



1 6. William declares and alleges that all defendants are political patronage officers or  
2 workers, who act in their personal capacity and Official capacity. "Official Capacity" When  
3 deprived of rights by "State Action" plaintiff must prepared to prove lack of process. Parrat v.  
4 Taylor 451US527; Hafer v. Melo 502US21 (1991) "State Actor" may be liable. Mercer Pg 745.  
5 (See MERCER LAW REVIEW VOL 56 pg 565-648 for "under the color of law"-state action.)

6 7. William declares and alleges that all events regarding William's seizure of animals,  
7 arrest, unreasonable force, unlawful arrest and unlawful search of William's home occurred on  
8 federally protected land patented land. [See Summa Corp. v. California ex rel. State Lands  
9 Comm'n, 466 US 198 - Supreme Court 1984 William owns superior Title to Land.]

10 8. William declares and alleges that William is not involved in commerce. There is no  
11 evidence that William is involved in commerce of operating a commercial kennel for profit.

12 9. William declares and alleges 42USC§1983 Deprivation of rights under color of law-  
13 State Action-Constitutional first amendment due process rights are applicable to Claim I  
14 through Claim XV. (See MERCER LAW REVIEW VOL 56 pg 745.)

15 10. William declares and alleges that William did not get given the Sheriff reports, TCSO  
16 reports, ACO evidence/ documents that William has demanded from County of Tulare  
17 specifically Tulare County County Counsel.

18 11. William declares and alleges all certified transcripts are impeachable witnesses.

19 12. William declares and alleges that William, based upon lack of probable cause for  
20 Claims I through XV, was not given the following right(s) and this estoppels the defendants;  
21 "Ordinarily, due process of law requires [notice and] an opportunity for some kind of hearing  
22 **prior** to the deprivation of a significant property interest." Id. Halverson, 42 F.3d at 1260.

23 13. William incorporates and includes by reference the Third Amended Complaint order of  
24 19 June 2017 CASE NO.: 1:15-CV-01779-EPG Section V. Additional legal standards pg 11  
25 In 24 through and including pg 14 In 17 subsections a, b, c and d.

26 14. Hearing officer Agnello changed the nature and cause of action from "vicious and  
27 dangerous" to "sick and endangered" to justify the lack of a warrant on 24Nov2013.

28 15. Hearing officer Hornburg changed the nature and cause of action from Agnello's order  
of "sick and endangered" back to "vicious and dangerous" to justify the lack of a warrant on  
18Mar2014.

1 16. Taylor did not properly notice William of the 30Jun2014 hearing that resulted in the  
2 euthanization of William's beloved dogs.

3 -INTRODUCTION-

4 17. William Declares and alleges the following: This is a complaint on a series of events  
5 that is based on William's dog takings from 27Apr2013 and 22Oct2013, Warrant application  
6 on 21Oct2013, series of animal control hearings from 24Nov2013 to 18Mar2014, series of  
7 Superior Court hearings from 10Jan2014 to 30Jun2014, unknown euthanization events and  
8 inadequate training of workers from 27Apr2013 to current date.

9 18. This complaint mainly involves Due Process-no probable cause issues spanning  
10 27Apr2013 to current date. Along with these core claims are subsequent claims of unlawful  
11 arrest, unreasonable force during arrest, multiple due process issues regarding having no  
12 warrant without probable cause, warrant without probable cause, application of a warrant  
13 without probable cause, multiple animal control hearings without due process jurisdiction,  
14 multiple Superior Court hearings without due process jurisdiction ending in euthanization of  
15 William's animals and inadequate supervision and training of Patronage workers in their  
16 personal and Official Capacities. Also discussed will be the lack of burden of proof to  
17 establish jurisdiction and accusation of operation of a commercial business occupation.

18 19. Tulare County-Taylor has not filed proof of jurisdiction in VCU253890.

19 **Claim I**

20 20. **Claim I 42USC§1983 [1<sup>st</sup> Dog taking 27Apr2013 unlawful seizure]**

21 21. On or about 27Apr2013 [TCACO] Lewis #1206 and [TCSO] McLean and Heiden  
22 trespassed onto William's land without a valid warrant supported by competent first hand  
23 eyewitness, arrested William without probable cause, used excessive force against William,  
24 and seized 8 (eight) of William's dogs without any warrant based on probable cause [See  
25 Summa Corp]. William considers these animals as his family members. In a confusing  
26 statement, Lewis said he was going to take all the "black dogs". Lewis seized the animals.  
27 William requested that Lewis produce a valid warrant with a sworn affidavit. Lewis stated he  
28 did not need a warrant to seize the dogs. Lewis said he did not need a competent eyewitness  
complaint. Lewis stated that he could seize these animals based on the authority of Tulare  
County codes. McLean and Heiden supported Lewis's actions. William witnessed McLean  
talking to ACO manager Grenseman, who stated over the phone that he has taken thousands of

1 dogs without any warrants in the Tulare County and euthanized them. McLean and Heiden  
2 did not prevent Lewis from seizing, without a warrant the animals. These animals are a  
3 comfort and support to William because of William's ADA disabilities. William alleges this  
4 conduct to be deliberate and malicious. Lewis left spent unauthorized FDA drug tranquilizer  
5 cartridges on William's land.

6 22. William witnessed Lewis shoot a tranquilizer gun, without clear visibility, with FDA  
7 controlled substances to tranquilize William's animals. Then Lewis dragged the tranquilized  
8 animals by a catch noose from underneath William's protective porch. Lewis then lifted the  
9 animals by the catch noose inhumanly up and over a 4 foot fence. Lewis dragged them on the  
10 ground. Then Lewis brutally threw them into his animal control truck. William witnessed this  
11 heartbreaking terrible act eight times. William was helpless to do anything as William was  
12 tightly handcuffed. Lewis was obviously inadequately trained on search warrants and proper  
13 handling of drugged and tranquilized animals by the use of FDA controlled drugs. No warrant  
14 was returned to Visalia Superior Court regarding the seizure of 27Apr2013. "This applies  
15 both with Federal Rules of Evidence and State Rules of Evidence.... there must be a competent  
16 first hand witness (a body). There has to be a real person making the complaint and bringing  
17 evidence before the court. Corporations are paper and can't testify. "Manifestly, [such  
18 statements] cannot be properly considered by us in the disposition of [a] case." United States  
19 v Lovasco (06/09/77)431 U.S. 783, 97 S. Ct.2044, 52l Ed.2d 572. This is a violation of  
20 William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> amendment rights. William's (See Menotti v. City of Seattle, 409  
21 F.3d 1113) (See Summa Corp):(See Stamas v. Cnty. of Madera, 795 F.Supp.2d 1047,  
22 Halverson v. Skagit Cnty., 42 F.3d 1257, 1260)

### Claim II

23. Claim II 42USC§1983 [1<sup>st</sup> Dog-taking 27Apr2013 unreasonable force]

24. On or about 27Apr2013 McLean and Heiden trespassed onto William's land without a  
25 valid warrant, not supported by competent first hand witness testimony, arrested William  
26 without probable cause and used excessive force against William without any warrant.  
27 McLean demanded that William produce identification. William said that he did not have  
28 identification on his person as William was on his own private land. McLean then asked  
William whether he had anything that would "poke, stab or cut" McLean. Upon William  
stating that he did not, McLean immediately twisted William's right wrist to the middle of the

1 back of William's head, causing pain and subsequently placed William in tight, restrictive and  
2 painful handcuffs. With both hands tightly handcuffed, using excessive and unreasonable  
3 force, William was confined to the front of McLean's cruiser for over one hour. William was  
4 in the hot sun, which exacerbated and contributed to William's hypertension medical  
5 condition. William complained to McLean that the tightness of the handcuffs restricted his  
6 blood flow. McLean declined to readjust the handcuffs. William suffered an injured shoulder  
7 from the handcuffs and William subsequently developed bronchitis which required medical  
8 attention from his physician. McLean did not use reasonable articulated suspicion (RAS) of  
9 what crime William was potentially accused of requiring handcuffing and what crime justified  
10 William producing identification on his land. Resisting arrest, PC§148(a), is a crime requiring  
11 Miranda v. Arizona warning would make William's arrest of criminal nature. William alleges  
12 this conduct to be deliberate and malicious. McLean and Heiden were apparently improperly  
13 trained on arrest procedures, penal codes and search warrants. The arrest was unreasonable  
14 and therefore is a fraud and unreasonable act as the officers came on William's land without  
any warrant.

15 25. Upon arrival of Heiden, William continued to complain regarding the tightness and the  
16 restriction caused by the tight handcuffs. William notified Heiden of his medical condition.  
17 Heiden and McLean did not request medical treatment for William. Heiden eventually, after  
18 approximately one hour, loosened up the handcuffs upon William's continued complaint.  
19 Violating and/or trespassing upon William's constitutional right(s) and/or liberty, constitutes a  
20 cause of action under 42 USC 1983 of William's civil rights. There was no warrant. This is a  
21 violation of William's 1<sup>st</sup>, 4<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> amendment right. (See Scott v. Harris, 550 U.S.  
22 372, 381, Graham, 490 U.S. at 396, 397, Gregory v. County of Maui, 523 F. 3d 1103, 1106)  
23 (See Lovasco, Summa Corp.) (See Stamas v. Cnty. of Madera, 795 F.Supp.2d 1047, Halverson  
v. Skagit Cnty., 42 F.3d 1257, 1260)

### Claim III

24 26. ~~Claim III 42USC§1983 [1<sup>st</sup> Dog taking 27Apr2013 unlawful arrest]~~

25 27. On or about 27Apr2013 McLean and Heiden trespassed onto William's land without  
26 any valid warrant supported by competent first hand witness, arrested William without  
27 probable cause for **resisting arrest PC§148(a)** and for not having identification on his person  
28 in his own front yard without any warrant. McLean and Heiden failed to provide Miranda v.

1 Arizona rights warning to William. McLean and Heiden jointly authored Tulare County  
2 Sheriff's report number 13-5348 for **resisting arrest PC§148(a)**. Tulare County Sheriff did  
3 not provide evidence of report 13-5348 to William. In the Sheriff's report 13-5348 both  
4 McLean and Heiden stated that William had resisted arrest. McLean and Heiden requested  
5 that the Tulare County Dist. Atty. to press charges of resisting arrest against William. Upon  
6 review, Tulare County Dist. Atty. Ward declined to prosecute William on resisting arrest.  
7 However McLean and Heiden conducted their 27Apr2013 activities under PC§148 (a). This  
8 Sheriff report substantiates and provides evidence that McLean and Heiden worked together  
9 and they assumed that William was allegedly arrested for criminal PC§148(a) behavior.  
10 Therefore in the mind of McLean and Heiden, Miranda rights should have been required and  
11 were not given to William. When the TCSO treated William like a criminal by tightly  
12 handcuffing for longer than one hour, William was unable to contact his lawyer. William  
13 alleges violation of William's 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> amendment right. (See Lacey v.  
14 Maricopa Cty., 693 F.3d 896,918 ).(See Stamas v. Cnty. of Madera, 795 F.Supp.2d 1047,  
Halverson v. Skagit Cnty., 42 F.3d 1257, 1260):(See Lovasco, Summa Corp)

#### Claim IV

15 28. Claim IV 42USC§1983 (Warrant application on or about 17-21Oct2013) (due process  
16 fraud)

17 29. On or about 17 21 October 2013 Attorney Taylor and ACO Hernandez initiated  
18 application for weed abatement/inspection and seizure warrant-under authority of  
19 CCCP§1822.50.

20 30. The full text of California Code of Civil Procedure is: Code of Civil Procedure - CCP  
21 PART 3. OF SPECIAL PROCEEDINGS OF A CIVIL NATURE [1063 - 1822.60] (Part 3 enacted  
1872.)

22 **TITLE 13. INSPECTION WARRANTS [1822.50 - 1822.60] (Title 13 added by Stats. 1968, Ch.  
1097.) § 1822.50.**

23 "**An inspection warrant is an order**, in writing, in the name of the people, **signed by a judge of**  
24 **a court of record**, directed to a state or local official, commanding him **to conduct any**  
25 **inspection** required or authorized by state or local law or regulation relating to building, fire,  
26 safety, plumbing, electrical, health, labor, or zoning.  
(Amended by Stats. 1980, Ch. 230, Sec. 1.)"

27 31. On or about 25Mar2014 Tulare County County Counsel attorney Taylor filed the  
28 following declaration in VCU253890;

Declaration of Taylor 25Mar2014 Ins 1 to 21 [KAT/3/11/2014/20131677/640823/640823]

"IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF TULARE, VISALIA DIVISION

1 COUNTY OF TULARE, a political subdivision of the State of California,  
2 Plaintiff, vs. WILLIAM ALAN FABRICIUS and DOES 1 thru 25, Inclusive; 26727 Avenue 56,  
3 Ducor, Tulare County, CA APN: 323-040-012-000 Defendants.

4 Case No. VCU 253890, Declaration of Kathleen A. Taylor re: Case Management Conference,  
5 Date: April 10, 2014. Time: 8:30a.m. Dept.: 7

6 I, Kathleen A. Taylor, am a Deputy County Counsel representing the County of Tulare in the  
7 above-entitled matter. I am licensed to practice before the state and federal courts within the  
8 State of California.

9 The court action number identified above was assigned by the court in connection with an  
10 inspection warrant issued at the request of the County Animal Control Officer. The procedure  
11 for such warrants is a Special Proceeding of a Civil Nature under Code of Civil Procedure  
12 section 1822.50. Various animals were seized as a result of observations made during execution  
13 of the warrant and administrative proceedings under the Tulare County Ordinance Code were  
14 instituted and are ongoing.”[KAT/3/11/2014/20131677/640823/640823]

15 32. William alleges that attorney Taylor and ACO Hernandez violated William’s due process  
16 rights by fraudulently initiating an inspection warrant for commercial businesses when William  
17 is not engaged in commercial kennel activities. There is no evidence that supports subject matter  
18 jurisdiction that William is operating a kennel. Whenever an agency is receiving federal funds  
19 that agency has no immunity. State law mirrors federal law. Local agencies cannot claim  
20 immunity. At 700 “Third, **municipalities can assert no reliance claim which can 700\*700**  
21 **support an absolute immunity**” [45 CFR 302.34, Monell v. NY City Department of Social  
22 Services, 436US658]. This is fraud against William. This is extrinsic fraud against the Visalia  
23 Superior Court and also CAED. Taylor and Hernandez gave William no notice.

24 33. William alleges that Taylor did not establish jurisdiction by filing proof of jurisdiction  
25 prior to filing VCU 253890. Without proof of jurisdiction, the weed abatement/inspection and  
26 seizure warrant in VCU 253890 is void and null for lack of jurisdiction and/or want of  
27 jurisdiction and has no force and effect of law. All acts that follow the preparation, filing and  
28 executing the warrant are void and null for lack of jurisdiction and want of jurisdiction. This  
includes and not limited to all Claims I to XV in the third amended complaint following  
21Oct2013. This includes all the acts and consequences of the second dog taking, ACO hearings  
1, 2, 3 and 4, VSC hearings 1, 2, 3 and 4, and the Euthanizing of William’s animals. William  
alleges that all these activities are based upon fraud due to the fraudulent warrant initiated by

1 Taylor and Hernandez based on hearsay. This is fraud against William. This is extrinsic fraud  
2 against the courts. This is a violation of William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> amendment rights.

3 34. William declares and alleges that the warrant is based on hearsay evidence and is without  
4 a first-hand competent witness. William alleges that the warrant was not issued on probable  
5 cause [See Lovasco, Halverson 42F 3d at 1260]. Taylor initiated VCU253890 under  
6 CCP§1822.50 special inspection warrant which does not authorize seizure and search. William  
7 alleges that this is a misapplication of the law and code. Taylor is an attorney for the Tulare  
8 County Council, who has the authority to act only as a litigator, not a prosecutor. Taylor had no  
9 jurisdiction to initiate a lawsuit, which Taylor did by filing VCU253890. William alleges that  
10 Taylor under false pretenses and without probable cause used the "weed abatement" procedure to  
11 fraudulently seize William's dogs and search William's home. Taylor drafted and prepared a  
12 declaration that was signed by Hernandez, under the supervision of Grenseman. Taylor prepared  
13 the application for warrant to seize William's animal under "dangerous and vicious"  
14 circumstances. There is no sworn competent first hand eyewitness affidavit from a complaining  
15 party that William's animal harmed any animal and/or are vicious and dangerous to establish  
16 probable cause. [See Lovasco].

17 35. William alleges that Taylor, (who works with Teresa Saucedo the wife of then Visalia  
18 Superior Court Judge Saucedo), used the 'influence' of Teresa Saucedo to have Judge Saucedo  
19 approve and sign the weed abatement/inspection and seizure warrant. William alleges that this  
20 constitutes fraud and a false filing. William alleges that Taylor without jurisdiction wrongly  
21 acted as a prosecutor initiating VCU253890 with a claim greater than \$25,000.00 against  
22 William, whose sole support is his Social Security Disability. This fraudulent claim is currently  
23 \$37,000.00, charges for heartlessly holding William's dogs when they were not released.

24 36. The alleged injured party, Matt Flynn, testified that Matt and/or John Flynn had no  
25 firsthand eyewitness testimony, nor any sworn first-hand competent testimony that William's  
26 animals caused any harm. William alleges that the warrant constitutes fraud and a false filing in  
27 the court. William alleges lack of jurisdiction. William alleges malice and intent on the part of  
28 Taylor. Judge Saucedo performed a non-judicial act violating William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup>  
Amendment constitutional rights, making the warrant invalid and void at conception by allowing  
Taylor and T Saucedo to influence him in signing the warrant. William alleges that this  
established the basis of an unreasonable, illegal and unlawful search of William's home and

1 seizure of his animals. William alleges that Judge Saucedo was in fact under investigation by the  
2 California Judicial Performance (Sept.-Dec.2013) when the warrant was signed. Judge Saucedo  
3 was subsequently removed from the bench for violating cannons and ethics rules by CJP.

4 37. William alleges William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment constitutional rights were violated  
5 by Taylor, Hernandez, Judge Saucedo and his wife Teresa Saucedo who filed and issued a false  
6 warrant without probable cause. William alleges that William received no notice regarding the  
7 seizure and search of his land. William has superior title to his land. (See Stamas v. Cnty. of  
8 Madera, 795 F.Supp.2d 1047, Halverson v. Skagit Cnty., 42 F.3d 1257, 1260)

8 **Claim V**

9 38. ~~Claim V 42USC§1983 [2<sup>nd</sup> dog taking 22Oct2013 unlawful seizure]~~

10 39. On or about 22Oct2013 Lewis, Grenseman, Hernandez and Hartley and Popoola,  
11 Zendajas and Torres, all workers acting in their personal and official capacity, trespassed onto  
12 William's land without a valid warrant supported by competent first hand witness, arrested  
13 William without probable cause, searched William's home and seized William's 25 (twenty  
14 five) [15 adult and 10 puppies] without a valid warrant. These animals were seized without  
15 probable cause. Grenseman presumed William was involved in commerce and running a  
16 commercial kennel. William requested that Torres produce a valid warrant with a sworn  
17 competent affidavit. Torres gave William a false warrant. William requested the sworn  
18 affidavit. Torres stated "You will get that in court". William did not receive a competent first  
19 hand affidavit from a complaining party. Torres stated he did not need a sworn affidavit to  
20 seize the dogs. Torres said he did not need a competent eyewitness complaint. Torres stated  
21 that he could seize these animals based on the authority of the warrant alone. Popoola,  
22 Zendajas and Torres supported Grenseman, Lewis, Hernandez and Harley actions. Popoola,  
23 Zendajas and Torres did not prevent TCACO officers from seizing William's comfort animals  
24 without a valid warrant based upon probable cause. William alleges this conduct to be  
25 deliberate and malicious. William alleges Lewis, Grenseman, Hernandez and/or Hartley left  
26 spent FDA drugs cartridges on William's land. ~~Taylor and Tulare County did not give~~  
27 ~~William his records.~~

28 40. William witnessed TCACO's shoot Williams animals with FDA controlled substances  
to tranquilize and then dragged the animals by a catch noose from underneath of protective  
porch and other locations. TCACO's then dragged the animals by the catch noose on the

1 ground and threw them into the animal control trucks. William witnessed this for all twenty  
2 five companion animals. William was helpless to do anything as he was arrested. William  
3 alleges Lewis, Grenseman, Hernandez and/or Hartley were inadequately trained on search  
4 warrants; proper handling of drugged animals and use of FDA controlled drugs. Popoola,  
5 Zendajas and Torres were inadequately trained on seizure and search warrants. This is a  
6 violation of William's 1<sup>st</sup>, 4<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> amendment rights.(See Menotti v. City of Seattle,  
7 409 F.3d 1113 ).(See Stamas v. Cnty. of Madera, 795 F.Supp.2d 1047, Halverson v. Skagit  
8 Cnty., 42 F.3d 1257, 1260) (See Summa)

8 **Claim VI**

9 41. ~~Claim VI 42USC§1983 [unlawful arrest 2<sup>nd</sup> dog taking 22Oct2013]~~

10 42. On or about 22Oct2013 TCSO Popoola, Zendajas and Torres trespassed onto  
11 William's land without a valid warrant supported by competent first hand witness, arrested  
12 William without probable cause, searched William's home without a valid warrant supported  
13 by probable cause. At this time William was arrested between three armed officers and did  
14 not have freedom of movement for over two hours. William was in the hot sun, without water,  
15 which exacerbated his medical condition. William alleges Popoola, Zendajas and Torres did  
16 not use reasonable articulated suspicion (RAS) of what crime the William was involved in and  
17 what crime justified the arrest upon William's land. William alleges this conduct to be  
18 deliberate and malicious. Popoola, Zendajas and Torres were improperly trained on due  
19 process, arrest, seizures and search warrants. The seizure was unreasonable when the TCSO's  
20 came onto land without a valid warrant. The search of William's home was without search  
21 warrant was an unreasonable act.

22 43. Violating and/or trespassing upon William's constitutional right(s) and/or liberty,  
23 constitutes a cause of action under 42USC1983 of William's civil rights. When this occurs  
24 without jurisdiction supported by a valid warrant and a competent first hand (eyewitness)  
25 witness to establish probable cause, then this is an act that is unconstitutional, unreasonable  
26 and constitutes fraud upon the court for violation of due process. This is a violation of  
27 William's 1<sup>st</sup>, 2<sup>nd</sup>, 4<sup>th</sup> and 14<sup>th</sup> amendment right. (See Lovasco, Summa Corp.) (See Lacey v.  
28 Maricopa Cty., 693 F.3d 896,918 ).(See Stamas v. Cnty. of Madera, 795 F.Supp.2d 1047,  
Halverson v. Skagit Cnty., 42 F.3d 1257, 1260)

8 **Claim VII**

1 44. Claim VII 42USC§1983 [unlawful warrant search during 2<sup>nd</sup> dog taking 22Oct2013]

2 45. On or about 22Oct2013 TCSO Popoola, Zendajas and Sgt. Torres trespassed onto  
3 William's land without any valid warrant supported by competent first hand witness, searched  
4 William's home without probable cause. Popoola and Zendajas searched William's home for  
5 over 20 minutes [See Lovasco]. William objected to Torres that the warrant was void as being  
6 only an abatement/inspection seizure warrant and not a search warrant supported by probable  
7 cause of a competent first hand eyewitness. Torres stated he could search William's house  
8 with that warrant. William informed Torres that the black letter of the warrant did not permit  
9 him or his officers to enter William's house under any circumstances. Popoola, Zendajas and  
10 Torres violated the terms and conditions of the abatement/inspection-seizure warrant signed by  
11 Judge Saucedo on 21Oct2013. Torres indicated again that William could discuss all that in  
12 court. Popoola, Zendajas and Torres have jointly authored Tulare County Sheriff's report  
13 number 13-13931. William did not get report 13-13931. 13-13931 report substantiates and  
14 provides evidence that all officers worked together to violate William's constitutional rights.  
15 The warrant has not been returned to VSC as required by due process. This is an unreasonable  
16 arrest, search and seizure. This is a violation of William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> amendment  
17 right.(See Stamas v. Cnty. of Madera, 795 F.Supp.2d 1047, Halverson v. Skagit Cnty., 42 F.3d  
18 1257, 1260)(See Lovasco)

17 **Claim VIII**

18 46. Claim VIII 42USC§1983 [ACO Agnello #1 hearing Monday 25Nov2013 Vicious and  
19 dangerous]. (See Parrat v. Taylor See; Hafer v. Melo. See Mercer Pg 745.)

20 47. On or about the week of Monday 25Nov2013 ACO hearing #1 was held. Agnello held  
21 a hearing to determine whether William's animals were "vicious and dangerous".

22 48. William alleges that hearing officer Agnello acting in his personal and official capacity,  
23 did a so-called "bait and switch" and changed the cause of action from **"dangerous and vicious"**  
24 animals to **"sick and endangered"** animals [Transcript of 25Nov2013, Pg 15 ln 7 to pg 18 to ln  
25 21]. At the apparent whim of the hearing officer and confusing to William, the 'cause of action'  
26 was changed to justify the lack of a warrant. Agnello changed the cause and nature of the action  
27 VCU253890 in midstream. William alleges that these new charges were not alleged in the  
28 original VCU253890 warrant. The record shows that Agnello stated that the county was  
Estoppelled from proceeding. William alleges that this is falsification and frauding of the

1 complete animal control process. William alleges that this is a violation of William's due  
2 process by fraud. "Fraud vitiates everything" [United States v. Throckmorton 98 U.S. 61  
3 (1878)]. William alleges that this is fraud upon the court by workers attorney(s) Agnello,  
4 Taylor, Tennenbaum and ACO(s) Grenseman and Hernandez. William alleges that his  
5 dogs were healthy when the County took them. William's companion animals were euthanized  
6 by unknown patronage workers. William alleges that this case is void and null for lack of  
7 jurisdiction and want of jurisdiction. William alleges that the County of Tulare and Taylor are  
8 estopped from proceeding in this instant case due to fraud upon the court by Agnello's ruling.

9 49. Agnello indicates and confirms that the warrant is defective. This verifies and establishes  
10 the law of the case, that the alleged warrant was defective at the onset of VCU253890. Agnello  
11 stated and testified that the warrant was defective **EIGHT TIMES** and therefore void and null  
[Transcript of 25 November 2013 pg 16 and ln 9 through and including pg 18 and ln 18].

12 50. William alleges that Agnello did not conduct a neutral, impartial, fair and meaningful  
13 hearing. William also alleges that Agnello by not upholding his constitutional oath, also  
14 violated William's 1<sup>st</sup> Amendment constitutional right and violated Marbury v. Madison, 5 US  
15 137, which holds **"that a law repugnant to the Constitution is void."** William also alleges  
16 Agnello violated Haas v County of San Bernardino, 45 P. 3d 280, 119 Cal. Rptr. 2d 341, 27  
17 Cal. 4th- Cal: Supreme 2002 when Agnello was acting as a hearing officer for TCHHSA-ACO  
that paid him.

18 51. When Agnello did not enforce Smith v. US District Court Officers by providing  
19 William court records, Agnello violated William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment right of due  
20 process. Agnello was paid under Tulare County contract #7002.

21 52. Agnello ordered Tennenbaum to provide all of the Sheriff Reports, ACO kennel cards  
22 and records to William. William did not receive any of these. Taylor and/or Tennenbaum  
23 have blocked a fair, impartial and meaningful hearing for William. William alleges that  
24 Agnello, Taylor or Tennenbaum did not give William access to court and County records.  
25 Taylor did not give William's access to animal control records. Taylor did not give William's  
26 access to Sheriff's reports. Taylor did not give William access to court records. When  
27 Agnello did not enforce Smith v. US District Court Officers Posner, Seventh Circuit Court of  
Appeals for access to court records[SMITH v. U.S. DISTRICT COURT OFFICERS Nos. 98-

1 1423, 98-1548, 203 F.3d 440 (2000)] by providing William court records and County records,  
2 Agnello violated William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment right of due process.

3 53. William had Grenseman excluded from the 24Nov2013 hearing as William was going  
4 to call Grenseman as a witness. On or about 04Dec2013 Grenseman was fired. William was  
5 not able to call Grenseman as a witness.

6 54. Attorney(s) Agnello, Taylor, Tennenbaum **knew and/or should have known** that this  
7 was/is a violation of William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment rights. William alleges Taylor  
8 and/or Tennenbaum have excluded evidentiary exhibits of hearings with malice and intent,  
9 [See Smith versus US District Court, Posner, 7<sup>th</sup> COA Rule 11d/e, *Ibid*, for access to court  
10 records]. This holding is applicable in William's case before the bar. William alleges that  
11 Taylor and/or Tennenbaum have blocked access to reports/records from William. This  
12 violates William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment right to a fair, impartial and meaningful  
13 hearing.

14 55. Finally, William has repeatedly complained that William's due process rights were  
15 violated by the procedures utilized by Tulare County in seizing and ultimately euthanizing his  
16 animals. William's liberty and/or animals (property) interest protected by the Constitution were  
17 taken by Tulare County workers with no warrant from a competent witness. A procedural due  
18 process claim is cognizable in a 42USC§1983 case. "To obtain relief on a procedural due  
19 process claim, the plaintiff must establish the existence of '(1) a liberty or property interest  
20 protected by the Constitution; (2) a deprivation of the interest by the government; and (3) lack of  
21 process.'" *Stamas v. Cnty. of Madera*, 795 F.Supp.2d 1047, 1077 (E.D. Cal. 2011), quoting  
22 *Shanks v. Dressel*, 540 F.3d 1082, 1090 (9th Cir. 2008). "[P]rocedural due process claims do not  
23 'deal with the substance of the challenged decisions, but with the process by which they were  
24 reached.'" *Id.*, quoting *Halverson v. Skagit Cnty.*, 42 F.3d 1257, 260 (9th Cir. 1994). "The due  
25 process clause does not prohibit every deprivation by the state of an individual's property. Only  
26 those deprivations **carried out without due process** are actionable under 42USC§1983."  
27 *Halverson*, 42 F.3d at 1260. "Ordinarily, due process of law requires [notice and] an  
28 opportunity for some kind of hearing **prior** to the deprivation of a significant property interest."  
*Id.* (See *Stamas v. Cnty. of Madera*, 795 F.Supp.2d 1047, *Halverson v. Skagit Cnty.*, 42 F.3d  
1257, 1260)

### **Claim IX**

1 **56. Claim IX 42USC§1983 [ACO Agnello #2 Hearing 18Dec13 sick and endangered]**

2 57. On or about 18Dec2013 the 2<sup>nd</sup> ACO hearing with Agnello was held. Agnello, a worker,  
3 held a hearing to determine whether William's animals were sick and endangered. Hernandez,  
4 Tennenbaum, Taylor, Hamblin testified in the hearing.

5 58. Shaffer, Doctor of Veterinary Medicine, testified under oath. Shaffer, a patronage worker  
6 under a Tulare contract, is the supplier of FDA controlled drugs used by TCHHSA-ACO.

7 William alleges that there was no testimony that William's animals were vicious and dangerous.

8 William alleges that the entire hearing focused on whether or not the dogs were "**sick and**  
9 **endangered**". The evidence and transcript did not support the county's new claim of sick and  
10 endangered animals that was not included in VCU253890. The VCU253890 warrant that was

11 prepared by Taylor specifically identified William's animals as vicious and dangerous. Agnello  
12 changed the cause and nature of the hearing from "**vicious and dangerous**" to "**sick and**  
13 **endangered**" without probable cause to justify no valid warrant. William alleges fraud.

14 William alleges a violation of due process and a right to fair, impartial and meaningful hearing.

15 "Fraud vitiates everything" [US v Throckmorton [98 U.S. 61 (1878)]]. William's animals should  
16 have been returned immediately to William based upon this fraud. William motioned Agnello  
17 for the return of his animals. Agnello did not return William's animals. William alleges that this  
18 is a violation of William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> constitutional rights of due process. (See Stamas v.  
19 Cnty. of Madera, 795 F.Supp.2d 1047, Halverson v. Skagit Cnty., 42 F.3d 1257, 1260)

18 **Claim X**

19 **59. Claim X 42USC§1983 [ACO 30Jan14 hearing #3 Agnello sick and endangered]**

20 60. On or about 30Jan2014 the 3<sup>rd</sup> ACO hearing with Agnello was held. Agnello, a worker,  
21 held a hearing under "**sick and endangered**" to determine whether William's animals caused  
22 harm. Hernandez, Tennenbaum, Taylor, Hamblin testified in the hearing.

23 61. On or about 17-21Oct2013 Taylor initiated VCU253890 by initiating an application for  
24 a weed abatement/inspection and seizure warrant before Judge Saucedo, suing William.

25 Taylor drafted the declaration of Hernandez which indicates that William's animals caused  
26 harm to Matt and John Flynn. Hernandez's sworn declaration was signed under penalty of  
27 perjury. The declaration was prepared by Taylor. Hernandez is not a competent firsthand  
28 eyewitness. (See Lovasco).

1 62. Matt Flynn testified that he and/or his brother John Flynn, by eyewitness, did not see  
2 William's animals cause harm [transcript 30Jan2013 pg 17 ln 1 to pg 17 ln 15]. Matt Flynn's  
3 testimony contradicts and opposes the basis of the VCU253890 warrant. Hernandez's sworn  
4 declaration states that William's animals are dangerous and vicious. William alleges that Matt  
5 Flynn and John Flynn are speaking truthfully. William alleges that the original VCU253890  
6 application of abatement/inspection and seizure warrant is based upon hearsay. This  
7 constitutes fraud on the court. William alleges that upon fraud the nature and cause of the  
8 action becomes void and null for lack of jurisdiction and want of jurisdiction. William alleges  
9 that the entire proceedings of VCU253890 are based upon fraud. "Fraud vitiates everything"  
10 [US v Throckmorton [98 U.S. 61 (1878)]]. William alleges that VCU253890 is void, null.  
11 William alleges that Taylor attempted to obtain jurisdiction by fraud.

12 63. William alleges that upon the Flynn testimony, Agnello continued on with the hearing,  
13 without jurisdiction, to avoid the issue that there was no warrant. Agnello did not return  
14 William's animal upon motion. No autopsy/necropsy was done. William alleges that there  
15 are animals of prey that roam this range from the foothills surrounding William. William  
16 entered into evidence in the ACO hearings, pictures of animals of prey in this area. Hernandez  
17 presented color photographs that in the original VCU253890 warrant. This **contradicts** Matt  
18 Flynn's transcript 30Jan2013 testimony pg 17 lns 1 to pg 17 ln 15. William alleges that there  
19 exists **a controversy** between Hernandez's declaration and Flynn's testimony.

20 64. William moved Agnello to have William's animals returned to William due as there  
21 was o no evidence that William's animal had done any harm to Mr. Flynn's cattle. William  
22 alleges that Hernandez's declaration, in his personal and official capacity, that was prepared  
23 by Taylor appears to be now exposed as hearsay and fraud. William alleges that Hernandez  
24 hearsay evidence documents, show fraud upon the court. Agnello, in his personal and official  
25 capacity, did not to return William's animals (See Hafer, See Melo). William alleges that  
26 Agnello violated William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment rights of due process. William alleges  
27 that Agnello himself committed fraud when it was clear and convincing that William's  
28 animals **had done no harm**.

65. On or about 24Nov2013, Agnello stated that the **warrant was defective** in transcript,  
pg 15, ln 18 through and including pg 18 ln 18. This transcript has been entered into evidence  
by as document 33-\_\_ exhibit. Agnello stated a minimum of **8 [EIGHT]** times that the warrant

1 was defective and void. Upon the declaration and statement of Agnello, William moved  
2 Agnello to dismiss this case and return William's animals to William. Agnello did not return  
3 William's animals in good health. (See Lovasco, See Haverson ) (See Stamas v. Cnty. of  
4 Madera, 795 F.Supp.2d 1047, Halverson v. Skagit Cnty., 42 F.3d 1257, 1260) Summa Corp.

5 **Claim XI**

6 66. Claim XI 42USC§1983 [ACO hearing #4 18Mar14 Hornburg/contract #SC032-  
7 14142A-7074 "vicious and dangerous"]

8 67. William alleges that all defendants are political patronage workers acting in their personal  
9 and official capacity. [See Wzorek v. City of Chicago, 84 C 9978, 906 F. 2d 1180 - Court of  
10 Appeals, 7th Circuit, 1990; 718 F. Supp. 1386 - Dist. Court, ND Illinois, 1989; 708 F. Supp. 954  
11 - Dist. Court, ND Illinois, 1989; 739 F. Supp. 400 - Dist. Court, ND Illinois, 1990, See  
12 MILLBROOK v. UNITED STATES 477 Fed. Appx. 4, reversed and remanded. Government  
and their agents can be held liable and accountable for wrongdoing.]

13 68. William alleges that hearing officer Hornburg acting in his personal and official capacity,  
14 did a so called "bait and switch" and changed the cause of action from "**sick and endangered**"  
15 animals back to "**dangerous and vicious**" animals [Transcript of 25 November 2013, Pg 15 In 7  
16 to pg 18 In 21]. At the apparent whim of the hearing officer and confusing to William, the  
17 'cause of action' was changed to justify the lack of a warrant. Hornburg again changed the cause  
and nature of the action VCU253890 in midstream.

18 69. On or about 18Mar2014 the 4<sup>th</sup> ACO hearing with Hornburg, a worker, was held.  
19 Hornburg held a hearing under "**dangerous and vicious**" to determine whether William's  
20 animals could be returned to William. William alleges that William is not involved in  
21 commerce.

22 70. In open hearing and on the record Hornburg stated that he had not read any of the  
23 transcripts and/or the documents [information] in the case [transcript 18Mar2014 pg 3 In 1 to pg  
24 5 In 1]. "HEARING OFFICER HORNBURG:

25 "I first want to apologize at this point. I have just been provided primarily all the documentation  
26 at the end of yesterday. So I've not had the opportunity to go through in detail all the volumes of  
information that have been provided....."

27 "I don't think it's going to make any difference whether I review it prior or after.""

28 71. William alleges that this was not a fair, impartial and meaningful hearing. William  
alleges that this Hornburg's admission is a violation of William's right to a fair, impartial and  
meaningful hearing under the 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment. William alleges that Hornburg knew

1 or should have known that that the VCU253890 warrant was defective based on no probable  
2 cause and a perjured declaration by Hernandez. William alleges that this creates lack of  
3 jurisdiction and want of jurisdiction for any hearing based on VCU253890. William motioned  
4 that William's animals be returned to him in good health. William's animals were not returned  
5 to him in good health. William alleges that Hornburg proceeded to rule against William, have  
6 animals declared **"dangerous and vicious"** and to have William's animals euthanized based  
7 upon hearsay evidence, a defective warrant, and fraudulent testimony by Taylor and Hernandez  
8 with no probable cause. William alleges that Hornburg violated Haas [Ibid] case himself. That  
9 Hornburg violated William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> amendment rights. Hornburg attempted to contract  
10 with William to force William to operate a commercial kennel with constant inspection and  
11 supervision. William is not involved in commerce. William did not contract with Hornburg in  
12 what William considers to be an unconscionable contract and extortion. William has the  
13 constitutional right not to contract.

14 72. Hrg#4 Transcript 18 Mar 2014 pg 45 ln20-21 "HORNBURG: Well, then wouldn't it --  
15 because this is a -- again, I think still think **this is a vicious animal hearing,.....**"

16 73. Hrg#4 Transcript 18 Mar 2014 pg56 ln7-8 "HORNBURG: **It's a vicious hearing.**"

17 74. Hrg#4 Transcript 18 Mar 2014 pg56 ln 19-20 HORNBURG:"...That is not what this  
18 hearing is about. **This hearing is whether or not those animals are vicious.....**"

19 75. Mr Hornburg changed the cause and nature of VCU253890 from "Sick and endangered"  
20 [Agnello's order] to Hornburg's Order that "It's a vicious hearing." "Vicious and dangerous"

21 76. This is a violation of William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Due process rights to know the cause and  
22 nature of the offense against William. The Cause and nature is going back and forth like a  
23 shuttlecock from "Vicious and dangerous" to "Sick and endangered" back to "Vicious and  
24 dangerous" at the whim of the hearing officer.

25 77. In the letter from Law Offices of Houk and Hornburg Inc. dated 25 March 2014, it states  
26 "At the conclusion of the hearings the hearing officer determined, among other things, that  
27 twenty-five (25) dogs are, in fact, dangerous animals that should not be returned to Mr.

28 Fabricius." This is why William did not get his animals returned to William. Ten (10) were  
puppies 6-8 weeks old. Hernandez, Tennenbaum, Taylor, Hamblin testified in the hearing.

Hornburg is under contract #SC032-14142A-7074. (See Lovasco, Summa Corp.) (See Stamas  
v. Cnty. of Madera, 795 F.Supp.2d 1047, Halverson v. Skagit Cnty., 42 F.3d 1257, 1260) (See

1 Hafer. See Melo.)

2 **Claim XII**

3 78. Claim XII 42USC§1983 [ACO.30Jan14 Papadakis VSC hearing # 1, 2, 3]

4 79. On or about 10Feb2014 William had a hearing before Judge Papadakis. William had  
5 served the County of Tulare with notification of this hearing. Taylor, a worker, failed to  
6 appear and Judge Papadakis continued the hearing until 10Apr2014 to allow Taylor to appear  
7 so that Judge Papadakis would not dismiss VCU253890 case. Judge Papadakis gave Taylor  
8 special rights by continuing and not dismissing Taylor's VCU253890 claim on failure to  
9 appear and not granting summary judgment to William. William alleges Papadakis said that  
10 "There was no record or audiotape of the hearing". When there is no record there is no Due  
11 process. William demanded the audiotapes and Judge Papadakis said, "There are no  
12 audiotapes and as you can see the court reporter is not keeping a record." William alleges that  
13 Judge Papadakis did not make a ruling. Judge Papadakis did not give William his official  
14 records. William alleges that this is a denial of access to court records which is a violation of  
15 William's due process rights to a fair and meaningful hearing. Smith v US District Court  
16 Officer establishes the "official record" is the audiotapes [Ibid]. William did not get the  
17 official record. William alleges that this is a violation of William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup>  
18 Amendment due process rights to a fair and meaningful hearing

19 80. Upon the 2<sup>nd</sup> hearing on or about 10Apr2014, Taylor appeared for the CCP§1822.50  
20 case management conference and said that there was no issue between Tulare County and  
21 William. Judge Papadakis permitted this with objection from William. William alleges that  
22 there was and is an audiotape and that no record was made of this hearing before Judge  
23 Papadakis. Papadakis made no order. Judge Papadakis did not give William his "official  
24 record" [Smith Ibid].

25 81. Upon the 3<sup>rd</sup> hearing on or about 22Apr2014, which is indicated as a demurrer, was  
26 taken off calendar by the court. No action was taken. William alleges that there was an  
27 audiotape and record made of this hearing before Judge Papadakis. Judge Papadakis did not  
28 give William the official record. William alleges that this is spoliation of the record and is a  
violation of William's 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment due process rights.

82. William alleges that Taylor committed fraud on the court by filing a false application for  
VCU253890 warrant without probable cause. William alleges that Taylor did not establish

1 jurisdiction prior to filing the VCU253890 warrant. William alleges that lack of jurisdiction and  
2 want of jurisdiction exists in VCU25380. Taylor violated William's 1<sup>st</sup> due process rights. (See  
3 Stamas v. Cnty. of Madera, 795 F.Supp.2d 1047, Halverson v. Skagit Cnty., 42 F.3d 1257, 1260)  
4 See Smith)-(See 7thCOA Circuit Rule 11d/e for evidence removed or not put into the file.)

5 **Claim XIII**

6 83. **Claim XIII 42USC§1983[Euthanization Hrg.VSC hrg #4 Hillman/30Jun2013]**

7 84. On or about 30Jun2014 a hearing was held before Judge Hillman, a patronage worker.  
8 William alleges that William was **not** noticed of this hearing by mail. Taylor failed to provide  
9 William with notice and opportunity to be heard in violation of William's due process rights  
10 (See Haverson). William was not aware that this hearing was held. William alleges that  
11 William did not agree to receive process of service in the form of emails. That there is no  
12 proof of service for this hearing in VCU253890. Judge Hillman or Taylor did not give  
13 William his official records. Taylor violated William's First Amendment right of due process  
14 by not noticing William of hearing.

15 85. William was not personally served with notification of this hearing from the County of  
16 Tulare. Taylor failed to provide proper notice and an opportunity to be heard. William alleges  
17 that this is a violation of William's due process of notice and an opportunity to be heard under  
18 the 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment. William alleges that there was an audiotape and record made  
19 of this hearing before Judge Hillman. Judge Hillman did not give William his official record.  
20 William alleges that this is spoliation of the record and is a violation of William's 1<sup>st</sup>, 4<sup>th</sup> and  
21 14<sup>th</sup> Amendment due process rights.

22 86. William alleges Taylor euthanized William's animals for reasons unknowable and  
23 incomprehensible to William. William alleges that Taylor committed fraud on the court by  
24 holding a hearing to euthanize William's dogs without jurisdiction, notice and an opportunity  
25 to be heard. William alleges that this is spoliation of the record and Taylor violated William's  
26 due process of notice and an opportunity to be heard under the 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup> Amendment.

27 87. William's animals were not returned to him in good health. William alleges that  
28 Taylor did not establish jurisdiction prior to filing of the application of the VCU253890  
warrant of abatement/inspection and seizure warrant. The CCP§1822.50 warrant was based  
upon hearsay evidence without probable cause. William alleges that this case is void and null  
for lack of jurisdiction and want of jurisdiction. William alleges that the Cnty of Tulare is

1 estopped from proceeding in this instant case due to fraud upon the court by Agnello's  
2 ruling. (See Stamas v. Cnty. of Madera, 795 F.Supp.2d 1047, Halverson v. Skagit Cnty., 42  
3 F.3d 1257, 1260)

4 **DEMAND FOR RELIEF**

5 88. William demands his animals be returned to William in good health.

6 89. William's animals were in quarantine, allegedly vicious and dangerous and/or sick and  
7 endangered and under the control of Tulare County Animal Control. Whenever an animal is  
8 unlawfully removed from quarantine there is a \$1000.00 per dog per day fine imposed upon  
9 whom ever violates quarantine. Tulare County Animal Control violated the quarantine  
10 requirement. Tulare County Animal Control should be penalized under the fine and the fine  
11 proceeds awarded to William. William also filed, upon advice of the Tulare County BOS a  
12 Claim for damages on or about 06Dec 2013. William demands that the Claim for Damages  
13 [06Dec2013] be included in its entirety in this demand. Fraud has occurred and therefore  
14 William should be awarded summary judgment, directed verdict, and judgment as a matter of  
15 law. Fraud warrants penalties of 3 to 9 times the award. William demands all of William's  
16 "Official records", documents and evidence be provided immediately to William. Additionally  
17 whatever the court deems fair and appropriate in addition to William's demand for relief.

18 -CONCLUSION-

19 90. There are three things that do not have a statue limitation: Murder, Kidnapping and  
20 Fraud. Fraud on the court is most Heinous of these offenses as it permeates all three offenses  
21 and attacks due process of law and the First Amendment. Fraud on the court is extrinsic fraud  
22 that occurs at the core of the due process violations. When fraud occurs there is no due process.  
23 "Fraud vitiates everything". When fraud occurs there is lack of jurisdiction and want of  
24 jurisdiction. Fraud on the court by litigant [Tulare County], estoppels that litigant [Tulare  
25 County] from proceeding in the case, therefore William demands that William be granted  
26 summary judgment, directed verdict, and/or judgment as a matter of law in William's favor.  
27 Fraud on the court, especially extrinsic fraud, must be answered by the court.

28 Signed on this 20<sup>TH</sup> day of July the year of my Lord Jesus Christ of 2017.



William A. Fabricius, Sui Juris



