the files have become unmanageable and confusing relative to Gillespie's disability. Mr. Gillespie is not able to concentrate when handling a large amount of physical files and documents. He is better able to manage the files and documents when they are organized and viewable on his computer. Mr. Gillespie will bear the cost of converting files and documents to PDF."

The failure to file electrically prevented me from being on an equal footing with the other parties in this case who could e-file documents from the comfort of their office or home without the time and expense of mailing, hiring a courier service, or serving the documents in person.

The technology to file documents electronically is fairly simple and cost effective. I have a website with documents in this case online at the following URLs:

http://yousue.org/litigation/

http://yousue.org/turner-v-rogers/

http://yousue.org/ryan-christopher-rodems/

http://yousue.org/bar-complaint-of-robert-w-bauer/

http://yousue.org/circuit-court-judge-martha-j-cook/

http://yousue.org/13th-judicial-circuit-hillsborough-co-florida/

My emergency motion to disqualify counsel described above is also filed free on Scribd at

http://www.scribd.com/doc/55960451/

Still, the document I personally filed in paper format September 28, 2010 in the Ocala Division has not been put on the Court's CM/ECF system to view on PACER.

The United States District Court for the Northern District of California offers online e-filing registration instructions for pro se litigants, found at this URL:

http://www.cand.uscourts.gov/pages/871

I meet the following technical requirements set forth by the Northern District of California:

1. A computer, the internet, and email on a daily basis so you can e-file your documents and receive notifications from the Court.

2. A scanner to scan documents that are only in paper format (like exhibits).

3. A printer/copier because each documents that you e-file will also need to be sent to the judge in hard copy (the judge's copy is called the "chambers copy").

4. A word-processing program to create your documents.

5. A .pdf reader and a .pdf writer, which enables you to convert word processing documents into .pdf format. Only .pdf documents are accepted for e-filing. Adobe Acrobat is the most common program used. The reader (Adobe Acrobat Reader) is free, but the writer is not. Some word processing programs come with a .pdf writer already installed.

The United States District Court for the Northern District of California offers an online pro se ECF Registration form in active PDF format.

INCORRECT DATE/TIME STAMP ON COMPLAINT BY CLERK

8. The Clerk's date/time stamp shows the Complaint (Doc. 1) was filed "2010 SEP 28 AM 7:47" which time is incorrect. The Court does not open until 8:30 AM, and I filed the Complaint myself in person by handing the Complaint directly to a deputy clerk about 8:47 AM.

INCORRECT PLAINITFF ADDRESS BY CLERK OF COURT

9. The Clerk used an incorrect mailing address for me, necessitating a corrective motion, see Plaintiff's Motion to Correct Mailing Address, filed October 5, 2010. (Doc. 9). My correct address is listed on the complaint and every document filed in this case. My address has not changed since 2005. The motion states as follows:

> "Plaintiff pro se Gillespie moves Court to correct his mailing address:
>
> 1. The Court is sending Plaintiff Gillespie's mail to the wrong address. Please use the correct address, listed on the complaint: 8092 SW I15th Loop, Ocala, Florida 34481."

INCORRECT PLAINITFF PHONE NUMBER BY CLERK OF COURT

10. The Clerk used an incorrect telephone number for me, necessitating a corrective motion, see Plaintiff's Motion to Correct Phone Number, filed October 13, 2010. (Doc. 15). My correct phone number is listed on the complaint and every document filed in this case. My home phone number has not changed since 2005. The motion states as follows:

> "Plaintiff pro se Gillespie moves the Court to correct his phone number and states:
>
> 1. The PACER docket shows an incorrect phone number for Plaintiff pro se Gillespie. The correct phone number is listed on the complaint: (352) 854-7807."

FAILURE OF MR. RODEMS TO COMPLY - RULE 7.1 DISCLOSURE STATEMENT

11. Mr. Rodems failed to comply with the Rule 7.1. Disclosure Statement and the Court did not take any corrective action. Mr. Rodems represented Barker, Rodems & Cook, PA, which is a Florida profit corporation according to the Florida Division of Corporations. (Exhibit 8).

Rule 7.1(a) states "A nongovernmental corporate party must file 2 copies of a disclosure statement that:

> (1) identifies any parent corporation and any publicly held corporation owning 10% or more of its stock; or
> (2) states that there is no such corporation.
>
> (b) Time to File; Supplemental Filing. A party must:
>
> (1) file the disclosure statement with its first appearance, pleading, petition, motion, response, or other request addressed to the court; and
> (2) promptly file a supplemental statement if any required information changes.

Upon information and belief, Barker, Rodems & Cook, PA is a nongovernmental corporate party under Rule 7.1(a) and Mr. Rodems had a duty to comply with Rule 7.1(b) and file the disclosure statement with his first appearance September 29, 2010. Mr. Rodems failed to do so. Had Mr. Rodems complied with Rule 7.1, the Court may have been better informed on the issue of my

motion to disqualify Mr. Rodems as counsel. (Doc. 8). I believe Mr. Rodems' failure to comply with Rule 7.1(b) was intended to mislead the Court.

FAILURE OF THE CLERK TO OFFER PRO SE SERVICES

12. The United States District Court for the Middle District of Florida does not appear to offer pro se services as compared to other federal District Courts. This is a denial of equal protection under the law under the Fourteenth Amendment. For example:

The United States District Court for the Northern District of California offers pro se litigants a Pro Se Handbook, also known as a Handbook for Litigants Without a Lawyer, which can be downloaded online or available free of charge from the Clerk's Office. This is a link to "Representing Yourself in Federal Court: A Handbook for Pro Se Litigants"

http://www.cand.uscourts.gov/prosehandbk

In addition to a pro se handbook, at the above link the District Court for the Northern District of California offers the following services to pro se litigants:

Official Court Forms in active PDF format. The link shows eleven (11) different forms.

http://www.cand.uscourts.gov/civillitpackets

Civil Litigation Packets, at the above URL, collections of forms in active PDF for the following:

Complaint packet
Motion packet
Opposition (to motion) packet
Initial Disclosures packet
Motion for Permission for Electronic Case Filing and Proposed Order

Tips for Pro Se Filers: http://www.cand.uscourts.gov/prosetips

The United States District Court for the Northern District of California has a comprehensive directory of all Article III judges and Magistrate Judges with photos and biographies, found online at this link http://www.cand.uscourts.gov/judges

28 USC § 455 - LETTER TO CHIEF JUDGE ANNE CONWAY

13. My letter to Chief Judge Conway (Doc. 68) made a request under the federal Freedom of Information Act, or other applicable law, pursuant to 28 USC § 455, for the biography and/or personnel file of Magistrate Judge David A. Baker. As of today I do not have a reply.

Subsequently I found some of this information myself with a Google search. It appears that Magistrate Judge Baker was formerly a partner in the law firm of Foley & Lardner, LLP. It

appears that the tenure of Attorney David A. Baker at Foley & Lardner included time in the firm's offices in Wisconsin and Orlando.

On May 25, 2011 Krista J. Sterken, Esq., an associate of Foley & Lardner LLP, Wisconsin, telephoned me at 11:55 a.m. offering legal representation in this matter. (Doc. 49). Ms. Sterken's offer of pro bono legal representation was only contingent upon a conflict search. On May 27, 2011 Michael D. Leffel, Esq., a partner at Foley & Lardner LLP, notified me that Foley & Lardner could not represent me. (Doc. 49). Neither Ms. Sterken nor Mr. Leffel informed me of a conflict as a result their conflict search. Therefore I concluded that the decision not to represent me involved another issue. Given the forgoing, a reasonable person could conclude that Judge Baker may have had some role in the decision by Foley & Lardner not to represent me.

CONCLUSION

Given the above, my experience in this case would cause a reasonable person to question the fairness and impartiality of this Clerk and this Court. Thank you for your consideration.

Sincerely,

Neil J. Gillespie
8092 SW 115th Loop
Ocala, Florida 34481

Telephone: (352) 854-7808
Email: neilgillespie@mfi.net

Enclosures

CC: Honorable Anne C. Conway, Chief United States District Judge
Hon. William Terrell Hodges, Ocala Division
Hon. David A. Baker, Orlando Division

Robert E. O'Neill, US Attorney, US Attorney's Office, 400 N. Tampa St., Suite 3200, Tampa, FL 33602-4798 (For the Thirteenth Judicial Circuit, Florida, et. al)

Catherine B. Chapman, Guilday, Tucker, Schwartz & Simpson, P.A., 1983 Centre Pointe, Boulevard, Suite 200, Tallahassee, FL 32308-7823 (For Robert W. Bauer, et. al)

Ryan C. Rodems, 400 North Ashley Drive, Suite 2100, Tampa, Florida 33602

VIOLATION OF BAR RULE 4-3.3 BY RYAN CHRISTOPHER RODEMS

Ryan Christopher Rodems, counsel for Barker, Rodems & Cook, P.A. and William J. Cook, prevented the lawful adjudication of both the state and federal cases primarily through his repeated violation of FL Bar Rule 4-3.3 *Candor Toward The Tribunal*.

Mr. Rodems violated the requirements of FL Bar Rule 4-3.3 in his response to the Court (Doc. 12) to the motion to disqualify (Doc. 8) as follows:

1. Mr. Rodems failed to disclose to the Court the actual interest of himself, his law partners, and his law firm Barker, Rodems & Cook, P.A. in the Amscot litigation, as set forth in the *Certificate of Interested Person* in the U.S. Court of Appeals for the Eleventh Circuit in Eugene R. Clement, Gay Ann Blomefield, and Neil Gillespie v. AMSCOT Corporation, Case No. 01-14761-AA. (copy provided)

2. Mr. Rodems failed to disclose to the Court a letter by Amscot's lawyer, Charles Stutts of Holland & Knight, LLP, that described the relationship between the Amscot lawsuit and the state court case Neil J. Gillespie v. Barker, Rodems & Cook, P.A. and William J. Cook, 05-CA-007205, Hillsborough Circuit Court. Mr. Stutts wrote February 13, 2007 that "This former action [Amscot] is, of course, at the heart of your pending action against Barker, Rodems & Cook, P.A.". (copy provided).

3. Mr. Rodems failed to disclose to the Court his letter dated December 13, 2006 to Neil J. Gillespie that set forth his prejudice in this matter, including: (copy provided)

> "I recognize that you are a bitter man who apparently has been victimized by your own poor choices in life. You also claim to have mental or psychological problems, of which I have never seen documentation. However, your behavior in this case has been so abnormal that I would not disagree with your assertions of mental problems." (P1, ¶3)
>
> "So, in addition to your case's lack of merit, you are cheap and not willing to pay the required hourly rates for representation." (P3, ¶2).

4. Mr. Rodems failed to disclose to the Court his actual conflict, established by Order of Circuit Court Judge Richard Nielsen dated January 13, 2006, that found a cause of action for Fraud and Breach of Contract against Barker, Rodems & Cook, P.A. and William J. Cook in the state court action 05-CA-007205. (copy provided). Partners engaged in the practice of law are each responsible for the fraud or negligence of another partner when the later acts within the scope of the ordinary business of an attorney. Smyrna Developers, Inc. v. Bornstein, 177 So.2d 16 (Fla. Dist. Ct. App. 2d Dist. 1965).

EXHIBIT 1

5. Mr. Rodems failed to disclose to the Court legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client, McPartland v. ISI Inv. Services, Inc., 890 F.Supp. 1029, M.D.Fla., 1995.

> In McPartland v. ISI Investment Services, Inc., 890 F.Supp. 1029, (US District Court, MD of Florida, Tampa Division) the court held that [1] Under Florida law, attorneys must avoid appearance of professional impropriety, and any doubt is to be resolved in favor of disqualification. [2] To prevail on motion to disqualify counsel, movant must show existence of prior attorney-client relationship and that the matters in pending suit are substantially related to the previous matter or cause of action. [3] In determining whether attorney-client relationship existed, for purposes of disqualification of counsel from later representing opposing party, a long-term or complicated relationship is not required, and court must focus on subjective expectation of client that he is seeking legal advice. [5] For matters in prior representation to be "substantially related" to present representation for purposes of motion to disqualify counsel, matters need only be akin to present action in way reasonable persons would understand as important to the issues involved. [7] Substantial relationship between instant case in which law firm represented defendant and issues in which firm had previously represented plaintiffs created irrebuttable presumption under Florida law that confidential information was disclosed to firm, requiring disqualification. [8] Disqualification of even one attorney from law firm on basis of prior representation of opposing party necessitates disqualification of firm as a whole, under Florida law.

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT
CASE NO. 01-14761A

EUGENE R. CLEMENT,
GAY ANN BLOMEFIELD, and
NEIL GILLESPIE, individually and
on behalf of others similarly situated,

Appellants,

v.

AMSCOT CORPORATION,

Appellee.
_____/

JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE

The Parties, by and though their undersigned counsel, having amicably resolved this matter, pursuant to Federal Rule of Appellate Procedure 42(b) move for dismissal with prejudice with each party bearing its own attorneys' fees and costs.

RESPECTFULLY SUBMITTED this 6th day of November, 2001.

BARKER, RODEMS & COOK, P.A.

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Tampa, Florida 33606
(813) 489-1001 (TEL)
(813) 489-1008 (FAX)
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Gray, Harris, Robinson,
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(813) 273-5000 (TEL)
(813) 273-5145 (FAX)
Attorneys for Appellee

CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rule 26.1-1, counsel for the Appellants certify that the following persons and entities have an interest in the outcome of this case.

Alpert, Jonathan L., Esq.

Alpert & Ferrentino, P.A.

Amscot Corporation

Anthony, John A., Esq.

Barker, Rodems & Cook, P.A.

Barker, Chris A., Esq.

Blomefield, Gay Ann

Clement, Eugene R.

Cook, William J., Esq.

Gillespie, Neil

Gray, Harris, Robinson, Shackleford, Farrior, P.A.

Lazzara, The Honorable Richard A.

United States District Judge, Middle District of Florida

MacKechnie, Ian

Rodems, Ryan Christopher, Esq.

IN THE UNITED STATES COURT OF APPEALS

FOR THE ELEVENTH CIRCUIT

No. 01-14761-AA

EUGENE R. CLEMENT,
individually and on behalf of others similarly situated,

Plaintiff-Appellant,

GAY ANN BLOMEFIELD,
NEIL GILLESPIE,

8:99-CV-2795-T-26 EAJ

Plaintiffs-Intervenors-
Counter-Defendants-Appellants,

versus

AMSCOT CORPORATION,
A Florida Corporation,

Defendant-Intervenor-Counter
-Claimant-Appellee.

On Appeal from the United States District Court for the Middle District of Florida

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BEFORE: EDMONDSON and BARKETT, Circuit Judges.

BY THE COURT:

The parties joint stipulation for dismissal of this appeal with prejudice, which is construed as a motion to dismiss this appeal with prejudice, with the parties bearing their own costs and attorney's fees, is GRANTED.

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United States Court of Appeals
for the Eleventh Circuit
56 Forsyth Street, N.W.
Atlanta, GA 30303-2289
(404) 335-6100

01-14761-AA
Eugene R. Clement v. Amscot Corporation

Closed

Docket #: 01-14761-AA
Short Style: Eugene R. Clement v. Amscot Corporation
Docket Date: 08/23/2001
Lead Case:
Agency:
Nature of Suit: Other: Statutory Actions
Misc. Type:
Clerk: Dixon, Eleanor
Clerk Phone: (404) 335-6172

District Information

Docket #: 99-02795-CV-T-26 **Judge:** Richard A. Lazzara
Dkt Date: 12/08/1999 **District:** Florida-Middle
NOA Date: 08/20/2001 **Office:** MFL-Tampa

Secondary Case Information

Docket #: **Judge:**
Dkt Date: / /

Case Relationships

Docket #	Short Style	Relation	Status

Pending Motions

No Pending Motions

United States Court of Appeals
for the Eleventh Circuit
56 Forsyth Street, N.W.
Atlanta, GA 30303-2289
(404) 335-6100

01-14761-AA
Eugene R. Clement v. Amscot Corporation

EUGENE R. CLEMENT,

individually and on behalf of others similarly

situated,

Plaintiff-Appellant,

GAY ANN BLOMEFIELD,

NEIL GILLESPIE,

Plaintiffs-Intervenors

Counter-Defendants

Appellants,

versus

AMSCOT CORPORATION,

A Florida Corporation,

Defendant-Intervenor

Counter-Claimant

Appellee.

United States Court OF Appeals
FOR the Eleventh Circuit
56 Forsyth Street, N.W.
Atlanta, GA 30303-2289
(404) 335-6100

01-14761-AA
Eugene R. Clement v. Amscot Corporation

Appellant	Appellant Attorney
Eugene R. Clement Address Not On File *Record Excerpts filed on 10/03/2001* *Fees: Paid on 08/20/2001*	**William John Cook** Barker, Rodems & Cook P.A. 400 N ASHLEY DR STE 2100 TAMPA, FL 33602-4350 (813) 489-1001 Fax: (813) 489-1008 wcook@barkerrodemsandcook.com *No Briefing Information Found.*
Gay Ann Blomefield Address Not On File *No Briefing Information Found.* *Fees: Paid on 08/20/2001*	**William John Cook** Barker, Rodems & Cook P.A. 400 N ASHLEY DR STE 2100 TAMPA, FL 33602-4350 (813) 489-1001 Fax: (813) 489-1008 wcook@barkerrodemsandcook.com *No Briefing Information Found.*
Neil Gillespie Address Not On File *Appellant Brief Filed filed on 10/03/2001* *Fees: Paid on 08/20/2001*	**William John Cook** Barker, Rodems & Cook P.A. 400 N ASHLEY DR STE 2100 TAMPA, FL 33602-4350 (813) 489-1001 Fax: (813) 489-1008 wcook@barkerrodemsandcook.com *No Briefing Information Found.*

Appellee	Appellee Attorney
Amscot Corporation Address Not On File	Person Not Found *No Briefing Information Found.*

	John A. Anthony GrayRobinson, P.A. 201 N FRANKLIN ST STE 2200 TAMPA, FL 33602-5822 (813) 273-5066 Fax: (813) 221-4113 janthony@gray-robinson.com *No Briefing Information Found.*

Initial Service	
Lara R. Fernandez 101 E KENNEDY BLVD STE 2700 TAMPA, FL 33602-5150 (813) 227-7404 Fax: (813) 229-6553 lfernandez@trenam.com	

United States Court of Appeals
for the Eleventh Circuit
56 Forsyth Street, N.W.
Atlanta, GA 30303-2289
(404) 335-6100

01-14761-AA
Eugene R. Clement v. Amscot Corporation

File Date	Entry	Party	Pending
08/20/2001	Fee Status: Paid (08/20/01) for Eugene R. Clement	Eugene R. Clement	No
08/20/2001	Fee Status: Paid (08/20/01) for Gay Ann Blomefield	Gay Ann Blomefield	No
08/20/2001	Fee Status: Paid (08/20/01) for Neil Gillespie	Neil Gillespie	No
08/24/2001	DKT7CIV (Docketing 7) issued. cc: Loesch, Sheryl L. cc: Cook, William J. cc: Anthony, John A.		No
08/24/2001	Briefing Notice Issued		No
09/04/2001	Appearance Form Submitted: William J. Cook	William John Cook	No
09/04/2001	Transcript Order Form: Appellants- No transcript required		No
09/04/2001	Civil Appeal Statement Form- Appellants		No
09/05/2001	Probable Jurisdiction Noted		No

	09/07/2001	Appearance Form Submitted: John A. Anthony	John A. Anthony	No
	09/28/2001	Certificate of Readiness		No
	10/03/2001	Appellant's Brief Filed: Appellants-Clement, Eugene R., Blomefield, Gay Ann, and Gillespie, Neil (Atty: William J. Cook)	Neil Gillespie	No
	10/03/2001	Record Excerpts: Appellant-Clement, Eugene R. (Atty: William J. Cook)	Eugene R. Clement	No
	11/09/2001	Joint Stipulation to Dismiss Appeal with Prejudice		No
	12/07/2001	The parties joint stipulation for dismissal of this appeal with prejudice, which is construed as a motion to dismiss this appeal with prejudice, with the parties bearing their own costs and attorney fees, is GRANTED(JLE/RB).j		No
	12/07/2001	DIS-4 (Dismissal 4 Letter) issued. cc: Cook, William J. cc: Anthony, John A. To: Loesch, Sheryl L.		No
	12/07/2001	CASE CLOSED		No

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Tampa, FL 33602-3644
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Charles L. Stutts
813 227 6466
charles.stutts@hklaw.com

February 13, 2007

VIA FEDEX

Neil J. Gillespie
8092 SW 115th Loop
Ocala, FL 34481

Re: Gillespie v. Barker, Rodems & Cook, P.A., et al.; Case No. 05-CA-7205

Dear Mr. Gillespie:

Amscot Corporation has asked me to respond to your letter of February 10, 2007 in which you request that Mr. Ian MacKechnie, President of Amscot, agree to his deposition in the above-referenced matter.

The U.S. District Court for the Middle District of Florida in 2001 dismissed all claims brought by you, Eugene R. Clement and Gay Ann Blomefield, individually and on behalf of others, against Amscot in connection with its deferred deposit transactions. This former action is, of course, at the heart of your pending action against Barker, Rodems & Cook, P.A.

Mr. MacKechnie views the prior litigation as closed, and neither he nor others at Amscot have any interest in voluntarily submitting to deposition or otherwise participating in the pending matter. Accordingly, Mr. MacKechnie must decline your request.

Please contact me if you have questions or care to discuss the matter.

Sincerely yours,

HOLLAND & KNIGHT LLP

Charles L. Stutts

cc: Ian MacKechnie

BARKER, RODEMS & COOK

PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW

CHRIS A. BARKER
RYAN CHRISTOPHER RODEMS
WILLIAM J. COOK

400 North Ashley Drive, Suite 2100
Tampa, Florida 33602

Telephone 813/489-1001
Facsimile 813/489-1008

December 13, 2006

Mr. Neil J. Gillespie
8092 SW 115th Loop
Ocala, Florida 34481

Dear Neil:

As you know, I called you on December 12, 2006 to schedule hearings before Judge Isom on February 7, 2007. You did not answer, so I left you a voice mail. Later that afternoon, you sent a letter to me by facsimile. In it, you claim to be unavailable February 7 and that you "hope to have representation within 30 days." You have made that assertion for several months now, without retaining counsel, and I cannot delay this proceeding any further on your unfulfilled promises of retaining counsel. You also state in your letter that I have "threatened the lawyers that were helping" you, which is completely unfounded. I will address that issue below.

Judge Isom has all day on February 5, 2007 open, and we could resolve all pending motions, except for your motion for summary judgment, on that date. I left you a voice mail on this today.

As has Judge Nielsen, I have endured for several months now disparaging remarks from you, false allegations, attacks on my credibility and otherwise boorish behavior. I have not responded to much of it because I recognize that you are a bitter man who apparently has been victimized by your own poor choices in life. You also claim to have mental or psychological problems, of which I have never seen documentation. However, your behavior in this case has been so abnormal that I would not disagree with your assertions of mental problems. I have maintained courtesy in every meeting with you, including a warm sentiment following a hearing -- only to be accused after that of "taunting" you.

I intend to continue treating you with the same dignity and respect as I would opposing counsel in any other case; however, I have First Amendment rights, too. I am not obligated to accept your false statements, disparaging remarks, attacks on my credibility and the other tactics you have used in this case. I want to ensure that you understand my position, and so I find it necessary now to write to correct the record.

As for your claims that I "threatened the lawyers" that is simply false. I forwarded by e-mail portions of your October 18, 2006 to Ms. Jenkins, Ms. Buchholz and Mr. Snyder, and stated "Neil Gillespie has filed a letter with Judge Richard Nielsen, and has attributed comments to the three of you. As an officer of the Court, I believe I have a duty to advise you of this. Please review pages 8-10 of the attached letter. Should any of you desire the complete document, with attachments, please advise." I have received no reply. In fact, the first confirmation that my letter had been received by these three attorneys was your December 12 facsimile letter.

Let me explain why I sent the portions of the letter to them. Your tactic of naming these three lawyers as people you had spoken to, and then attributing statements to them anonymously and en masse is very damaging to them professionally. I sent the portions of the October 18, 2006 letter to them so that they could review it and do whatever they felt necessary.

I also sent it to them because I questioned the veracity of your letter. I considered four possibilities about the statements you attributed to them anonymously: First, you may be lying. Second, you may be taking some or all of the statements out of context. Third, you may be paraphrasing and changing the meaning of the actual statements. Fourth, one or all of these attorneys may have never said anything to you, but were being used by you to endorse statements that you would later use to attempt to recuse Judge Nielsen.

I also disagree that my actions have harmed your ability to hire counsel. The primary problem is that your case is weak. You are essentially claiming in this action that our law firm breached its contract with you by not paying you a portion of the attorneys' fees earned in the Amscot case. Every attorney knows -- or should know -- that the Rules Regulating the Florida Bar and the caselaw prohibit splitting attorneys' fees with a nonlawyer.

It is also clear by reviewing the Closing Statement and your letters to us that you knew that Amscot was paying all of your attorneys' fees and that you would not have to pay any portion of your settlement for attorneys' fees and costs. In this case, you received 100% of your settlement, not 60%, and Amscot paid all of your attorneys' fees and costs.

No one has ever rendered an opinion that your case has any merit. You misunderstood the meaning of a denial of a motion to dismiss. It is not a comment on the merits. In fact, the Court is required to accept all of your allegations as true. That requirement disappears after the motion to dismiss is resolved. Now, you are required to prove your specious allegations. Any rational attorney looking at this situation would not take this case on a contingency fee basis and would instead require you to pay them by the hour.

You, apparently, from your comments to me and in court filings, are unwilling to pay an attorney fairly for the work that would need to be done. In fact, you even moved the Court to have an

attorney appointed for you at the government's expense. Of course, there is no provision under the ADA for appointment of counsel, but the fact that you believe the government should foot the bill for you to file baseless lawsuits is entirely consistent with your actions in this case and past cases.

So, in addition to your case's lack of merit, you are cheap and not willing to pay the required hourly rates for representation. Yet, you have had no problem paying filing fees for this baseless lawsuit, the court reporters to transcribe hearings and our telephone calls, and for the frivolous appeal of the discovery order.

Another major problem, I gather, in hiring attorneys is your extortion of your former attorneys by threatening to file a Florida Bar complaint if they do not split portions of their earned fees with you. In fact, you have filed three grievances against Bill Cook in connection with this matter -- all of which were dismissed, meaning your allegations were unfounded. Rhetorically, why would an attorney wish to represent you given your past actions against other attorneys?

Additionally, any reasonable attorney would find your conduct in this case to be reprehensible.

1. You have routinely violated the Florida Rules of Civil Procedure, only to claim that pro se litigants are entitled to special treatment. At every hearing, I recall Judge Nielsen had to advise you to follow the procedural rules and protocol. As I have pointed out with citations of authority, the law in Florida is clear: You are expected to follow the rules of procedure, and you are not entitled to special treatment. When I have cited the law to you, you have told me not to do so.

2. You threatened to "slam me up against the wall." After that, I had to request a bailiff to attend the hearings. You claimed I "taunted" you when, after a hearing, I wished you well.

3. You have recorded a telephone conversation without my permission. I assume your research skills have led you to the statutes and caselaw on recording telephone conversation without permission. In fact, you only filed a portion of the transcript of our very first telephone conversation and we both know why: You never told me you were recording it.

4. You represented to the Court that I "threatened" you, and the comment on which you based it was my comment to you that your libeling of my clients was unnecessary, and that act would cause you to have to pay. Which, it will. You have accused me of perjury.

5. You have filed defenses to the counterclaim that are nonsensical, and yet you claimed to be well-qualified to represent yourself when I moved for sanctions and asked the Court to require you to hire counsel.

6. You took a contradictory position and moved to have an attorney appointed for you because you were not qualified or able to represent yourself, citing your disability, without proof, and a federal law that does not even address the appointment of counsel in a civil action. In one hearing, when Judge Nielsen asked you for authority, you replied with words to the effect that you have no training in the law. You have portrayed yourself as the victim when it suits you and the able advocate when it suits you.

7. You failed to respond to discovery, forcing me to file a motion to compel, which was granted. You refused to comply with that Order, filed a frivolous appeal, which was dismissed, and then petitioned for writ of certiorari, which was also dismissed.

8. When I filed a motion for an Order to Show Cause on the discovery Order, you claimed to be pursuing coverage of the counterclaim by an insurance company. You asked for a continuance of the hearing on that basis. We contacted the insurer's claims adjuster and negotiated a very favorable settlement for you of the counterclaim, and when you found out, you withdrew the claim, thereby preventing the counterclaim from being resolved.

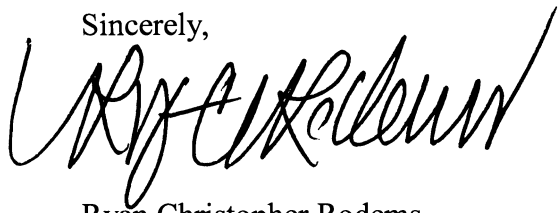
9. Facing an imminent hearing on your contumacious disregard for the Court's July 24, 2006 discovery Order after your appeal of it was denied, you decided to "judge shop" and attacked Judge Nielsen to force him to recuse himself. In doing so, you cited unrelated, irrelevant issues and attempted to bait him with disparaging and caustic remarks, even though he was polite and respectful towards you at all times, allowed you to submit additional argument when you came to the first hearing unprepared, and gave you additional time to find an attorney when we were scheduled to hear on October 4, 2006 your defiance of the July 24, 2006 discovery Order. No good deed goes unpunished, right?

   You succeeded in having Judge Nielsen step down. There is no effective process for challenging his recusal or having a Court rule on the motive of your motion to disqualify him, but if you were an attorney, the Rules Regulating the Florida Bar would require me to file a grievance and you would likely have faced severe sanctions.

Neil, we offered to settle with you without pursuing our right to attorneys' fees and costs, as ordered by Judge Nielsen in the July 24, 2006 Order. You rejected it. We offered to settle the counterclaim with your insurer. You withdrew the insurance claim. You are spending a lot of money on filing fees, court reporter fees, and gasoline to hand-deliver motions and whatnot. It appears you want your day in court, so to speak. Judge Isom has all day on February 5, 2007 open. I urge you to agree to set the hearings on that date. We can then move forward and bring this case to resolution.

I hope this clarifies my position on matters, and I look forward to working with you.

Sincerely,



Ryan Christopher Rodems

RCR/so

Barker, Rodems & Cook, P.A.
400 North Ashley Drive, Suite 2100
Tampa, Florida 33602

Gillespie - 05.5422

Neil J. Gillespie
8092 SW 115th Loop
Ocala Florida 34481

34481$3567 R045

311

05-7205

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT OF THE STATE OF FLORIDA, IN AND FOR HILLSBOROUGH COUNTY, CIVIL DIVISION

NEIL J. GILLESPIE,

PLAINTIFF,

CASE NUMBER ~~05-CA-72105~~

vs.

DIVISION " F "

BARKER, RODEMS & COOK, P.A., a Florida Corporation; and WILLIAM J. COOK,

DEFENDANTS.

_____/

FILED
CLERK OF CIRCUIT CT
2006 JAN 13 AM 11:03
HILLSBOROUGH CNTY. FL
CIRCUIT CIVIL

am

ORDER ON DEFENDANTS' MOTION TO DISMISS AND STRIKE

THIS CAUSE came on for hearing on September 26, 2005, upon Defendant's Motion to Dismiss and Strike, and counsel for the parties being present and having made arguments and the court having considered the Plaintiff's Rebuttal to Defendant's Motion to Dismiss and Strike. Defendant's Reply to Plaintiff's Rebuttal to Defendant's Motion to Dismiss and Strike and the Plaintiff's Second Rebuttal to Defendant's Motion to Dismiss and Strike, and the court being advised fully in the premises, it is thereupon,

ADJUDGED as follows:

1. Defendant's Motion to Dismiss and Strike is granted in part and denied in part.

2. Those portions of Defendant's Motion to Dismiss and Strike seeking to dismiss the Complaint are denied. Defendant shall have fifteen days from the date of this order within which to file responsive pleadings.

00: 36

[redacted]

ML

3. Those portions of Defendant's Motion to Dismiss and Strike seeking to strike portions of the Complaint is granted in the following particulars:

a. Paragraphs 47, 48, 49 and 50 of the Complaint are stricken.

b. Exhibit 8 to the Complaint is stricken.

c. All references to or demands for punitive damages are stricken or failure to comply with §768.72 of the Florida Statutes.

ORDERED in Chambers, at Tampa, Hillsborough County, Florida, this _____ day of JAN 13 2006, 20____.

RICHARD A. NIELSEN
CIRCUIT JUDGE

Copies furnished to:

Ryan C. Rodems, Esquire
300 West Platt Street, Suite 150
Tampa, Florida 33606

Neil J. Gillespie
8092 SW 115th Loop
Ocala, Florida 34481

STATE OF FLORIDA)
COUNTY OF HILLSBOROUGH)
THIS IS TO CERTIFY THAT THE FOREGOING IS A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE IN MY OFFICE. WITNESS MY HAND AND OFFICIAL SEAL THIS 31st DAY OF August 2010
PAT FRANK
CLERK OF CIRCUIT COURT
BY Donna Healy D.C.

August 30, 2010

Mr. James Leanheart, Court Operations Supervisor
United States District Court, MD of Florida, Ocala Division
Golden-Collum Memorial Federal Building & US Courthouse
207 NW Second Street, Room 337
Ocala, Florida 34475-6666

Dear Mr. Leanheart:

In a two weeks or so I plan to file an Americans With Disabilities Act (ADA) lawsuit in your court. This will be a pro se action since I cannot find counsel to represent me. The complaint may also allege other civil rights and constitutional claims, or other claims.

In August 2005 I filed a pro se action in your court, Gillespie v. HSBC Bank et al, Case No. 5:05-CV-362-OC-WTH-GRJ. The proceedings were efficient and well managed.

Pursuant to local Rule 1.01(a) the Court may prescribe by administrative order procedures for electronic filing and related matters in civil and criminal cases. This is a request to file documents electronically if you believe this would be beneficial. I live in Oak Run which is about 15 miles from the Court. It is not overly burdensome to mail or hand deliver documents to the Court. I have had a PACER account in good standing since 1999.

Since this is an ADA lawsuit there are documents with my personal HIPAA protected medical information for the Court to consider, and perhaps attach to the complaint. Pursuant to local Rule 1.09 I may want to file under seal my personal HIPAA protected medical information, but that presents a dilemma when the complaint refers to this information, and to have it under seal may diminish my ADA claims. Any procedural guidance (not legal advice) you can provide would be appreciated.

My ADA claims (and possibly other claims) involve documents in the state court record from the Circuit Civil Court of the 13th Judicial Circuit, including ADA accommodation requests, an ADA disability report prepared by my ADA advocate and designer, Dr. Karin Huffer, various Orders, motions, an amended complaint (150 pages), and an emergency motion to disqualify counsel (190 pages). What is the procedure for including or incorporating these numerous and sometimes large documents into my ADA and/or civil rights complaint? Thank you for your consideration.

Sincerely,

Neil J. Gillespie
8092 SW 115th Loop
Ocala, Florida 34481
Telephone: (352) 854-7807
email: neilgillespie@mfi.net
VIA US Certified Mail, RRR, Article No. 7010 0780 0000 8981 6504

EXHIBIT
2

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Description	Qty	Price
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Cash		$10.55
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City, State, ZIP+4: OCALA, FL 34478-6666

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207 NW Second Street, Rm 337
Ocala, FL 34475-6666

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In the
United States Court of Appeals
For the Seventh Circuit

No. 11-2811

TERRANCE PRUDE,

Plaintiff-Appellant,

v.

DAVID A. CLARKE, JR., *et al.*,

Defendants-Appellees.

Appeal from the United States District Court
for the Eastern District of Wisconsin.
No. 2:10-cv-00167-JPS—**J.P. Stadtmueller**, *Judge.*

SUBMITTED MARCH 7, 2012—DECIDED MARCH 27, 2012

Before POSNER, WOOD, and TINDER, *Circuit Judges*.

POSNER, *Circuit Judge*. The plaintiff in this prisoner's civil rights suit brought under 42 U.S.C. § 1983 complains that he was subjected to cruel and unusual punishment by personnel of the Milwaukee County Jail. (He has a second, less substantial claim that we discuss at the end of the opinion.) He appeals from the grant of summary judgment to the four defendants, who are the Sheriff

EXHIBIT
3

of Milwaukee County, two County Inspectors who work at the jail, and a guard.

The plaintiff is serving time in a Wisconsin state prison, but was transferred to the county jail on several occasions to enable him to attend court proceedings relating to a postconviction petition that he had filed. On the second and third stays, which lasted a week and 10 days respectively, the jail fed him only "nutriloaf," pursuant to a new policy the jail had adopted of making nutriloaf the exclusive diet of prisoners who had been in segregation in prison at the time of their transfer to the jail, even if their behavior in the jail was exemplary. Nutriloaf (also spelled "nutraloaf") is a bad-tasting food given to prisoners as a form of punishment (it is colloquially known as "prison loaf" or "disciplinary loaf"). See, e.g., Jeff Ruby, "Dining Critic Tries Nutra-loaf, the Prison Food for Misbehaving Inmates," *Chicago Magazine*, Sept. 2010, www.chicagomag.com/Chicago-Magazine/September-2010/Dining-Critic-Tries-Nutraloaf-the-Prison-Food-for-Misbehaving-Inmates; Arin Green-wood, "Taste-Testing Nutraloaf: The Prison Loaf That Just Might Be Unconstitutionally Bad," *Slate*, June 24, 2008, www.slate.com/articles/news_and_politics/jurisprudence/2008/06/tastetesting_nutraloaf.html; Matthew Purdy, "Our Towns: What's Worse Than Solitary Confinement? Just Taste This," *N.Y. Times*, Aug. 4, 2002, www.nytimes.com/2002/08/04/nyregion/our-towns-what-s-worse-than-solitary-confinement-just-taste-this.html (all visited March 15, 2012).

On his third stay, after two days on the nutriloaf diet, the plaintiff began vomiting his meals and experiencing stomach pains and constipation. (He had vomited during the second stay as well.) He stopped eating nutriloaf and subsisted for the eight remaining days of his stay on bread and water (it's unclear how he obtained the bread). He had weighed 168 pounds before his second and third stays at the jail, had lost either 5 or 6 pounds during the second stay, had not regained them, and by the end of the third stay was down to 154 pounds: he had lost 8.3 percent of his weight as a result of the two stays (and he had not been overweight at 168).

A guard sent him to the infirmary after one of the vomiting incidents during his third stay, and the nurses there gave him antacids and a stool softener and one of them told him his weight loss was "alarming." Upon his return to state prison he continued experiencing painful defecation and bloody stools, and he was diagnosed with an anal fissure that the defendants have not denied had developed while he was in the county jail.

The defendants' response to his suit has been contumacious, and we are surprised that the district judge did not impose sanctions. The defendants ignored the plaintiff's discovery demands, ignored the judge's order that they comply with those demands, and continued their defiance even after the judge threatened to impose sanctions. But the judge failed to carry through on his threat, so the threat proved empty.

The only evidence the defendants submitted in support of their motion for summary judgment was a

preposterous affidavit from a sheriff's officer who is also an assistant chief of a suburban Wisconsin fire department. The affidavit states only, so far as bears on the appeal, that "Nutraloaf has been determined to be a nutritious substance for regular meals." The defendants made no effort to qualify him as an expert witness. As a lay witness, he was not authorized to offer hearsay evidence ("has been determined to be . . . nutritious").

No evidence was presented concerning the recipe for or ingredients of the nutriloaf that was served at the county jail during the plaintiff's sojourns there. "Nutriloaf" isn't a proprietary food like Hostess Twinkies but, like "meatloaf" or "beef stew," a term for a composite food the recipe of which can vary from institution to institution, or even from day to day within an institution; nutriloaf could meet requirements for calories and protein one day yet be poisonous the next if, for example, made from leftovers that had spoiled. The recipe was among the items of information that the plaintiff sought in discovery and that the defendants refused to produce.

Even an affidavit from an expert stating after a detailed chemical analysis that "nutriloaf meets all dietary requirements" would be worthless unless the expert knew and stated that nutriloaf invariably was made the same way in the institution. The assistant fire chief's affidavit says no such thing—and he was not an expert.

In addition to stonewalling the plaintiff and the district judge, the defendants failed to file a brief in this

court and failed to respond to our order to show cause why they hadn't filed a brief. They seem to think that the federal courts have no jurisdiction over a county jail.

Deliberate withholding of nutritious food or substitution of tainted or otherwise sickening food, with the effect of causing substantial weight loss, vomiting, stomach pains, and maybe an anal fissure (which is no fun at all, see http://en.wikipedia.org/wiki/Anal_fissure (visited March 15, 2012)), or other severe hardship, would violate the Eighth Amendment. See, e.g., *Hutto v. Finney*, 437 U.S. 678, 687 (1978); *Atkins v. City of Chicago*, 631 F.3d 823, 830 (7th Cir. 2011); *Sanville v. McCaughtry*, 266 F.3d 724, 734 (7th Cir. 2001); *Simmons v. Cook*, 154 F.3d 805, 808 (8th Cir. 1998). Not that all nutriloaf is unhealthful, though all is reputed to have an unpleasant taste. But we do not know the recipe for the nutriloaf that was served the plaintiff, or whether the ingredients were tainted or otherwise unhealthful, because of the defendants' failure to comply with the plaintiff's discovery demands. The defendants decided to defy rather than to defend. The uncontradicted evidence is that other prisoners in the jail also vomited after eating the nutriloaf, and this suggests that it was indeed inedible.

The only possible justification for the district court's rejection of the plaintiff's Eighth Amendment claim, at this early stage of the litigation, is that he may not have sued the right defendants, since he can prevail against a defendant only by proving that the defendant was deliberately indifferent to his health. The guard who sent him to the infirmary knew he had vomited, but

the guard sent him for medical attention and there is no suggestion that he was responsible for the composition of the nutriloaf or had any reason to suspect its ill effects until the plaintiff got sick. The nurses may have realized that the plaintiff would suffer seriously if he weren't given a different diet, and maybe they should have done something other than just treat his symptoms, but they are not defendants. We don't know the precise role that any of the four defendants—the sheriff, who runs the jail, the two inspectors, and the jail guard (whether he was the guard who sent the plaintiff to the infirmary or some other guard is another thing we don't know)—played in making the plaintiff sick. He filed a grievance with the jail, although after his last sojourn there, when he was back in state prison with its adequate diet. The grievance states that the defendant inspectors had authorized the nutriloaf for the prisoners in the part of the jail in which the plaintiff was housed and that they'd done this pursuant to policy established by the defendant sheriff.

Complaints filed by unrepresented prisoners are supposed to be construed liberally. E.g., *McNeil v. United States*, 508 U.S. 106, 113 (1993); *Haines v. Kerner*, 404 U.S. 519, 520 (1972) (per curiam); *Marshall v. Knight*, 445 F.3d 965, 969 (7th Cir. 2006); *Chavis v. Chappius*, 618 F.3d 162, 170-71 (2d Cir. 2010). There are intimations in the record that jail officials—who may have included one or more of the named defendants—were aware of the plaintiff's plight, and it is apparent that nothing was done to replace the nutriloaf diet that was sickening him, though he was able somehow to obtain bread. The

record contains statements that he had "tried to solve this problem by speaking with a [correctional officer]," that after a second incident of vomiting he "told officers again," that he was "taken to the clinical office to be seen by a nurse" (presumably guards took him there), that other inmates were vomiting their nutriloaf meals (which must have been observed by correctional officers), and that he had written the sheriff informing him about their vomiting. Adult vomiting other than because of illness or drunkenness is rare—healthy, sober adults do not vomit a meal just because it doesn't taste good—and if the plaintiff is being truthful there was a veritable epidemic of vomiting during his stay. "A risk can be so obvious that a jury may reasonably infer actual knowledge on the part of the defendants." *Hall v. Bennett*, 379 F.3d 462, 464 (7th Cir. 2004); see *Farmer v. Brennan*, 511 U.S. 825, 842-43 (1994). The defendants have submitted no contrary evidence, once the inadmissible affidavit from the assistant fire chief is ruled out. It is a possible though certainly not an inevitable inference from the record (and from the defendants' contumacy) that jail officials were aware that the nutriloaf being fed the prisoners when the plaintiff was there was sickening him yet decided to do nothing about it. That would be deliberate indifference to a serious health problem and thus state an Eighth Amendment claim.

The dismissal of the suit was premature. Since the plaintiff has departed from the county jail and the case involves medical issues, we suggest that the district court request a lawyer to assist him in litigating his

claim. The court should also consider imposing sanctions on the defendants.

The plaintiff's other claim is that the defendant jail guard offered him a sandwich (and not of nutriloaf, either) if he would spy on other prisoners, and that he had refused. Bribing prisoners in a nonfederal jail to inform on other prisoners does not violate any federal law of which we're aware. The failure to give the plaintiff the sandwich could not be thought cruel and unusual punishment for his refusing to take the bribe, for it made him no worse off than he would have been had no bribe been offered—stuck with a nutriloaf diet. The second claim adds nothing to the first, so we affirm its rejection.

The judgment is affirmed in part, reversed in part, and remanded. We order the defendants to show cause within 14 days of the date of this order why they should not be sanctioned for contumacious conduct in this court. If they ignore this order to show cause like the last one, they will find themselves in deep trouble.

Constitutional Law

For One Prisoner, Nutriloaf Diet May Violate Eighth Amendment, Posner Opinion Says

Posted Mar 28, 2012 6:25 AM CDT
By Debra Cassens Weiss

A federal appeals court has reinstated a lawsuit filed by a prisoner who claimed the nutriloaf he ate in the Milwaukee County Jail was cruel and unusual punishment.

The opinion (PDF) by Judge Richard Posner of the Chicago-based 7th U.S. Circuit Court of Appeals suggested appointment of counsel for the inmate, Terrance Prude, who vomited and suffered an anal fissure after eating nutriloaf at the jail during a stay to attend court proceedings. Jail officials gave Prude bread and water as a substitute, and his weight dropped from 168 to 154 after two stays at the facility. Other inmates at the jail also vomited after eating nutriloaf.

Withholding nutritious food or substituting sickening food, causing substantial weight loss, vomiting and maybe an anal fissure would violate the Eighth Amendment, Posner said. He cited Wikipedia for the proposition that such a fissure is "no fun at all."

The defendants, including Sheriff David Clarke Jr., did not disclose the nutriloaf recipe in response to discovery demands. "No evidence was presented concerning the recipe for or ingredients of the nutriloaf that was served at the county jail during the plaintiff's sojourns there," Posner wrote. " 'Nutriloaf' isn't a proprietary food like Hostess Twinkies but, like 'meatloaf' or 'beef stew,' a term for a composite food the recipe of which can vary from institution to institution, or even from day to day within an institution; nutriloaf could meet requirements for calories and protein one day yet be poisonous the next if, for example, made from leftovers that had spoiled."

Posner said the defendants ignored discovery demands and the trial judge's order that they comply. The defendants also failed to file an appellate brief and failed to respond to an order to show cause whey they didn't do so. "They seem to think that the federal courts have no jurisdiction over a county jail," Posner said. The appeals court issued an order to show cause why the defendants should not be sanctioned for contumacious conduct and warned they "will find themselves in deep trouble" if they fail to comply.

The case is *Prude v. Clarke*. Hat tip to How Appealing.

EXHIBIT
4

Torture

From Wikipedia, the free encyclopedia

Torture is the act of inflicting severe pain (whether physical or psychological) as a means of punishment, revenge, forcing information or a confession, or simply as an act of cruelty. Throughout history, torture has taken on a wide variety of forms, and has often been used as a method of political re-education, interrogation, punishment, and coercion. In addition to state-sponsored torture, individuals or groups may be motivated to inflict torture on others for similar reasons to those of a state; however, the motive for torture can also be for the sadistic gratification of the torturer.

A variety of torture instruments including, at right, the iron maiden of Nuremberg.

Torture is prohibited under international law and the domestic laws of most countries in the 21st century. It is considered to be a violation of human rights, and is declared to be unacceptable by Article 5 of the UN Universal Declaration of Human Rights. Signatories of the Third Geneva Convention and Fourth Geneva Convention officially agree not to torture prisoners in armed conflicts. Torture is also prohibited by the United Nations Convention Against Torture, which has been ratified by 147 countries.[1]

National and international legal prohibitions on torture derive from a consensus that torture and similar ill-treatment are immoral, as well as impractical.[2] Despite these international conventions, organizations that monitor abuses of human rights (e.g. Amnesty International, the International Rehabilitation Council for Torture Victims) report widespread use condoned by states in many regions of the world.[3] Amnesty International estimates that at least 81 world governments currently practice torture, some of them openly.[4]

Contents

EXHIBIT 5

Psychology of torture

From Wikipedia, the free encyclopedia

Torture, whether physical or psychological or both, depends on complicated interpersonal relationships between those who torture, those tortured, bystanders and others. Torture also involves deeply personal processes in those tortured, in those who torture and in others. These interacting psychological relationships, processes and dynamics form the basis for the psychology of torture.

Contents

The torture process to the torturer

Motivation to torture

Research over the past 50 years, starting with the Milgram experiment, suggests that under the right circumstances and with the appropriate encouragement and setting, most people can be encouraged to actively torture others.[1]

John Conroy:

> When torture takes place, people believe they are on the high moral ground, that the nation is under threat and they are the front line protecting the nation, and people will be grateful for what they are doing.[2]

Confidence in the efficacy of torture is based upon the behaviorist theory of human behavior.[3]

Stages of torture mentality include:

- Reluctant or peripheral participation
- Official encouragement: As the Stanford prison experiment and Milgram experiment show, many people will follow the direction of an authority figure (such as a superior officer) in an official setting (especially if presented as mandatory), even if they have personal uncertainty. The main motivations for this appear to be fear of loss of status or respect, and the desire to be seen as a "good citizen" or "good subordinate".
- Peer encouragement: to accept torture as necessary, acceptable or deserved, or to comply from a wish to not reject peer group beliefs.
- Dehumanization: seeing victims as objects of curiosity and experimentation, where pain becomes just another test to see how it affects the victim.
- Disinhibition: socio-cultural and situational pressures may cause torturers to undergo a lessening of inhibitions and as a result act in ways not normally countenanced by law, custom and conscience.

EXHIBIT 6

After this 1992 investigation, the Department of Defense discontinued the use of the manuals, directed their recovery to the extent practicable, and destroyed the copies in the field. U.S. Southern Command advised governments in Latin America that the manuals contained passages that did not represent U.S. government policy, and pursued recovery of the manuals from the governments and some individual students.[10] Notably, David Addington and Dick Cheney retained personal copies of the training manuals.[11]

Soon after The army created FM 34-52 Intelligence Interrogation manual. This was used by the U.S. Army until 2007.

EXHIBIT 7

CIA manuals

The first manual, "KUBARK Counterintelligence Interrogation," dated July 1963, is the source of much of the material in the second manual. KUBARK was a U.S. Central Intelligence Agency cryptonym for the CIA itself.[13] The cryptonym KUBARK appears in the title of a 1963 CIA document *KUBARK Counterintelligence Interrogation* which describes interrogation techniques, including, among other things, "coercive counterintelligence interrogation of resistant sources". This is the oldest manual, and promotes the use of abusive techniques, as exemplified by two references to the use of electric shock.[13]

Techniques discussed in School of the Americas training manuals, 1987-1991: [12][5][1]

- Motivation by fear
- Payment of bounties for enemy dead
- False imprisonment
- Use of truth serum
- Torture
- Execution
- Extortion
- Kidnapping and arresting a target's family members

The second manual, *"Human Resource Exploitation Training Manual - 1983,"* was used in at least seven U.S. training courses conducted in Latin American countries, including Honduras, between 1982 and 1987. According to a declassified 1989 report prepared for the Senate intelligence committee, the 1983 manual was developed from notes of a CIA interrogation course in Honduras.[4]

Both manuals deal exclusively with interrogation.[14][15] Both manuals have an entire chapter devoted to "coercive techniques." These manuals recommend arresting suspects early in the morning by surprise, blindfolding them, and stripping them naked. Suspects should be held incommunicado and should be deprived of any kind of normal routine in eating and sleeping. Interrogation rooms should be windowless, soundproof, dark and without toilets.

The manuals advise that torture techniques can backfire and that the threat of pain is often more effective than pain itself. The manuals describe coercive techniques to be used "to induce psychological regression in the subject by bringing a superior outside force to bear on his will to resist." These techniques include prolonged constraint, prolonged exertion, extremes of heat, cold, or moisture, deprivation of food or sleep, disrupting routines, solitary confinement, threats of pain, deprivation of sensory stimuli, hypnosis, and use of drugs or placebos.[5][16]

Between 1984 and 1985, after congressional committees began questioning training techniques being used by the CIA in Latin America, the 1983 manual went through substantial revision. In 1985 a page advising against using coercive techniques was inserted at the front of *Human Resource Exploitation Training Manual*. Handwritten changes were also introduced haphazardly into the text. For example, "While we do not stress the use of coercive techniques, we do want to make you aware of them and the proper way to use them," has been altered to, "While we deplore the use of coercive techniques, we do want to make you aware of them so that you may avoid them." (p. A-2) But the entire chapter on coercive techniques is still provided with some items

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