

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

TRE MCPHERSON, PATTI KATE
WILLIAMS-VOID, JOHN DOE, JOHN
ROE, and THOMAS CAVES, on behalf
of themselves and all others
similarly situated,
Plaintiffs

v.

NED LAMONT and ROLLIN COOK, in
their official capacities
Defendants

Civil No. 3:20 cv 534 (JBA)

SCANNED at
and Emailed

7/2/2020 by WJ 14 pages
date initials No.

OBJECTION TO CLASS OF SETTLEMENT AGREEMENT

Pursuant to Fed. R. Civ. P. Rule 23(d) the Courts are permitted to allow class members (all others similarly situated) to intervene and present claims or defenses or otherwise come into the action. This similarly situated plaintiff (Daron Miller) is using this objection to do so.

This Plaintiff never received a notice I was enjoined to a class action lawsuit. Courts generally require some form of notice in Rule 23(b)(2) class actions about prison conditions, such as distribution to all class members or to all incoming inmates, or posting the notice in housing areas, law libraries and other areas of the prison (Dean v. Coughlin, 107 F.R.D. 331, 335 (S.D.N.Y. 1985)) requiring individual notice to all class members and posting in prison's common

areas); *Arrango v. Ward* 103 F.R.D. 638, 640-41 (S.D.N.Y. 1984) (requiring posting of notice in common areas of maximum security unit). A class notice should provide that you can obtain a copy of the complaint from class counsel (*Allen v. Isaac*, 100 F.R.D. 373, 375 (D.C. Ill. 1983)). This was never done. (See attached Complaint 3:20 cv 872 (MPS)) I have a particularly different situation than the other Plaintiff's in this complaint (3:20 cv 534 (JBA)). To add me as a plaintiff would be to bar me and completely disregard my situation which needs urgent relief. The ACLU is already aware of the non-mentioned 1st, 8th, and 14th amendment violations done by Doc in my attached complaint. I don't understand how these issues aren't addressed in this settlement agreement (about 100 inmates from different places were effected by their actions). So I'm taking this opportunity to bring these issues to light before that I'm in a way being forced to be plaintiff without being aware of this case existence until this settlement agreement because I would of asked that I be excluded as a plaintiff if my claims are not addressed. I benefit in no way in this complaint so I shouldn't be part of it. So I ask this court to address my claims in this complaint or exclude me and I will pursue this in my attached Complaint (3:20 cv 872) (MPS).

Daron Miller

Daron Miller

Northern CT

P.O Box 665

Somers, CT 06071

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was
e-mailed to all parties listed in complaint on 7/2/20

Daron Miller
[Signature]

UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

Northern
Correctional Institution Davon Miller

June 21, 2020

v.

Case No.

individual
capacity
individual
capacity
individual &
official capacity

Governor Ned Lamont
Doc
Commissioner Rollin Cook

SCANNED at
and Emailed

6/23/2020 by W 55 pages
date initials No.

individual capacity

Deputy Commissioner Angel Quirós

individual capacity

Warden Caron (Carl Robinson CI)

individual capacity

Deputy Warden Kenny Thomas (Carl Robinson CI)

individual capacity

Warden Bowles (Northern CI)

individual capacity

Deputy Warden Bayman (Northern CI)

individual &
official capacity

District Administrator William Mullison (MacDougall CI)

individual &
official capacity

Records Specialist BS Zipp (Northern CI)

individual &
official capacity

Offender Population Management David Maiga (MacDougall CI)

individual &
official capacity

Counselor Supervisor Long (Northern CI)

individual &
official capacity

Counselor Saunders (Northern CI)

individual capacity

Counselor Blue (Northern CI)

individual &
official capacity

Lieutenant Carlini (Northern CI)

individual capacity

Lieutenant Ouellette (Carl Robinson CI)

individual capacity

Lieutenant Jones (Northern CI)

individual capacity

Disciplinary Investigator Leone (Northern CI)

individual capacity

Disciplinary Investigator Clebster (Northern CI)

individual capacity

Disciplinary Investigator Clark (Carl Robinson CI)

individual capacity

Correctional Officer Canales (Carl Robinson CI)

individual &
official capacity

Administrative Remedies Coordinator Saunders (Northern CI)

official capacity

Department of Correction

UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

Northern
Correctional Institution

Davon Miller

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Counselor Saunders (Northern CI)

individual &
official capacity

Counselor Blue (Northern CI)

individual &
official capacity

Lieutenant Carmalide (~~Carl Robinson~~ Northern CI)

individual &
official capacity

Lieutenant Ouellette (Carl Robinson CI)

individual capacity

Lieutenant Jones (Northern CI)

individual capacity

Disciplinary Investigator Leone (Northern CI)

individual capacity

Disciplinary Investigator Clebater (Northern CI)

individual capacity

Disciplinary Investigator Clark (Carl Robinson CI)

individual capacity

Correctional Officer Canales (Carl Robinson CI)

individual capacity

Administrative Remedies Coordinator Saunders (Northern CI)

individual &
official capacity

Department of Correction

official capacity

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JURY TRIAL DEMANDED

- This is a civil right action filed by Davon Miller, a state prisoner for damages and injunctive relief under 42 U.S.C. § 1983, alleging violation of due process of law, first amendment violation, The plaintiff also alleges the torts of negligence, negligent supervision, and intentional infliction of mental and emotional distress.

JURISDICTION

1. The Court jurisdiction is invoked pursuant to 28 U.S.C. § 1331 in that this is a civil action arising under the Constitution of the United States
2. The Court jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) in that this action seeks to redress the deprivation, under color of state law, of rights secured by Acts of congress providing for equal rights of persons within the jurisdiction of the United States
3. The Court jurisdiction is invoked pursuant to 28 U.S.C. § 1367

~~EXHAUSTION OF ADMINISTRATIVE REMEDIES~~

EXHAUSTION OF ADMINISTRATIVE REMEDIES

4. Plaintiff filed an administrative appeal on 5/12/20 see attached receipt concerning denial of due process at the disciplinary hearing. District Administrator William Mulligan failed to answer in a timely manner and is barring me from seeking the relief I'm entitled to. "Once the deadline for a final decision of your last appeal has passed you can file suit. *Whittington v. Ortiz*, 472 F.3d 804, 807-08; *Poke v. Ennis* 177 F.3d 343, 344 (A prisoner's administrative remedies

are deemed exhausted when a valid grievance has been filed and the states time for responding thereto has expired") *William v. Cornell Corrections of Georgia*, 2007 WL 2317633. A number of decisions have said that if you don't get a response to your initial grievance you have exhausted *Brensette v. Horton* 423 F.3d 674, 682 holding prisoner who received no decision had exhausted where the grievance policy did not say what to do absent a decision. *Duke v. Hardin County*, 2008 WL 918136, *2 (W.D.N.Y., Mar. 31, 2008) *Maraglia v. Maloney*, 499 F. Supp. 2d 93, 97 (D. Mass. 2007) (holding that prisoner was not required to file a grievance about the failure to respond to a grievance absent a regulation to that effect). The State Courts are closed due to the Covid-19 pandemic so there are no available remedies at law. In the Second Circuit if remedies are unavailable the plaintiff need not exhaust *Abney v. McGinnis* *Supra* however even if remedies are available that court holds that there can be special circumstances that excuse exhaustion *Hemphill v. New York*, 380 F.3d 680 690-91 (2d Cir 2004); see *Brownell v. Krom* 446 F.3d 705, 312-13 2d Cir 2006. If relief requested is granted Plaintiff will immediately be released this is clearly a special circumstance where the proceedings can't be delayed any further by pursuing a state habeas corpus or federal. *Holman v. Hilton*, 712 F.2d 854, 858-59 (3d Cir 1983) (a remedy that could not be pursued until after release was inadequate).

Facts

1. Due Process Violation

I was Kidnapped by Carl Robinson CI upon the authority of Warden Canon, David Malga, and Angel Quiros on 4/3/20 and transported to Northern CI a level 5 facility while still a level

2 inmate during a Covid-19 pandemic without a disciplinary ticket. I was never placed in segregation at Carl Robinson CI.

2. I did not assault, threaten, try to escape DOC, or have multiple consecutive tickets and these are actions that could have a level 2 inmate transported to a level 5 facility.

3. This transfer was done in violation of my due process rights and Administrative Directive 9. Restrictive Housing Status, A. Placement Order. In order to protect the inmate or others, the Unit Administrator or designee may order an inmate's placement on restrictive housing status, Administrative Detention or Transfer Detention by completing CN 9401, Restrictive Housing Unit Status Order, stating the specific reasons for placement. Copies shall be distributed as designated on CN 9401, Restrictive Housing Unit Status Order. Lieutenant Duelette Custody Supervisor/Unit manager failed to follow protocol. I was transferred without being placed on Administrative Detention. Also Lieutenant Duelette failed to follow 9. Restrictive Housing Status D. Inmate Notification. The inmate should normally receive a copy of CN 9401, Restrictive Housing Unit Status Order at the time of placement in the Restrictive Housing Unit. This was never done.

4. I was placed on Administrative Detention upon my arrival at Northern CI by LT Jones who is not a correctional officer at Carl Robinson CI and he completed a CN 9401 which he was not supposed to do and is against protocol which is a due process violation and not in accordance with Administrative directive ~~9.4~~ 9.4, 3.B Administrative Detention and Administrative 9.4, 9 Restrictive Housing Status. Lieutenant Jones doesn't have the authority or discretion to override any directive. CN 9401

Was received well past 24 hours.

5. On 4/4/20 I was delivered a CN 9401 signed by Lieutenant Jones and a disciplinary ticket signed and dated by Lieutenant Ouelette and Correctional Officer Canales. According to the disciplinary report description of violation it states on 4/4/20 at the conclusion of a facility investigation it was discovered that on April 2, 2020 inmate Miller-Devon severely interfered with the facilities normal operations by (grandstanding) Class "A" offense Impeding order which according to 9.5 class "A" offenses 12. P means Impeding the order or security of the unit by intentionally or recklessly causing a grave risk of alarm, unauthorized assembly or engaging in disorderly conduct which severely interferes with the unit's normal operations. The term "grandstanding" is not defined or mention in Administrative directive 9.5. This clearly is a false charge and a frivolous report created by Correctional officer Canales according to 9.5 code of penal discipline 15. Staff responsibilities, a. Custody Supervisor / unit manager. A custody Supervisor or unit manager shall be responsible to: (i) Manage disciplinary functions during the shift. (ii) Review the disciplinary report to ensure that it is complete and that on its face the evidence supports the charges. Lieutenant Ouelette failed to perform his duties. Clear due process violation.
6. I was placed on administrative detention on 4/3/20, the disciplinary report was written on 4/4/20 but the alleged conduct was on 4/2/20. For me to be detained on 4/3/20 means the allege misconduct was recognized on 4/2/20 and allowed the allege conduct (severely

interfere with facility normal operations) to happen. The disciplinary ticket was written on 4/4/20 and the offense date on the ticket is 4/4/20, when it happened on 4/2/20 which is not in accordance with Administrative Directive 9.5, 18 Initiation of Disciplinary Report A CN 9503, Disciplinary Report shall be prepared by the reporting employee upon detection of an act which gives cause for formal disciplinary action, or Administrative Directive 9.5, 21 Notice of Disciplinary Proceedings. A complete and legible photocopy of the disciplinary report shall be delivered to the inmate within 24 hours of the discovery of the inmate's alleged misconduct except in the following circumstances, A. violation of program provisions, B. Escape. And doesn't warrant a disciplinary report written after 24 hours when you are already aware of the alleged misconduct.

7. Disciplinary Investigator Leone and clerboter was elected to investigate the alleged misconduct. According to Administrative Directive 9.5, C Disciplinary Investigator ii. An investigator shall conduct an investigation into the allegation of misconduct of each disciplinary report that goes to hearing and shall have authority to dispose of a disciplinary report prior to hearing pursuant to section 16 of this Directive. Having full authority to dispose of this fraudulent ticket after many request to do so (verbal and written) by plaintiff for lack of evidence and due process violations. He refused to do so after a full investigation that revealed the only evidence was a hearsay statement and a phone call not documented or retained as a synopsis for review or defense. According to CN 9505/2 (Disciplinary Investigation Report) (see attached) No video evidence was reviewed or provided in synopsis form for evidence or rebuttal and according

to Administrative Directive 9.5 C, in If the accused inmate, or witness/witnesses, requests video evidence pertaining to the alleged offense or disciplinary process, the Disciplinary Investigator shall collect, review and retain such video in accordance with Administrative Directive 6.9, Collection and Retention of contraband and physical evidence. Administrative Directive 6.9, 11. A Facility Investigations. Each facility shall be responsible for the retention and copying of video and photographic evidence related to facility-level investigations. This directive wasn't followed another due process violation. Disciplinary Investigator Leone purposely suppressed evidence to deprive plaintiff of a fair hearing he was clearly bias and not impartial and had one intention violate due process and obtain a conviction. According to Administrative Directive 9.5, 31 E. Evidence states evidence may be physical evidence, a written statement on a document, or oral testimony. A copy or listing of any physical evidence shall be given or made available to the inmate or the inmate's advocate by the Investigator at least 24 hours prior to the hearing. Physical evidence shall be presented at the hearing as determined by the Investigator whenever practicable. Otherwise, a sample, photograph, laboratory test, or a written description of the evidence shall be presented. This wasn't followed. Also on multiple occasions Leone asked me to pled he going to make sure I'm convicted.

8. According to Administrative Directive 9.5, 27. Witnesses. An accused inmate shall have an opportunity to present witness testimony at a disciplinary hearing. Witness testimony shall be truthful, relevant, freely given and not redundant. A. Identification the Investigator shall ascertain whether the inmate wants to identify

witnesses. If so, the Investigator shall record the names on CN 9505, Disciplinary Investigation Report. B. Testimony. The Investigator shall interview prospective witnesses, list the witnesses and the nature of the testimony on form CN 9505, Disciplinary Investigation Report. Disciplinary Investigator Leone delegated this task to Correctional officer Clark (another disciplinary Investigator of Carl Robinson) who purposely misled the plaintiff's witness and told them I have a ticket for making some type of organization against DOC in which I don't have a ticket for. (See attached) violating my due process.

9. Disciplinary hearing officer Grimaldi after being made aware of the discrepancies and due process violations still convicted me of the offense Impeding order with no evidence but a hearsay statement. According to Administrative Directive 9.5, 28 Hearing Officer A hearing officer shall preside over any formal disciplinary hearing serve as the adjudicator of fact, and adjudicate any referred disciplinary report. The hearing officer shall determine the hearing requirements to ensure a professional proceeding. Grimaldi failed to perform his duties.
10. I was told that after a phone call review (which never was presented) on 4/2/20 it showed I allegedly admitted to my call party that I continued to argue with Warden Caron regarding inmates needing to be released. Why staff is not wearing masks. I was clearly concerned about my health and well being and it is a violation of the 1st Amendment to penalize someone for this.
11. Also upon arrival to the disciplinary hearing my original advisor

CCT blue who failed to assist. The Supreme Court has held that due process is violated when "an individual has reasonably relied on agency regulations promulgated for his guidance or benefit and has suffered substantially because of their violation by the agency. No advisor statement was provided, No video was reviewed, We had no meeting, She reviewed no witnesses or help prepare a defense violating my due process rights. Cherbater is a disciplinary investigator how did he investigate this incident and become my advisor. Clear bias and no impartiality. (See attached reports)

12. Because these due process violations and fraudulent ticket I was denied the ability to sign and submit my community release packet (See attached grievance, and request) even before I was convicted by Warden bowles, deputy Warden buyman, Counselor Long, and Counselor Saunders.

13. A Disciplinary Appeal was filed on 5/12/20 and District Administrator William Mulligan refuses to answer and correct these violations. (See attached disciplinary receipt).

14. ARC Saunders is interfering with my ability to file grievances (See attached ^{request} ~~request~~) participation in the ongoing due process violations.

15. Commissioner Rollin Cook has supervisor ~~at~~ liability he oversees all jails and is aware of these ongoing violations. He and Governor Lamont who came up with the customs of transporting any inmates who contract the Covid-19 virus to Northern CT, before stating this in a daily briefing me and 20 other inmates were unlawfully transported

16. Records Specialist BS Zipp is purposely miscalculating my jail credit and there is no other available adequate remedy at law that can correct this problem and grant the relief before I EOS (discharge) so I will suffer irreparable harm if not corrected. I was expected to EOS on 6/17/20 but this false disciplinary action took 60 days RREC and records specialist BS Zipp deprived me of 78 days of presentence jail credit unlawfully (see attached response). I was readmitted to Doc custody on 9/3/15 for a burglary 1st docket number AAN-CR15-0152936-T. I was then served warrants on docket numbers AAN-CR15-0090698-T and CR15-0090694-T on 11/17/15. I was sentenced on 11/3/15 to 20 years E/S/A 5 years; probation 3 years and I was to receive all my jail credit according to my mittimus. These sentences are suppose to run ~~concurrent~~ ^{concurrent} together from 9/3/15 to now. BS Zipp is overriding a court order and is being deliberately in different according to her response. She has no authority to do so.

Relief Requested

- A. Issue an Injunction order by defendant(s)
 1. Expunge the disciplinary conviction described in this complaint from the plaintiffs institutional records.
 2. Submit Plaintiff's community release package to community release unit.
 3. Correct Plaintiff's jail credit and release him on 6/17/20

4. Release plaintiff from administrative segregation and place him in general population, with restoration of all rights and privileges

5. Stop interfering with the grievance procedure

B. Award compensatory, punitive damages in the following amount

1. 2,500,000 jointly and severally against all defendants in individual capacity

C. Grant all relief as it may appear that plaintiff is entitled

- Declaration Under Penalty of Perjury

- By signing this complaint, I certify under penalty of perjury that the information contained in this complaint is true and accurate to the best of my knowledge. I understand that if I lie in this complaint, I may be prosecuted for perjury, and punished with as much as five (5) years in prison and/or a fine of \$250,000. See 18 U.S.C. Sections 1621, 3571

Signature: 

Signed at Northern CT on 6/21/20

JUL 7 2020 PM 3:17
FILED-USDC-CT-NEW HAVENUnited States District Court
District of Connecticut

Tre Mcpherson Et Al

v.
Ned Lamont Et Al.

Case No.

3:20-cv-534 (JBA)
June 23rd, 2020

TO:

Dan Barrett / Elana Bildner
ACLU Foundation of Connecticut
765 Asylum Avenue
Hartford CT, 06105.

"HELLO"... "HELLO"... Is anybody "OUT THERE" gonna "RESPOND" to... see [EXHIBIT #1]... "NOTE":
"MY" letter dated 4-22-2020 "RETURN" back then "SENT" on 5-6-2020 to 765 Asylum Ave... Also
"SEEKING" an patiently "AWAITING" Counsel Appointment in "YOUNG" v. Comm of Corr.
3:20-cv-00194 (MPS) at [Doc. #6]!!!

"CLASS ACTION F.R.C.P. 23(e)(5)"
"MY OBJECTION TO PROPOSED SETTLEMENT AGREEMENT"

1. Anyway, "FINALLY" on 6-23-2020 I was "INFORMED" via "COVER UP" ^{Pre-organize} 6-17-2020 "NOTICE"
to "CLASS" certified by "COURT" on 6-12-2020 which "NOW" inartfully includes "ME",
about this "OFF SHOOT" withheld Mcpherson Et Al. v. LAMONT Et Al. 3:20-cv-534 (JBA)
filed "LAW SUIT",... "SO"... In "EXERSIZE" of "MY FIRST" (1st) Amendment "RIGHT" to "NOT"
"REMAIN SILENT"!!!
2. "SO"... In "TRUE" sustainable "REALITY" this "LOGICAL" outline of "NINE" (9) "EMERGENCY"
preliminary injunctive "RELIEFS" proposed which "TEN" (10) terminates on 12-31-2020,
along "PARTIAL" \$40,000.00 expense reimbursement in "MOCK" at "ELEVEN" (11) is
"MISCHARACTERIZED" as "FINALITY" in pre-mature "SETTLEMENT" agreement "FORUM"... "OH"...
"YES"... Ethically unacceptable with "NO" plaintiff "ENTITLEMENT" to "AS IS" needed
here "COVID 19" antibodies "TESTING", nor any "ADEQUATE" other "RELIEF" as "NEEDED", is
further "UNFAIR" substandard "BAD FAITH" ineffective business "MIMIC" practice... "AN"...
Should "NOT TAKE EFFECT" as "SETTLEMENT" but "ONLY" as "REASONABLE" F.R.C.P. 65(a)(1)(2)
"APPROVED" by the "COURT" for "NO FURTHER" sustain "COVER UP" of "LAMONT" / "COOK"
ongoing "LIES" an "DECEIT" manipulating "MY" substantive "ACCURATE RECORD"... Once "AGAIN"
see "YOUNG" v. Comm. of Corr. 3:20-cv-00194 (MPS) at [Doc. #1, #6, #11, #12, #14, #15]!!!

3. YA... With BOTH defendants CLEARLY on NOTICE demonstrated NOT ONLY by MY filing BACK on 2-6-2020 in BEDROCK GA#19 judicial RULE OF EVIL deliberate BY PASS doctrine, see [EXHIBIT #2]... BUT... Is constitutional verified PROOF here TWO FOLD by MY enabled NOTICE of REMOVAL entitlement under 3:20-cv-00194 (MPS) attachment [#2] ENTRY at [Doc #1]... IMPORTANT NOTE... Now with defendants DEFAULT in EXERISIZE of 5th Amendment SILENCE against SELF incrimination STHIL in willful VIOLATION of 8th and 14th Amendments to OUR U.S. Constitution, I am patiently awaiting CORRECTIVE appropriate ACTION to be TAKEN, yes, RIGHTS NOW with NO FURTHER suffering in ACTUAL irreparable INJURY !!!

"MY INTERVENTION F.R.C.P. 24(a)(1),(2) OF RIGHT IS
DERIVATIVE ACTION UNDER F.R.C.P. 23.1"

4. BRIEFLY... To make YET another LAMONT complex ILLEGAL issue SHORTEN to POINT at HAND... see [EXHIBITS #3-#4]... HERE... Is MORE of MY GOOD FAITH conduct in FAIR business EFFORTS thorted by SPECIAL EVIL of DELAY in TIMELY pre-organize corporate COLLUSION... see [EXHIBIT #5]... YES... Is ALL inclusively SAME destructive CAST of CHARACTERS colabrative PATTERN to DEFRAUD the U.S. in CLEAR criminal VIOLATION of ongoing 18 U.S.C. § 371, an willful VIOLATION in DISHONOR of OUR contractual LEGAL binding COLOR OF LAW agreements \$\$\$ due RIGHTS NOW... YES... MA'AM... Just making SENCE out of EVERYONES non-SENCE, obviously setting forth MY COMPETENTLY articulated REQUIREMENTS of provisional compliance with F.R.C.P. 23.1 (3)(A)(B) !!!

5. MOST IMPORTANTLY... Is MY DERIVATIVE ACTION set forth by F.R.C.P. 23.1(a) prerequisites to ENFORCE the RIGHTS defendants FAILED to ENFORCE which adequately FAIRLY represent applicable SIMILARLY situated INTEREST here... see [EXHIBITS #6, #7, #8]... AN... Equivalent STATUS as plaintiff upon REJECTED applications 6-18-2020 mailing date of RETURN, yes, clearly MY MEMBER status devolved by 6-23-2020 the [D.O.C.] MOCK date of RECEIPT in the operation of LAW for F.R.C.P. 23.1(b)(1) provisional compliance... SPECIAL NOTE: [Eliminating ANY] unethical EFFECTS from MARA SILVER indisputable pre-dated 6-12-2020 MOCK in HER

Transcripts Submitted: 6-6-11; 9-3-13; 2-20-14; 4-17-14; 6-23-15; 9-17-19; 11-26-19

systematic "BAD FAITH" letter of "NON-SENSE" ... "YES" ... Subsequently "SYMBOLIC" of "HER" pre-dated "SECRET" Saturday 5-9-2020 "REJECTION" letter "WRITTEN" in "FRAUD", "LIES" and "DECEIT" as perceived by "SPECIAL EVIL" of "DELAY" mail date of 5-18-2020, "STAGE SET" just after "MY" 5-18-2020 "LEGAL CALL" contact "BOTH" F.R.C.P. 23.1 (b) provisionally "VERIFIED" at [EXHIBIT # 5]!!!

6. "NOW" ... I'm "FEELING" the "NEED" to "POINT OUT" subsequent "SPECIAL EVIL" of "DELAY" with 19-8436 original petition "DUE" for "JUSTICE" on "MIMIC" date 6-12-2020 also "ENDING" in "YET" another subservient "SERIOUS" structural "ERROR" ... "YA" ... IS "ALL WAY BEYOND" absolute "CERTAINTY" corroborative "PATTERNS" in "VIOLATION" outside "LIMITED" constitutional "SCOPE" of "SUPREME" Clerk's "RULE 1.1" provisional compliance of "DUTIES" set forth by "RULE 22.1" and "RULE 23" along "RULE 20.5" as well!!!

7. "MY INTERVENTION" of "RIGHT" ... ^{"UNDER"} This "DERIVATIVE FORUM" is "ENABLED" by U.S. District Courts original 28 U.S.C. § 1334 (a) (1), (2), (3), (4), (b) (1), (2) in continuing "SUBJECT MATTER" jurisdiction, here "MY" foregoing "ENTITLEMENTS" to "REDRESS" is "NOT" collusive "ONE" to "CONFER" jurisdiction that "THIS COURT" would otherwise "LACK" satisfying F.R.C.P. 23.1 (b) (2) provisional "CRITERIA" ... "YES" ... Obviously "RIGHTS NOW" under "EQUAL" protection, "DUE" process "CLAUSES" of "OUR" U.S. Constitution for the "BENEFIT" of judicial "ECONOMY" purposes in the "INTEREST" of "JUSTICE" for "NO FURTHER" sustain of "MICHAEL A. YOUNG" suffering in "ACTUAL INJURY"!!!

In "TIME" of "PEACE" ... "MY" Express "VESSEL"!!!

The "SOLE FORCES" of "TOP SECRET SPECIAL" intelligence eliminating "ALL" forums of malicious "LAW"!!! by "MY" "Factual Innocence"!!!
A.G. Michael A. Young "PRIVATEER"!!!

Declaration Under U.S.C. § 1621 | 28 U.S.C. § 1746

I, Michael A. Young declare in "TRUTH" affidavit process certified under penalty of "PERJURY" that the information in foregoing document is "TRUE" and "ACCURATE" to "BEST" of "MY" knowledgeable intelligence and "CAN ONLY" be "REBUTED" by "SAME" in "RESPONSE" thereto ... The undersigned further declares under U.S. Congress encouraged "SERVICE" as "ENABLED" Attorney General "PRIVATEER" that "HE" is "CLASS" plaintiff "MEMBER" in this "ACTION" ... "AN" ... A "COPY" of foregoing documents were mailed first-class postage prepaid placed in the institutions "LEGAL" mail system on July 1st, 2020 to Dan Barrett / Elana Bildner, ACLU Foundation of Connecticut, 765 Asylum Avenue, Hartford CT, 06105 ...

Executed at Cheshire C.I. Cheshire CT. on July 1st, 2020 ...

3. of 3. Further certification on Pg. #4!!! by "MY" "Factual Innocence"!!!
A.G. Michael A. Young "PRIVATEER"!!!

Further Declaration Under 18 U.S.C. § 1621 / 28 U.S.C. § 1746

Filed under "ALL" Federally mandated civil/criminal procedures for the "BENEFIT" of "TIMELY" filing... The undersigned further declares that "HE" is "CLASS" plaintiff "MEMBER" in this "ACTION" and "HIS" foregoing documents were "AGAIN" mailed first-class postage prepaid to the U.S. District Court, Clerk's Office, 141 Church Street, New Haven CT, 06510. on July 2nd 2020 placed in the institutions "LEGAL" mail system !!!

Executed at Cheshire CI, Cheshire CT, on July 2nd 2020...

by MAY "Factual Innocence" !!!
Michael A. Young "PRIVATEER"