

**SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

**MONTGOMERY BLAIR SIBLEY**  
402 King Farm Blvd, Suite 125-145  
Rockville, Maryland, 20850  
202-643-7232,

Plaintiff,

vs.

**RICHARD W. ROBERTS AND ANGELA O.  
CAESAR**, both of whose addresses are:  
United States Courthouse  
333 Constitution Avenue, NW  
Washington, D.C. 20001  
202-354-3173

Defendants.

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Case No.:2016 CA 1272 B  
Honorable Michael L. Rankin  
Next Hearing: May 27, 2016. 10:30 a.m.  
Event: Scheduling & Settlement Hearing

**COMPLAINT FOR DAMAGES AND  
DECLARATORY JUDGMENT**

**JURY TRIAL REQUESTED**

Plaintiff, Montgomery Blair Sibley (“Sibley”), sues Defendants Richard W. Roberts and Angela O. Caesar and states:

**INTRODUCTION**

1. By this lawsuit, Sibley seeks:
  - (i) Damages against the Defendants Richard W. Roberts and Angela O. Caesar under the First and Fifth Amendments to the United States Constitution as authorized in *Bivens v. Six Unknown Names Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971) for the chilling of Sibley’s First and Fifth Amendment rights to access court, petition the government, publish and additionally, as to Defendant Roberts, denial of an impartial tribunal, and
  - (ii) A Declaratory Judgment that Sibley can release the telephone and other records obtained during his representation of Deborah Jeane Palfrey.

## JURISDICTION AND VENUE

2. Jurisdiction of this Court is invoked pursuant to the provisions of District of Columbia Statutes, §11-921.

3. Venue in this court is proper under as a substantial part of the events or omissions giving rise to the claims herein occurred in the District of Columbia.

## PARTIES

4. Plaintiff, Montgomery Blair Sibley, is a Citizen of the United States.

5. Defendant Richard W. Roberts is the Chief Judge of the United States District Court for the District of Columbia and is sued solely in his personal capacity.

6. Defendant Angela O. Caesar is the Clerk of Court for the United States District Court for the District of Columbia and is sued solely in her personal capacity.

## GENERAL ALLEGATIONS

7. On **October 3, 2006**, a Civil Forfeiture Complaint in *United States of America v. 803 Capitol Street et al* was filed in the United States District Court for the District of Columbia and assigned Case 1:06-cv-01710. This civil suit sought the forfeiture of all of Deborah Jeane Palfrey's assets.

8. On **October 19, 2006**, Sibley filed Notice of appearance as counsel of record for Deborah Jeane Palfrey in *U.S. v. 803 Capitol Street*.

9. On **March 1, 2007**, Deborah Jeane Palfrey was indicted in the United States District Court for the District of Columbia in *U.S. v. Palfrey*, and is assigned Case Number: 07-cr-046.

10. On **March 22, 2007**, Judge Gladys Kessler in *U.S. v. Palfrey* issues a Restraining

Order which specifically directs Sibley not to contact any government witnesses. A copy of the Order is attached as Exhibit "A".

11. On **May 10, 2007**, Judge Gladys Kessler in *U.S. v. Palfrey* issues another Restraining Order which states in pertinent part: "In order to insure that the Defendant and her counsel in her civil cases have clear notice of what action is prohibited, the Court is ordering both the Defendant and her agents and attorneys, including counsel in her civil cases, **Montgomery Blair Sibley**, to not release, further distribute, or otherwise provide to any person or organization the phone records of Pamela Martin & Associates and/or the phone records of Deborah Jeane Palfrey." A copy of the Order is attached as Exhibit "B".

12. On **September 10, 2007**, Sibley substitutes as counsel of record for Deborah Jeane Palfrey in *U.S. v. Palfrey*.

13. On **October 28, 2007**, Sibley files under seal his *Ex Parte* Application for Issuance of Subpoenas in *U.S. v. Palfrey* to a wide range of private and government entities.

14. On **November 13, 2007**, Judge Gladys Kessler grants Sibley's *Ex Parte* Application for Issuance of Subpoenas in *U.S. v. Palfrey*. Among the subpoenas requested by Sibley were five directed to telephone companies for the account information pertaining to eighty-three (83) escort agencies operating in the District of Columbia.

15. On **December 14, 2007**, one of the *ex parte* subpoenas authorized by Judge Gladys Kessler and served by the U.S. Marshall's Service to which Sibley had attached a list of 5,902 telephone numbers that had turned up in Deborah Jeane Palfrey's telephone records was answered by Verizon Wireless. That subpoena had sought the account holder information for each telephone number that appeared in Verizon Wireless' records on the day the call was made

to Deborah Jeane Palfrey's escort service – Pamela Martin & Associates. The *ex parte* subpoena return from Verizon Wireless contained a CD with 815 account holders names, addresses, social security numbers, and home and business telephone numbers. Each name represented a former escort or client who had a cell phone number that had called Pamela Martin & Associates when that cell phone number was owned by that person. Additionally, Verizon Wireless provided to Sibley the account information for some forty (40) escort agency telephone numbers listed in the 2007 Verizon Yellow Pages as operating in the Metro D.C. area.

16. On November 8, 2013, Sibley files a Judicial Conduct Complaint against Defendant Roberts for his involvement as an accessory-after-the-fact in the *U.S. v. Duke* cover-up of the felonious behavior of Magistrate-Judge Robinson. A copy of that Judicial Conduct complaint is attached hereto as Exhibit "C". In sum and substance, the Judicial Conduct Complaint alleged that with the knowledge and approval of Defendant Roberts, Article I Magistrate-Judge Robinson: (i) knowingly falsified the record of a court proceeding before her and (ii) impersonated an Article III Judge when she signed the Order of Dismissal of the indictment of the fugitive, domestic terrorist, United-States-Capitol-bombing Defendant, Elizabeth Duke.

17. In or about **January 2016**, Sibley comes to believe that information contained in the sealed-from-the-public Verizon Wireless record directly, and upon crowd-sourced analysis would, contain information relevant to the upcoming Presidential election. Given Sibley's First Amendment right and duty to publish matters of public concern singularly in his possession, Sibley determined to exercise his right to engage in a free discussion of the importance of the Verizon Wireless records upon public events and public measures, and thus discharge his right

and duty to bring the government and any person in authority to the bar of public opinion for just criticism upon their conduct in the exercise of the authority which the people have conferred and are preparing to confer upon them.

18. Accordingly, on **January 13, 2016**, Sibley deposited with Defendant Caesar in her capacity as Clerk of the U.S. District Court for the District of Columbia his “Motion to Modify Restraining Order to Permit the Release of Telephone Records Received Pursuant to Subpoenas but Never Made Public and Other Records” in *U.S. v Palfrey*.

19. On **February 4, 2016**, Defendant Roberts ordered Defendant Caesar to not file Sibley's Motion to Modify in *U.S. v Palfrey*. A copy of that Order is attached as Exhibit “D”.

20. On **February 7, 2016**, Sibley deposited with Defendant Caesar in her capacity as Clerk of the U.S. District Court for the District of Columbia his: (i) “Motion to Reconsider on an Expedited Basis the Motion to Modify Restraining Order to Permit the Release of Telephone Records Received Pursuant to Subpoenas but Never Made Public and Other Records” and (ii) “Motion to Disqualify Defendant Roberts” in *U.S. v Palfrey*.

21. On **February 16, 2016**, Defendant Roberts, without addressing the Motion to Disqualify, ordered Defendant Caesar to not file Sibley's Motion to Reconsider and Motion to Disqualify in *U.S. v Palfrey*. A copy of that Order is attached as Exhibit “E”.

**FIRST CLAIM  
DAMAGES FOR DENIAL OF ACCESS TO COURT, PETITION THE GOVERNMENT,  
PUBLISH AND A FAIR TRIBUNAL  
DEFENDANT ROBERTS**

22. Sibley re-alleges paragraphs 1 through 21 and incorporates them herein by reference.

23. A chill of First Amendment-protected conduct constitutes a Constitutional injury-in-fact sufficient to establish irreparable harm.

24. By directing Defendant Caesar to refuse to file Sibley's: (i) Motion to Modify and (ii) Motion to Reconsider, Defendant Roberts wrongfully chilled Sibley in his exercise of his First Amendment rights to access court, petition the government, and publish.

25. By directing Defendant Caesar to not file Sibley's Motion to Disqualify in *U.S. v Palfrey* while ruling on the Motion to Reconsider, Defendant Roberts has violated Sibley's Fifth Amendment right to an impartial tribunal.

26. As such, Defendant Roberts violated Constitutional rights which were clearly established at the time of Defendant Roberts conduct. Additionally, Defendant Roberts orders were entered in retaliation for Sibley exercising his protected speech to the Judicial Conduct Commission.

27. Sibley has thereby been damaged by the actions of Defendant Roberts.

WHEREFORE, under the authority of *Bivens v. Six Unknown Names Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), Sibley demands judgement against Defendant Roberts personally for One Million dollars (\$1,000,000), nominal damages, punitive damages, costs and such other and further relief as the Court deems equitable and just.

**SECOND CLAIM  
DAMAGES FOR DENIAL OF ACCESS TO COURT, PETITION THE GOVERNMENT  
AND PUBLISH  
DEFENDANT CAESAR**

28. Sibley re-alleges paragraphs 1 through 21 and incorporates them herein by reference.

29. A chill of First Amendment-protected conduct constitutes a Constitutional injury-in-fact sufficient to establish irreparable harm.

30. By refusing to file Sibley's Motion to Modify, Motion to Reconsider and Motion to Disqualify, Defendant Caesar wrongfully chilled Sibley in his exercise of his First Amendment rights to access court, petition the government, and publish.

31. Sibley has been damaged by such chilling by Defendant Caesar.

WHEREFORE, under the authority of *Bivens v. Six Unknown Names Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971) Sibley demands judgement against Defendant Caesar personally for One Million dollars (\$1,000,000), nominal damages, punitive damages, costs and such other and further relief as the Court deems equitable and just.

**THIRD CLAIM  
DECLARATORY RELIEF**

32. Plaintiff re-alleges paragraphs 1 through 21 and incorporates them herein by reference.

33. Sibley is presently restrained under federal court orders in *U.S. v. Palfrey* from distributing, or otherwise providing the phone records of Pamela Martin & Associates and/or the phone records of Deborah Jeane Palfrey. Both the explicit and implicit authority to issue such restraining orders confirms a right in Sibley to seek to modify and/or dissolve those orders.

34. Sibley has repeatedly sought such modification but has been denied the right to file such modification requests by the Defendants.

WHEREFORE, Plaintiff requests that this Court:

A. Assume jurisdiction of this action;

B. Declare that:

i. In so much as the Defendants have refused to Sibley the right to even petition for modification, Sibley is no longer restrained by the orders issued in *U.S. v. Palfrey* from distributing, or otherwise providing the phone records of Pamela Martin & Associates and/or the phone records of Deborah Jeane Palfrey and thus may release those records; and

ii. The subpoena returns from Verizon Wireless are not subject to the restraining orders issued in *U.S. v. Palfrey*;

C. Retain jurisdiction of this matter to enforce this declaratory degree if subsequently violated by Defendants; and

D. Enter such other and further relief as the Court deems just and proper.

**JURY TRIAL REQUESTED**

Sibley requests a jury be empaneled to determine all issues of fact and law raised herein.

**MONTGOMERY BLAIR SIBLEY**  
402 King Farm Blvd, Suite 125-145  
Rockville, Maryland, 20850  
202-643-7232  
montybsibley@gmail.com

By: \_\_\_\_\_  
Montgomery Blair Sibley



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

CRIMINAL NO. 07-046 (GK)

v.

DEBORAH JEANE PALFREY

aka "Jeane Palfrey,"

aka "Julia,"

aka "Pamela Martin,"

Defendant.

FILED

MAR 22 2007

NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT

POST-INDICTMENT RESTRAINING ORDER

The United States has made an *ex parte* application to this Court, pursuant to 18 U.S.C. 1963(d)(1) and 18 U.S.C. § 982(b)(1) (incorporating 21 U.S.C. § 853(e)(1)(A)), for a Post-Indictment Restraining Order to preserve the availability of certain property that is subject to forfeiture in the above-styled criminal action. Upon consideration of the Government's application and the Indictment of **DEBORAH JEANE PALFREY**, it appears to the Court that there is reasonable cause to enter a restraining order to preserve the subject property based upon the following:

1. That on March 1, 2007, a Federal Grand Jury of this district returned a multi-count Indictment charging defendant **DEBORAH JEANE PALFREY** with a number of felony offenses, including violations of 18 U.S.C. § 1962(c) (Racketeer Influenced and Corrupt Organizations (RICO)); 18 U.S.C. § 1952(a)(3) (Travel in Interstate Commerce in Aid of Racketeering Enterprises); and 18 U.S.C. § 1952(h) (Conspiracy to Commit Money Laundering). The Indictment also included two forfeiture allegations, pursuant to 18 U.S.C. §§ 982(a)(1) and 1963, and by which the United States seeks the criminal forfeiture of the following property:

Exhibit "A"

(N)

i. any interest **DEBORAH JEANE PALFREY** acquired or maintained in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

ii. any interest in, security of, claims against, and property and contractual rights which afforded a source of influence over the enterprise named and described in the Indictment and which the **DEBORAH JEANE PALFREY** established, operated, controlled, conducted, or participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2);

iii. and any property constituting and derived from proceeds **DEBORAH JEANE PALFREY** obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

2. That the interests of the defendant subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), and Title 18, United States Code, Section 982, include but are not limited to:

a money judgment of at least \$988,610 based on the money laundering charge and 18 U.S.C. § 982, and a money judgment of at least \$2,075,384 based on the RICO charge and 18 U.S.C. § 1963, and all interest and proceeds traceable thereto, including but not limited to the following assets:

a. \$276,645.97 in funds from Charles Schwab investment

accounts 6884-3181, 6884-3186, and 6884-3192, and approximately \$135,442.60 in stocks maintained in these accounts by Charles Schwab, a total amount of \$11,396.35 from Wells Fargo accounts 6952-139217 and 005-9211417 (hereafter collectively "the Accounts").

The funds and stocks are more fully described as:

- (1) Charles Schwab Account 6884-3181 (funds \$36,458.67);
- (2) Charles Schwab Account 6884-3186 (funds \$188,403.71; stock approximately \$125,432.60);
- (3) Charles Schwab Account 6884-3192 (funds \$51,783.59; stock approximately \$10,010.00);
- (4) Wells Fargo Account 6952-139217 (funds \$2,055.68); and
- (5) Wells Fargo Account 005-9211417 (funds \$9,340.67).

b. Coins seized from 803 Capitol Street, Vallejo, California, and are more fully described as:

- (1) 413 South African Gold Krugerrands;
- (2) 81 U.S. Liberty \$50 Gold Coins;
- (3) 320 U.S. Liberty \$1 Silver Coins; and
- (4) 61 Canadian \$50 Gold Coins.

c. at least \$182,529.59 of equity in the Real Property more fully described as:

803 Capitol Street, Vallejo, California 94590, more fully described as:

The North Seventy (70) Feet of Lot Nine (9) in block Three Hundred and Six (306), as the same is shown on the official map of the City of Vallejo, made by E.H. Rowe, C.S.,

and which map was filed for record in the Office of the County Recorder of Solano County, California, September 19, 1868, in Book 1 of Maps, Page 123; and,

d. Real property more fully described as:

1441 Vaquero Glen, Escondido, California 92026, more fully described as:

Lot 17 of Escondido Tract No. 350 in the City of Escondido, County of San Diego, State of California according to map thereof No. 9034, filed in the Office of the County Recorder of San Diego County on November 22, 1978.

3. That subsequent to the Grand Jury's return of the Indictment, **DEBORAH JEANE PALFREY** has publicly identified an additional asset of the enterprise named and described in the Indictment, which property, or proceeds traceable thereto, would be subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3), that is: business records, including all records reflecting clients or customers of the enterprise named and described in the Indictment.

4. That **DEBORAH JEANE PALFREY**, or her agents or attorneys, have publicly expressed an intent to sell, transfer or otherwise to dissipate certain assets that she possesses or controls and that are subject to forfeiture.

5. That the Federal Grand Jury's Indictment of **DEBORAH JEANE PALFREY**, which specifically identified property as being subject to forfeiture under applicable statutes establishes sufficient probable cause for the issuance of this restraining order.

6. That in the event **DEBORAH JEANE PALFREY** is convicted of the charges alleged in said Indictment, the subject property would be subject to forfeiture under 18 U.S.C. §§ 1963 and/or 982.

7. That the need to preserve the availability of the subject property through the entry of the order requested herein outweighs the hardship on any party against whom the order is to be entered.

8. That any third party claims to the subject property may be properly brought and resolved in ancillary proceedings conducted by this Court following the execution of a Preliminary Order of Forfeiture in accordance with the provisions of federal forfeiture law.

THEREFORE, IT IS HEREBY ORDERED AND DECREED:

That, effective immediately, **DEBORAH JEANE PALFREY**, her agents, servants, employees, attorneys, family members and those persons in active concert or participation with her, and those persons, financial institutions, or other entities who have any interest or control over the subject property are hereby

RESTRAINED, ENJOINED, AND PROHIBITED, without prior approval of this Court and upon notice to the United States and an opportunity for the United States to be heard, from attempting or completing any action that would affect the availability, marketability or value of said property, including but not limited to selling, transferring, assigning, pledging, distributing, encumbering, wasting, secreting, depreciating, damaging, or in any way diminishing the value of, all or any part of their interest, direct or indirect, in the following property:

1. BANK/INVESTMENT ACCOUNTS

Funds, interest and credits in banking, brokerage and investment accounts

held by or for the benefit of any the defendant, **DEBORAH JEANE PALFREY**, at financial institutions, including but not limited to the following:

- a. \$276,645.97 in funds from Charles Schwab investment accounts 6884-3181, 6884-3186, and 6884-3192, and approximately \$135,442.60 in stocks maintained in these accounts by Charles Schwab, a total amount of \$11,396.35 from Wells Fargo accounts 6952-139217 and 005-9211417 (hereafter collectively "the Accounts").

The funds and stocks are more fully described as:

- (1) Charles Schwab Account 6884-3181 (funds \$36,458.67);
- (2) Charles Schwab Account 6884-3186 (funds \$188,403.71; stock approximately \$125,432.60);
- (3) Charles Schwab Account 6884-3192 (funds \$51,783.59; stock approximately \$10,010.00);
- (4) Wells Fargo Account 6952-139217 (funds \$2,055.68); and
- (5) Wells Fargo Account 005-9211417 (funds \$9,340.67).

2. PERSONAL PROPERTY

- a. Coins seized from 803 Capitol Street,

Vallejo, California, and are more fully described as:

- (1) 413 South African Gold Krugerrands;
- (2) 81 U.S. Liberty \$50 Gold Coins;
- (3) 320 U.S. Liberty \$1 Silver Coins;
- (4) 61 Canadian \$50 Gold Coins; and

b. records the enterprise identified in the Indictment, including, but not limited to all records reflecting clients or customers of the enterprise named and described in the Indictment and all proceeds traceable to any sale, transfer or other disposition of such materials as may have occurred prior to service of this Order.

3. REAL PROPERTY

a. \$182,529.59 of equity in the Real Property more fully described as:

803 Capitol Street, Vallejo, California 94590, more fully described as:

The North Seventy (70) Feet of Lot Nine (9) in block Three Hundred and Six (306), as the same is shown on the official map of the City of Vallejo, made by E.H. Rowe, C.S., and which map was filed for record in the Office of the County Recorder of Solano County, California, September 19, 1868, in Book 1 of Maps, Page 123; and,

b. Real property more fully described as:

1441 Vaquero Glen, Escondido, California 92026, more fully described as:

Lot 17 of Escondido Tract No. 350 in the City of Escondido, County of San Diego, State of California according to map thereof No. 9034, filed in the Office of the County

Recorder of San Diego County on  
November 22, 1978.

IT IS FURTHER ORDERED that any financial institutions holding any accounts subject to this Order shall take no offsets against such accounts. They shall continue to credit any deposits, interest, dividends, or other credits to such accounts in the normal course of business, and such deposits, interest, dividends, and other credits shall be subject to this Order. In addition, upon receiving notice of this Order, each financial institution shall promptly inform the Government as to the account balances at the time of notice, and shall thereafter supplement such information by reporting to the Government any changes to the accounts, and by responding promptly to requests by the Government for information on the accounts' current status.

IT IS FURTHER ORDERED that the United States or any Subject of this Order may seek modifications of this Order if it is deemed necessary by them to preserve their interest in the subject property.


IT IS FURTHER ORDERED that any Subject of this Order shall be permitted to execute a satisfactory performance bond pursuant to 21 U.S.C. § 853(e)(1) as an alternative to the restraint of the subject property. After notice to the United States and an opportunity to be heard, the Court shall determine whether any proposed bond is a satisfactory performance bond.

IT IS FURTHER ORDERED that the United States shall cause a copy of this Restraining Order to be served promptly upon counsel for **DEBORAH JEANE PALFREY**, and all other appropriate individuals and/or financial institutions having an interest in the properties identified herein, and shall make a return thereon reflecting the date and time of service.



THIS RESTRAINING ORDER shall remain in full force and effect until further order of  
this Court.

DONE this the 20<sup>th</sup> day of March, 2007.

  
GLADYS KESSLER  
UNITED STATES DISTRICT JUDGE

**Chambers of Gladys Kessler  
United States District Judge  
United States District Court for the District of Columbia  
United States Courthouse, Room 6333  
333 Constitution Avenue, NW  
Washington, DC 20001-2802  
Office No: (202) 354-3440  
Fax No.: (202) 354-3442**

DATE: May 10, 2007

TO: Montgomery Blair Sibley  
(202) 478-0371

FROM: Chambers of Gladys Kessler

Total Number of Pages (including cover sheet): 4

**NOTE:** PLEASE CALL **Candice** IF YOU DID NOT RECEIVE ALL PAGES.

**REMARKS:**

Exhibit "B"

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>Criminal No. 07-46 (GK)</b>
	:	
<b>DEBORAH JEANE PALFREY,</b>	:	
	:	
<b>Defendant.</b>	:	

**ORDER**

On March 19, 2007, the Government filed an *Ex Parte* Application for a Temporary Restraining Order and a Protective Order, and Request for a Hearing. On March 22, 2007, the Court granted the original Application and issued an Order (“March 22, 2007 Order”) after determining that there were “reasonable grounds to believe that harassment of an identified witness exists or that such an order is necessary to prevent such harassment.” March 22, 2007 Order at 1. The Court ordered that Defendant “and her agents and attorneys shall not act, or cause any act to be done, to further the civil action . . . and shall not engage in any other similar acts or actions against Government witnesses, agents and investigators.” *Id.* On May 9, 2007, the Government filed an *ex parte* Supplement<sup>1</sup> to its Application (“Supplement”) in order to clarify and extend its original request.

On May 6, 2007, approximately six weeks after issuance of the original March 22, 2007

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<sup>1</sup> The Government also filed a Motion to Seal this Supplement. Because the Court is clarifying its March 22, 2007 Order in light of evolving developments, there is no need to seal either the Government’s Supplement or this Order. This Order will be before the Court at the May 21, 2007 Status Conference.

Temporary Restraining Order, Defendant's lawyer in her civil cases<sup>2</sup> sent a letter to Attorney General "Alberto Gonzalez [sic]" and emailed a copy to the Assistant United States Attorneys assigned to this case. In that letter, Defendant's civil counsel gave the Attorney General of the United States an ultimatum; he "insist[ed]" that the Attorney General undertake the immediate interview and appointment of a Special Counsel, and that he identify the "career Justice Department prosecutor" mentioned in a recent ABC News report as well as "what, if any, role that individual played in the investigation and prosecution of [Defendant]." Supplement Ex. A at 2. The letter-writer threatens that, if the Attorney General does not comply and notify Defendant's civil counsel of his response within five days after the date of the letter, by May 11, 2007, the prior "limited distribution" of the telephone records from Defendant's business to ABC News and the Washington Independent Writers Association "will change." *Id.* at 2-3. Specifically, the letter-writer states that "the reporting will be much more extensive as all of the years of the escort service telephone records will be released and . . . the 'standards and practices' committees of the recipient organizations, journalists and internet bloggers who will receive these records have decidedly different professional standards than that of ABC News." *Id.* at 2.

Although Defendant's lawyer in her civil cases does not spell out exactly what steps he and his client will take if the Attorney General of the United States does not respond to his ultimatum within the prescribed five-day time frame, the clear inference to be drawn is that there will be a wholesale release of all telephone records possessed by Ms. Palfrey.

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<sup>2</sup> Counsel for Defendant in her civil cases has conceded, presumably accurately, that he "cannot appear in the Criminal Case as he does not possess the requisite expertise to make a LcrR 44.5(b) certification." Petition for Writs of Mandamus, Proceadendum Ad Justicium, Certiorari and Prohibition at 10, *In Re Deborah Jeane Palfrey*, No. 07-5107 (D.C. Cir. Apr. 9, 2007).

Because of the ultimatum contained in the letter sent to the Attorney General, the Court agrees with the Government that Defendant's civil counsel is threatening action that would violate this Court's March 22, 2007 Order. In order to ensure that the Defendant and her counsel in her civil cases have clear notice of what action is prohibited, the Court is ordering both the Defendant and her agents and attorneys, including counsel in her civil cases, Montgomery Blair Sibley, to not release, further distribute, or otherwise provide to any person or organization the phone records of Pamela Martin & Associates and/or the phone records of Deborah Jeane Palfrey.

Because this matter was decided *ex parte*, it may be revisited at the Scheduling Conference scheduled for May 21, 2007, where Ms. Palfrey will be represented by recently appointed, highly experienced counsel who has actively prosecuted and defended numerous criminal cases.

**WHEREFORE**, it is this 10th day of May, 2007, hereby

**ORDERED**, that Defendant and her agents and attorneys, including her civil counsel, Montgomery Blair Sibley, shall not release, further distribute, or otherwise provide to any person or organization the phone records of Pamela Martin & Associates and/or the phone records of Deborah Jeane Palfrey.

  
Gladys Kessler  
United States District Judge

**Copies via ECF to all counsel of record**

and by fax to:

Montgomery Blair Sibley  
(202) 478-0371

**MONTGOMERY BLAIR SIBLEY**  
4000 MASSACHUSETTS AVENUE, N.W.  
APARTMENT 1518  
WASHINGTON, D.C. 20016-5136  
EMAIL: MBSIBLEY@GMAIL.COM  
202-478-0371

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November 8, 2013

Judicial Council of the D.C. Circuit  
Complaint of Judicial Misconduct  
333 Constitution Avenue, N.W.  
Washington, D.C. 20001-2866

Re: *Judicial Conduct Complaint against Magistrate Judge Robinson  
and Chief Judge Robertson*

Greetings,

Pursuant to the Judicial Conduct and Disability Act, 28 U.S.C. §§351-364 and the Rules for Judicial Conduct and Judicial Disability Proceedings, Rule 6(a) – which dispenses with the requirement that I use a particular form inasmuch as I am otherwise complying with the requirements of Rule 6(b) – I hereby state the following under penalty of perjury:

**1. Complainant's Name:** Montgomery Blair Sibley  
**Address:** 4000 Massachusetts Ave, NW, #1518, Washington, D.C.  
**Telephone:** 202-478-0371

**2. Judge or Magistrate Judge complained about:**

Magistrate Judge Deborah Robinson, and  
Chief Judge Richard W. Robertson

**Court:** U.S. District Court for the District of Columbia

**3. Does this complaint concern the behavior of the judge or magistrate judge in a particular lawsuit or lawsuits?** Yes

If "yes" give the following information about each lawsuit:

**Court:** U.S. District Court for the District of Columbia,  
**Case number:** *U.S. v. Elizabeth Duke*, 88-cr-145

Exhibit "C"

**Were you a party or lawyer in the lawsuit?** No.

**4. Have you filed any lawsuits against the judge or magistrate judge?** No. However, a Petition for Certiorari was taken to the United States Supreme Court. The Clerk of that Court refused to file the Petition and, after my Motion to Direct the Clerk to File the Petition was heard, the Supreme Court refused to so direct its Clerk. That Motion was assigned S.C. Docket #: 13M38.

**5. Brief Statement of Facts:**

**What Happened** – In *U.S. v. Duke*, Magistrate Judge Deborah A. Robinson: (i) falsified the record, (ii) exceeded her jurisdiction and (iii) impersonated an Article III judge in dismissing the Indictment of the fugitive, Capitol Bombing, domestic-terrorist, Elizabeth Duke..

Chief Judge Robertson, though repeatedly made aware of this misfeasance of Magistrate Judge Robinson, failed to take any action and sought to obfuscate and cover-up further inquiry into my allegations of the felonious behavior by Magistrate Judge Robinson. Additionally, Judge Robertson failed to discharge his obligation to report this matter to the Grand Jury.

**When and Where the relevant events happened:**

The time-line and location of the events at issue are as follows:

**November 7, 1983** – In the District of Columbia, a bomb was detonated inside the United States Capitol.

**May 24, 1985** – Defendant Elizabeth Duke (“Duke”) was arraigned in Philadelphia upon an Indictment charging her with involvement in the aforementioned bombing.

**July 24, 1985** – Duke was released on bail by U.S. District Court Judge Louis Heilprin Pollak. After failing to appear back in Court as ordered, on October 15, 1985, the government moved to revoke Duke’s bail and a bench warrant for her arrest as a fugitive was issued the same day.

**May 11, 1988** – Duke – along with her co-conspirators Laura Whitehorn, Linda Evans, Marilyn Buck, Susan Rosenberg, Timothy Blunk, and Alan Berkman – was indicted in the District of Columbia for acts of violence against the United States, including the aforementioned bombing of the United States Capitol on November 7, 1983 and several other government buildings in Washington, D.C. The case was assigned Docket No.: 88-cr-145.

**June 2, 1988** – Judge Harold H. Greene issued a bench warrant for Duke when she again

failed to appear making Duke a fugitive from justice.

**April 25, 2008** – Police arrest Philip Robinson Winkfield at his apartment in Dutch Village in Northeast Baltimore and seize five loaded guns, including two semiautomatic pistols, two shotguns and a semiautomatic assault rifle; a bullet resistant vest; 157 grams of heroin; 180 grams of crack; more than six pounds of marijuana and \$8,000 cash. Winkfield is the then 21-year-old son of U.S. Magistrate Judge Deborah Robinson.

**May 23, 2008** – Winkfield indicted in Baltimore City Circuit Court on Maryland State Drug offenses.

**November 2008** – Barack Hussein Obama is elected President of the United States. The U.S. Attorney's Office in Maryland takes over the Winkfield case from Maryland State prosecutors moving it from Maryland State Court to federal court.

**December 3, 2008** – Winkfield waives Indictment and pleads guilty to being an armed heroin dealer.

**April 10, 2009** – Winkfield – eligible for a 40 year sentence – is sentenced to five years in federal prison for possession with intent to distribute heroin. Assistant U.S. Attorney George Hazel recommends to U.S. District Court Chief Judge Motz that Winkfield, receive the mandatory minimum of 60 months in prison. Chief Judge Motz sentenced Winkfield to five years in prison with credit for time served and, upon a request made by the defense with the concurrence of the government, that Winkfield be sent to Cumberland FCI, a notorious “Club Fed”

**June 17, 2009** – Magistrate Judge Deborah A. Robinson holds a hearing in *U.S. v. Duke* at which the government makes an oral motion to dismiss the Indictment and quash the outstanding arrest warrant as to Duke which was granted by Magistrate Judge Deborah A. Robinson. Notably, the Transcript of that June 17, 2009, hearing reveals that the government failed to proffer any reason and failed to show good cause to justify the granting of the government's motion to dismiss the Indictment Duke. A copy of that Transcript is attached as Exhibit “A”. The same day, Magistrate Judge Robinson signed the Order dismissing the Indictment as a “United States District Court Judge”, a position Deborah A. Robinson does not hold. A copy of her Order is attached as Exhibit “B”. Notably, in that Order dismissing the Indictment against Elizabeth Duke she stated that the dismissal was: “for the reasons set forth in the government's motion and for good cause shown” – a clear misrepresentation of what actually transpired as the Transcript reveals.

**August 31, 2012** – Winkfield is released from federal prison after serving only 4.3 years of his five year sentence.



**May 13, 2013** – I file a motion to intervene in the *U.S. v. Duke* matter alerting both Magistrate Judge Robinson and Judge Robertson of the improprieties of the June 17, 2009, hearing and requesting the audio recording of that hearing. That request is denied by Magistrate Judge Robinson.

**June 20, 2013** – After finally obtaining a transcript of the June 17, 2009, hearing, I again move to intervene pointing out the now-proven misrepresentation-of-the-record by Magistrate Judge Robinson in her June 17, 2009, order. Magistrate Judge Robinson denies my motion and seals the motion from public view on the Docket in 88-cr-145.

**July 26, 2013** – I write Chief Judge Robinson – and copy all the other judges of the D.C. District Court – and alert him of the issues concerning Magistrate Judge Robinson and tell him in that letter that: “I am privy to compelling evidence regarding why the Obama administration would *soto voce* seek the dismissal of the indictment against the fugitive, terrorist, indicted United-States-Capitol-bombing Elizabeth Duke.” Additionally, pursuant to 28 USC § 631(i) I request that Magistrate Judge Robinson be removed from her office. There is no response to my letter.

**October 23, 2013** – I again write Chief Judge Robinson – and copy all the other judges of the D.C. District Court – and bring to his attention the Winkfield matter described above and how it relates to the dismissal of the Indictment against Duke. Accordingly, I demand that pursuant to 18 U.S.C. § 3332(a)<sup>1</sup> and Federal Rules Criminal Procedure, Rule 6(a)<sup>2</sup>, Judge Robertson discharge his statutory obligation to bring “to the attention of the grand jury” the evidence of criminal behavior presented in that letter.

**October 30, 2013** – Chief Judge Robertson responds to my letter of October 23, 2013, concluding – after ignoring the proof of Magistrate Judge Robinson’s misrepresentation of the record and impersonating an Article III judge – that: “I see no basis for taking any further action.”

Simply stated, it appears to me that Magistrate Judge Robinson – under threat that her son could be committed to Maryland State Prison where the threat of violence is much higher than in

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<sup>1</sup> 18 U.S.C. §3332(a) which states in pertinent part: “It shall be the duty of each such grand jury impaneled within any judicial district to inquire into offenses against the criminal laws of the United States alleged to have been committed within that district. **Such alleged offenses may be brought to the attention of the grand jury by the court** or by any attorney appearing on behalf of the United States for the presentation of evidence.” (Emphasis added).

<sup>2</sup> Federal Rules Criminal Procedure, Rule 6(a) which states: “When the **public interest** so requires, the court **must** order that one or more grand juries be summoned.” (Emphasis added).

Judicial Council of the D.C. Circuit  
November 8, 2013  
Page 5

the federal system and knowing her son was facing 40 years in prison – caved to the Obama Administration’s peculiar demand to dismiss an Indictment against the fugitive, domestic terrorist, Capitol-bombing Elizabeth Duke made without explanation by granting that motion and then signing the order impersonating an Article III judge. In return, her son received the velvet glove treatment from the federal government.

And yet there is more. I repeatedly requested of Chief Judge Robertson that he allow me to present to him and/or a Grand Jury evidence relating to the improper motivation of the Obama Administration to seek dismissal of the Indictment against Elizabeth Duke. This Judge Robertson has failed to do in violation of his duties under the common law, 18 U.S.C. § 3332(a) and Federal Rules Criminal Procedure, Rule 6(a) not to mention his Oath of Office.

Accordingly, I believe for the reasons aforesaid that both Magistrate Judge Robinson and Chief Judge Robertson have engaged in behavior which is prejudicial to the effective and expeditious administration of the business of the courts.

**Any information that would help an investigator check the facts**

I have in my possession copies of the pleadings, letters, and orders to confirm the allegations made herein and would be pleased to meet with an investigator to provide copies of the same.

**Declaration and Signature:**

I declare under penalty of perjury that the statements made in this complaint are true and correct to the best of my knowledge.

Dated: November 8, 2013

Signature: \_\_\_\_\_  
Montgomery Blair Sibley

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	.	
	.	
Plaintiff,	.	CR No. 88-0145
	.	
v.	.	
	.	
ELIZABETH DUKE,	.	Washington, D.C.
	.	Tuesday, June 17, 2009
Defendant.	.	
.....	.	

TRANSCRIPT OF STATUS CONFERENCE  
BEFORE THE HONORABLE DEBORAH A. ROBINSON  
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

For the Government:	M. JEFFREY BEATRICE, ESQ. U.S. Attorney's Office 555 Fourth Street, NW Room 4104 Washington, DC 20530 (202) 353-8831
---------------------	---

Transcribed By:	BRYAN A. WAYNE, RPR, CRR Official Court Reporter U.S. Courthouse, Room 4704-A 333 Constitution Avenue, NW Washington, DC 20001 (202) 354-3186
-----------------	--

Proceedings electronically recorded and transcribed.

## P R O C E E D I N G S

1  
2 THE DEPUTY CLERK: Criminal case No. 88-145,  
3 Elizabeth Duke. For the government, Mr. Beatrice.

4 THE COURT: Mr. Beatrice.

5 MR. BEATRICE: Thank you, Your Honor. We would orally  
6 move to dismiss this case at this time, dismiss the indictment  
7 and also to quash the warrant, and we will submit a proposed  
8 order today, Your Honor.

9 THE COURT: Very well. Thank you, Mr. Beatrice.

10 (Proceedings adjourned.)  
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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Criminal No. 88-00145 (DAR)

v.

ELIZABETH DUKE,

Defendant.

:  
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:  
:  
:  
:  
:

**FILED**

JUN 17 2009

NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT

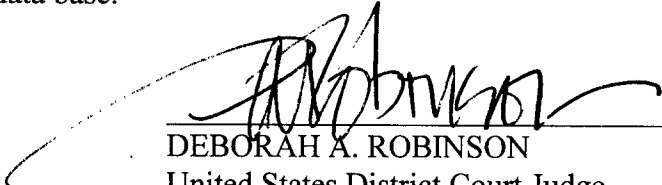
ORDER

Upon consideration of the government's oral Motion to Dismiss Indictment and Quash Arrest Warrant and the record herein, for the reasons set forth in the government's motion and for good cause shown, it is this 17<sup>th</sup> day of June 2009,

ORDERED that the above case is dismissed without prejudice, and it is

FURTHER ORDERED that the arrest warrant issued for the defendant in this case is hereby quashed, and it is

FURTHER ORDERED that the United States Marshals Service cancel and/or withdraw the warrant from the NCIC data base.

  
DEBORAH A. ROBINSON  
United States District Court Judge

**U.S. District Court  
District of Columbia (Washington, DC)  
CRIMINAL DOCKET FOR CASE #: 1:07-cr-00046-RWR-1**

Case title: USA v. PALFREY

Date Filed: 03/01/2007

Magistrate judge case number: 1:06-mj-00441-DAR

---

Assigned to: Chief Judge Richard W.  
Roberts

**Defendant (1)**

**DEBORAH PALFREY**

*also known as*

**JEANE PALFREY**

*also known as*

**JULIA**

*also known as*

**PAMELA MARTIN**

represented by **A.J. Kramer**

FEDERAL PUBLIC DEFENDER FOR  
THE DISTRICT OF COLUMBIA

625 Indiana Avenue, NW

Suite 550

Washington, DC 20004

(202) 208-7500

Fax: (202) 501-3829

Email: a.\_j.\_kramer@fd.org

*TERMINATED: 05/21/2007*

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

*Designation: Public Defender or*

*Community Defender Appointment*

**Montgomery Blair Sibley**

MONTGOMERY BLAIR SIBLEY

4000 Massachusetts Avenue, NW

Suite 1518

Washington, DC 20016

(202) 248-3973

Fax: (202) 478-0371

*TERMINATED: 01/16/2008*

*LEAD ATTORNEY*

*ATTORNEY TO BE NOTICED*

*Designation: Retained*

**Preston Burton**

POE & BURTON PLLC

The Executive Building  
1030 Fifteenth Street, NW  
Suite 580 West  
Washington, DC 20005  
(202) 583-2500  
Fax: (202) 583-0565  
Email: pburton@poeburton.com  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*  
*Designation: CJA Appointment*

**Pending Counts**

None

**Highest Offense Level (Opening)**

None

**Terminated Counts**

18:1962(c) - RACKETEERING -  
PROSTITUTION; Racketeering Influenced  
and Corrupt Organization.

(1)

18:1952(a)(3) and 2 - RACKETEERING -  
TRANSPORTING IN AID OF; Travel in  
Interstate Commerce in Aid of Racketeering  
Enterprises and Aiding and Abetting.

(2-4)

18:1956(h) - LAUNDERING OF  
MONETARY INSTRUMENTS;  
Conspiracy to Launder Monetary  
Instruments.

(5)

**Highest Offense Level (Terminated)**

Felony

**Complaints**

None

**Disposition**

**Disposition**

VERDICT VACATED Pursuant to Order  
filed 5/20/08 - Jury Verdict of Guilty  
Rendered.

VERDICT VACATED Pursuant to Order  
filed 5/20/08 - Jury Verdict of Guilty  
Rendered.

VERDICT VACATED Pursuant to Order  
filed 5/20/08 - Jury Verdict of Guilty  
Rendered.

**Disposition**

**Plaintiff**

USA

represented by **Catherine K. Connelly**  
U.S. ATTORNEY'S OFFICE FOR THE  
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555 Fourth Street, NW  
Washington, DC 20530  
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Email: catherine.connelly2@usdoj.gov  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Daniel Pearce Butler**  
U.S. DEPARTMENT OF JUSTICE  
Fraud Section, Criminal Division  
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Room 11114  
Washington, DC 20530  
(202) 307-2184  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

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Email: wcowden@cowdenllc.com  
*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
02/16/2016	328	"LEAVE TO FILE DENIED per Prior Order" - Cover Letter and Two Attached Motions submitted by Montgomery Blair Sibley as to DEBORAH PALFREY. Signed by Chief Judge Richard W. Roberts on 02/11/16. (Attachments: # 1 Motion to Reconsider on an Expedited Basis the Motion to Modify Restraining Order to Permit the Release of Telephone Records Received Pursuant to Subpoenas But Never Made Public and Other Records, # 2 Motion and Affidavit to Disqualify Chief Judge Richard W. Roberts) This document is unavailable as the Court denied its filing. (mlp) (Entered: 02/16/2016)



02/04/2016	<a href="#">326</a>	LEAVE TO FILE DENIED-Motion to Modify Restraining Order to Permit the Release of Telephone Records Received Pursuant to Subpoenas But Never Made Public and Other Records, by Montgomery Blair Sibley, as to DEBORAH PALFREY Pursuant to Order on 2/4/2016 Signed by Chief Judge Richard W. Roberts on 2/3/2016. This document is unavailable as the Court denied its filing. (hsj) Modified on 2/4/2016 (mlp) (Entered: 02/04/2016)
02/04/2016	<a href="#">325</a>	ORDER as to DEBORAH PALFREY Denying the Motion to Modify Restraining Order to Permit the Release of Telephone Records. The Clerk's Office Shall Return the Motion to Montgomery Blair Sibley Along With A Copy of This Order. Signed by Chief Judge Richard W. Roberts on 2/3/2014. (hsj) Modified on 2/4/2016 (mlp) (Entered: 02/04/2016)
01/26/2016		ENTERED IN ERROR....PROBATION MINUTE ORDER: Concurring with the recommendation of the Probation Office as to DEBORAH PALFREY to transfer jurisdiction of the criminal case to the District of New Jersey. Signed by Chief Judge Richard W. Roberts on 1/26/15. (lcrwr1) Modified on 1/26/2016 (lcrwr1). (Docketed in the wrong case. Modified on 1/27/2016. zmlp) (Entered: 01/26/2016)
01/13/2016		Case as to DEBORAH PALFREY directly reassigned to Chief Judge Richard W. Roberts. Judge James Robertson is retired and no longer assigned to the case. (ztnr) (Entered: 01/13/2016)
02/04/2009	<a href="#">324</a>	<p>TRANSCRIPT OF PROCEEDINGS in case as to DEBORAH PALFREY before Judge James Robertson of proceedings held on 04/07/08; Page Numbers: 1-46. Date of Issuance:2/4/09. Court Reporter/Transcriber Catalina Kerr, Telephone number 202.354.3258, Court Reporter Email Address : catykerr@msn.com.</p> <p>For the first 90 days after this filing date, the transcript may be viewed at the courthouse at a public terminal or purchased from the court reporter referenced above. After 90 days, the transcript may be accessed via PACER. Other transcript formats, (multi-page, condensed, CD or ASCII) may be purchased from the court reporter.</p> <p><b>NOTICE RE REDACTION OF TRANSCRIPTS:</b> The parties have twenty-one days to file with the court and the court reporter any request to redact personal identifiers from this transcript. If no such requests are filed, the transcript will be made available to the public via PACER without redaction after 90 days. The policy, which includes the five personal identifiers specifically covered, is located on our website at <a href="http://ww.dcd.uscourts.gov">ww.dcd.uscourts.gov</a>.</p> <p>Redaction Request due 2/25/2009. Redacted Transcript Deadline set for 3/9/2009. Release of Transcript Restriction set for 5/5/2009.(Kerr, Catalina) (Entered: 02/04/2009)</p>
07/31/2008	<a href="#">323</a>	TRANSCRIPT OF PROCEEDINGS in case as to DEBORAH PALFREY before Judge James Robertson of proceedings held on March 19, 2008; Page Numbers: 1 - 33. Date of Issuance:July 31, 2008. Court Reporter/Transcriber Rebecca Stonestreet, Telephone number 202-354-3249, Court Reporter Email Address :

Leave to file DENIED

per prior Order

Authenticity

Ch. U.S.D.S.

2-11-16

**MONTGOMERY BLAIR SIBLEY**

February 8, 2016

Via USPS Delivery Confirmation  
Clerk's Office  
United States Courthouse  
333 Constitution Avenue, NW  
Washington, D.C. 20001  
202-354-3173

Re: *U.S. v. Palfrey*  
Case No.: 07-046-JR

Greetings:

Please find enclosed an original and a copy for Chambers of: (i) Motion to Reconsider on and Expedited Basis the Motion to Modify Restraining Order to Permit the Release of Telephone Records Received Pursuant to Subpoenas but Never Made Public and Other Records and (ii) Motion and Affidavit to Disqualify Chief Judge Richard W. Roberts.

Respectfully, I trust you will not "conceal" these motions as was my "Motion to Modify Restraining Order to Permit the Release of Telephone Records Received Pursuant to Subpoenas but Never Made Public and Other Records" which was received on January 11, 2016, but not recorded on the docket in the above matter.

Indeed, I maintain that to Fail to promptly file my enclosed motions violates your oath and legal obligations. As you know, your oath pursuant to 28 USC §951 obligates you "truly and faithfully enter and record all orders, decrees, judgments and proceedings of such court. . ." To fail to fully "record" the proceedings in the above matter which includes my motions, I submit violates that Oath and opens the Clerk to civil liability which you can be sure I will expeditiously pursue.

More importantly, Fed Rules Crim Proc R 49(d) "Filing" states in pertinent part: "A paper must be filed in a manner provided for in a civil action." Fed Rules Civ Proc R 79(a)(2) states in pertinent part: "Items to be Entered. The following items must be marked with the file number and entered chronologically in the docket: (A) papers filed with the

MontyBSibley@gmail.com  
202-643-7232

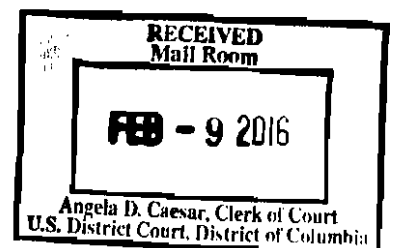
402 King Farm Blvd, Suite 125/145  
Rockville, Maryland 20850

**RECEIVED**

FEB 16 2016

Clark, U.S. District & Bankruptcy  
Courts for the District of Columbia

Exhibit "E"



Clerk's Office – United States District Court  
February 8, 2016  
Page 2

clerk; . . .".

Hence, absent Court order, there is no authority to delay filing my Motions. Pointedly, it is a felony under 18 USC § 2071(b) to: "willfully and unlawfully conceal [or] obliterate" any "paper, document, or other thing, filed or deposited with any clerk or officer of any court of the United States". For you to "conceal" my motions is, my estimation; a felony.

Accordingly, I look forward to promptly seeing the enclosed motions docketed on PACER upon receipt by your office.

yours,

A handwritten signature in black ink, appearing to be 'MBS', with a long horizontal stroke extending to the right.