

Date: Wednesday, September 3, 2008

To: Cook County Circuit Judge Donnelly
Cook County State's Attorney Devine and Prosecuting ASAs
Defendant's Attorney Russ Stewart
US Attorney Patrick Fitzgerald
FBI-Chicago Director Robert Grant
Illinois Attorney General Lisa Madigan
Multiple Media Contacts

From: Sheila A. Mannix, PhD

Re: Official Notice of Alleged Federal Crimes Under 18 USC 1961-1968
Case No. 07 MC 119441701 State of Illinois v Jaime Hernandez

Dear Responsible Authorities and Fellow Americans:

I am a subpoenaed witness for the defense in the above-referenced case and I don't know what to do other than speak the truth with strength and honor despite my fear of ongoing criminal retaliation against my sons and me by actors in the verified racketeering enterprise in the Cook County family court operating in our case. [Cook County Case No. 93 D 2984, et al] But I must uphold my civil and moral duty to the young and adult children of our nation who are suffering and dying as a result of public corruption despite the documented criminal retaliation.

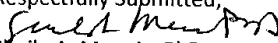
I am under information and belief that persons in the Cook County State's Attorney's Office are suppressing evidence in the instant case and are engaging in violations of 18 USC 2, 3, & 4 among other violations of federal statutes in relation to a verified "bribery scheme" pursuant to my testimony on 10-13-06 in Cook County Case No. 98 CH 11007, D'Agostino v Lynch which resulted in the April 2, 2008 First Appellate Court finding, "[s]he produced direct evidence regarding several other judges' involvement in the bribery scheme."

Specifically, I can prove with direct evidence that Defendant Hernandez witnessed state and federal criminal acts against me under 18 USC 1961-1968 on 2-2-07 by the late Judge James Donegan, court-appointed attorney David J. Wessel, and Attorney Mitchell F. Asher and that the current criminal prosecution of him as a witness to federal crimes is in violation of 18 USC 1512 and 1513.

I have attached some documents in support of my allegations herein including the "RICO checklist" federal Judge Milton I. Shadur gave me on April 18, 2008 in USDC Case No. 08 C 1883. A civil RICO action should be filed within the month.

On behalf of the US citizens of the State of Illinois, I humbly and respectfully beg you to uphold your Oaths of Office and mandatory fiduciary contracts with the US citizens of the State of Illinois and [1] dismiss the instant case and [2] pursue federal grand jury indictments pursuant to the "bribery scheme" ruling against the actors in the verified racket in the Cook County family court that is hurting innocent children.

Respectfully Submitted,


Sheila A. Mannix, PhD

DATE/TIME OF REPORT 110506 1239	BARRINGTON-INVERNESS POLICE DEPARTMENT GENERAL CASE REPORT	COMPLAINT NUMBER 06119056
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OFFENSE/INCIDENT Harassment	LOCATION OF INCIDENT 18 E Dundee Road, Suite 210, Barrington
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DAY/DATE/TIME OF INCIDENT Friday 021706	TYPE PREMISES Attorney's Office	WILL COMPLAINANT PROSECUTE YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
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REPORTED BY Sheila Mannix	ADDRESS 1118 RFD, Long Grove, IL	PHONE 8479716679
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VICTIM NAME R/P	RACE W	GEN F	DOB 091460	VICTIM OCCUPATION N/A	BUSINESS PHONE 8478218273
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VICTIM'S ADDRESS SAA	HOME PHONE SAA
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DESCRIBE INJURIES N/A	TRANSPORTED BY	TRANSPORTED TO
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JUVENILE PARENT CONTACTED N/A	RACE	GEN	HOME ADDRESS	PHONE
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PERSON WHO DISCOVERED/WITNESSED R/P	RACE W	GEN F	HOME ADDRESS SAA	PHONE SAA
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WITNESS NAME Kevin Sheetz(DOD 081190)	RACE W	GEN M	HOME ADDRESS 241 Otis Road, Barrington Hills	PHONE 8473811755
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WITNESS NAME Brian Sheetz(DOB 102093)	RACE W	GEN M	HOME ADDRESS SAA	PHONE SAA
--	-----------	----------	---------------------	--------------

NAME AND ADDRESS OF SUSPECT (AGE, RACE, DESCRIPTION, RELATIONSHIP WITH COMPLAINANT OR WITNESS) Daniel Sheetz DOB 090555, 241 Otis Road, Barrington Hills TX 8473811755

M/O HOW DONE, FORCE USED No force	TOOL OR WEAPON N/A	OTHER ACTS OR TRADEMARKS N/A
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VEHICLE INVOLVED YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK <input type="checkbox"/>	YEAR, COLOR, MAKE, MODEL, BODY STYLE, LIC. NO, STATE, VIN
--	---

WORTHLESS DOCUMENT	DOCUMENT COLOR	DOC TYPE	DOCUMENT DATE	DOC NO.	FIRM NAME ON DOCUMENT
	NAME AND NUMBER OF BANK		MADE PAYABLE TO		SIGNATURE ON FACE OF DOCUMENT
	REASON NOT HONORED		TYPE OF PROPERTY OR SERVICE OBTAINED		AMOUNT OF DOCUMENT \$

PROPERTY SECTION	CODES S=STOLEN D=DAMAGED PROPERTY L=LOST PROPERTY				
	Code S-D-L	QTY	DESCRIPTION (SIZE, COLOR, MODEL, STYLE, MATERIAL, CONDITION)	SERIAL NUMBER	VALUE
					\$
					\$
					\$
					\$
					\$

UCR SECTION	Type of criminal activity codes	NOT APPLICABLE <input type="checkbox"/>
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Aggravated Assault/homicide circumstances

Relationship of victim to offender XS-Ex-spouse NON-FAMILY

Bias Motivation RACIAL RELIGIOUS ETHNIC SEXUAL

REPORTING OFFICER Cpl. G. Lisauskas, 120	APPROVING SUPERVISOR <i>[Signature]</i> 107	Page 1 of 2 Pages
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BARRINGTON HILLS POLICE DEPARTMENT
INCIDENT REPORT

RD NO. 06-11196
PAGE 1 OF 3

ADULT

Offense Classification	UCR Code	Date Received	Time Received	Time Cleared
Other Public Complaint	9059	11/04/06	1701 hrs.	1914 hrs.
Location Of Occurrence			Date of Occurrence	Time of Occurrence
See Narrative			See Narrative	See Narrative

COMPLAINANT

Name (Last, First, Middle)	DOB	Sex	Race	Home Telephone Number
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Address	City	State	Zip Code	Business Telephone Number
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

NARRATIVE

On 11/04/06, at 1701 hrs., Officer Ruffin # 819 reported to the lobby, of the Barrington Hills Police Department, to take a station complaint. Upon arrival, Ruffin met with [REDACTED], Kevin Sheetz (08/11/90). [REDACTED]

[REDACTED] Kevin also submitted a written statement to the false information provided in these affidavits about him. The written statements were made a part of this file. [REDACTED] advised that they are willing to testify, before a judge, to these allegations brought forth and to provide proof to support these serious allegations.

Unfortunately, Ruffin had to advise [REDACTED] that none of these perjuries occurred in the jurisdiction of Barrington Hills and referred [REDACTED] to the proper jurisdictions to seek further assistance. [REDACTED] agreed. [REDACTED] also stated that [REDACTED] trying to seek assistance to file a criminal order of protection against [REDACTED]. At this time, there are no current orders of protection on file [REDACTED].

Nothing further at this time.

Reporting Officer (Print Name & ID No.)	Records Clerk Signature & ID No. (Processed By)
R. RUFFIN # 819	[Signature] 803
Reporting Officer (Signature)	Supervisor Approval (Signature & ID No.)
[Signature] #819	[Signature] 804

06-11196

BARRINGTON HILLS POLICE DEPARTMENT

RD NO. 06-11196

STATEMENT FORM

PAGE 2 OF 3

Name: Kevin Sheetz

DOB: 8/11/90

Beginning Date: 11/4/06

Time: 6:40 pm A.M./P.M. (P.M.)

Ending Date: 11/4/06

Time: 6:49 pm A.M./P.M. (P.M.)

- 1.) Within the 'Affidavit in support of petition
- 2.) for order of protection, which my father
- 3.) Daniel Sheetz signed on February 17th 2006,
- 4.) the following articles are false/untrue;
- 5.) 3a, 3b, 3d, 3e, 3h and 4.
- 6.) 3a, 3b and 3e each say my mother Sheila
- 7.) Mannix "ranted and raved and screamed" at
- 8.) myself and brother; this untrue; she was calm
- 9.) and my brother and I welcomed her presence,
- 10.) In 3d; my mother did not tell me to "call the
- 11.) police, I did that of my own free will, 3h; my
- 12.) mother had given us phones years before,
- 13.) for reasons that are not stated in this affidavit,
- 14.) 4 is entirely untrue.
- 15.) As well 3b occurred at the Northbrook Theater,
- 16.) not my school.
- 17.) _____
- 18.) _____

I ACKNOWLEDGE THAT THE ABOVE STATEMENT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Signed: Kevin Sheetz

Address: 249 Otis Road

City: Barrington

State: IL

Zip Code: 60010

Home Phone No. (847) 381 1755

Business Phone No. (847) 716 0832

Witness By:

[Signature] #3219
Officer's Signature

Officer's Signature

BARRINGTON HILLS POLICE DEPARTMENT

RD NO. 06-11196

STATEMENT FORM

PAGE 3 OF 3

Name: Kevin Sheetz DOB: 8/11/90

Beginning Date: 11/4/06 Time: 6:51 pm A.M./P.M.

Ending Date: 11/4/06 Time: 6:59 pm A.M./P.M.

1.) Mr Wessel's motion filed February 6th 2006

2.) _____
3.) The following articles ^{are} ~~is~~ false/untrue:

4.) _____
5.) (5) + (6)

6.) _____
7.) _____

8.) I had not ~~handed~~ ^{presented/handed} the pleading to my

9.) father Daniel Sheetz nor had I

10.) confirmed that untrue act with Mr

11.) Wessel over the phone or otherwise.

12.) The rest is true.

13.) _____

14.) _____

15.) _____

16.) _____

17.) _____

18.) _____

I ACKNOWLEDGE THAT THE ABOVE STATEMENT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Signed: Kevin Sheetz

Address: 1491 Otis Road

City: Barrington State: IL Zip Code: 60010

Home Phone No. (847) 381 1755

Business Phone No. (847) 716 9832

Witness By: [Signature]

Officer's Signature

Officer's Signature

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY

SHEILA A. MANNIX,)
on behalf of the Minor Child,)
BRIAN S. SHEETZ)
Petitioner,)
v.)
DANIEL P. SHEETZ, SR.)
Respondent.)

Case No. 07 OP 30
Independent

Honorable Brian P. Hughes
Presiding Judge

FILED

JAN 05 2007

Brian P. Hughes
CIRCUIT CLERK

PETITIONER'S EMERGENCY MOTION TO RECONSIDER THE DENIAL
AND DISMISSAL OF HER SON'S EMERGENCY VERIFIED PETITION FOR
ORDER OF PROTECTION PURSUANT TO
750 ILCS 60/205 AND 60/217 AND 735 ILCS 5/2-1203

COMES NOW, on this 5th day of January 2007, the Petitioner, SHEILA A. MANNIX, on behalf of the Minor Child, BRIAN S. SHEETZ, as and for his **Emergency Motion to Reconsider the Denial and Dismissal of Her Son's Emergency Verified Petition for Order of Protection Pursuant to 750 ILCS 60/205 and 60/217 and 735 ILCS 5/2-1203**. Specifically, Petitioner, on behalf of the minor child, moves this Court to enter an order reversing both rulings of January 4, 2007, entering the requested emergency order of protection, setting a hearing for plenary order of protection in 30 days to allow for preparation for a full evidentiary hearing which will include the testimony of the thirteen year old child and his sixteen-year-old brother, and ordering

disclosure of Identity and Testimony of Witnesses pursuant to SCR 213(f) in 10 days.

Petitioner respectfully states as follows in support thereof:

I. Statement of Petitioner

On June 9, 2005, Petitioner interviewed with the FBI and learned what material evidence was needed to prove the existence of an illicit racketeering enterprise in the Domestic Relations Division of the Circuit Court of Cook County. Then Petitioner co-founded the organization, Illinois Family Court Accountability Advocates (IFCAA), which is a grassroots organization that has taken on the corruption in the Cook County Circuit Court. Petitioner proceeded to research and target five exemplary cases of the illicit acts. Records of these cases have been submitted to the ACLU. This includes a co-member's state and federal cases in which in May 2006, in the federal bankruptcy case, a fraud expert engaged by the co-member found a \$40 million dollar "bribery" fund and witnessed a bribe taking place in the second floor cafeteria of the Dirksen Federal Building about which affidavits were executed and entered into the record.

After the release of an IFCAA national press release on June 19, 2006, courageous individuals and organizations fighting similar corruption in courts across the nation networked with IFCAA. Multiple ^{FAMILY} members of an organized crime enterprise that has allegedly infiltrated the US judicial system have come forward and have provided affidavits and material evidence of same including pure trusts and/or bank accounts of judges and/or court-appointed attorneys in the Circuit Court of Cook County. Within the past six months, three judges of the Law Division of the Circuit Court of Cook County have quit the bench (taken "early retirement") as a result of the lawful and meritorious

actions of co-members of IFCAA. Judges have also recently quit the bench in Utah and Louisiana as a result of similar lawful actions by network partners.

Petitioner is of information and belief that the Cook County trial court is allegedly an actor in a partnered local and national racketeering enterprise. Arguendo, if the trial court were not an alleged actor in an alleged racketeering enterprise, then why has the Petitioner, who is an exemplary mother, professional, and citizen, lost over one million dollars, her reputation, her career, and her children. If the trial court were not an alleged actor in an alleged racketeering enterprise, then why has the Child Representative submitted parenting proposals giving the Petitioner sole custody and final decision making power in April 2003 and March 2005, the former proposal within three weeks of the release of a fraudulent court-ordered report alleging that the Petitioner is severely mentally ill, delusional, needs to be on medication, and barely functions. If the trial court were not an alleged actor in an alleged racketeering enterprise, then why did this same Child Representative, on June 29, 2005, agree to a proposed agreed order giving the Petitioner sole custody and final decision making power, if the unenforced SCR 219 financial default order of October 19, 2004 against the Respondent worth over \$100,000 was vacated, if the material evidence that the Child Representative allegedly conspired with other state court agents in the criminal extortion of \$27,000 for the fraudulent report of 2003 was covered up, and if the long history of domestic violence of the Respondent against the Petitioner and the children was covered up.. [The court's emergency intervenor made a finding of abuse of the children against the Respondent after a court-ordered emergency intervention on April 23, 2002.]

Arguendo, if the trial court were not an alleged actor in an alleged racketeering enterprise, then why have three Petitions for orders of Protection been languishing unheard for sixteen months, twelve months, and nine months, respectively, [the latter two petitions were unlawfully transferred from Lake County (Judge Winters –also a defendant in Petitioner’s federal law suit) and from the Third Municipal District (with a phone call from Judge Donegan to Judge Sullivan one week before the status date, with no notice to Petitioner’s attorney and in direct violation of General Order 15 (3.8)(c)(2) of the Circuit Court of Cook County.)]. Further that the latter two petitions, as well as Judge Geiger’s order of protection entered 10/12/05, were transferred to a judge whose authority to enter orders was suspended and remains suspended by mandatory, ministerial law to this very day. Cook County Judge Donegan has continued to entered orders when his authority and jurisdiction to enter orders was stayed on September 29, 2005 when a 735 ILCS 5/2-1203 motion was filed and remains pending to this very day. Opposing counsels filed a motion to strike and dismiss in October 2005 that they never noticed up.

Seven months after Respondent was ordered to pay child support and an arrears award to the Petitioner, Respondent filed a fraudulent sole custody petition in January 2002 that is the subject of a second SCR 219 default motion against the Respondent that has been languishing before Judge Donegan since March 2005. Custody is not at issue in the Cook County case and the children have been judicially kidnapped for fourteen months. This includes Brian, the subject of the instant motion, for whom the Cook County Court has NEVER HAD personal or subject matter jurisdiction for custody or visitation.

Petitioner is of information and belief that her children and herself became victims of the illicit enterprise in Cook County since 2002 because the actors believed she was the heiress of the Rand McNally map company family fortune. Petitioner's predecessors applied gyroscopic principles to invent the instruments for instrument flight and other inventions. Petitioner's great-grandfather, Elmer Sperry, was credited with providing the most technological advances to the Navy. Her great-uncle, Lawrence "Gyro" Sperry, has the dubious honor of being the man who invented the prototype for the guided missile. A spin-off of Sperry Gyroscope Company was Sperry Rand Corporation. Petitioner's first attorney, Sandra Nye, and Child Rep. David Wessel, who are both under investigation by the ARDC, confabulated Sperry Rand into Rand McNally. In the summer of 2004, Child Rep. David Wessel told Petitioner's subsequent attorney, David Mann, this information and Mr. Mann stated he is willing to give testimony of same in future litigation.

Petitioner did not inherit a fortune but she seems to have inherited something much more valuable - a strong mind, brave heart, and indomitable faith in the spiritually-based democratic principles of our great US Constitution.

"Let stormy winds blow in the Pacific; let mountain waves rage; let nights be dark and perilous; let evil-thinkers evil think and evil-doers evil do. But let us be of good cheer for we have Sperry's wondrous invention to stabilize; his compass to point out our course; his magic arc, "brighter than the sun," to illuminate; and, above all, we have that priceless blessing which he has bequeathed to us, the example of his unchanging sincerity of heart and nobleness of mind together with his ever constant magnanimity and humanitarian principles, against which malice is impotent." - Hideo Takeda, Chairperson, Japanese Memorial Committee, in Dr. Sperry As We Knew Him (1930)¹

¹ Petitioner is an Illinois-licensed Clinical Psychologist. She completed her undergraduate degree at Stanford University. She completed a dual-track PhD in Clinical Psychology and Neuroscience at the University of Illinois at Chicago. She was trained in a scientist-practitioner model and completed her clinical coursework at the Circle Campus and she neuroscience research at the Department of Physiology and Biophysics

Petitioner is of information and belief that there has been no finding that the Circuit Court of Cook County is no longer a criminal enterprise, nor that judicial corruption no longer exists in Chicago. That the Seventh Circuit Court of Appeals held that the Circuit Court of Cook County is a criminal enterprise. [*U.S. v. Murphy*, 768 F.2d 1518, 1531 (7th Cir. 1985)] Further, that the United States Supreme Court acknowledged the judicial corruption in Cook County when it stated that Judge Maloney was one of many dishonest judges exposed and convicted through 'Operation Greylord', a labyrinthine federal investigation of judicial corruption in Chicago." [*Bracey v. Gramley*, 519 U.S. 1074, 117 S.Ct. 726 (1997)] Petitioner is of information and belief that a de novo review of the manifest weight of evidence in the record of her Cook County case definitely proves the existence of a racketeering enterprise in the Domestic Relations Division of the Circuit Court of Cook County. As such, the trial court's official standing is severed by criminal acts and all orders are void as being entered without authority or jurisdiction.

Petitioner is of information and belief that her innocent children's and her constitutional rights including, civil rights, liberty interests, property rights, parenting rights, rights to freedom from abuse, and First and Fourteenth Amendment equal access to the law rights and due process rights have been and continue to be violated by the unlawful interference of the state trial courts in Cook and Lake Counties. The Cornell Law School, Legal Information Institute states in pertinent part: "First Amendment: An Overview: The First Amendment of the United States Constitution protects the right to

at the Medical School Campus. She completed her Clinical Internship at the VA Medical Center in North Chicago. She is currently researching sociopathic behaviors in illegitimate authority as detailed in her trademarked curriculum per same found at www.gyropower.com, click on the 'Tools for 2k' link. Further biographical materials can be found by clicking on Corporate Overview and then Biographies.

freedom of religion and freedom of expression from government interference. See U.S. Const. amend. I. Freedom of expression consists of the rights to freedom of speech, press, assembly and to petition the government for a redress of grievances, and the implied rights of association and belief. The Supreme Court interprets the extent of the protection afforded to these rights. The First Amendment has been interpreted by the Court as applying to the entire federal government even though it is only expressly applicable to Congress. Furthermore, the Court has interpreted, the due process clause of the Fourteenth Amendment as protecting the rights in the First Amendment from interference by state governments. See U.S. Const. amend. XIV.”

Further, that the following opinion exemplifies Petitioner’s factual allegations made herein. Mitchum v. Foster, 407 U.S. 225, (1972) stated in pertinent part, “It is clear from the legislative debates surrounding passage of 1983’s predecessor that the Act was intended to enforce the provisions of the Fourteenth Amendment “against State action, . . . whether that action be executive, legislative, or judicial.” Ex parte Virginia, 100 U.S. 339, 346. Proponents of the legislation noted that **state courts were being used to harass and injure individuals**, either because the state courts were powerless to stop deprivations **or were in league with those who were bent upon abrogation of federally protected rights...** And Representative Perry concluded: **“Sheriffs, having eyes to see, see not; judges, having ears to hear, hear not; witnesses conceal the truth or falsify it;** grand and petit juries act as if they might be accomplices [A]ll the apparatus and machinery of civil government, all the processes of justice, skulk away as if government and justice were crimes and feared detection. **Among the most dangerous things an injured party can do is to appeal to justice.**” [Emphasis added.]

II. Introduction

1. On January 4, 2007, Petitioner, on behalf of the minor child, Brian, brought forth a new independent Verified Emergency Petition for Order of Protection due to Brian's independence as a party in his own right, who was born out-of-wedlock and for whom no Judicial Determination or Acknowledgement of Parentage has been executed. [Simcox v. Simcox, 131 IL2d 491, 546 N.E.2d 609, 137 Ill.Dec. 664] Petitioner made it clear that she was non-suiting Brian from the petition for protective order filed on December 31, 2006 which is the subject of a reconsideration motion which stays the judgment. [735 ILCS 5/2-1203]
2. Further, Petitioner made it clear that Brian is the subject of a pending Parentage Petition pursuant to the Illinois Parentage Act 750 ILCS 45/1 *et seq.* filed in January 2006 that survived a Motion to Dismiss and is proceeding as a meritorious cause of action. Further, Petitioner made it clear that the First District Appellate Court accepted Petitioner's appeal of a rogue July 25, 2006 ruling under her post-divorce Case No. 92 D 2984 making a determination of Brian's parentage unknown in Illinois law. Petitioner made it clear that pursuant to Supreme Court Rule 306(g) the proceedings in the Cook County case are stayed.
3. On January 4, 2007, the instant protective order petition was originally before Judge Donald Geiger who is a defendant in Petitioner's federal lawsuit [05 C 7232] currently before the Seventh Circuit [06-2120, et al.]. Judge Geiger is a defendant for his apparent, fully-documented, misconduct in October 2005 when he participated in the unlawful modification and transfer of a Lake County Order of Protection that he entered on October 12, 2005 with the direct testimony of

Petitioner's then 15-year-old son that his father physically threatened him on the evening of October 11, 2005 and that he witnessed his father begin to physically abuse his younger brother, Brian, in the past. On October 14, 2005, Judge Geiger took a phone call from Cook County Judge James Donegan. As a result of that phone call in which judicial fraud took place, and in direct violation of the Illinois Domestic Violence Act of 1986 Section 205, a Cook County order was entered modifying the visitation restriction of the Lake County order of protection. There exists material evidence of the judicial fraud in the form of court orders, court transcripts, a faxed document from Judge Donegan to Judge Geiger, and three material witnesses including Petitioner's teenaged son. In a court order of October 26, 2005, said son was prohibited from testifying at the return hearing for the protective order that was set for hearing before Judge Donegan in Cook County on October 31, 2005 despite Judge Donegan being aware on 10/26/05 of a 735 ILCS 5/2-1203 motion pending in Lake County for Judge Geiger's transfer of the protective order on October 21, 2005 with NO NOTICE. On the morning of October 31, 2005, Judge Geiger refused to reconsider his unlawful transfer order despite the vigorous arguments of Petitioner's Attorney Ronald Greisheimer which included the statement, "Respectfully, I believe this is judicial misconduct, but that is not an issue for this Court to deal with." [Certified Report of Proceedings 10/31/05, Page 5, Lines 12-14] That afternoon, in Cook County, Judge Donegan unlawfully vacated the Lake County Order of Protection and entered a "No Contact" and temporary custody order of the children to the Respondent in an ex parte proceeding with no notice, no motion, no emergency,

no affidavit, no testimony, no evidence, no findings, and **NO DUE PROCESS** **WHATSOEVER** in the clear absence of all authority and jurisdiction. The orders themselves and the certified court proceedings evidence fraud upon the court by multiple state court agents that vitiates the judgment. [The People of the State of Illinois v. Fred E. Sterling, 357 Ill. 354; 192 N.E. 229 (1934) ("The maxim that fraud vitiates every transaction into which it enters applies to judgments as well as to contracts and other transactions."); Allen F. Moore v. Stanley F. Sievers, 336 Ill. 316; 168 N.E. 259 (1929) ("The maxim that fraud vitiates every transaction into which it enters ..."); In re Village of Willowbrook, 37 Ill.App.2d 393 (1962) ("It is axiomatic that fraud vitiates everything."); Dunham v. Dunham, 57 Ill.App. 475 (1894), affirmed 162 Ill. 589 (1896); Skelly Oil Co. v. Universal Oil Products Co., 338 Ill.App. 79, 86 N.E.2d 875, 883-4 (1949); Thomas Stasel v. The American Home Security Corporation, 362 Ill. 350; 199 N.E. 798 (1935)] Petitioner and her children have had no just access to the law since that abhorrent moment on the afternoon of October 31, 2005 to this present moment.

4. On January 4, 2007, Judge Gieger recused himself and the instant matter was transferred to this Court.
5. This Court entered the order attached as Exhibit A denying and dismissing Petitioner's request on behalf of her son, Brian, for an emergency order of protection without notice to Respondent pursuant to Section 217 of the Illinois Domestic Violence Act of 1986 (hereinafter, "DV Act").
6. Petitioner brings this motion for reconsideration forth pursuant to the following:

a. 750 ILCS 60/205 which states in pertinent part:

Sec. 205. Application of rules of civil procedure; Domestic abuse advocates.

(a) Any proceeding to obtain, modify, reopen or appeal an order of protection, whether commenced alone or in conjunction with a civil or criminal proceeding, shall be governed by the rules of civil procedure of this State. The standard of proof in such a proceeding is proof by a preponderance of the evidence, whether the proceeding is heard in criminal or civil court. The Code of Civil Procedure and Supreme Court and local court rules applicable to civil proceedings, as now or hereafter amended, shall apply, except as otherwise provided by this law.

b. 735 ILCS 5/2-1203 which states in pertinent part:

Sec. 2-1203. Motions after judgment in non-jury cases. (a) In all cases tried without a jury, any party may, within 30 days after the entry of the judgment or within any further time the court may allow within the 30 days or any extensions thereof, file a motion for a rehearing, or a retrial, or modification of the judgment or to vacate the judgment or for other relief.

(b) A motion filed in apt time stays enforcement of the judgment.

7. That this matter constitutes an emergency because the minor child has no other adequate remedy at law.
8. That this matter constitutes an emergency because the minor child has an ascertainable legal right to emergency protection and relief from abuse as defined by the DV Act.
9. That this matter constitutes an emergency that needs to proceed without notice due to the history of retaliatory acts of abuse by the Respondent against the minor child.
10. That this matter constitutes an emergency due to the irreparable harm being perpetrated against the minor child by the Respondent including but not limited to

harassment, i.e., knowing conduct that causes the minor child emotional distress, including but not limited to the daily threat of physical violence and the ongoing threat of permanent removal of the minor child from the physical care of the child's primary caretaker, the Petitioner, after the actual improper removal on October 31, 2005, interference with personal liberty, intimidation of the minor child, willful deprivation of the medical and special educational needs of the minor child.

11. That the Legal Standards which entitle Brian, the minor child, to a reconsideration of this Court's order include informing the court of (1) newly discovered evidence previously unavailable at the time of the original hearing; (2) changes that have occurred in the law since the original hearing; or (3) errors in the court's earlier application of the law. [*Weidner v. Midcon Corp.*, 328 Ill. App. 3d 1056, 1061 (5th Dist. 2002)] Plaintiff brings this motion forward on point (3).

II. Legal Standard for Reconsideration: Errors in the Court's Earlier Application of the Law

1. There were multiple reversible errors in this Court's interpretation and application of the law with regard to undisputed and potentially disputed facts of the case which would fall under the following Standards of Review were this matter brought before the Second District Appellate Court:
 - a. Appellate Standards of Review
 - i. Mixed Questions of Law and Fact which incorporates a level of review between Manifest Weight of Evidence of the Record and

De Novo Review [City of Belvidere v. Illinois State Labor Relations Board, 181 Ill. 2d 191, 692 N.E. 2d 295 (1998)].

- ii. De Novo Review such that questions of law involving the constitutionality of a statute [Kaufman, Litwin & Feinstein v. Edgar, 301 Ill.A00.3d 826, 704 N.E.2d 756, 760 (1st Dist. 1998)] and questions of law for which there are no disputed facts and the issue is the interpretation and application of a statute [People v. Wehde, 210 Ill. App. 3d 56, 568 N.E. 2d 910 (1991) and Du Page County Board of Review v. Property Tax Appeal Board, 284 Ill. App. 3d 649, 653, 672 N.E.2d 1309 (1996)] are reviewed *de novo*.
- iii. Manifest Weight of Evidence in the Record, namely, where “an opposite conclusion is clearly evident from the record” [Wilmette Partners v. Hamel, 230 Ill. App. 3d 248, 255, 594 N.E. 2d 1177 (1992)] and “where upon review of all the evidence in the light most favorable to the prevailing party, an opposite conclusion is clearly apparent or the fact finder’s findings are palpably erroneous and wholly unwarranted, is clearly the result of passion or prejudice, or appears to be arbitrary and unsubstantiated by the evidence.” [Joel R. v. Board of Education of Manheim School District, 292 Ill. App. 3d 607, 613, 686 N.E. 2d 659 (1997)].
- iv. Abuse of Discretion is a Standard of Review which applies in this matter such that the assumption that a trial court, when given the privilege of judicial discretion, will rule in a reasonable manner is

put under scrutiny. [O'Connell v. City of Chicago, 285 Ill. App. 3d 459, 463, 647 N.E.2d 105 (1996), stated in pertinent part, "no reasonable person would take the view adopted by (the court)" and Kaden v. Pucinski, 263 Ill. App. 3d 611, 615, 635 N.E.2d 468 (1994), stated in pertinent part, that the ruling "exceeded the bounds of reason" and was "made without the employment of conscientious judgment."]

2. During the proceedings of 1/4/07, Petitioner witnessed this Court acknowledge full awareness that there are three Petitions for Order of Protection that are unlawfully languishing in Cook County, the latter two being transferred from Lake County and the Third Municipal District, in direct violation of the DV Act which mandates the expedited adjudication of same. Further, Petitioner detailed for the Court some of the information stated above with regard to the Cook County Court having no authority to enter orders due to the pending 1203 motion of an SOJ for cause which is also detailed with case law in the Supporting Authorities attachment. Petitioner made this Court aware that her son is a party in his own right and that her son's First and Fourteenth Constitutional Rights to access to the court as well as freedom from abuse ^{v. l.} has been severed.
3. During the proceedings of 1/4/07, Petitioner witnessed this Court state, in effect, that he relied on the rulings of denial and dismissal of the petition brought forth on 12/31/06. This position was asserted with the full knowledge that said ruling was the subject of a 735 ILCS 5/2-1203 motion which stays the ruling. This reliance represents a reversible error.

4. During the proceedings of 1/4/07, Petitioner witnessed this Court ignore new evidence and testimony, including the submission to the court of material evidence, a color picture of Brian's self mutilation after the last retaliatory act of abuse against him that meets the level of a violation of the Illinois Criminal Code of 1961 [Exhibit B] and testimony detailing Brian's special education needs and medical needs for which he is the victim of harassment, willful deprivation and intimidation of a minor by the Respondent. Brian is threatened with physical violence by the Respondent if he tries to exercise his personal liberty to attend his Montessori school.
5. This Court's finding that "Petitioner has not presented credible evidence to meet the burden of proof required by the IDVA" represents as reversible error. Not only did the Petitioner present ample evidence and testimony, she provided abundant supporting authorities.
6. This Court's finding that "it is unlikely, based on the evidence presented to the Court, that the Respondent will cause irreparable harm or abuse." represents as reversible error. On page 2 of 11, item 3 (a), Petitioner listed the pending criminal investigation for criminal harassment of the perjurious affidavit for a petition for order of protection executed in February 2006 that was solicited by Respondents' attorney, Mitchell Asher, and conspired with by Judge Donegan, Mitchell Asher, Anna Bush., David Wessel, and the Respondent and represents a classic pattern of practice of the alleged racketeering enterprise in the Domestic Relations Division of the Cook County Court. This fact evidences that the Respondent is already engaged in irreparable harm that meets the elements of a

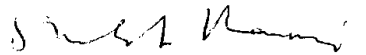
criminal act **IN ADDITION TO** the fact that Brain is **ALREADY** the victim of unwarranted separation from his primary caretaker pursuant to 750 ILCS 60/214(b)(5) as detailed in Petitioner's Support Authorities attached to the instant petition.

7. This Court's finding that "Petitioner has not presented the court with any new allegations since 12/31/06 when 06OP176(9) involving same parties was heard and denied," represents a reversible error. There was no court transcript and no findings were entered by the prior court. Petitioner can detail the new allegations with regard to Brain that she presented to this Court. Further, the prior court did not even look at the attachments submitted in the separate proceeding. Moreover, the judgment of that proceedings is stayed such that this Court's ruling which relies on a stayed judgment is without just cause.
8. With tears in her eyes, anguish in her voice, and **testifying under oath to this Court of her son's call for help the night before**, Petitioner begged this Court to follow the law and do the right thing by her son. But her plea for help on behalf of her innocent child fell on deaf ears, ["... *judges, having ears to hear, hear not.*" Mitchum v. Foster, 407 U.S. 225, (1972)], which represents a reversible error.

III. Conclusion

WHEREFORE, Petitioner, SHEILA A. MANNIX, on behalf of the minor child, BRIAN S. SHEETZ, for the reasons clearly set forth in good faith and with just cause herein, and warranted in law and in fact, respectfully prays of this Honorable Court as follows:

- A. For an Order of Court reversing both rulings of 01/04/07, issuing the requested emergency order of protection, setting a hearing for plenary order of protection in 30 days to allow for preparation for a full evidentiary hearing which will include the testimony of the thirteen year old child and his sixteen-year-old brother, and ordering disclosure of Identity and Testimony of Witnesses pursuant to SCR 213(f) in 10 days; or, in the alternative,
- B. For an Order of Court reversing the dismissal ruling of 01/04/07, ordering service of the emergency petition by special process server, and ordering the return for hearing with the minor child within two days of service; or
- C. If not A or B above, for an Order of Court indicating with specificity this Court's findings for denial of the instant motion for reconsideration and that this Court's instant order is a final judgment ripe for appeal as a matter of right pursuant to SCR 301 and SCR 303, and/or
- D. For such other relief as to this Court may deem just and proper.



SHEILA A. MANNIX

SHEILA A. MANNIX,
on behalf of the Minor Child,
BRIAN S. SHEETZ
1118 RFD
Long Grove, Illinois 60047
(847) 971-6679

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY

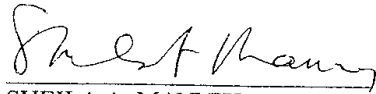
SHEILA A.MANNIX,)	
on behalf of the Minor Child,)	
BRIAN S. SHEETZ)	Case No. 07 OP 30
Petitioner,)	Independent
)	
v.)	Honorable Brian P. Hughes
)	Presiding Judge
DANIEL P. SHEETZ, SR.)	
Respondent.)	

AFFIDAVIT OF SHEILA A. MANNIX IN SUPPORT OF PETITIONER'S
EMERGENCY MOTION TO RECONSIDER THE DENIAL
AND DISMISSAL OF HER SON'S EMERGENCY VERIFIED PETITION FOR
ORDER OF PROTECTION PURSUANT TO
750 ILCS 60/205 AND 60/217 AND 735 ILCS 5/2-1203

I, Sheila A. Mannix, being first duly sworn, on oath, states as follows:

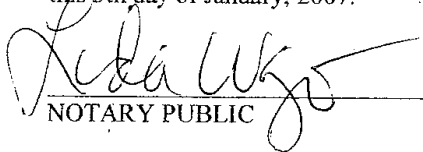
1. I am of legal age and competent. This affidavit is made on my personal knowledge of all matters set forth and referenced herein. If sworn and called as a witness in this case, I could, and I would, testify competently as to each fact set forth and incorporated herein by reference.
2. I created the attached emergency pleading about which this affidavit is attesting is of integrity and involves an emergency matter as a pro se non-attorney litigant, on behalf of my son, Brain, who has asked me to fight for him and his freedom and to never give up.
3. The alleged facts supported with attached evidence are true and correct to the best of my personal knowledge of the facts and evidence.
4. The alleged facts stated without evidence I believe to be true and correct to the best of my personal knowledge, information and belief.
5. That this matter constitutes an emergency as detailed in my attached emergency pleading.

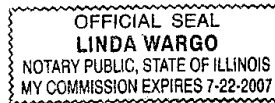
6. Further affiant sayeth naught.



SHEILA A. MANNIX

SUBSCRIBED and SWORN before me on
this 5th day of January, 2007.


NOTARY PUBLIC



IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS

EXHIBIT # A11

Shirley H. Moore)
Petitioner(s))
vs.)
David Schultz)
Respondent)

Case No: 29CP30

FILED

ORDER WITH STATUTORY FINDINGS REGARDING - 4 2007
PETITION FOR ORDER OF PROTECTION

Emergency Interim Plenary

This matter having come before the Court for hearing the **Petitioner** (not present) (appearing with counsel) (appearing pro-se) and the **Respondent** (not present) (appearing with counsel) (appearing pro-se), and the court having heard testimony and considered the evidence, finds as follows:

- That Respondent is not a "family or household member" as defined in the IDVA.
- That for the emergency relief sought, there is no immediate and present danger of abuse and therefore prior notice is required.
- That for the emergency relief sought, it has not been shown that the harm sought to be prevented would likely occur if the respondent were given prior or greater notice of Petitioner's efforts to obtain judicial relief.
- That the Court lacks jurisdiction over the Respondent.
- That Petitioner has not presented credible evidence to meet the burden of proof required by the IDVA.
- That Petitioner has not satisfied the statutory requirements for a single remedy.
- That it is unlikely, based on the evidence presented to this Court, that the Respondent will cause irreparable harm or abuse.
- That it is not necessary to grant the requested relief in order to protect the Petitioner or other alleged abused persons.
- Other: Respondent has not provided any proof with any IDVA
New abuse as since 12/31/96 when OGC/P/96

IT IS THEREFORE ORDERED:

- That the request for emergency relief be denied, and
- The cause be dismissed, or
- The Petition is set for further hearing provided proper notice is given in **Lake County Courthouse, 18 N. County St., Waukegan, IL 60085** on:

Hearing Date: _____ at _____ am/pm

Courtroom: _____

- That the request for an Order of Protection is denied, and cause dismissed.
- That pursuant to Petitioner's request, the cause is non-suited.
- That Petitioner has failed to appear for hearing, and the cause is dismissed for want of prosecution.

Attorney's Name: Moore
Address: _____
City: _____ State: _____
Phone: _____ Zip Code: _____
Fax: _____
ARDC: _____

Date: 11/4/07
[Signature]
Enter: _____
Judge

IN THE CIRCUIT COURT OF COOK COUNTY ILLINOIS
COUNTY DEPARTMENT - DOMESTIC RELATIONS DIVISION

IN RE: THE FORMER MARRIAGE OF
SHEILA MANNIX,

Petitioner,

vs.

DANIEL SHEETZ,

Respondent.

No. 93 D 2984

Exhibit "B"

AFFIDAVIT OF DELVINA CHRISTIAN

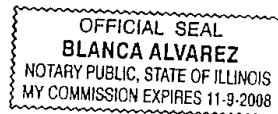
I, your affiant, Delvina Christian, being first duly sworn upon oath, depose and state as follows:

1. That I am forty-five (46) years of age, and I reside at 699 S. Dymond Rd., Libertyville, IL 60048.
2. I am a Montessori teacher at the Country Meadows School in Gurnee, Illinois and I am a learning disability specialist with a Masters degree from Northwestern University.
3. My son, Alex (12), became a classmate of Kevin (14) and Brian (11) Sheetz at the Montessori School of Lake Forest in November 2002 and August 2003, respectively.
4. I became aware that Sheila Mannix, Kevin and Brian's mom, is a clinical psychologist who is creating a regional Montessori secondary school in Long Grove.
5. On Monday afternoon, May 17, 2004, in the carport at the Montessori School of Lake Forest during student pick-up, I observed a bald spot on the crest of Brian's head that was the size of a fifty-cent piece.
6. Further affiant sayeth naught.

Delvina Christian
DELVINA CHRISTIAN

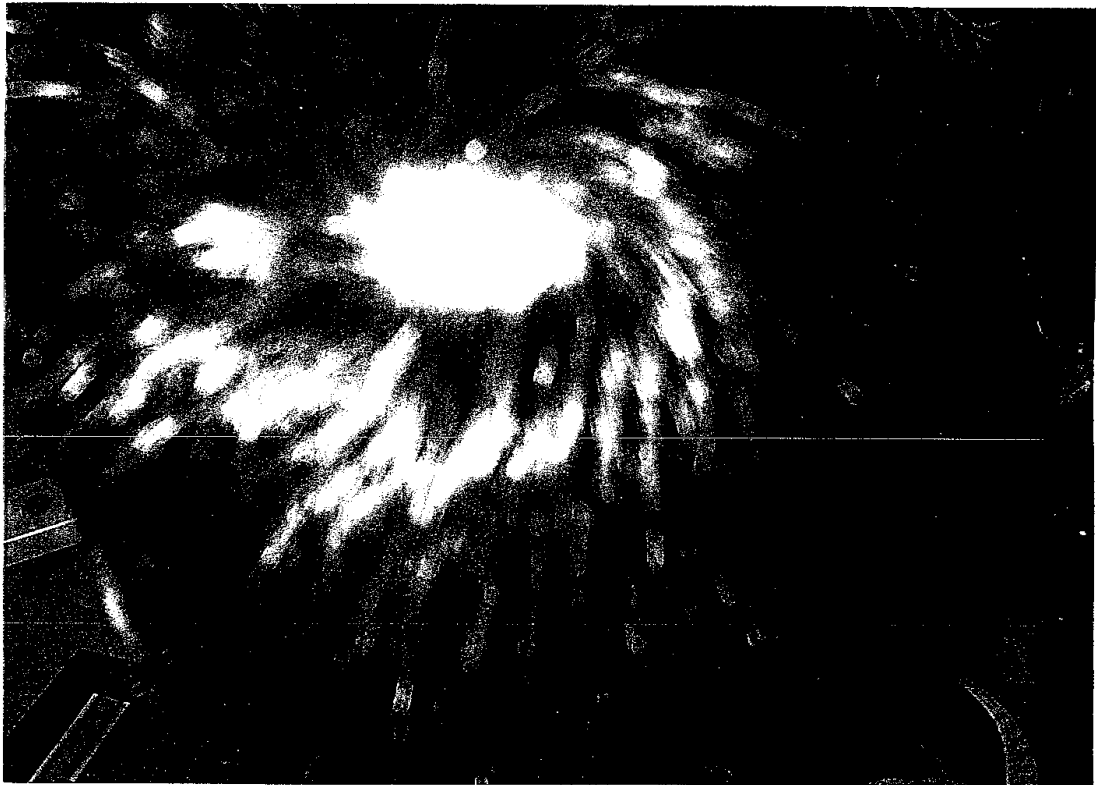
SUBSCRIBED and SWORN before me on
this 16th day of February, 2005.

Blanca Alvarez
NOTARY PUBLIC





BRIAN'S HEAD Tuesday, May 18, 2004



LIST OF TRIAL EXHIBITS

CASE NO. 07 OP 30

January 8, 2007

1. Affidavits of "bribery" fund and bribe referenced on Page 2, Paragraph 1.
2. Press Release referenced on Page 2, Paragraph 2, and subsequent releases and draft release.
3. All settlement proposals and proposed agreed orders referenced on Page 3, Paragraph One.
4. Petitions for Orders of Protection referenced on Page 4, Paragraph One and Page 14, Paragraph 2, and supportive documents.
 - a. Cook County September 2005
 - b. Lake County January 2006 and unlawful transfer orders
 - c. Third Municipal District March 2006, May 24, 2006 transcript of phone call from Judge Donegan to Judge Sullivan one week prior to status date, and unlawful transfer orders.
5. Transcript of Judge Donegan in Case No. 00 D 12889 soliciting a criminally perjurious protective order with the statement, **"There's nothing lesser than an order of protection. It's the easiest thing in the world."** Page 18, Lines 3-4.
6. Two Petitions non-suited before Judge Winter due to apparent bias and prejudice and unlawful delay, and Transcript of March 9, 2006
 - a. January 2005
 - b. March 2005
 - c. Transcript of March 9, 2006 with statement, **"I do not find a three week delay in hearing this petition and the motion will affect greatly the child's well-being. I understand the educational issues. The allegations are they have been longstanding already."** Page 11, Lines 19-23.
 - d. Orders
7. Affidavit of Sheila Mannix filed February 24, 2005 regarding gross improprieties of October 2005 by Judge Geiger and Attorney Bruno. And Lake County Orders delaying hearing of Petitions for Order of Protections due to Atty. Bruno filing motion to strike affidavit. Referenced on Pages 8-10, Paragraph 3.
8. Evidence of judicial fraud by Judge Geiger and Judge Donegan in October 2005:
 - a. Transcripts of October 14, 21, 26, and 31, 2005, all court orders, fax cover from Judge Donegan to Judge Geiger of October 14, 2005.
9. Pending 1203 motion to vacate denial of SOJ for cause filed September 29, 2005 and Motion to Strike and Dismiss that was NEVER noticed up by opposing counsel referenced on Page 4, Paragraph One, and Page 14, Paragraph 2.
10. Documentation of meritorious Parentage Petition filed by Petitioner in behalf of Brian in January 2006 referenced on Page 8, Paragraph 2.
11. Documentation of First District acceptance of appeal of rogue order of Judge Donegan re: Brian's parentage on July 25, 2006.
12. Documentation of retaliatory act of abuse in January 2002 with the filing of the false sole custody petition, rule to show cause, and restraining order seven months after child support and arrears award to Petitioner.

13. Documentation of retaliatory act of abuse in February 2004 after Petitioner obtained an order of protection and documentation of coercion under duress to vacate same. Said retaliatory act included the creation of an affidavit that meets the level of violations of Article 32: Interference with Judicial Procedure, Subparagraph 32-2 Perjury and 32-3 Subornation of perjury
14. Documentation of current retaliatory act of abuse, namely, the creation of a second perjurious affidavit which is the subject of a criminal investigation in by the Barrington-Inverness Police and about which the Cook County State's Attorney's Office in Rolling Meadows has been informed.
15. Documentation of Brian being held against his will in violation of law about which the Lake County Sheriff's Office and Lake County State's Attorney's Office have been fully informed.
16. Documentation of actions which meet the level of criminal communicating with and harassment of witness against Brian. Article 32-4 and 4a.
17. Transcript of October 31, 2005 in which it was stated that Brian's school would not be changed.
18. Transcript of November 4, 2005 in which it is stated that Brian's school would not be changed and included the discussion of Petitioner's last asset in direct violation of Supreme Court Rule 219 default judgment of October 19, 2004 that Judge Donegan has refused to enforce and has criminally impoverished the petitioner pursuant to the Cook County record, such that the petitioner has been forced to go the McHenry County and Lake County to seek enforcement of the Cook County order. Documentation re: same.
19. Documentation that Brian's school was changed January 3, 2006 and evidence of parental alienation by Respondent.
20. Evidence of criminal perjury of Child Representative David Wessel in Cook County case unlawfully purporting to represent Brian.
21. Evidence of criminal extortion by Cook County Court and Child Representative David Wessel against Petitioner.

STATE OF ILLINOIS }
COUNTY OF LAKE } ss

Page 1 of 2

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS

Skyla Munnix, on behalf
of Brian Skietz

FILED

2007

vs.

Gen. No. 09 OP 30

David Skietz, Sr.

[Signature]
CIRCUIT CLERK

ORDER

This cause coming on to be heard on Petitioner's motion to Reconsider the Denial and Dismissal of her Sins Emergency Petition for Order of Protection, and the Court being advised in the premises and finding as follows,

1. That Petitioner filed an Emergency Order of Protection, 06 OP 1769, involving the same parties which ~~was~~ was heard, denied and dismissed by Judge George Strickland on 12/31/06.
2. That Petitioner filed this cause on 1/4/07 which was heard before this court and emergency relief denied and cause dismissed.
3. That a motion to reconsider was filed by Petitioner in 06 OP 1769 prior to 1/4/07 requesting Judge Strickland to reconsider his denial of emergency relief and vacation of his dismissed order, and that motion was set for hearing, 1/18/07.
4. That Petitioner has filed a motion on 1/3/07 seeking to remove Brian Skietz as a party to the proceedings in 06 OP 1769.

Dated at Wankegan, Illinois this
_____ day of _____, 20_____

ENTER:

Judge

ORDER PREPARED BY:

(Please Print Name and Address)

STATE OF ILLINOIS }
COUNTY OF LAKE } ss

Page 2

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS

Minnix

vs.
Sheetz

Gen. No. 09 of 30

ORDER

5. That for the emergency relief sought, there is no immediate and present danger of abuse and therefore prior notice is required.

6. That for the emergency relief sought, it has not been shown that the harm sought to be prevented would likely occur if the respondent were given prior or greater notice of Petitioner's efforts to obtain judicial relief.

WHEREFORE, IT IS HEREBY ORDERED: 1) That the request for emergency relief is denied.

2) The order of 1/4/09 dismissing this cause is vacated.

3) The Petitioner is given leave to file ~~motion~~ her petition for an Order of Protection on behalf of her son Brian Sheetz.

4. That this cause is set before Judge June Walker in C-173 instanter for reassignment pursuant to local rule to set a return date pursuant to notice on Petitioner's petition for Order of Protection.

Dated at Waukegan, Illinois this
11 day of January, 2009.

ENTER: 

Judge

ORDER PREPARED BY: _____
(Please Print Name and Address)

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS

Mannin

VS.

Shutz, Sr.

JAN 11 2007

General No. 070P3U

CIRCUIT CLERK

REASSIGNMENT ORDER

This cause being referred to the Office of the Chief Judge for reassignment of Judge for the following reason:

Recusal due to:

- Motion for Substitution by Plaintiff. Specify as per right
- Motion for substitution by Defendant. Specify _____
- Judicial Conflict.
- Other _____

Administrative Reassignment due to:

- Consolidation of Cases-(Case # of C0-Def(s)) _____
- Previous involvement by Judge to whom case is to be reassigned. (Probation Case #) _____
- Other _____

IT IS HEREBY ORDERED THAT pursuant to assignment by the Office of the Chief Judge this cause be
assigned to the Honorable Joseph A. Waldeck

adhering to procedure

ENTER:

JANE D. WALKER
JUDGE

Filed at Waukegan, IL this
4th day of Jan, 2007.

STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

F I L E D

JAN 13 2007

IN THE CIRCUIT COURT OF THE NINETEENTH
JUDICIAL CIRCUIT, LAKE COUNTY, ILLINOIS

Signature
CIRCUIT CLERK

SHEILA A MANINIX, in behalf of

BRIAN S SHEER

vs. Partner

GEN. NO. 07 OP 30

DANIEL P. SHEETZ SR.

Respondent

PROPOSED ORDER

① THIS MATTER IS SET FOR HEARING FOR
PLENARY ORDER OF PROTECTION ON
JAN 31, 2007 at 9:00 A.M. in C-105.

② WITNESS LISTS PURSUANT TO SCR 213(f) due
by _____.

1-11-07
DATE

JOSEPH B. WALDECK
JUDGE

THIRD DIVISION
April 2, 2008

No. 1-06-3026

MARY CARR D'AGOSTINO and)	Appeal from
MARIO D'AGOSTINO,)	the Circuit Court
)	of Cook County.
Plaintiffs and Counterdefendants-Appellees,)	
v.)	
MICHAEL W. LYNCH,)	
)	
Defendant and Counterplaintiff and Third-)	
Party Plaintiff and Contemnor-Appellant,)	
(Michigan Avenue Partners, LLC, and Michigan)	No. 98 CH 11007
Avenue Partners, Inc.,)	
)	
Defendants and Counterplaintiffs and)	
Third-Party Plaintiffs,)	
v.)	
Dominic Forte,)	Honorable
)	Paddy McNamara,
Third-Party Defendant).)	Judge Presiding.

JUSTICE THEIS delivered the opinion of the court:

Defendant, counterplaintiff, third-party plaintiff, and contemnor Michael W. Lynch (Lynch) appeals on an interlocutory basis pursuant to Supreme Court Rule 304(b)(5) (210 Ill. 2d R. 304(b)(5)) from the order of the circuit court of Cook County holding him in direct criminal contempt and sentencing him to 60 days' imprisonment. The court held Lynch in contempt after he filed a motion for substitution of judge for cause in which he alleged that Judge Alexander

1-06-3026

against the corrupt judges. Although Mannix did not provide Lynch with any information regarding Judge White, she produced direct evidence regarding several other judges' involvement in the bribery scheme.

Regarding Judge White, Lynch asserted that documentation filed with his motion established that Judge White was an owner and director of Five Whites, LLC. When Lynch confronted Judge White about Five Whites, LLC, Judge White was "visibly shaken," and responded in a retaliatory manner. Nevertheless, Judge White did not deny involvement in Five Whites, LLC. Lynch thus maintained that the D'Agostinos and the mob were using Judge White to obtain a "corrupt judgment" against him.

On cross-examination, Lynch explained that an informant whose identity could not be revealed because he was a member of the Arizona crime family, whom Lynch would only identify as "Informant X," told Lynch that Braun and Mario D'Agostino had bribed Judge White. Informant X also confirmed that the Alexander White who was listed an owner and director of Five Whites, LLC, is the same person as Judge Alexander White. However, Lynch refused to disclose specifically what materials he was shown to support these allegations.

On questioning by the court, Lynch admitted that the only evidence of wrongdoing by Judge White he had presented was that Judge White owned a trust in Arizona that was not revealed on his financial disclosure form. The court then inquired whether there was any evidence that Judge White was the Alexander White who owned this trust, other than the hearsay from Informant X. Lynch responded that he did have other evidence, but he could not disclose it because it would place certain people's lives in jeopardy. Lynch stated that he did have direct



CERTIFICATION

I, Mary Ellen Vanderventer, Recorder for the County of Lake, State of Illinois, do hereby certify this to be a true and correct copy of Document Number 6324306 recorded March 27, 2008 as it appears from the records and microfilm in my office. In witness hereof, I have hereunto set my hand and affixed the seal of my office.

DATE: March 27, 2008

[Seal]

Mary Ellen Vanderventer
Mary Ellen Vanderventer
Lake County Recorder

by *Cristy Lee Weber*
Clerk, Recorder's Office

18 N County St – Second Floor
Waukegan, IL 60085-4358
(847) 377-2678
fax (847) 625-7200

AFFIDAVIT

OF

SHEILA A. MANNIX



Image# 043052340062 Type: AFD
Recorded: 03/27/2008 at 02:07:21 PM
Receipt#: 2008-00015620
Total Amt: \$87.00 Page 1 of 62
IL Rental Housing Fund: \$0.00
Lake County IL Recorder
Mary Ellen Vanderverter Recorder

File **6324306**

THE ABOVE SPACE FOR RECORDER'S USE ONLY

AFFIDAVIT OF SHEILA A. MANNIX

I, Sheila A. Mannix, being first duly sworn, on oath, states as follows:

1. I am of legal age and competent. This affidavit is made on my personal knowledge of all matters set forth herein. If sworn and called as a witness in this matter, I could, and I would, testify competently as to each fact set forth herein.
2. Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), I certify that the statements set forth in this instrument are true and correct, except as to such matters herein stated to be on information and belief and as to such matters, I certify aforesaid that I verily believe the same to be true.
3. I certify that the exhibits attached to this instrument are true and correct copies of authentic documents.
4. I have created this instrument in support of my teenaged sons' and my **independent Lake County Petition for Order of Protection, Case No. 07 OP 1512**, and the "Verified Emergency Petition for Temporary Restraining Order and Preliminary Injunction" filed therein, which petition stated in pertinent part at Page 12, Paragraphs 41 and 42:

"41. On June 19, 2006, IFCAA [Illinois Family Court Accountability Advocates, the lawful, volunteer, non-profit organization I co-founded with Karyn Mehringer] issued its first national press release through BusinessWire announcing that it had taken on the public corruption in the Circuit Court of Cook County.

42. In response to the national press release, IFCAA was connected to organized crime informants in Utah and Arizona who provided material evidence that indicated alleged involvement of multiple judges and attorneys in Chicago in an alleged national racketeering enterprise in the US judicial system partnered with territorialized organized crime families."

62

umm.

5. On October 9, 2007, before Lake County Head Family Court Judge Jane Waller, I presented Case No. 07 OP 1512, an *ex parte*, emergency **Verified Petition for Order of Protection** against my ex-husband, on behalf of my two teenaged sons [17 and 14] and myself. To date, said petition is unopposed and languishing in direct violation of statutory strictures and Supreme Court Rules which require expedited adjudication of petitions for order of protection and child custody matters. Said petition requested the following relief under 750 ILCS 60/214(b)(17): Remedies and Standards. Order for Injunctive Relief, "That Respondent be further ordered and enjoined as follows: (1) Stop all criminal acts against Petitioner and the teenaged minor children. (2) Stop all malicious prosecution in Cook County Case Known as: Cook Co. 93 D 2984, Lake Co. 05 OP 1348, Lake Co. 07 OP 143, Cook Co. 06 OP 2465 (formerly Lake Co. 06OP 97), Consolidated with: Cook Co.06 OP 3-0185, Cook Co. 07 OP 1949 (formerly Lake Co, 07 OP 30)."
6. After another verified attempt on November 13, 2007 by Cook County state court agents and those acting on their behalf to frame and falsely arrest me as an alleged "serious security threat," on December 5, 2007, in Lake County Case No. 07 OP 1512, I lawfully filed, served, and noticed a **Verified Emergency Petition for Temporary Restraining Order and Preliminary Injunction** seeking "the court to issue a temporary restraining order *instanter* and to schedule an evidentiary hearing for preliminary injunction against any further proceedings by the Respondent, Daniel P. Sheetz, Sr., in the Circuit Court of Cook County under Case No. 93 D 2984, et al.," proceeding in direct violation of binding state and federal constitutional and statutory civil and criminal law as well as the Illinois Wrongs to Children Act and federal RICO law as defined by 18 USC § 1961. In direct violation of Local Rules, Judge Waller continued the emergency matter to January 2, 2008.
7. On December 21, 2007, Judge Waller denied my **Verified Emergency Motion for the Self-Disqualification of The Honorable Jane D. Waller Instanter**.
8. On January 2, 2008, Judge Waller sent my **Verified Motion for Substitution of Judge for Involvement, or, In the Alternative, Verified Motion for Substitution of Judge for Cause** to Chief Judge David M. Hall.
9. On March 12, 2008, at the conclusion of that day's proceedings in my sons' and my **independent Lake County Petition for Order of Protection case** regarding well-pled motions for his own and Judge Waller's mandatory self-disqualifications and a motion to vacate as void his orders of January 25, 2008, all of which he denied me leave to file with another void order, Chief Judge Hall handed out to the four attorneys who had stepped up before him, specifically, Assistant Attorney General Janet Fasano, Assistant State's Attorney Daniel Jasica, and my ex-husband's attorneys, Mitchell Asher, and Charisse Bruno, pre-prepared, stapled copies of the 19-page, unpublished opinion in Cook County Case No. 98 CH 11007, Mary Carr and Mario D'Agostino v Michael Lynch, et al., at which I testified about the public corruption in Chicago's family court. The proceeding was before ex-Judge Paddy McNamara and was regarding a motion to substitute Judge Alexander White for involvement and/or cause.
10. The First District Appellate Court opinion issued on February 27, 2008 in the Lynch case stated in pertinent part: "Although Mannix did not provide Lynch with any information

regarding Judge White, she **produced direct evidence** regarding several other judges' involvement in the bribery scheme." [Page 8, last paragraph; Emphasis added.]

11. Further, it is my opinion from witnessing all of the proceedings on October 13, 2006 even though I was called as a witness in the proceeding but ex-Judge McNamara did not have me leave the courtroom after Mr. Lynch's statement that I should, that the aforementioned Appellate Court opinion in Mr. Lynch's appeal being handled by reputable Criminal Attorney Thomas Durkin issued on February 27, 2008 that upheld the ruling of ex-Judge McNamara falsely incarcerating Mr. Lynch evidenced an established pattern of practice of public corruption replicated in courts nationally in which corrupt public officials cause the problem for which the litigant is then held illegally responsible on the trial, appellate, and supreme court levels.
12. Specifically, on October 13, 2006, ex-Judge McNamara denied Mr. Lynch's Emergency Motion for Continuance which would have enabled him to set the parameters of the hearing on his motion for substitution of judge for involvement and/or cause against Judge Alexander White, including protections for mob informants, and would have enabled him to bring in his out-of-state witnesses to substantiate his well-pled factual allegations. [PR 001 - PR 003] Then ex-Judge McNamara held Mr. Lynch in contempt for not substantiating his factual allegations as a result of her preventing him from doing so. At Page 6, Lines 5-7 of the certified Report of Proceedings, ex-Judge McNamara stated in pertinent part, "**Well, I think we should proceed today. These are suppose - - these are proceedings that are suppose to be conducted expeditiously.**" Ex-Judge McNamara did not even enter an order documenting her denial of Mr. Lynch's motion for emergency relief to continue the proceedings so he could substantiate his factual allegations.
13. The aforementioned facts are especially disturbing because co-members of IFCAA have filed motions alleging that the Illinois statute for substitution of judge for cause under the Civil Practice Act, 735 ILCS 5/2-1001(a)(3)(iii), is unconstitutionally vague and contradictory. Specifically, it states "(iii) **Upon the filing of a petition for substitution of judge for cause, a hearing to determine whether the cause exists shall be conducted as soon as possible by a judge other than the judge named in the petition. The judge named in the petition need not testify but may submit an affidavit if the judge wishes.**" As a result of this unconstitutionally vague and contradictory statute, dishonest judges who act in a manner prejudicial to the administration of justice engage in gross abuses of power and exploit litigants to cover-up for the prejudicial and bias acts of fellow judges which misconduct eclipses litigants' federally-protected, constitutionally-secured rights to a fair trial before an impartial judge.
14. For example, (A) in my Cook County Case No. 93 D 2984, et al, my SOJ for Cause against Judge Eileen Brewer was assigned to Judge R. Morgan Hamilton, over my objection, on September 18, 2007 and she continued it to **October 18, 2007**. (B) In IFCAA co-member, Rosemarie Broderick's Case No. 00 D 4868, on October 24, 2007, Judges Brewer and Shields and Head Family Court Judge Moshe Jacobius entered a total of five orders transferring and denying a **non-existent** SOJ for Cause motion. I repeat, three Cook County Family Court judges entered a total of five orders transferring and **denying an SOJ for Cause motion that was never written**. Further, (C) court records document that under no authority of law whatsoever, thereby rendering the proceedings void, judges in Lake and

Cook Counties transfer self-disqualification motions that only the named judge can adjudicate himself or herself (as common sense would dictate) to other judges who deny the self-disqualification motions naming judges other than themselves. Specifically, for example, Cook County Judges Shields, Katz, Ruble-Murphy, Mathein and Jacobius have done this in IFCAA co-members' case in 2005 and 2007. Lake County Chief Judge Hall and Judges Starck, Winter, and Waller have done this in my Lake County cases in 2006, 2007, and 2008. In other instances, (D) judges named in well-pled SOJ for cause motions irrefutably detailing extra-judicial bias and prejudice refuse to transfer the motions to another judge in direct violation of statutory strictures, thereby rendering the proceedings void.

15. In my next proceeding before Chief Judge Hall in my sons' and my protective order case, on March 25, 2008, Chief Judge Hall denied me leave to file my **Verified Motion to Invoke Mandatory Duty to Report Federal Felony Crimes and Attorney Misconduct** and **Motion to Vacate as Void the Orders Chief Judge Hall Entered on March 12, 2008** with another void order. The former motion detailed direct evidence of federal felony criminal extortion over state lines and conspiracy to commit federal felony criminal extortion over state lines by two court-appointed Cook County state court agents, specifically, attorney David Wessel and Jonathan Gamze, MD, as well as detailed criminal perjury and subornation of perjury and conspiracy to commit criminal perjury and subornation of perjury by my ex-husband and his attorney, Anna Markley Bush.
16. Before the proceedings on the 25th, I formally requested an in chambers conference with bench and bar as follows:

“If I might please formally request an in chambers conference to discuss off the record the ramifications of the 19-page unpublished First District Appellate Court opinion in the Cook County Case No. 98 CH 11007, Mary Carr and Mario D’Agostino v Michael Lynch, et al. that Chief Judge Hall distributed to everyone on March 12, 2008 and which opinion states in pertinent part, “Although Mannix did not provide Lynch with any information regarding Judge White, she **produced direct evidence** regarding several other judges’ involvement in the bribery scheme,” [Page 8, last paragraph; Emphasis added.]

Specifically, I am respectfully requesting to show to and discuss with bench and bar some of the documents I received from organized crime family informants to whom I was networked after the release of the national press release on June 19, 2006 by the organization I co-founded, Illinois Family Court Accountability Advocates, about which I testified on October 13, 2006 in the aforementioned case that directly resulted in the above quote from the aforementioned opinion.”

17. Before the bench, I directly implored Chief Judge Hall to share the burden with me, but he refused my aforementioned request for an in chambers conference which was distributed to all involved parties except Judge Waller who was reportedly attending a funeral on March 25, 2008 and was not on the bench that day. [PR 004].
18. I am of information and belief that, under binding constitutional and statutory civil and criminal laws and under controlling higher court opinions, Chief Judge Hall and Presiding Judge Waller have lost authority and jurisdiction to enter orders in Case No. 07 OP 1512.

19. I have attached hereto for entry into the public record of Lake County a few of the documents I received from organized crime family informant, "Informant X," which, in part, formed the basis of my testimony about which the First District Appellate court made the aforementioned finding, "she produced direct evidence regarding several other judges' involvement in the bribery scheme."
20. I am of information and belief that I have been unable to find a state or federal trial, appellate, or supreme court judge to uphold my teenaged sons' and my constitutional and civil rights and liberty interests as well as enforce binding state and federal civil and criminal laws in my family's post-divorce case and protection order cases because of the apparent involvement of multiple Circuit Court of Cook County judges in an interstate organized crime family enterprise involving the Sucato Family and the Maricopa County Recorder's Office in Arizona about which I testified under oath on October 13, 2006 in the Cook County Case No. 98 CH 11007, Mary Carr and Mario D'Agostino v Michael Lynch, et al.
21. I am of information and belief that the copies of the documents that are attached hereto that I received from "Informant X" indicate the involvement of the named judges, solely and in conspiracy with other state court agents, in illegal acts within and across state lines.
22. Further, I am of information and belief that the extreme retaliation against my sons and me by the named judges supports the finding of the First District Appellate Court, namely, "she produced direct evidence regarding several other judges' involvement in the bribery scheme," such that the retaliation against my sons and me meets the elements of violations of the Illinois Criminal Code of 1961, Article 32: Interference with Judicial Procedure, Section 32-41: Harassment of Witnesses and meets the elements of violations of the federal statutes, 18 USC § 1512: Tampering with a Victim, Witness, or an Informant, and 18 USC § 1513: Retaliating Against a Victim, Witness, or an Informant in pending or potential proceedings.
23. I have attached pages 73 to 75 of the certified Report of Proceedings of the end of my testimony in the aforementioned D'Agostino v. Lynch case to put into the public record the fact that my IFCAA co-member, Michael Lynch, and myself do not believe that all judges are corrupt. However, we have been blessed with the burden of service to our fellow Americans and are obligated to uphold our civil and moral duty to expose the irrefutable evidence that some judges are corrupt and these judges are a "clear and present danger to the administration of justice," especially in cases involving the nation's children. [PR 005 - PR 008]
24. I restate and reaffirm the statements I made at the national Family Preservation Day rally on August 18, 2007 at the foot of the Lincoln Memorial in our nation's capital:

And most important to my presentation today, we were networked with organized crime family informants.

Please understand that IFCAA members did not ask to become aware of organized crime informants.

We did not ask for this cross to bear and become moms and dads against the mob. But we will shoulder this burden with honor and integrity on behalf of the suffering children of our nation and on behalf of our law enforcement officials, soldiers and veterans.

People say that we are crazy.

My response is that if you think that our belief in justice and our great US Constitution is crazy then you have made a statement about yourself, not me and my co-members of IFCAA.

People ask me if I am afraid.

And I respond, of course I am afraid, I'm not crazy!

But I am more afraid of waking up one day and looking in the mirror to see a woman who has sold her soul to this fear. And in the face of this fear, I just have to think of our suffering children and our suffering soldiers and veterans who are alone in the dark of night - wounded, abused, or wondering if their protective mom or dad or their country has abandoned them. And when I think of them, I am filled with indomitable courage to stand up to my moral and civil duty to them.

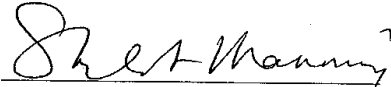
I ask you to stand up with me and my IFCAA co-members.

25. Attached hereto are some of the documents I have received from "Informant X" that I am of information and belief are "linked" to the state court agents named herein:
- a. The table of contents and section summary pages of an over 90-page "book" of documents "linked" with Associate Judge Karen G. Shields. [PR 009 – PR 022]
 - b. **The Second Affidavit of Karyn Mehringer In Support of Her Emergency Motion for Leave to File *Instantly* the Attached Emergency Motion for Judicial Admission or Denial by Judge Karen G. Shields Regarding Knowledge of and/or Participation in Alleged Criminal Acts Within and Across State Lines by Judges in the Circuit Court of Cook County, Illinois, and Other Relief *Instantly***, which is a Court Watch witness affidavit of the proceedings in my case before the late Judge Donegan on August 16, 2006 at which three Private Investigators were present as well as IFCAA co-member, Michael Lynch, as a material witness to give testimony for my emergency "judicial admission or denial motion" directed to Judge Donegan and, further, attached pages 1, 2, 3, 29, and 30 from the organized crime informant's "book" on Judge Shields and my Affidavit of Service to Ms. Mehringer's ex-husband on August 15, 2006. I gave Judge Shields her Courtesy Copy of Ms. Mehringer's emergency pleading on August 15, 2006 as well. Ms. Mehringer's emergency pleading was lawfully filed, served and noticed for presentation on August 17, 2006. On August 17, 2006, Ms. Mehringer was prevented from entering Judge Shields' courtroom by Deputy Louie Sanchez who gave Ms. Mehringer the denial order entered by Judge Shields in the court hallway. Please note that one of the two Cook County Sheriff's Police Detectives who criminally harassed and intimidated Ms. Mehringer at her home later that evening of August 17, 2006 showed up at my last proceeding before Judge Donegan on February 23, 2007. He refused to give me his name and/or card. [CCSPD Jason Moran #952] The following week, Judge Donegan was found dead at the bottom of his basement stairs with a "severely broken neck." [PR 023 – PR 031]

- c. A summary page of “links” and documents from the Maricopa County Recorder’s Office “linked” with the late Associate Judge James G. Donegan. [PR 032 – PR 034]
 - d. The documents associated with Judge Eileen M. Brewer [PR 035 – PR 036] and court-appointed attorney David Wessel (“linked” with other state court agents) [PR 037 – PR 044] that I entered into the record of the First District Appellate Court Case No. 1-07-1520 on August 3, 2007. Additionally, I have attached hereto Exhibit H of said filing which was the March 26, 2007 national press release of my letter to US Senator Patrick Leahy, Chairman of the Senate Judiciary Committee with a summary of the exhibits submitted in the large three-ringer binder of documents I sent Senator Leahy on or about January 18, 2007 [PR 045 – PR 047] Note that the aforementioned appellate court filing included the entirety of the documents sent to Senator Leahy designated by Exhibit G: G1 through G17 which coincide with the documents attached below for ex-Judges Disko (G3), McNamara (G5) and Henry (G17), all of whom left the bench between October 2006 and December 2006.
 - e. A document “linked” with retired Judge James Henry who immediately recused from my younger son’s Cook County habeas corpus action on August 24, 2006 when the document was attached to a pleading which asked Judge Henry for a judicial admission or denial regarding knowledge of and/or participation in alleged criminal acts within and across state lines by judges in the Circuit Court of Cook County, Illinois. Judge Henry did not run for re-election in November 2006 [PR 048]
 - f. A document “linked” to retired Judge Barbara Disko which was attached to IFCAA co-member, Michael Lynch’s pleading in his case before Judge Disko, which asked her for a judicial admission or denial regarding knowledge of and/or participation in alleged criminal acts within and across state lines by judges in the Circuit Court of Cook County, Illinois. Said pleading was lawfully filed, served, and noticed for presentation on October 19, 2006. On said day, Judge Disko announced her retirement effective December 1, 2006. [PR 049]
 - g. A document “linked” to ex-judge Paddy McNamara’s husband, Barry T., which was put on the witness bench while on I was the stand in the aforementioned D’Agostino v. Lynch case on October 13, 2006. I am of information and belief that Judge McNamara quit the bench within weeks of said date after falsely incarcerating IFCAA co-member, Michael Lynch, for alleged direct criminal contempt of court. [PR 050]
 - h. Introductory pages and a table of contents of a “book” “linking” Arizona and Utah. [PR 051 – PR 054]
26. I swear before Almighty God that I have never been and will never be an unlawful threat to anyone. However, by the Grace of God and the Power of Love, and with strength and honor, I pray that in the face of the devastating suffering of my own children and the undeniable retaliation against me as a victim, witness, and informant of irrefutable public corruption

resulting in irreparable damage to my health and my reputation and career and my unlawful defamation, criminalization, and impoverishment that I may continue to be given the courage to obey my moral and civil duty as a resident of the State of Illinois, as a citizen of the United States of America, and as a loving, caring human being so that I may continue be a lawful threat to corrupt public officials, who are literally selling children's flesh to the highest bidder through our nation's family courts, by utilizing the many blessings God has bestowed upon me on behalf of disenfranchised children.

27. Further sayeth naught.


Sheila A. Mannix

SUBSCRIBED and SWORN to before me on
this 27th day of March, 2008.


NOTARY PUBLIC



Prepared by/Send to: Sheila Mannix, 1118 RFD, Long Grove, IL 60047

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

(caption)

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O R D E R

In this action, claims have been asserted under the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. §1961. Under the current practice of this Judge, all parties filing RICO claims must file a RICO statement in the form following.

The plaintiff shall file, within twenty (20) days hereof, a RICO case statement. This statement shall include the facts the plaintiff is relying upon to initiate this RICO complaint as a result of the "reasonable inquiry" required by Fed. R. Civ. P. 11. In particular, this statement shall be in a form which uses the numbers and letters as set forth below, and shall state in detail and with specificity the following information.

1. State whether the alleged unlawful conduct is in violation of 18 U.S.C. §§1962(a), (b), (c), and/or (d).
2. List each defendant and state the alleged misconduct and basis of liability of each defendant.
3. List the alleged wrongdoers, other than the defendants listed above, and state the alleged misconduct of each wrongdoer.
4. List the alleged victims and state how each victim was allegedly injured.

5. Describe in detail the pattern of racketeering activity or collection of unlawful debts alleged for each RICO claim. A description of the pattern of racketeering shall include the following information:

a. List the alleged predicate acts and the specific statutes which were allegedly violated;

b. Provide the dates of the predicate acts, the participants in the predicate acts, and a description of the facts surrounding the predicate acts;

c. If the RICO claim is based on the predicate offenses of wire fraud, mail fraud, or fraud in the sale of securities, the "circumstances constituting fraud or mistake shall be stated with particularity." Fed. R. Civ. P. 9(b). Identify the time, place and contents of the alleged misrepresentations, and the identity of persons to whom and by whom the alleged misrepresentations were made;

d. State whether there has been a criminal conviction for violation of the predicate acts; *none*

e. State whether civil litigation has resulted in a judgment in regard to the predicate acts; *defense case*

f. Describe how the predicate acts form a "pattern of racketeering activity"; and

g. State whether the alleged predicate acts relate to each other as part of a common plan. If so, describe in detail.

6. Describe in detail the alleged enterprise for each RICO claim. A description of the enterprise shall include the following information:

a. State the names of the individuals, partnerships, corporations, associations, or other legal entities, which allegedly constitute the enterprise;

b. Describe the structure, purpose, function and course of conduct of the enterprise;

c. State whether any defendants are employees, officers or directors of the alleged enterprise;

d. State whether any defendants are associated with the alleged enterprise;

e. State whether you are alleging that the defendants are individuals or entities separate from the alleged enterprise, or that the defendants are the enterprise itself, or members of the enterprise; and

f. If any defendants are alleged to be the enterprise itself, or members of the enterprise, explain whether such defendants are perpetrators, passive instruments, or victims of the alleged racketeering activity.

7. State and describe in detail whether you are alleging that the pattern of racketeering activity and the enterprise are separate or have merged into one entity.

8. Describe the alleged relationship between the activities of the enterprise and the pattern of racketeering activity. Discuss how the racketeering activity differs from the usual and daily activities of the enterprise, if at all.

Lake Co.
Board
now
perpetrators

Some of Daley C. OIC → Direct Relation of # or not
Then other Divisions conspire + cover up → fed. funds
Educato and Lake Co
Comp

*person's
tax payers #*

- 9. Describe what benefits if any, the alleged enterprise receives from the alleged pattern of racketeering.
- 10. Describe the effect of the activities of the enterprise on interstate or foreign commerce. *crush private business*
- 11. If the complaint alleges a violation of 18 U.S.C. §1962(a), provide the following information:
 - a. State who received the income derived from the pattern of racketeering activity or through the collection of an unlawful debt; and
 - b. Describe the use or investment of such income.
- 12. If the complaint alleges a violation of 18 U.S.C. §1962(b), describe in detail the acquisition or maintenance of any interest in or control of the alleged enterprise.
- 13. If the complaint alleges a violation of 18 U.S.C. §1962(c), provide the following information:
 - a. State who is employed by or associated with the enterprise; and
 - b. State whether the same entity is both the liable "person" and the "enterprise" under §1962(c).
- 14. If the complaint alleges a violation of 18 U.S.C. §1962(d), describe in detail the alleged conspiracy.
- 15. Describe the alleged injury to business or property.
- 16. Describe the direct causal relationship between the alleged injury and the violation of the RICO statute.
- 17. List the damages sustained for which each defendant is allegedly liable.

*just # or also reputation
career
criminal
etc.*

→ Civil rights?

18. List all other federal causes of action, if any, and provide the relevant statute numbers.

19. List all pendent state claims, if any. *defamation? sent*

20. Provide any additional information that you feel would be helpful to the court in processing your RICO claim. *mal. practice? mal. pros. suit*

AND NOW, this _____ day of _____, 19____,
IT IS SO ORDERED.

United States District Judge

cc: Counsel of record.