

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY FLORIDA

STATE OF FLORIDA,  
PLAINTIFF,  
vs.

CASE NO.: 17- 00074 CF10 A  
JUDGE: ANDREW L. SIEGEL

ANTHONY WILLIAMS,  
DEFENDANT.

**ORDER ON DEFENDANT'S VARIOUS MOTIONS**

THIS CAUSE, having come before the Court, upon the Defendant's Motion for Discharge, Motion for Computer with Internet, Motion for Prospective Jurors Names and the court having heard argument of the Defendant, pro se, having heard argument from the State, having reviewed the record, and otherwise being advised in the premises,,

The Defendant's Motion for Discharge is DENIED.

The Defendant's Motion for Computer with Internet is DENIED.

The Defendant's Motion for Prospective Jurors Names is GRANTED. The names of the assigned jurors will be provided to the Defendant prior the beginning of juror selection/voir dire.

DONE AND ORDERED at Ft. Lauderdale, Broward County Florida this 12<sup>th</sup> day of June, 2017.

**JUDGE ANDREW L. SIEGEL**  
A TRUE COPY

\_\_\_\_\_  
ANDREW L. SIEGEL  
CIRCUIT JUDGE

cc:

Anthony Williams, Defendant  
Kathy Heaven, Esq., Atty for the State

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>,  
JUDICIAL CIRCUIT, IN AND FOR  
BROWARD COUNTY, STATE OF FLORIDASTATE OF FLORIDA,  
  
PLAINTIFF,  
  
VS.

CRIMINAL DIVISION

CASE NO. (S) 17-74CF10AANTHONY WILLIAMS I  
DEFENDANT,JUDGE: SiegelMOTION TO DISCHARGE

THE DEFENDANT, ANTHONY WILLIAMS, by and through undersigned counsel and pursuant to Florida Rules of Criminal Procedure 3.191(a) (2), respectfully moves this honorable Court to discharge the Defendant from the above-styled cause. In Support of said motion Defendant states as follows:

- 1.) The Defendant has previously filed a Demand for Speedy Trial pursuant to Rule 3.191(a) (2) of the Florida Rules of Criminal Procedure on January 6, 2017.
- 2.) The Defendant has been continually available for trial since that date.
- 3.) The fifty (50) day period expired on February 25, 2017.

WHEREFORE, the Defendant moves this Honorable Court forever discharge the defendant from the crime charged in the above-styled cause.

CERTIFICATE OF SERVICE

I, ANTHONY WILLIAMS, the defendant do hereby certify that the information Prescribed to here in the foregoing Motion before the Court is true and correct, to the best of my Knowledge, understanding and belief and that a true copy is being forwarded to the Clerk of the Courts For the 17<sup>th</sup> Judicial Circuit, at 201 S.E. 6<sup>th</sup> Street, Fort Lauderdale, Florida 33301, to the SAO, the Office of the Public Defender, and to the Honorable Judge Siegel.  
Presiding: on this 30th day of May, 2017.

By: Anthony Williams  
~~Common Law Counsel~~  
Arrest No. 501602094  
P.O. Box 9356  
Fort Lauderdale, FL 33310

## AFFIDAVIT

I, Anthony Williams do hereby declare that the following statements are correct and true to the best of my knowledge.

1. Affiant was add charged and arrested on December 29, 2016 while in custody of the Broward County Jail.
2. Affiant filed a speedy trial demand on or approximately around January 6, 2017.
3. A hearing was commenced on January 10, 2017 in which Judge Siegel advised Affiant that he would have to withdraw his speedy trial demand in order to participate in discovery.
4. Affiant believed he had no other choice but to withdraw the demand in order to receive discovery.
5. Affiant has just been informed that it was unlawful and illegal for a judge to state Affiant had to withdraw his demand in order to participate in discovery.
6. Affiant asserts that there were no exceptional circumstances pursuant to Rule 3.191(c) which would have warranted an extension.
7. Affiant did not read any discovery provision in Rule 3.220 for withdrawing a speedy trial demand in order to participate in discovery.
8. Affiant was misled by the court and prosecution in order to keep Affiant incarcerated longer than the law allow.
9. The time to try defendant has expired as of February 25, 2017 and the charges are due to be discharged and dismissed.

UNDER PENALTY OF PERJURY I DO DECLARE THE  
FOREGOING STATEMENTS TO BE CORRECT AND TRUE  
TO THE BEST OF MY KNOWLEDGE

Executed this 30th day of May 2017.

Anthony Williams

IN THE CIRCUIT COURT OF THE  
17TH JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

Exhibit 13

STATE OF FLORIDA

CASE NO. 17-74CF10A

VS.

ANTHONY WILLIAMS

MOTION FOR COMPUTER WITH INTERNET ACCESS TO BE  
PROVIDED AT THE EXPENSE OF THE STATE TO PRESENT  
RELEVANT EVIDENCE

Defendant, by and through his undersigned Common Law Counsel submits  
this Motion For Computer With Internet Access To Be Provided At  
The Expense of the State To Present Relevant Evidence at trial  
which will prove the innocence of the defendant and undersigned  
Common law Counsel.

Executed this 2nd day of June 2017.

Righteously Submitted,

Anthony Williams

Anthony Williams

Honorable P.A.G.

P.O. Box 9356

Ft. Lauderdale, FL 33310

Common Law Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing  
was sent by U.S. Mail to: Clerk of Court, SAO, Judge Siegel at 201  
S.E. 6th Street, Ft. Lauderdale, FL 33301 on June 5, 2017.

Anthony Williams



IN THE CIRCUIT COURT OF THE  
17TH JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

EXhibit 13A

STATE OF FLORIDA

CASE NO. 16-485 AF10

VS.

Anthony Williams

### NOTICE OF FILING

YOUTUBE VIDEOS OF

PAG Anthony Williams

COMES NOW, Anthony Williams, Private Attorney General, who is a  
servant of the Most High Yahweh Elohim and Yeshua the Messiah and  
submits the youtube videos of his public activism against mortgage  
fraud, judicial corruption and police corruption.

Righteously submitted,

Anthony Williams

Private Attorney General

PAG #12-6799

P.O. Box 9356

Ft. Lauderdale, FL 33301

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was  
sent by U.S. mail to the State Attorneys Office, 201 S.E. 6th Street,  
Ft. Lauderdale, FL 33301, Clerk of Court, and Judge  
this 10<sup>th</sup> day of January 2017.

Anthony Williams

## Youtube Videos

Orange County Confrontation: The Denial

Orange County Confrontation 2: The Triumph

Anthony Confronts FBI Part 3

Anthony Confronts FBI Part 2

Anthony Confronts FBI Part 1

US Marshals Office Part 2 PAg Anthony Williams

US Marshals Office Part 1

Evidence of Outlaws in Justice Anthony Williams Attempts to service

Common law Arrest Warrant in KO

Anthony Williams, Private-A.G. on Live T.V.

PAg Anthony Williams at FBI

FBI Hawaii Conspiracy 1 of 2... Judge Evade Oath of Office

FBI Hawaii Conspiracy 2 of 2, Anthony Williams framed and assaulted

PAg Anthony Williams Sovereign ID accepted at Ft. Lauderdale Airport

PAg Anthony Williams Sovereign ID accepted at Airport

Broward Sheriff Unlawful Stop of Anthony Williams

**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA**

**STATE OF FLORIDA**

Plaintiff,

vs.

**WARRANT TO ARREST**

**WILLIAM BURL HATCHETT  
BLACK / MALE, DOB: 3/26/1963**

Defendant,  
.....

**COUNT 1**

**GRAND THEFT, 1° F**

**IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR THE  
SHERIFFS AND CONSTABLES OF THE STATE OF FLORIDA:**

WHEREAS, JOHN CALABRO has this day made oath before me that beginning on or about the 1<sup>st</sup> day of October 2015 and continuing through on or about the 18<sup>th</sup> day of September 2016, in the County aforesaid, one **WILLIAM BURL HATCHETT**, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Bank of America NA, to wit: the value of one hundred thousand dollars or more (\$100,000.00), with intent to either temporarily or permanently deprive Bank of America, N.A. of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(a)1, Florida Statutes.

**COUNT 2**

**UNLAWFUL FILING OF FALSE DOCUMENTS  
OR RECORDS AGAINST PROPERTY, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 10<sup>th</sup> day of October 2015, in the County aforesaid, one **WILLIAM BURL HATCHETT**, did then and there file, or direct a filer to file, with the intent to defraud or harass another, an instrument, to-wit: a lien containing materially false, fictitious, or fraudulent statements or representation that purport to affect the interest of an owner, to-wit: Bank of America, N.A. and Youry Angel, in the property described in the instrument, contrary to sections 817.535(2)(a), Florida Statutes.

**COUNT 3****UNLAWFUL FILING OF FALSE DOCUMENTS  
OR RECORDS AGAINST PROPERTY, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27<sup>th</sup> day of January 2016, in the County aforesaid, one WILLIAM BURL HATCHETT, did then and there file, or direct a filer to file, with the intent to defraud or harass another, an instrument, to-wit: a lien containing materially false, fictitious, or fraudulent statements or representation that purport to affect the interest of an owner, to-wit: Bank of America, N.A., in the property described in the instrument, contrary to sections 817.535(2)(a), Florida Statutes.

**COUNT 4****UNLAWFUL FILING OF FALSE DOCUMENTS  
OR RECORDS AGAINST PROPERTY, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6<sup>th</sup> day of September 2016, in the County aforesaid, one WILLIAM BURL HATCHETT, did then and there file, or direct a filer to file, with the intent to defraud or harass another, an instrument, to-wit: a lien containing materially false, fictitious, or fraudulent statements or representation that purport to affect the interest of an owner, to-wit: Bank of America, N.A. in the property described in the instrument, contrary to sections 817.535(2)(a), Florida Statutes.

**COUNT 5****CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION 3°F.**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27<sup>th</sup> day of January 2016, in the County aforesaid, one WILLIAM BURL HATCHETT, did then and there willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information, concerning a person, to-wit: Howard Forman, without first obtaining that person's consent, contrary to Section 817.568(2)(a), Florida Statutes.

**COUNT 6**

**CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION 3°F.**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27<sup>th</sup> day of January 2016, in the County aforesaid, one WILLIAM BURL HATCHETT, did then and there willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information, concerning a person, to-wit: Jason Kniper without first obtaining that person's consent, contrary to Section 817.568(2)(a), Florida Statutes.

**COUNT 7**

**CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION 3°F.**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27<sup>th</sup> day of January 2016, in the County aforesaid, one WILLIAM BURL HATCHETT, did then and there willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information, concerning a person, to-wit: June James, without first obtaining that person's consent, contrary to Section 817.568(2)(a), Florida Statutes.

**COUNT 8**

**CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION 3°F.**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27<sup>th</sup> day of January 2016, in the County aforesaid, one WILLIAM BURL HATCHETT, did then and there willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information, concerning a person, to-wit: Paul Donofrio, without first obtaining that person's consent, contrary to Section 817.568(2)(a), Florida Statutes.



**COUNT 9**

**CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION 3°F.**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27<sup>th</sup> day of January 2016, in the County aforesaid, one WILLIAM BURL HATCHETT, did then and there willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information, concerning a person, to-wit: Peter Lee, without first obtaining that person's consent, contrary to Section 817.568(2)(a), Florida Statutes.

The offenses set forth in the foregoing Warrant are contrary to the statute in such case made and provided, and against the peace and dignity of the State of Florida. Attached hereto and made a part hereof by incorporation is the Affidavit executed by JOHN CALABRO, Affiant herein.

THESE ARE, THEREFORE, to command you forthwith to arrest the said WILLIAM BURL HATCHETT and bring him before me to dealt with according to law.

Given under my hand and seal this \_\_\_\_ day of September, A.D. 2016.

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Honorable  
Judge of the Circuit Court

**IN THE CIRCUIT/COUNTY COURT OF THE SEVENTEENTH JUDICIAL  
CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA**

**STATE OF FLORIDA**

**vs.**

**ORDER SETTING BOND**

**WILLIAM BURL HATCHETT**

**Black / Male, DOB: 3/26/1963**

**The court hereby sets bond in the above-captioned case as follows:**

**COUNT 1: Grand Theft**  
1<sup>st</sup> Felony, F.S. 812.014(2)(a)1

**BOND:** \_\_\_\_\_

**COUNT 2: UNLAWFUL FILING OF FALSE  
DOCUMENTS OR RECORDS AGAINST PROPERTY**  
3<sup>rd</sup> Felony, F.S. 817.535(2)(a)

**BOND:** \_\_\_\_\_

**COUNT 3: UNLAWFUL FILING OF FALSE  
DOCUMENTS OR RECORDS AGAINST PROPERTY**  
3<sup>rd</sup> Felony, F.S. 817.535(2)(a)

**BOND:** \_\_\_\_\_

**COUNT 4: UNLAWFUL FILING OF FALSE  
DOCUMENTS OR RECORDS AGAINST PROPERTY**  
3<sup>rd</sup> Felony, F.S. 817.535(2)(a)

**BOND:** \_\_\_\_\_

**COUNT 5: CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION**  
3<sup>rd</sup> Felony, F.S. 817.568(2)(a)

**BOND:** \_\_\_\_\_

**COUNT 6: CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION**  
3<sup>rd</sup> Felony, F.S. 817.568(2)(a)

**BOND:** \_\_\_\_\_

**COUNT 7: CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION**  
3<sup>rd</sup> Felony, F.S. 817.568(2)(a)

**BOND:** \_\_\_\_\_

**COUNT 8: CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION**  
3<sup>rd</sup> Felony, F.S. 817.568(2)(a)

**BOND:** \_\_\_\_\_

**COUNT 9: CRIMINAL USE OF PERSONAL  
IDENTIFICATION INFORMATION**  
3° Felony, F.S. 817.568(2)(a)

**BOND:** \_\_\_\_\_

**TOTAL BOND:** \_\_\_\_\_

**SPECIAL BOND CONDITIONS**

1. The Defendant shall secure his release pursuant to a surety bond that is fully collateralized, net asset value of the collateral must be in an amount equal to or in excess of bond amounts.
2. Prior to the Defendant's release, the Defendant must fulfill a Nebbia requirement wherein the Defendant will submit for the State's review documentation showing proof that the bond is fully collateralized and the legality of the funds used for both the bond premium and bond collateral. The State or Defendant has the right to object and request a further hearing as to the sufficiency of collateral and legality of the funds.
3. Any property used to collateralize the bond shall not be further encumbered or liquidated during the pendency of the bond.
4. Only after the Court's subsequent review and issuance of an Order approving the Nebbia requirement of the legality of the funds and sufficiency of the collateral, will the Defendant then be eligible for release upon the posting of the said bond.
5. The Surety shall provide to the State an updated title search within ten (10) days of the Defendant's release reflecting recorded mortgages on the properties utilized for bond collateral.
7. The Defendant will not possess any firearms.
8. The Defendant shall surrender his passport and it shall remain in the custody of the Broward County Clerk and the Defendant shall not reapply for any passport.

Given under my hand and seal this \_\_\_\_ day of September 2016, at Fort Lauderdale,  
Broward County, Florida.

\_\_\_\_\_  
**HONORABLE**  
**Judge of the Circuit Court**

Exhibit 15

Filing # 50998335 E-Filed 01/10/2017 03:41:13 PM

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA

THE STATE OF FLORIDA,	:	INFORMATION FOR:
Plaintiff,	:	Count 1. Grand Theft 1 <sup>st</sup> F.
vs.	:	2-6. Criminal Use of Personal Identification Information 1 <sup>st</sup> F.
WILLIAM B. HATCHETT and	:	7-11. Unlawful Filing of False Documents or
ANTHONY TROY WILLIAMS,	:	Records Against Property 3 <sup>rd</sup> F.
Defendants,	:	

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

COUNT 1

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between January 1, 2015, and September 18, 2016, inclusive, in the County and State aforesaid, the defendants, WILLIAM B. HATCHETT and ANTHONY TROY WILLIAMS, did then and there, pursuant to one scheme or course of conduct, unlawfully and knowingly obtain or use, or endeavor to obtain or use, the property of Bank of America, NA and/or Youry Angel, to-wit: money and/or real property, of the value of one hundred thousand dollars (\$100,000.00) or more, with the intent to either temporarily or permanently deprive Bank of America, NA and/or Youry Angel of a right to the property or benefit from the property, or to appropriate the property to their own use or to the use of any person not entitled to the use of the property, contrary to Sections 812.014(1)(a), 812.014(1)(b) and 812.014(2)(a)1, Florida Statutes. (L7)

KPH/kk/01/09/17

\*\*\* FILED: BROWARD COUNTY, FL BRENDA D. FORMAN, CLERK 1/10/2017 3:40:03 PM.\*\*\*

## COUNT 2

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between January 1, 2016, and January 27, 2016, in the County and State aforesaid, the defendant, **WILLIAM B. HATCHETT**, did then and there willfully and without authorization fraudulently use personal identification information concerning a person, to wit: Paul M. Donofrio, without first obtaining that person's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was one hundred thousand dollars (\$100,000.00) or more, contrary to Section 817.568(2)(c), Florida Statutes. (L7)

## COUNT 3

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between January 1, 2016, and January 27, 2016, in the County and State aforesaid, the defendant, **WILLIAM B. HATCHETT**, did then and there willfully and without authorization fraudulently use personal identification information concerning a person, to wit: Jacob J. Lew, without first obtaining that person's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was one hundred thousand dollars (\$100,000.00) or more, contrary to Section 817.568(2)(c), Florida Statutes. (L7)

## COUNT 4

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between January 1, 2016, and January 27, 2016, in the County and State aforesaid, the defendant, **WILLIAM B. HATCHETT**, did then and there willfully and without authorization fraudulently use personal identification information concerning a person, to wit: June L. James, without first obtaining that person's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was one hundred thousand dollars (\$100,000.00) or more, contrary to Section 817.568(2)(c), Florida Statutes. (L7)



## COUNT 5

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between January 1, 2016, and January 27, 2016, in the County and State aforesaid, the defendant, **WILLIAM B. HATCHETT**, did then and there willfully and without authorization fraudulently use personal identification information concerning a person, to wit: Howard C. Forman, without first obtaining that person's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was one hundred thousand dollars (\$100,000.00) or more, contrary to Section 817.568(2)(c), Florida Statutes. (L7)

## COUNT 6

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between January 1, 2016, and January 27, 2016, in the County and State aforesaid, the defendant, **WILLIAM B. HATCHETT**, did then and there willfully and without authorization fraudulently use personal identification information concerning a person, to wit: Jason Knyper, without first obtaining that person's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was one hundred thousand dollars (\$100,000.00) or more, contrary to Section 817.568(2)(c), Florida Statutes. (L7)

## COUNT 7

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between March 1, 2015, and March 31, 2015, inclusive, in the County and State aforesaid, the defendants, **WILLIAM B. HATCHETT** and **ANTHONY TROY WILLIAMS**, did then and there file, or direct a filer to file, with the intent to defraud or harass another, an instrument, to-wit: document entitled 'Mortgage' filed as CFN 112871558, containing a materially false, fictitious, or fraudulent statement or representation that purports to affect the interest of an owner, to-wit: Bank of America, N.A., and/or Youry Angel in the property described in the instrument, contrary to Sections 817.535(2)(a), Florida Statutes. (L7)

## COUNT 8

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between May 1, 2015, and May 31, 2015, inclusive in the County and State aforesaid, the defendants, **WILLIAM B. HATCHETT** and **ANTHONY TROY WILLIAMS**, did then and there file, or direct a filer to file, with the intent to defraud or harass another, an instrument, to-wit: document entitled 'UCC Financing Statement' filed as CFN 112982595, containing a materially false, fictitious, or fraudulent statement or representation that purports to affect the interest of an owner, to-wit: Bank of America, N.A., in the property described in the instrument, contrary to Sections 817.535(2)(a), Florida Statutes. (L7)

## COUNT 9

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between August 1, 2015, and August 15, 2015, inclusive, in the County and State aforesaid, the defendant, **WILLIAM B. HATCHETT**, did then and there file, or direct a filer to file, with the intent to defraud or harass another, an instrument, to-wit: a document entitled 'Affidavit of Interest of William Hatchett', filed as CFN 113162377, containing a materially false, fictitious, or fraudulent statement or representation that purports to affect the interest of an owner, to-wit: Bank of America, N.A. and/or Youry Angel, in the property described in the instrument, contrary to Sections 817.535(2)(a), Florida Statutes. (L7)

## COUNT 10

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between January 1, 2016, and January 31, 2016, inclusive, in the County and State aforesaid, the defendant, **WILLIAM B. HATCHETT**, did then and there file, or direct a filer to file, with the intent to defraud or harass another, an instrument, to-wit: document entitled '697,370.47 Bond' and/or IRS Forms 56, containing a materially false, fictitious, or fraudulent statement or representation that purports to affect the interest of an owner, to-wit: Bank of America, N.A., in the property described in the instrument, contrary to Sections 817.535(2)(a), Florida Statutes. (L7)

## COUNT 11


MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that between January 1, 2016, and September 30, 2016, inclusive, in the County and State aforesaid, the defendant, **WILLIAM B. HATCHETT**, did then and there file, or direct a filer to file, with the intent to defraud or harass another, an instrument, to-wit: document entitled '\$300,00 promissory note', containing a materially false, fictitious, or fraudulent statement or representation that purports to affect the interest of an owner, to-wit: Bank of America, N.A., in the property described in the instrument, contrary to Sections 817.535(2)(a), Florida Statutes. (L7)

STATE OF FLORIDA vs. Identifying Data:  
 ANTHONY TROY WILLIAMS DOB 08-09-71 B/M

INFORMATION, Pg. 6

COUNTY OF BROWARD  
 STATE OF FLORIDA

Personally appeared before me ALESH H. GUTTMANN, duly appointed as an Assistant State Attorney of the 17th Judicial Circuit of Florida by MICHAEL J. SATZ, State Attorney of said Circuit and Prosecuting Attorney for the State of Florida in the County of Broward, who being first duly sworn, certifies and says that testimony has been received under oath from the material witness or witnesses for the offenses and the allegations as set forth in the foregoing Information would constitute the offenses charged, and that this prosecution is instituted in good faith.

  
 ASSISTANT STATE ATTORNEY  
 17th Judicial Circuit of Florida

SWORN TO AND SUBSCRIBED before  
 me this 10 day of January, 2017.

HOWARD C. FORMAN  
 Clerk of the Circuit Court  
 17th Judicial Circuit,  
 Broward County, Florida

BY   
 Deputy Clerk

To the within Information,  
 Defendant pleaded \_\_\_\_\_

HOWARD C. FORMAN  
 Clerk of the Circuit Court  
 17th Judicial Circuit,  
 Broward County, Florida

BY \_\_\_\_\_  
 Deputy Clerk

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA, : CASE NO.: 17-74CF10A  
Plaintiff, : JUDGE: SIEGEL  
vs. :  
ANTHONY WILLIAMS, :  
Defendant. :

---

STATE'S MOTION IN LIMINE

COMES NOW, MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, by and through the undersigned Assistant State Attorney, and moves this Honorable Court for an Order in Limine instructing the Defendant to refrain from making any direct or indirect mention whatsoever at trial before the jury of the matters hereinafter set forth, without first obtaining permission from the Court outside the presence of the jury, on the grounds that the said matters are incompetent, irrelevant, or immaterial to the issues involved herein, and will serve only to unfairly prejudice the jurors against the State. The subject matter in question is:

1. That there shall be no reference in this trial by a witness, by a party, or by an attorney to the fact that other states chose not to prosecute Defendant for Grand Theft or Unlawful Filing of False Document or Records against Property.
2. That there shall be no reference in this trial by a witness, by a party, or by an attorney to the fact that other Defendant's filing of similar documents in other states has in any way been sanctioned or approved by those state's or governmental agencies.
3. That there shall be no reference in this trial by a witness, by a party, or by an attorney that these charges of Grand Theft and Unlawful Filing of False Documents or Records against Real Estate violate double jeopardy principles.

A Copy



4. That there shall be no reference in this trial by a witness, by a party, or by an attorney that any similar mortgage note and/or UCC lien was scrutinized by any Anti-Predatory Lending Database in Illinois or that any jurisdiction in the United State of America authorized or sanctioned filings of same, or that this is prima facie evidence that these documents are not fraudulent.
5. That there shall be no reference in this trial by a witness, by a party, or by an attorney that there are pending or civil lawsuits here or elsewhere wherein Anthony Williams or Mortgage Enterprise Investments is a party.
6. That there shall be no discussion in front of the jury by a witness, by a party, or by an attorney of any case law or authority including, but not limited to, the U. S. Constitution, the Uniform Commercial Code, Corpus Juris Secundum, Black's Law Dictionary, or Common Law.
7. That there shall be no discussion in front of the jury by a witness, by a party, or by an attorney of the Holy Bible, or Scriptures.
8. That there shall be no discussion in front of the jury by a witness, by a party, or by an attorney of the concept of "Next Friend."
9. That there shall be no discussion in front of the jury by a witness, by a party, or by an attorney of Yahweh Elohim, biblical law, the Religious Freedom Restoration Act of 1993, and Yahshua the Messiah.

**WHEREFORE**, the STATE OF FLORIDA, would respectfully request that this Honorable Court grant this Motion in Limine.

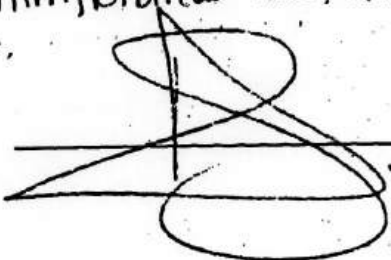
**I HEREBY CERTIFY** that a true copy hereof has been furnished by hand-delivery on this 12th day of June, 2016, to: Anthony Williams, Pro Se.

MICHAEL J. SATZ,  
State Attorney

By: 

Kathryn Heaven  
Assistant State Attorney  
Economic Crime Unit  
201 S.E. Sixth Street, Room 7170  
Fort Lauderdale, FL 33301  
Telephone: (954) 831-7223  
Fax: (954) 831-7207

Exhibit 17

<input type="checkbox"/> 17th Judicial Circuit in and for Broward County <input type="checkbox"/> In the County Court in and for Broward County		CLOCK IN Filed in Open Court,	
DIVISION: <input type="checkbox"/> Criminal <input type="checkbox"/> Traffic <input type="checkbox"/> Other	<b>ORDER</b>		ON _____ BY _____
THE STATE OF FLORIDA VS. <b>Anthony Williams</b>		CASE NUMBER <b>17-74 CF10A</b>	
		DEFENDANT	
CHARGE <b>I Grand Theft</b> <b>7-8 unlaw Filing False Documents</b>			
<b>State's in Limine</b>			
DEFENSE MOTION TO _____ IS HEREBY <b>AS BELOW</b> FOR REASONS AS STATED ON THE RECORD			
IN OPEN COURT.			
1) Granted -	As to other. States chose not to prosecute		
2) Granted -	As to left filing similar documents in other states		
3) Granted -	As to charges against estate violate double jeopardy principles		
4) Granted -	No reference any jurisdiction USA authorize sanctioned filings		
5) Granted -	No reference pending or civil lawsuits elsewhere		
6) Denied -	NO Discussion US Constitution, uniform Commercial, Corpus, Black bird dictionary		
7) Reserve -	as to Holy Bible		
8) Reserve -	concept of Nat 19 Friend		
DONE AND ORDERED THIS <b>19</b> DAY OF <b>June</b> , 20 <b>17</b> , IN			
BROWARD COUNTY, FLORIDA.			
9) Reserve -	Wahweh etchum, biblical law, Religious Freedom		
			JUDGE
			
COPIES: BSO - SAO			
ICC 112-19 ORDER DEFENSE MOTION			

STATE OF FLORIDA

v.

ANTHONY WILLIAMS

CASE NO. 17-74CF10A

COMMON LAW JURISDICTION

UCC 1-103.6

DEFENDANTS SWORN MOTION TO DISMISS

COMES NOW, Anthony Williams, Private Attorney General, who is a servant of the Most High Yahweh Elohim and Yahshua the Mahshyah, on behalf of the defendant and submits Defendant's Sworn Motion To Dismiss pursuant to Rule 3.190(C)(4). In Support thereof, defendant through his undersigned Common Law Counsel states the following:

1. The material undisputed facts do not establish a prima facie case of guilt as to the Charge of Grand Theft and Unlawful Filing of documents.
2. Grand Theft statute is not a continuing offense statute, for limitations purposes.  
O'Malley v. Mounts, App. 4 Dist., 590 So. 2d 437 (1991) review denied 595 So. 2d 557.
3. The indictment states the grand theft was committed and continued from January 1, 2015 through September 18, 2016 which is inconsistent with the 4th D.C.A. ruling in O'Malley v. Mounts, supra.
4. The undersigned was protecting a client's home from foreclosure who had a valid lease and had occupancy and possession of the property since October 2008.
5. There was no criminal nor felonious intent in assisting a client facing foreclosure.
6. Felonious intent required to convict of grand theft must exist at the time of taking.  
Adams v. State, App. 2 Dist., 443 So. 2d 1003 (1983), petition for review denied 449 So. 2d 265.
7. Specific intent to commit theft is essential element of crime of grand theft.  
Redding v. State, App. 1 Dist., 666 So. 2d 921 (1995)
8. The state cannot prove undersigned nor defendant had criminal intent in defending foreclosure proceedings.
9. To prove the crime of grand theft, the state must establish the defendant had the requisite criminal intent at the time of the taking. Yerrick v. State, App. 4. Dist., 979 So. 2d 1228 (2008)
10. There never was a crime of grand theft committed as evidenced by their being no police report, no complaint filed by any alleged owner that defendant stole their property.
11. Property allegedly stolen does not meet the criteria for 1st degree grand theft as evidenced by the Certificate of Sale for the property being sold for \$300 Cash to Bank of America. (See Exhibit's D and E of States discovery)
12. The documents filed where with the defendant has been charged with unlawful filing of documents are the routine practice of the undersigned's business which have been approved for filing in all other states by governmental agencies and county attorneys. There was no felonious intent in filing the same documents that have been filed for hundreds of other clients facing foreclosures in other states and counties in Florida.
3. Felonious intent is an essential element of the crime of grand theft. Sewell v. State, App. 5 Dist., 783 So. 2d 1171 (2001)
4. The Charges of Grand Theft and 2 counts of unlawful filing of documents violate double jeopardy principles, as the offenses arose from a single act of protecting a homeowner from foreclosure and thus charges should be dismissed.  
Hays v. State, App. 2 Dist., 844 So. 2d 705 (2003)



15. There was nothing false nor fraudulent about the documents filed on behalf of the undersigned's client to protect his home from foreclosure. The UCC lien and mortgage and note were authorized as evidenced by the same documents being filed in other states for 15 years and the undersigned has never been charged with unlawful filing of documents.
16. It is undisputed that the tenant and homeowner William Hatchett hired the undersigned to protect his home from foreclosure and signed a power of attorney giving the undersigned authority to take the necessary lawful actions to achieve such.
17. The court can take judicial notice of the mortgage, note and UCC being filed in other counties in Florida and in other states and the defendant nor the undersigned has been charged with unlawful filing of documents nor grand theft.
18. The court can take judicial notice that the mortgage, note and UCC was scrutinized by the Anti-Predatory Lending Database governmental agency in Illinois which forbids the filing of such documents before they are scrutinized to ensure the documents aren't fraudulent or misleading and only upon approval can the documents be filed in the records office at which time the company will receive a Certificate of Exemption authorizing the filing of all future documents of same nature.
19. The undersigned received a Certificate of Exemption which is prima facie evidence that the documents are not fraudulent and have lawful authority to be filed. (See Exhibit Attached)
20. While the undersigned was unlawfully incarcerated, Bank of America unlawfully foreclosed on the undersigned client's home, evicting him off of the property and gaining full possession of the property through civil procedures. Verifying this case was a civil matter and not criminal.
21. The charge of grand theft and unlawful filing of documents were maliciously charged against the undersigned by pseudo detective John Calabro 3 months after Bank of America had full possession of the home which nullify there ever being a crime of grand theft which Bank of America nor its representative ever filed charges nor accused the defendant or undersigned of committing grand theft.
22. Grand theft requires that perpetrator knowingly obtained property of another with intent to either temporarily or permanently deprive owner of its use. *Coker v. State*, App. 3 Dist, 662 So. 2d 422 (1995) review granted 675 So. 2d 120, approved 684 So. 2d 189.
23. The undersigned did not steal the property because the property was lawfully obtained by his client in 2008 as evidenced by the lease signed by William Hatchett giving him lawful possession of the property through a lease agreement with Yourry Angel.
24. The undersigned and defendant's reasonable hypothesis of innocence is that he was protecting a client's home from foreclosure and thus no evidence presented by the state is legally sufficient to show intent to steal. *Benitez v. State*, App. 3 Dist, 852 So. 2d 386 (2003).
25. The court can take judicial notice that the same documents were filed in orange county, California and was denied filing by the recorder's office until the documents could be approved by the county or district attorneys office to ensure the documents were not fraudulent. The whole incident was recorded on video and uploaded on youtube under Orange County Confrontation: The Denial, which shows that they initially denied the filing of the mortgage and then under Orange County Confrontation 2: The Triumph, which shows the mortgage was approved by the county attorneys and was allowed to be filed because the mortgage was found not to be fraudulent. This proves that the undersigned was in fact executing the routine practice of his business and is evidence that there is no intent to steal but to protect homeowners from foreclosure.
26. Donna Hickenbottom, who was a subject of investigation by John Calabro, filed the same documents on all other properties as did William Hatchett, but she was never charged with grand theft or unlawful filing of documents for no other reason other than she is white. This shows racial discrimination on the part of John Calabro.

and grounds for an immediate dismissal. The fact that he didn't charge her with the same crime indicates no crime was committed and that the charges were used as a means to harass, intimidate and retaliate against the undersigned and his client because they are African-American.

27. Defendant and the undersigned only acted in good faith to fulfill his obligation to his client to protect him from foreclosure.
28. There is no corpus delicti nor sworn affidavit by any man or woman or person claiming to have been harmed by the actions of the defendant or the undersigned.
29. The corpus delicti essentially consists of showing both of the fact that the crime charged has been committed and that some person is criminally responsible for it.  
Finney v. State, 550 So.2d 1194 (Fl. 1st DCA 1989)
30. No crime of Grand Theft or Unlawful Filing of documents were committed being evidenced by there never being a complaint or charge filed against the defendant or the undersigned by anyone claiming ownership of the property.
31. The warrant nor indictment states with specificity or particularity of exactly when or how the grand theft occurred but only offered dates speculated to be when the undersigned or defendant assisted his client from foreclosure.
32. The warrant and indictment have conflicting dates on when the alleged grand theft took place which indicates the charges were fabricated and the investigation was sloppy, incompetent and malicious.
33. Whenever the state seeks to obfuscate the truth seeking of a court by knowingly using false testimony or misleading argument the integrity of the judicial proceeding is placed in jeopardy. Johnson v. State, 44 So. 3d 51 (Fla. 2010);  
Griglio v. United States, 405 U.S. 153, 92 S.Ct. 763 (1972).

WHEREFORE, the instant case should be dismissed pretrial for lack of corpus delicti and the above enumerated reasons stated herein.



UNDER PENALTY OF PERJURY I DECLARE THE FOREGOING FACTS  
TO BE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Executed this 23<sup>rd</sup> day of April 2017.

Righteously Submitted,

Honorable

Anthony Williams

Anthony Williams, PAG

P.O. Box 9356

Ft. Lauderdale, FL 33310

Filing # 56443962 E-Filed 05/15/2017 03:32:24 PM

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO: 17-74CF10A

JUDGE: ANDREW SIEGEL

STATE OF FLORIDA, :

Plaintiff, :

vs. :

ANTHONY TROY WILLIAMS :

Defendant. :

STATE'S MOTION TO STRIKE AND  
SWORN TRAVERSE TO  
DEFENDANT'S SWORN MOTION TO  
DISMISS WITH INCORPORATED  
MEMORANDUM OF LAW

COMES NOW Michael J. Satz, by and through the undersigned Assistant State Attorney, pursuant to Rule 3.190(d) of the Florida Rules of Criminal Procedure and files this Motion to Strike the Defendant's Sworn Motion to dismiss and alternatively files this Sworn Traverse to Defendant's Sworn Motion to Dismiss, specifically admitting or denying the following factual matters alleged in said Motion, to-wit:

1. The State denies the statement in Paragraph 1 of the Defendant's Motion, undisputed facts establish a prima facie case against the Defendant. Additionally, this statement does not constitute a factual basis for purposes of a 3.190(c)4 motion;
2. The State denies the allegations in Paragraph 2 of the Defendant's Motion, and they are not applicable as this case was filed within the statute of limitations. Such allegations are not a proper basis for a 3.190(c)4 motion;
3. The State denies the allegations in Paragraph 3 of the Defendant's Motion, and they are not applicable as the case was filed within the statute of limitations. Also, such allegations are not a proper basis for a 3.190(c)4 motion;
4. The State denies the allegations in Paragraph 4 of the Defendant's Factual Basis and adds that neither Defendant or Co-Defendant had any lawful possession of the property;
5. The State denies the allegations in Paragraph 5 of the Defendant's Motion;
6. The statement in Paragraph 6 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
7. The statement in Paragraph 7 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;

26. The State denies the allegations in paragraph 26 of the Defendant's Factual Basis;
27. The State denies the allegations in paragraph 27 of the Defendant's Factual Basis;
28. The State denies the allegations in paragraph 28 of the Defendant's Factual Basis;
29. The statement in Paragraph 29 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
30. The State denies the allegations in paragraph 30 of the Defendant's Factual Basis and adds that victim's Youry Angel and Bank of America have both provided affidavits in this case.
31. The statement in Paragraph 31 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion
32. The statement in Paragraph 32 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion
33. The State denies the allegations in paragraph 33 of the Defendant's Factual Basis and adds that statement in Paragraph 33 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
34. Other grounds to be argued ore tenus.

**Memorandum of Law in Opposition to Defense Motion to Dismiss**

**There are Material Facts in Dispute.**

The Defendant and Co-defendant committed Grand Theft when they willfully and without authorization obtained or used, or attempted to obtain or use the real property belonging to Youry Angel &/OR Bank of America, NA.. To do so they created and recorded/filed documents affecting the title to real property, including a document purported to be a Mortgage and a UCC Filing Statement. They did so with the intent to obtain the property from it's rightful owner. The filing of these documents constituted the Unlawful Filing of False Documents or Records against Property (FS 817.535(2)(a)).

When there are material facts in dispute as there are here, a Motion to Dismiss should not be granted. State v. Kalogeropolous, 758 So2d 110 (Fla 2000). State v. Taylor, 16 So3d 997 (Fla. 5<sup>th</sup> DCA 2009).

**Intent is not a proper claim under a 3.190(c)(4) Motion to Dismiss.**

Intent is not an issue to be decided on a motion to Dismiss. State v Simbach, 742 So2d 365 (Fla. 2<sup>nd</sup> DCA 1999).

8. The statement in Paragraph 8 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
9. The statement in Paragraph 9 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
10. The State denies the allegations in paragraph 10 of the Defendant's Factual Basis;
11. The State denies the allegations in Paragraph 11 of the Defendant's Factual Basis and adds that valuation of the subject property is evidenced to be over \$100,000.00;
12. The State denies the allegations in Paragraph 12 of the Defendant's Factual Basis and adds that the Defendant is presently charged with crimes in Hawaii as the result of him creating and filing documents similar to those he created and filed in this case;
13. The statement in Paragraph 13 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
14. The statement in Paragraph 14 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
15. The State denies the allegations in Paragraph 15 of the Defendant's Factual Basis and adds that the Defendant is presently charged with crimes in Hawaii as the result of him creating and filing documents similar to those he created and filed in this case;
16. The State denies the allegations in Paragraph 16 of the Defendant's Factual Basis and adds that neither the Defendant or Co-defendant had any ownership rights or authority to act regarding subject property;
17. The statement in Paragraph 17 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
18. The State denies the allegations in Paragraph 18 of the Defendant's Factual Basis;
19. The State denies the allegations in Paragraph 19 of the Defendant's Factual Basis;
20. The State denies the allegations in Paragraph 20 of the Defendant's Factual Basis;
21. The State denies the allegations in Paragraph 21 of the Defendant's Factual Basis;
22. The statement in Paragraph 22 of the Defendant's Motion does not constitute a factual basis for purposes of a 3.190(c)4 motion;
23. The State denies the allegations in Paragraph 23 of the Defendant's Factual Basis with the exception of the fact that Co-defendant William Hatchett had a lease for the property in 2008;
24. The State denies the allegations in paragraph 24 of the Defendant's Factual Basis and adds the fact that the defendant produced and filed documents used to commit Grand theft and filed the false and fraudulent documents to affect title to the property.;
25. The State denies the allegations in paragraph 25 of the Defendant's Factual Basis;

Intent is generally a question for a jury and usually cannot be ascertained by direct evidence, but only inferred from acts from the parties and surrounding circumstances. State v. Gee, 624 So2d 284 (Fla. 2<sup>nd</sup> DCA 1993), State v. Franchi, 746 So2d 1126 (Fla. 4<sup>th</sup> DCA 1999). Herein, the facts of this case establish substantial competent evidence by which a jury can reasonably infer intent. This evidence must be evaluated by a jury and should not be determined in a Motion to Dismiss. Motive, knowledge and intent are states of mind usually inferred from conduct and surrounding circumstances and all inferences drawn therefrom. These are questions for the trier of fact and usually, as here, are not appropriate issues for a Motion to Dismiss. State v. Hart, 677 So2d 385 (Fla. 4<sup>th</sup> DCA 1996).

As set out above, there are material facts upon which the State relies to establish a prima facie case of Grand Theft in the First Degree and Unlawful Filing of False Documents or Records Against Property against the Defendant. When reviewed in the light most favorable to the State, the applicable standard herein, it is clear that a reasonable jury could find in favor of the State's position.

**Defendant's Sworn Motion to Dismiss should be struck**

Defendant's Sworn Motion to Dismiss should be struck as it repeatedly makes conclusory statements that are unsupported by fact or law, and articulates little if any disputed or undisputed facts.

WHEREFORE, the State of Florida, having filed this Sworn Traverse, specifically denies material fact allegation with specificity that were made in the Defendant's Sworn Motion to Dismiss, pursuant to Rule 3.190(d) FRCP, and respectfully moves this Court to deny the Defendant's Sworn Motion to Dismiss.

MICHAEL J. SATZ  
State Attorney

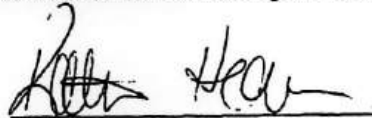
By:  

Kathryn P. Heaven FL Bar #771661  
Assistant State Attorney



State of Florida :  
County of Broward : SS

BEFORE ME, the undersigned authority duly authorized to administer oaths and take acknowledgments, personally appeared Kathryn P. Heaven, who is personally known to me and who, being by me first duly sworn, on oath deposes and says that she is a duly appointed Assistant State Attorney of the Seventeenth Judicial Circuit of Florida and that, as such, she is authorized to execute and has executed the above Traverse; and that she has read the allegations therein contained and the same are true and correct to the best of his knowledge and belief.

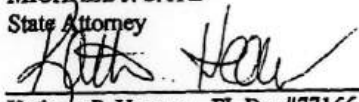
FURTHER AFFIANT SAITH NOT.

  
Kathryn P. Heaven

SWORN TO AND SUBSCRIBED before me by the above-named Affiant who is personally known to me and who did take the oath as reflected hereinabove, this 11th day of January 2017.

  
Notary Public, State of Florida  
My Commission expires:  KATHLEEN G. KONIOR  
Commission # FF 079694  
Expires March 19, 2018  
Revised Notary Public Seal Form 12-2010

I HEREBY CERTIFY that a true copy hereof has been furnished by mail delivery this 30th day of May 2017, to: Defendant Anthony Williams.

MICHAEL J. SATZ  
State Attorney  
By:   
Kathryn P. Heaven FL Bar #77166  
Assistant State Attorney  
Economic Crime Unit  
201 SE 6<sup>th</sup> Street, Suite 660B  
Fort Lauderdale, FL 33301  
954-831-7223



IN THE CIRCUIT COURT OF THE  
17<sup>th</sup> JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO. 17-74CF10A

VS.

COMMON LAW JURISDICTION

ANTHONY WILLIAMS

UCC 1-103.6

DEFENDANT'S MOTION TO STRIKE STATE'S MOTION  
TO STRIKE AND SWORN TRAVERSE TO DEFENDANT'S SWORN  
MOTION TO DISMISS WITH INCORPORATED MEMORANDUM OF LAW

COMES NOW, Defendant, by and through his Common Law Counsel,  
Honorable Private Attorney General Anthony Williams, who is a  
servant of the Most High Yahweh-Elohim and Yahshua the  
Makshyah and submits Defendant's Motion To Strike State's  
Motion To Strike and Sworn Traverse to Defendant's Sworn  
Motion to Dismiss With Incorporated Memorandum of Law,  
specifically denying the State's Traverse with the undisputed  
facts of this case, to-wit:

1. The State's Traverse is legally and lawfully insufficient because it fails to specify in detail the reasons it denies the sworn assertions of the defendant.
2. It is undisputed that William Hatchett had a valid lease since 2008, as verified by Youry Angel and Paul Donofrio's affidavits.
3. It is undisputed that Mr. Williams was hired by the homeowner to protect his property from foreclosure.
4. It is undisputed that at all times William Hatchett had lawful possession of the property since 2008 and never acquired the property by Grand Theft.

5. It is undisputed that Yourry Angel or Bank of America ever filed a complaint of grand theft against Mr. Williams.
6. It is undisputed that Mr. Williams other client who is Anna Hickenbottom, a white woman, filed the same documents on her property, yet she was not charged with grand theft or unlawful filing of documents, because she is white.
7. It is undisputed that the court can take judicial notice that the same documents were filed in other counties in Florida and Mr. Williams has never been charged with grand theft or unlawful filing of documents.
8. It is undisputed that the court can take judicial notice that the same documents were filed in other states and Mr. Williams has never been charged with grand theft or unlawful filing of documents in 15 years.
9. It is undisputed that Yourry Angel nor Bank of America accused Mr. Williams of stealing any property in their affidavits.
10. It is undisputed that the State proffered no case law or rulings to support any of its 33 denials in its traverse.
11. The State submitted 15 denials in its traverse on the unfounded and unsupported argument that the paragraphs or statements does not constitute a factual basis for purposes of a 3.190(c)4 motion. The State did not cite one ruling or case law to support its assumption and opinion. (Paragraphs 1, 2, 3, 6-9, 13, 14, 17, 22, 29, 31-33)
12. The State submitted 10 other denials in its traverse with no supporting arguments, facts or case law to support its denial. (Paragraphs 5, 10, 18-21, 25-28)

13. Nothing in the states denials are supported by facts or law.
14. The state submitted ~~7~~ other denials in its traverse which attempts to give a reason but fails miserably to state any facts supported by evidence or case law. (Paragraphs 4, 11, 12, 15, 16, 24 and 30.)
15. It is undisputed that there is no law preventing one from filing a UCC lien or a mortgage on their property to protect their property rights.
16. It is undisputed that Mr. Williams' Client, William Hatchett has been in possession of the subject property lawfully since 2008.
17. It is undisputed that Youry Angel and Bank of America knew Mr. Williams Client, William Hatchett had lawful possession of the property through a lawful lease executed by Youry Angel and is the reason Youry Angel nor Bank of America ever filed a criminal complaint for grand theft or unlawful filing of documents.
18. It is undisputed that Youry Angel nor Bank of America ever stated in their affidavits they wanted to press charges against Mr. Williams or his client for grand theft or unlawful filing of documents.
19. It is undisputed that none of the documents purport to give Mr. Williams title to the property.
20. It is undisputed that the documents were scrutinized by the Anti-Predatory Lending Database and approved for filing because nothing in the documents were false or fraudulent and Mr. Williams Company received a Certificate of Exemption, evidencing the lawfulness of the mortgage.



21. It is undisputed that the documents were scrutinized by the County attorneys and District Attorneys in California and approved for filing because the documents were lawful and not fraudulent. The approval of these documents were recorded on video by the staff of Mr. Williams in his California office.
22. It is undisputed that the property is worth \$300 as it is evidenced by the Certificate of Sale in the state's discovery which proves that the highest and best bid for the property was \$300 cash paid by Bank of America.
23. It is undisputed that Bank of America was not the owner of the property being evidenced by them having to purchase the property at auction. If they were the lawful owner, they would not have to buy property they already own.
24. It is undisputed with the state agreeing with the fact that William Hatchett had a valid lease since 2008, as evidenced by the state agreeing in paragraph 23 of its traverse.
25. It is undisputed that there are no criminal charges filed against Mr. Williams or William Hatchett from January 1, 2015 through September 18, 2016.

#### MEMORANDUM OF LAW

There Are No Material Facts In Dispute

The states Memorandum of Law is legally insufficient, grossly inadequate and flawed in the fact that the state argues that Mr. Williams had documents filed with the intent to steal the property, then the state uses the argument that defendant can't use intent as a ground for a motion to dismiss, while using intent as the basis of the argument in

the memorandum of law. This is absurd, ridiculous, frivolous and constitutes legal incompetence, dishonesty or both on the part of the assistant state Attorney Kathryn P. Heaven.

There are no material facts in dispute. The state is relying on their assumption of intent to obtain or steal property from the rightful owner when the fact remains that the title to the property was not, has not and never was intended to be obtained or transferred into Mr. Williams name to constitute theft. The property was never stolen, title to the property was never transferred and the property was foreclosed on while Mr. Williams was unlawfully incarcerated. The property was in full possession of the bank as of September 2016 through a civil foreclosure and therefore there was no reason for Young Angel nor Bank of America to file a complaint for grand theft (in which they didn't) three (3) months after the bank foreclosed and evicted William Hatchett from the property. If there was a claim of grand theft it would have been filed in 2008 when William Hatchett obtained the property. The fact that the state is not alleging that the property was stolen from 2008 to 2015 but from January 1, 2015 through September 18, 2016, shows that the state knew and knows the property wasn't stolen but used those dates assuming those are the dates Mr. Williams was assisting William Hatchett from foreclosure. There is no police report nor 911 call on January 1, 2015 through September 18, 2016 that Mr. Williams committed the crime of grand theft because the crime never happened. As stated in defendants Motion to Dismiss, "grand theft is not a continuing offense statute, for limitation purposes." O'Malley v. Mounts, App. 4 Dist., 590 So. 2d 437 (1991) review denied 595 So. 2d 557. The state can not state nor prove when, where and how the grand theft took place. The state's whole argument is based on intent to steal and not the actual crime of stealing or grand theft. The state misunderstood the O'Malley, supra, ruling by stating the charges were filed in the statute of limitations time limits. However, O'Malley specifically states



that grand theft is NOT a continuing offense and the state has charged the defendant with the continuing offense of stealing a house from January 1, 2015 through September 15, 2016. There must be a SPECIFIC DATE the house was stolen. Based on this appellant ruling alone, this case is due to be dismissed. It is impossible to grand theft a house in the manner the state is alleging. The house was never taken nor removed, nor was the title to the property unlawfully obtained or transferred by any documents that were filed. The state has not proven corpus delicti. "The corpus delicti essentially consists of showing both of the fact that the crime charged has been committed and that some person is criminally responsible for it." Finney v. State, 530 So. 2d 1184 (Fla. 1st DCA, 1989). The state essentially has proven the defendant's case by acquiescing that William Hatchett had a valid lease in 2008 and therefore obtained possession of the property lawfully, therefore eradicating the false and bogus charges of grand theft and unlawful filing of documents.

Defendants Sworn Motion To Dismiss Should Be Granted and Not Struck

Defendant through his common law counsel outlined the undisputed material facts supported by documented evidence and law and sufficiently articulated those undisputed facts.

States Traverse Should Be Stricken

Upon scrutinizing the State's Traverse, it was sworn to by the notary Kathleen Konior that the State's Sworn Traverse was sworn on January 11, 2017 when defendant had not submitted a Motion To Dismiss at that time to be traversed.

Also the assistant state Attorney Kathryn R. Heaven certified that she furnished by mail delivery on the 30th day of May 2017 to the defendant when: 1) defendant never received the traverse by mail but in court on May 16, 2017, which was the day of the hearing.

for the Motion to Dismiss and 2) the 30<sup>th</sup> day of May 2017 has not arrived yet making the whole sworn statement and the Certification a lie. The reasons for these obvious lies, blunders and incompetence is immaterial, but the court cannot allow this type of incompetence, dishonesty and legal insufficiencies to be tolerated, especially by someone who claims to be an assistant State Attorney with a so-called law degree entrusted to prosecute real crimes on behalf of the state.

Therefore, the Traverse is not legally sufficient and should be stricken or denied and defendant's Motion To Dismiss granted.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Executed this 22<sup>nd</sup> day of May 2017.

Righteously Submitted,

Anthony Williams  
Anthony Williams  
Honorable P.A.G.

P.O. Box 9356

Ft. Lauderdale, FL 33310

Common Law Counsel for Defendant

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was provided to the Clerk of Court, SAG, Judge Siegel at 201 S.E. 6<sup>th</sup> Street, Ft. Lauderdale, FL 33310 on May 26, 2017.

Anthony Williams

Exhibit 21

☐ 17th Judicial Circuit in and for Broward County  
☐ In the County Court in and for Broward County

CLOCK IN  
Filed in Open Court,

DIVISION:  
☐ Criminal  
☐ Traffic  
☐ Other

## ORDER

ON \_\_\_\_\_  
BY \_\_\_\_\_

THE STATE OF FLORIDA VS.

CASE NUMBER

Anthony Williams DEFENDANT

17-74 CFAA

CHARGE

I Grand Theft  
7-8 Unlaw filing

DEFENSE MOTION TO

Dismiss  
Denied

IS HEREBY

FOR REASONS AS STATED ON THE RECORD

IN OPEN COURT.

DONE AND ORDERED THIS

12

DAY OF

June

, 20

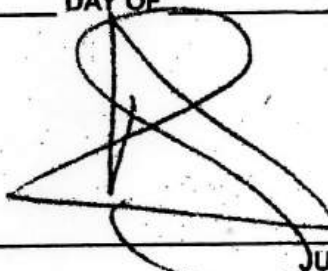
17

, IN

BROWARD COUNTY, FLORIDA.

  
JUDGE

COPIES: BSO - SAO

<input type="checkbox"/> 17th Judicial Circuit in and for Broward County <input type="checkbox"/> In the County Court in and for Broward County		CLOCK IN Filed in Open Court,	
DIVISION: <input type="checkbox"/> Criminal <input type="checkbox"/> Traffic <input type="checkbox"/> Other	<b>ORDER</b>		ON _____ BY _____
THE STATE OF FLORIDA VS. <u>Anthony Williams</u> DEFENDANT		CASE NUMBER <u>17-74/FICA</u>	
CHARGE <u>Grand Theft / Unlicensed</u>			
DEFENSE MOTION TO <u>Denial</u> <u>FX JOA</u> IS HEREBY FOR REASONS AS STATED ON THE RECORD IN OPEN COURT.			
DONE AND ORDERED THIS <u>21</u> DAY OF <u>June</u> , 20 <u>17</u> , IN BROWARD COUNTY, FLORIDA.			
 JUDGE			
COPIES: BSO - SAO			





IN THE CIRCUIT COURT OF THE  
17<sup>th</sup> JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO. 17-74CF10A

vs.

Common Law JURISDICTION

ANTHONY WILLIAMS

UCC 1-103.6

## NOTICE OF FILING OF AFFIDAVIT

Notice is given that defendant by his common law  
counsel, Honorable Private Attorney General Anthony Williams  
submits this Notice of Filing of Affidavit to state under-  
oath the facts of this case. Executed this 22<sup>nd</sup> day of May 2017.

Righteously Submitted,

Anthony Williams

Anthony Williams

Honorable P.A.G.

P.O. Box 9356

Ft. Lauderdale, FL 33310

Common Law Counsel for Defendant

## CERTIFICATE OF SERVICE

I hereby cert. fy that a true and correct copy of the foregoing  
was furnished to the Clerk of Court, SAs and Judge Siegel at  
201 S.E. 6<sup>th</sup> Street, Ft. Lauderdale, FL 33301 on May 22, 2017.

Anthony Williams

AFFIDAVIT OF  
ANTHONY WILLIAMS

Ex. 24 cont'd

"Indeed, no more than (affidavits) is necessary to make the prima facie case." United States v. Kis, 658 F.2d 526, 536 (7th Cir. 1981); cert. denied, 50 USLW 2169; S.Ct. March, 22, 1982

1. Affiant is over the age of 21.
2. Affiant is competent to state the facts provided herein.
3. Affiant states that he nor William Hatchett committed Grand Theft nor unlawful filing of documents.
4. Affiant came to know William Hatchett through Donna Hickenbottom.
5. Donna Hickenbottom referred William Hatchett to Affiant to assist Mr. Hatchett in protecting his home from foreclosure.
6. William Hatchett sought the services of Affiant to protect his home from foreclosure.
7. William Hatchett was forced to seek the services of two attorneys, Charles D. Barnard and Dana E. Rodriguez because Affiant was unlawfully incarcerated on bogus unlicensed practice of law charges.
8. The two attorneys also filed motions to protect William Hatchett's home from foreclosure.
9. William Hatchett has been a tenant at 3816 N.W. 88th Terrace, Hollywood, FL 33024 since October 2008.
10. William Hatchett signed a lease with Youry Angel to occupy the house.
11. William Hatchett paid Youry Angel \$3,600 a month for rent.
12. William Hatchett was given advice by Donna Hickenbottom regarding the Affidavit of Interest that she filed to protect her home from foreclosure and advised he do the same thing.
13. Donna Hickenbottom drafted and filed the Affidavit of Interest on behalf of William Hatchett.
14. At all times William Hatchett was the rightful tenant of the subject property and was a customer seeking any available help to keep him

and his family from being kicked out onto the streets.

15. William Hatchett signed a Common law mortgage and Note with Mortgage Enterprise Investments which Affiant is owner of.
16. The mortgage, note and UCC lien that was filed was filed only to protect the property rights of William Hatchett from being infringed by Bank of America or any other entity trying to deprive William Hatchett of his property without a trial by jury as it is mandated in the 7th Amendment of the U.S. Constitution.
17. The UCC lien was filed against the legal person WILLIAM HATCHETT in favor of William Hatchett, American citizen, to ensure William Hatchett, American citizen had priority over WILLIAM HATCHETT, a legal person for any and all debts and a superior lien on any and all assets of the legal person WILLIAM HATCHETT.
18. AFFIANT asserts that Bank of America committed fraud against Yvonne Angel and WILLIAM HATCHETT by executing foreclosure proceedings without having any legal or lawful authority to do so.
19. Affiant asserts that Bank of America was never the lawful owner of the subject property as evidenced by them being a purchaser at the auction.
20. Affiant asserts that Bank of America also committed fraud by obtaining a Certificate of Title in complicity with Howard Farman and stating that the highest and best bid for a \$900,000 house was \$300 cash paid by Bank of America.
21. Affiant asserts that he has read the Affidavit submitted by Paul Donofrio of Bank of America and nowhere in the affidavit does he accuse William Hatchett or Affiant of Grand Theft or unlawful filing of documents.
22. Affiant asserts that in Paul Donofrio's affidavit he admits



that William Hatchett was a lawful tenant on the subject property since 2008.

23. Affiant asserts William Hatchett had a lawful right to the property stemming from an agreement with Young Angel and the maintenance and up keep of the property since 2008.
24. Affiant sent Bank of America a Qualified Written Request demanding Bank of America prove they are the lawful owners and have standing to foreclose and Bank of America failed to properly respond.
25. The Qualified Written Request had a default provision if Bank of America failed to respond, William Hatchett could have documents filed to claim lawful ownership and rights to the property.
26. William Hatchett gave Affiant power of attorney to execute any and all lawful actions to protect his property interests.
27. Affiant only filed lawful documents authorized by law to be filed on William Hatchett's behalf.
28. William Hatchett had no criminal intent in fighting the foreclosure of his home but was lawfully protecting his property rights under the law.
29. The charges against William Hatchett were maliciously filed by John Calabro in retaliation against Affiant to harass anyone who supported Affiant's cause in fighting corruption in Broward.
30. John Calabro knew and knows that the same documents Donna Hickenbottom filed on William Hatchett's behalf, she filed on her own property, yet she was not charged with Grand Theft or unlawful filing of documents because she is white and is evidence of the racist disposition of pseudo detective John Calabro.
31. All of the documents other than the ones Affiant had filed on William Hatchett's behalf were filed by people who William Hatchett

believed knew the law and knew what they were doing in filing those documents.

32. The other documents were filed while Affiant was incarcerated and had no knowledge of nor authorized their filing.
33. Affiant and William Thickett are innocent of any wrongdoing or criminal intent and all actions were according to the law and not done to steal or deprive anyone of any property that was lawfully theirs.

UNDER PENALTY OF PERJURY I declare the foregoing to be true and correct to the best of my knowledge.

Done this 12<sup>th</sup> day of March 2012.

Anthony Williams  
Affiant



STATE OF FLORIDA

VS.

ANTHONY WILLIAMS

CASE NO. 17-17CF10A

COMMON LAW JURISDICTION

UCC 1-103.6

NOTICE TO THE COURT

COMES NOW, Anthony Williams, Private Attorney General, who is a servant of the Most High Yahweh-Elohim and Yehshua the Mahshyah and submits this Notice to the Court to inform this ersatz of a Court the following:

1. This is an official notice that the jurisdiction of this court is challenged and once challenged must be proven on the record. (Bindell v. City of Harvey, 212 Ill. App. 3d 1042, 571 N.E. 2d 1017 (1st Dist. 1991))
2. The magistrate presiding has been properly disqualified because of his racial bias and discrimination and fails to recuse himself as it is mandated by law and therefore Respondent KNOWS he can't have a fair trial because he has already been subjected to two unfair trials by this same magistrate. (Fla. Stat. 38.10 and Rule 2.330 Fla. R. Crim. P.)
3. This Court is in complicity with Broward County Jail and the State Attorney's Office to deprive Respondent of his basic divine, common law and constitutional rights by denying him the opportunity to depose witnesses, use the pro se phone denial of access to the law library to properly defend this case and unlawfully agreeing with Stand by Counsel Kristie Cohen that as stand by counsel she does not have to assist respondent in anything in violation of the U.S. Supreme Court ruling U.S. vs. Coupez, 603 F.2d 1347; U.S. vs. Giger, 605 F.2d 507.

4. Respondent has been unlawfully denied pre-trial release in order to give the prosecution an unfair advantage and to disadvantage Respondent from obtaining the necessary documents and to deprive Respondent of his liberty to cause an undue hardship on his family and business. (Fla. Const. Art. I sec. 14, Rule 3.131 Fla. R. Crim. P.)

5. Respondent has Filed a motion to Remove Kristie Cohen as Standby counsel and allow Stephanie Moon who is Standby Counsel on Respondent's other case who have assisted Respondent according to the law and the Motion was unlawfully denied with no reasons given but ostensibly to ensure Respondent does not receive the assistance he is entitled to as an incarcerated litigant.

Executed this 22<sup>nd</sup> day of May 2017.

Righteously Submitted,

Anthony Williams

Anthony Williams

Honorable P.A.G.

P.O. Box 9356

Ft. Lauderdale, FL 33310

Common Law Counsel For Defendant

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy was furnished to the Clerk of Court, SAO, Judge Siegel at 201 S.E. 6th Street, Ft. Lauderdale, FL 33310 on May 24, 2017.

Anthony Williams

STATE OF FLORIDA

CASE NO. 17-742F10A

vs.

ANTHONY WILLIAMS

NOTICE OF SABOTAGE BY THE COURT  
AND PROSECUTORS OFFICE

COMES NOW, defendant through his undersigned common law counsel who is a servant of the Most High Yahweh-Elohim and Yehshua the Mahshyah and submits this Notice of Sabotage by the Court and Prosecutors office to enumerate the following facts:

1. The court in complicity with the State Attorneys Office (SAO) unlawfully forced the undersigned to withdraw his speedy trial demand in order to participate in discovery.
2. The undersigned sent subpoena's to the court on March 8, 2017 in order to subpoena witnesses for trial and didn't receive a response from the clerk until June 2, 2017 which is 17 days before trial making it impossible to have witnesses subpoenaed on that short of notice.
3. The court prevented the undersigned from being able to depose the state witnesses by not allowing the undersigned to use the building where the trial will be had and preventing stand by counsel from deposing witnesses by stating that is not the duty of stand by counsel to depose witnesses which violates the U.S. Supreme Court ruling U.S. vs. Couper, 603 F.2d 1347; U.S. vs. Oigax, 605 F.2d 507 and Fla. L. Crim. P. 3.220.



4. The undersigned has reasons to believe and knows that he can't have a fair trial with this magistrate because of the racial discrimination that has been displayed in the previous two trials and undersigned filed numerous legally sufficient Motions to Disqualify Judge which were denied by the magistrate who set forth no justifiable reasons for the denial in violation of F.S. 38.10 and Rule 3.230 Fla. R. Crim. P.

5. The undersigned filed a federal lawsuit against this magistrate on June 28, 2016 in the U.S. District Court for the District of Columbia which was transferred to the U.S. District Court for the District of Hawaii Civil No. 16-00411 LEK-RLP and amended on April 24, 2017. The magistrate knowing that a federal lawsuit has been filed against him, still refuses to recuse himself in violation of the law.

6. The undersigned filed a Motion To Discharge on the 30th of May, 2014 for failure to bring the defendant to trial within the 60 day period and thus the case should have been dismissed and discharged.

7. The undersigned received a supplemental discovery from the State whereby the State coerced defendant's co-defendant to lie against the undersigned in order to turn the co-defendant into a witness for the State twenty (20) days before the trial. The undersigned reviewed the co-defendant's deposition on June 4, 2017.

WHEREFORE, the defendant, through undersigned Common law Counsel Notices this Court that he is aware of the measures that it has taken in complicity with the SAO to sabotage the defendant's case and defendant will be seeking a remedy both civilly and criminally against both conspirators with a higher court and law enforcement agency.

UNDER PENALTY OF PERJURY I DECLARE THAT  
THE FOREGOING IS TRUE AND CORRECT TO THE BEST  
OF MY INFORMATION AND KNOWLEDGE

Executed this 11<sup>th</sup> day of June 2017.

Righteously Submitted,

Anthony Williams

Anthony Williams

Honorable P.A.G.

P.O. Box 9356

Ft. Lauderdale, FL 33310

Common Law Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the  
foregoing was furnished to: Clerk of Court, SAO, Judge Siegel  
at 201 SE. 16<sup>th</sup> Street, Ft. Lauderdale, FL 33301 on June 12, 2017.

Anthony Williams



*Theft Pursuant to One Scheme. Give if applicable.*

Amounts of value of separate properties involved in thefts committed pursuant to one scheme or course of conduct, whether the thefts are from the same person or several persons, may be added together to determine the total value of the theft.

*Good faith defense. Give if applicable. Cliff Berry, Inc. v. State, 116 So. 3d 394 (Fla. 3d DCA 2012).*

It is a defense to the charge of Theft if (defendant) had an honest, good faith belief that [he] [she] had the right to possess the (property alleged) of (victim).

If you have a reasonable doubt about whether (defendant) had an honest, good faith belief, even though unreasonable or mistaken, that [he] [she] had the right to possess the (property alleged) of (victim), you should find [him] [her] not guilty of Theft.

If you find the State proved beyond a reasonable doubt the defendant did not have a honest, good faith belief that [he] [she] had the right to possess the (property alleged) of (victim), you should find [him] [her] guilty, if all of the elements of Theft have been proven beyond a reasonable doubt.

#### Lesser Included Offenses

GRAND THEFT — FIRST DEGREE (PROPERTY VALUED AT \$100,000 OR MORE) — 812.014(2)(a)			
CATEGORY ONE	CATEGORY TWO	FLA. STAT.	INS. NO.
Grand theft — second degree		812.014(2)(b)	14.1
Grand theft — third degree		812.014(2)(c)1.,2.,3.	14.1
Petit theft — first degree		812.014(2)(e)	14.1
Petit theft — second degree		812.014(3)(a)	14.1
	Trade secrets	812.081	

GRAND THEFT — SECOND DEGREE (PROPERTY VALUED AT \$20,000 OR MORE BUT LESS THAN \$100,000) — 812.014(2)(b)			
CATEGORY ONE	CATEGORY TWO	FLA. STAT.	INS. NO.
Grand theft — third degree		812.014(2)(c)1.,2.,3.	14.1
Petit theft — first degree		812.014(2)(e)	14.1
Petit theft — second degree		812.014(3)(a)	14.1
	Trade secrets	812.081	

GRAND THEFT — THIRD DEGREE (PROPERTY VALUED AT \$300 OR MORE BUT LESS THAN \$20,000) — 812.014(2)(c)			
CATEGORY ONE	CATEGORY TWO	FLA. STAT.	INS. NO.
Petit theft — first degree		812.014(2)(e)	14.1
Petit theft — second degree		812.014(3)(a)	14.1
	Trade secrets	812.081	

GRAND THEFT — THIRD DEGREE (A MOTOR VEHICLE) — 812.014(2)(c)6			
CATEGORY ONE	CATEGORY TWO	FLA. STAT.	INS. NO.
None			
	Trespass to conveyance	810.08	13.3

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT OF THE  
STATE OF FLORIDA, IN AND FOR OKEECHOBEE COUNTY  
CIVIL DIVISION**

THE BANK OF NEW YORK MELLON AS  
SUCCESSOR BY MERGER TO THE BANK  
OF NEW YORK AS TRUSTEE FOR THE  
BENEFIT OF THE  
CERTIFICATEHOLDERS CWABS, INC.  
ASSET-BACKED CERTIFICATES, SERIES  
2007-11

Plaintiff,

vs.

PAT LONG, et al.

Defendant(s),

Case No: 47-2012-CA-000137-CAAX-MX

Division:

**MOTION FOR REMOVAL OF  
FILING OF UNIFORM COMMERCIAL CODES**

The Law Offices of Daniel C. Consuegra, by and through their attorney or record, Susan B. Morrison, moves for entry of an order directing the removal of the unlawful filing of Uniform Commercial Code Instruments No. 201402011553 and 201402020064, and states as follows:

1. The Law Offices of Daniel C. Consuegra (the "Firm"), formerly represented the Plaintiff in the above referenced matter and filed the foreclosure action on April 4, 2012.
2. On or about March 31, 2015, an Order on Defendant's Motion to Cancel Foreclosure Sale and Stay All Proceedings Pending Appeal was entered in the instant case. A copy of the Order is attached hereto as Exhibit "A" and incorporated herein by reference.
3. On or about August 14, 2014, Defendant Patrick Michael Long ("Long") filed Commercial Code Instrument No. 201402011553 ("UCC-1 553") and on August 15, 2014, Long ) filed Commercial Code Instrument No. 201402020064 ("UCC-1 064"). A copy of the UCC-1 553 and UCC-1 064 are attached hereto as composite Exhibit "B" and incorporated herein by reference.
4. The UCC-1 553 and UCC-1 064 were served on Daniel C. Consuegra on March 10, 2015, by U.S. Mail.


5. The UCC-1 553 identified Long both Debtor and Secured Party and attached an agreement identifying Long as both the Secured Party and the Debtor and alleges a debt of Two Billion Dollars (\$2,000,000,000.00).
6. The UCC-1 064 named Long as the Secured Party and the Debtor along with Gary Sweet, Stephanie Broder and Harold Thomerson of Hinshaw & Culberson, LLP, Daniel Charles Consuegra ("Consuegra"), the Law Offices of Daniel C. Consuegra (the "Firm"), and Janet Morgan of the Florida Bar as additional Debtors.
7. The UCC-1 064 attaches an Affidavit of Service by Notary Presentment, A Summons to Daniel Charles Consuegra, and a Notice to Levy Commercial Lien Obligation in the amount of One Million One Hundred Ninety Thousand Dollars (\$1,190,000.00).
8. At no time did Consuegra or the Firm enter into any contracts, agreements, liens, judgments, or other security instruments nor does the Firm owe any debt to Long.
9. Consuegra and the Firm has no interest whatsoever, in the Collateral or Property referenced in the UCC-1 553 or UCC-1 064.
10. Long filed UCC-1 553 and UCC-1 064 with the intent to defraud or harass the Consuegra and the Firm for filing the foreclosure action and the litigation of the foreclosure.
11. The credit reporting of Consuegra and the Firm can be impacted by this false document.
12. Florida Statute § 817.535 (8)(a) states:

"Any person adversely affected by an instrument filed in the official record which contains a materially false, fictitious or fraudulent statement or representation has a civil cause of action under this section without regard to whether criminal charges are pursued....(b) Upon a finding that an instrument contains materially false, fictitious, or fraudulent statement or representation such that the instrument does not establish a legitimate property or lien in favor of another person (1) The court shall determine whether the entire instrument or certain parts thereof are null and void ab initio. If the court finds the instrument void in its entirety, it may order the instrument sealed from the official record and removed from any electronic database used for indexing or locating instruments in the official record."

13. Consuegra and the Firm have been adversely affected by this filing.

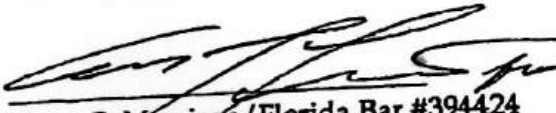
WHEREFORE, Consuegra and the Firm respectfully requests the court to enter an order (1) that the UCC-1 553 and UCC-1 064 are null and void in their entirety; (2) directing the Clerk of the Florida Secured Transaction Registry to

remove the UCC-1 553 and UCC-1 064 from all electronic databases and otherwise; (3) enjoin Long from filing any instrument in an official record absent prior review and approval for review by the Court and (4) that this Court retain jurisdiction in this matter.

  
Susan B. Morrison/Florida Bar #394424  
Law Offices of Daniel C. Consuegra, P.L.  
9204 King Palm Dr., Tampa, FL 33619  
Phone: (813) 915-8660/Fax: (813) 915-0559  
[attorneynotice@consuegralaw.com](mailto:attorneynotice@consuegralaw.com)  
*Andrew h. Fivcoot #122068*

**CERTIFICATE OF SERVICE**

I certify that this 3 day of April, 2015, I have served notice of limited appearance on all counsel and all parties not represented by counsel.

  
Susan B. Morrison/Florida Bar #394424  
Law Offices of Daniel C. Consuegra, P.L.  
9204 King Palm Dr., Tampa, FL 33619  
Phone: (813) 915-8660/Fax: (813) 915-0559  
[attorneynotice@consuegralaw.com](mailto:attorneynotice@consuegralaw.com)  
*Andrew h. Fivcoot 122068*

**SERVICE LIST**

ATTORNEY FOR PLAINTIFF  
LAW OFFICES OF DANIEL C. CONSUEGRA, P.L.  
9204 KING PALM DR.  
TAMPA, FL 33619  
[attorneynotice@consuegralaw.com](mailto:attorneynotice@consuegralaw.com)

PAT LONG  
325 NORTH EAST 342ND TRAIL  
OKEECHOBEE, FL 34972

FORD MOTOR CREDIT COMPANY, LLC  
CT CORPORATION SYSTEM, REGISTERED AGENT  
1200 SOUTH PINE ISLAND ROAD #250  
PLANTATION, FL 33324

UNKNOWN SPOUSE OF PAT LONG  
325 NORTH EAST 342ND TRAIL  
OKEECHOBEE, FL 34972

UNKNOWN TENANT #1  
325 NORTH EAST 342ND TRAIL  
OKEECHOBEE, FL 34972

UNKNOWN TENANT #2  
325 NORTH EAST 342ND TRAIL  
OKEECHOBEE, FL 34972



Exhibit 29

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) MORTGAGE ENTERPRISE INVESTMENTS 8887022347
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address) MORTGAGE ENTERPRISE INVESTMENTS P.O. BOX 1215 Killeen, TX 76540 USA

FILING NUMBER: 15-0007358564  
FILING DATE: 03/11/2015 08:51 PM  
DOCUMENT NUMBER: 595684510004  
FILED: Texas Secretary of State  
IMAGE GENERATED ELECTRONICALLY FOR WEB FILING  
THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S NAME - Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

1a. ORGANIZATION'S NAME				
OR	1b. INDIVIDUAL'S SURNAME HATCHETT	FIRST PERSONAL NAME WILLIAM	ADDITIONAL NAME(S)/INITIAL(S) B.	SUFFIX
1c. MAILING ADDRESS 3816 N.W. TERRACE		CITY COOPER CITY	STATE FL	POSTAL CODE 33024
COUNTRY USA				

2. DEBTOR'S NAME - Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

2a. ORGANIZATION'S NAME				
OR	2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE
COUNTRY				

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY) - Provide only one Secured Party name (3a or 3b)

3a. ORGANIZATION'S NAME MORTGAGE ENTERPRISE INVESTMENTS				
OR	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
3c. MAILING ADDRESS P.O. Box 1215		CITY Killeen	STATE TX	POSTAL CODE 76540
COUNTRY USA				

4. COLLATERAL: This financing statement covers the following collateral:  
"All of debtor's assets, land, real estate, personal property and all debtor's rights in said assets, land, real estate and personal property, now owned and hereafter acquired, now existing and hereafter arising, and wherever located, described fully in Security Agreement WBH-03111501-SA dated the Eleventh Day of the Third Month in the Year of our Lord Two Thousand Fifteen.  
Inquiring parties may consult directly with debtor for ascertaining the financial relationship and contractual obligations associated with this commercial transaction identified in security agreement referenced above. Adjustment of this filing is in accord with UCC 1-103, 1-104, and House Joint Resolution 192 of June 5, 1933. Secured Party accepts Debtor's signature in accord with UCC 1-201(39), 3-401."

5. Check only if applicable and check only one box: Collateral is <input checked="" type="checkbox"/> held in a Trust (see UCC1Ad, item 17 and instructions) <input type="checkbox"/> being administered by a Decedent's Personal Representative	
6a. Check only if applicable and check only one box: <input type="checkbox"/> Public-Finance Transaction <input type="checkbox"/> Manufactured-Home Transaction <input type="checkbox"/> Debtor is a Transmitting Utility	
6b. Check only if applicable and check only one box: <input type="checkbox"/> Agricultural Lien <input type="checkbox"/> Non-UCC Filing	
7. ALTERNATIVE DESIGNATION (if applicable): <input type="checkbox"/> Lessee/Lessor <input type="checkbox"/> Consignee/Consignor <input type="checkbox"/> Seller/Buyer <input type="checkbox"/> Bailor/Borrower <input type="checkbox"/> Licensee/Licensor	
8. OPTIONAL FILER REFERENCE DATA:	

page 2

UCC FINANCING STATEMENT ADDENDUM  
FOLLOW INSTRUCTIONS

9. NAME OF FIRST DEBTOR: Same as line 1a or 1b on Financing Statement; if line 1b was left blank because individual Debtor name did not fit, check here ☐

OR	9a. ORGANIZATION'S NAME
	9b. INDIVIDUAL'S SURNAME HATCHETT
	FIRST PERSONAL NAME WILLIAM
	ADDITIONAL NAME(S)/INITIAL(S) SUFFIX B.

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

10. DEBTOR'S NAME: Provide (10a or 10b) only one additional Debtor name or Debtor name that did not fit in line 1b or 2b of the Financing Statement (Form UCC1) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name) and enter the mailing address in line 10c:

OR	10a. ORGANIZATION'S NAME
	10b. INDIVIDUAL'S SURNAME
	INDIVIDUAL'S FIRST PERSONAL NAME
	INDIVIDUAL'S ADDITIONAL NAME(S)/INITIAL(S) SUFFIX

10c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY
----------------------	------	-------	-------------	---------

11. ☒ ADDITIONAL SECURED PARTY'S NAME or ☐ ASSIGNOR SECURED PARTY'S NAME: Provide only one name (11a or 11b)

OR	11a. ORGANIZATION'S NAME			
	11b. INDIVIDUAL'S SURNAME Hatchett			
	FIRST PERSONAL NAME William			
	ADDITIONAL NAME(S)/INITIAL(S) SUFFIX B.			
11c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY
3816 N.W. Terrace	Cooper City	Fla	[33024]	USA

12. ADDITIONAL SPACE FOR ITEM 4 (Collateral)

13. ☐ This FINANCING STATEMENT is to be filed (for record) (or recorded) in the REAL ESTATE RECORDS (if applicable)  
15. Name and address of a RECORD OWNER of real estate described in item 16 (if Debtor does not have a record interest):

14. This FINANCING STATEMENT ☐ covers timber to be cut ☐ covers as-extracted collateral ☐ is filed as a fixture filing  
16. Description of real estate:

17. MISCELLANEOUS:

FILING OFFICE COPY



I hereby certify this document to be a true, correct and complete copy of the record filed in my office. Dated this 16 day of May, 2015  
County Administrator [Signature]  
By [Signature] Deputy Clerk

IN THE CIRCUIT COURT OF THE  
17TH JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

Exhibit 30

STATE OF FLORIDA

CASE NO. 17-14CF10A

v.

ANTHONY WILLIAMS

NOTICE OF WITNESS LIST

Defendant through his undersigned common law counsel submits his Notice of Witness List.

Donna Hickenbottom, 10821 Morningstar Dr., Cooper City, FL 33026

William Hatchett, 555 SE 1st Ave, Ft. Lauderdale, FL 33310

Marisol Descalzo, 100 S.E. 2nd street, suite 4000, Miami, FL 33131 (305) 530-0050

Maurice Symonette, 3320 NE 165 street, Miami, FL 33160 786-859-9421

Senait Beiene, 6317 NW 33rd St, Miramar, FL 33023

Michael Henry, 1425 16th Lane, Green Acres, FL 33463

Jorge Chavez, 10821 Morningstar Dr. Cooper City, FL 33026

Barbara Williams, 2306 Blue Bonnet Dr., Killeen, TX 76549

Paul Murray, 21st St of Venice Dr., Ft. Lauderdale, FL 33301 561-629-0697

Executed this 7th day of March 2017.

Righteously Submitted,

Anthony Williams

Anthony Williams, DAG

P.O. Box 9356

Ft. Lauderdale, FL 33310

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was delivered to the Clerk of Court, SAG and Judge Siegel at 201 S.E. 16th Street, Ft. Lauderdale, FL 33300 on March 8, 2017.

Anthony Williams



Offense:  
**SHERIFF'S OFFICE - BROWARD COUNTY, FLORIDA**  
Public Corruption Unit Report



CASE NUMBER: PC2016-03-0001

OFFENSE: FRAUD

On 12/29/16, I prepared a warrant affidavit charging Williams with one count of Grand Theft, one count of Unlicensed Mortgage Broker and two counts of Unlawful Filing of False Documents or Records Against Property. The charges stemmed from co-conspirators Hatchett and Williams, with assistance of Hickenbottom in their efforts to steal the residence located at 3816 NW 33 Terrace, Cooper City, Florida. This property having been titled to Bank of America, N.A., in re: foreclosure case number CACE10016541, as follows:

On 3/17/2015, Williams' associate Hickenbottomin filed in the Broward Public Records, Instrument number 112871558, a fraudulent \$700,000.00 mortgage. The mortgage on behalf of William Hatchett names the secured party creditor as Mortgage Enterprise Investments (MEI), a company owned and operated by Williams. I met with Nancy Williams, Special Projects Coordinator of the Broward Clerk's Recording Office who provided a certified copy of the recording and recording fee receipt in the amount of \$89.00.

On 5/12/2015, Williams' co-defendant Hatchett filed in the Broward Public Records instrument #112982595 a UCC, with Hatchett listed as Debtor and Williams' company Mortgage Enterprise Investments listed as secured party. This was done to further cloud the title of the Cooper City property which had been titled to Bank of America NA, in foreclosure case number CACE10016541. I met with Nancy Williams, Special Projects Coordinator of the Broward Clerk's Recording Office who provided a certified copy of the recording and recording fee receipt, paid by Hatchett, in the amount of \$22.50.

I met with Department of Financial Services Investigator Robert Crespo, who provided an affidavit under seal declaring that neither Williams, nor his company Mortgage Enterprise Investments are licensed to conduct business in the State of Florida, under the provisions of the Mortgage Brokerage Act in violation of Chapter 494, Florida Statutes.

Based on this information on 12/29/2016, I presented to ASA K. Heaven for review an arrest warrant affidavit charging Williams with four felony counts of Grand Theft, Unlicensed Mortgage Broker and Filing of False Documents or Records Against Real Property. The arrest warrant was signed by Judge Carlos Rebollo, who set the bond at \$300,000.00, with full collateral and Nebbia requirements. Warrant number 16-485AF10 was filed with the Clerk's Office and delivered to BSO

Detective CCN 14826 Sign: <i>John Calabro</i> Print: Det. John Calabro	Date: 1/3/2017 Page 5	Supervisor CCN 10791 Sign: <i>168. 2 7 10 22</i> Print: Sgt. Maurice Mathis
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**Offense:**  
**SHERIFF'S OFFICE - BROWARD COUNTY, FLORIDA**  
**Public Corruption Unit Report**



CASE NUMBER: PC2016-03-0001

OFFENSE: FRAUD

warrants.

Williams was served with the warrant on 12/29/16, while serving time at the Broward County Jail on a previous VOP in case number 15-014566CA10A.

Case to be filed with ASA Katherine Heaven, SAO-ECU.

The foregoing police report, consisting of <u>6</u> pages, each page having been initialed by me, are hereby sworn to:	
<u>John Calabro</u> AFFIANT	<u>1/4/17</u> DATE
<u>Florida</u> STATE OF	<u>Broward</u> COUNTY OF
The foregoing instrument was acknowledged before me this <u>4th</u> day of <u>January</u> 20 <u>17</u> by <u>Sgt. Maurice Mathis</u> who is personally known to me or who has produced <u>1380 ID</u> TYPE OF IDENTIFICATION as identification and who did take an oath.	
<u>148-7-74-10221</u> NOTARY PUBLIC OR PUBLIC OFFICER AND TITLE OR RANK / CCN	

Detective CCN 14826 Sign: <u>John Calabro</u> Print: Det. John Calabro	Date: 1/3/2017 Page 6	Supervisor CCN 10791 Sign: <u>148-7-74-10221</u> Print: Sgt. Maurice Mathis
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IN THE CIRCUIT COURT OF THE  
17th JUDICIAL CIRCUIT, IN AND FOR  
BROWARD COUNTY, FLORIDA

Exhibit 32

STATE OF FLORIDA

vs.

ANTHONY WILLIAMS

CASE NO. 17-74CF10A

COMMON LAW JURISDICTION

MOTION FOR STATEMENT OF PARTICULARS

Defendant, by his Common Law Counsel, pursuant to Rule 3.140(n), moves this court to direct the State Attorney's Office to supply defendant's Common Law Counsel with a Statement of Particulars, and in support thereof would show:

To prevent danger after acquittal or conviction of a second prosecution for the same charges or offense, defendant demands that the State provide him with the following particulars of the offense charges:

1. The exact date and time of the offense charged.
2. The exact location of the offense charged.
3. The nature of the evidence charged in the offense before the court.
4. A sworn affidavit from any alleged victim swearing under oath they were harmed.
5. The exact location where the alleged stolen property was recovered.

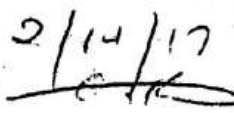
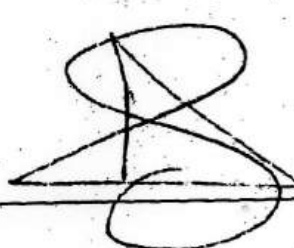
WHEREFORE, defendant moves this court to grant the requested relief, direct the State Attorney's Office to provide defendant with a Statement of Particulars and such other and further relief as defendant is entitled.

## CERTIFICATE OF SERVICE

I, Anthony Williams, hereby certify that a true and correct copy was forwarded to the Clerk of Court, to the SAs and Judge Siegel at 201 S.E. 6th Street, Ft. Lauderdale, FL 33301, on this 2nd day of February 2017.

Anthony Williams  
Anthony Williams  
Private Attorney General  
#12-6799  
P.O. Box 9356  
Ft. Lauderdale, FL 33301

(1) Statement of Particulars. The court, on motion, shall order the prosecuting attorney to furnish a statement of particulars when the indictment or information on which the defendant is to be tried fails to inform the defendant of the particulars of the offense sufficiently to enable the defendant to prepare a defense. The statement of particulars shall specify as definitely as possible, the place, date, and all other material facts of the crime charged that are specifically requested and are known to the prosecuting attorney, including the names of persons intended to be defrauded. Reasonable doubts concerning the construction of this rule shall be resolved in favor of the defendant.

<input type="checkbox"/> 17th Judicial Circuit in and for Broward County <input type="checkbox"/> In the County Court in and for Broward County		
DIVISION: <input type="checkbox"/> Criminal <input type="checkbox"/> Traffic <input type="checkbox"/> Other	<b>ORDER</b>	2/14/17 
THE STATE OF FLORIDA VS. <b>ANTHONY WILLIAMS</b> DEFENDANT		CASE NUMBER 17-74CF10A
<p>1. GRAND THEFT</p> <p>CHARGE <u>7-8. UNLAWFUL FILING OF FALSE DOCUMENTS</u> <u>OR RECORDS AGAINST PROPERTY</u></p> <p>DEFENSE MOTION FOR STATEMENT OF PARTICULARS IS HEREBY <u>DENIED</u> AS PROVIDED ON THE RECORD.</p> <p>DONE AND ORDERED THIS <u>14TH</u> DAY OF <u>FEBRUARY</u> 20 <u>17</u>, IN BROWARD COUNTY, FLORIDA.</p> <p> JUDGE</p> <p>COPIES: BSO - SAO</p>		



STATE OF FLORIDA

CASE NO. 17-174CF10A

VS.

ANTHONY WILLIAMS

SUBPOENA DUCES TECUM

Defendant, through his common law counsel, Private Attorney General Anthony Williams, who is a servant of the Most High Yahweh-Elohim and Yahshua the Messiah, directs the court to issue a subpoena duces tecum to John Calabro of the Broward Sheriff's Office (BSO) to produce the following documents and serve on common law counsel of the defendant pursuant to Rule 3.361:

1. Sworn affidavit from Youry Angel accusing defendant of Grand Theft.
2. Sworn affidavit from Bank of America representative accusing defendant of Grand Theft.
3. Personnel record of John Calabro including disciplinaries, reprimands or recommendations.
4. All incident reports, investigations, warrants or arrests generated from BSO concerning defendant.
5. Any and all communication from the State Attorneys office regarding the defendant.
6. Any and all communication from the FBI regarding the defendant.
7. Any and all communication from the Florida Bar regarding the defendant.
8. All grand theft cases for the past 10 years investigated and prosecuted by pseudo det. John Calabro.
9. All unlawful filing of document cases for the past 10 years investigated and prosecuted by John Calabro.

Defendant will notice the court to construe this subpoena also as a public request for records under Chapter 119, Fla. Stat. for law enforcement records. Defendant demands the court to compel John Calabro to provide the above enumerated documents within 15 days of receipt of this subpoena or the earliest time possible. Due this 7th day of February 2017.

Righteously Submitted,  
Anthony Williams  
Anthony Williams  
Private Attorney General #12-6799  
P.O. Box 9356  
Ft. Lauderdale, FL 33301

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent to the Clerk of Court, the SPO, Judge Siegel and John Calabro at 201 S.E. 6th Street, Ft. Lauderdale, FL 33301 on the 7th day of February 2017.

Anthony Williams

☐ 17th Judicial Circuit in and for Broward County  
☐ In the County Court in and for Broward County

Exhibit 33A

2/14/17

DIVISION:  
☐ Criminal  
☐ Traffic  
☐ Other

## ORDER

THE STATE OF FLORIDA VS.

ANTHONY WILLIAMS

DEFENDANT

CASE NUMBER NUMBER

17-74CF10A

1. GRAND THEFT.  
CHARGE ~~7-8. UNLAWFUL FILING OF FALSE DOCUMENTS  
OR RECORDS AGAINST PROPERTY~~

DEFENSE MOTION TO ISSUE  
SUBPOENA DUCES TECUM IS  
HEREBY DENIED AS provided  
on the record.

DONE AND ORDERED THIS 14TH DAY OF FEBRUARY 20 17, IN

BROWARD COUNTY, FLORIDA.

  
JUDGE

COPIES: BSO - SAO

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL  
CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO. 17-74CF10A

vs.

ANTHONY WILLIAMS

DEFENDANT'S MOTION FOR BOND PENDING APPEAL

COMES NOW, the Defendant by and through the undersigned Common law Counsel and submits this motion pursuant to F.S. § 903.132 and Fla. R. Crim. P. 3.691(a) to set a reasonable bond pending appeal. As grounds in support of this motion, the following is shown:

1. That on June 22, 2017, defendant was found guilty of Grand Theft and two (2) Counts of Unlawful Filing of documents.
2. That on June 23, 2017 defendant filed his Notice of Appeal to appeal his conviction and sentence of 15 years in Florida State Prison and 15 years of probation.
3. That Mr. Williams has amply demonstrated that he is not a flight risk when he was placed on probation last year and did not attempt to flee but stayed to wait the outcome of his appeal, which is still pending.
4. Mr. Williams does not have a passport therefore he is not a risk to flee the country nor does he have a desire to because he is confident he will win his appeal.
5. That pursuant to F.S. § 903.132, as well as Fla. R. Crim. P. 3.691(a) and *Youngbars v. State*, 90 So. 2d 308 (Fla. 1956), this Court has the discretion to authorize the release of Mr. Williams pending appellate review of his felony conviction upon a showing that the "appeal is taken in good faith, on grounds fairly debatable and not frivolous."

In *Baker v. State*, 213 So. 2d 285, 287 (Fla. 4th DCA 1968), the Fourth District Court of Appeal explained "good faith does not mean that there is probable cause to believe the judgment will be reversed, but simply that the appeal is not vexatious and the defendant has assigned errors that are open to debate and about which reasonable questions exist." See also, *Brown v. State*, 82 So. 3d 209, 211 (Fla. 4th DCA 2012).

6. That other offenders convicted of more serious offenses in Florida have been granted reasonable appellate bonds. Examples of cases wherein an appellate bond was granted include:

a) *State v. Delia Dippolito*. Ms. Dippolito was convicted of solicitation to commit the premeditated murder of her husband and was sentenced to 20 years in prison.

<sup>2</sup> b) *State v. James Tucker*, Case No. 2004CF010981 AXX  
Charges: Attempted First Degree Murder with a Firearm,  
Improper Exhibition of a Weapon, Carrying a  
Concealed Firearm.

Sentence imposed prior to bond: 25 years in DOC  
Appellate Bond: \$50,000.00

c) *State v. Richard Bruch*, Case No. 2002CF013706 AXX  
Charges: DUI Manslaughter

DUI Causing Injury to Person or Property (2 Counts)

Sentence imposed prior to bond: 11 years in DOC  
Appellate Bond: \$10,000.00

d) *State v. Damon Corne*, Case No. 2001CF007082 AXX

Charges: Attempted First Degree Murder with a Firearm  
Second Degree Murder with a Firearm

Sentence imposed prior to bond: Life imprisonment  
Appellate Bond: \$75,000.00 with in House Arrest

<sup>1</sup> Mr. Williams cannot be convicted and sentenced for both Grand Theft and Unlawful Filing of documents, see *Shepard v. State*, App. 2 Dist., 659 So. 2d 399 (1995)



7. Mr. Williams case is non-violent and has no victim as the above noted cases which were granted an appeal bond and therefore his case meets the parameters and requisite to have a bond pending appeal.

WHEREFORE, Mr. Williams moves this court to grant him a reasonable bond pending his appeal.

Righteously Submitted,

Anthony Williams

Anthony Williams

P.O. Box 9356

Ft. Lauderdale, FL 33310

Common Law Counsel For Defendant

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was furnished by U.S. mail to: Clerk of Court, SAO and Judge at 201 S.E. 6th Street, Ft. Lauderdale, FL 33310 on the 10th day of July 2017.

Anthony Williams

<sup>2</sup> These examples were set forth in Dippolito's Motion For Suppression.

IN THE FOURTH DISTRICT COURT OF APPEAL

ANTHONY WILLIAMS  
Appellant,

CASE NO. 4D17-1674  
C.T. NO. 17-74CFIDA

v.  
STATE OF FLORIDA  
Appellee.

MOTION FOR SUPERSEDEAS BOND

COMES NOW, Anthony Williams, a servant of the Most High Yahweh Elohim and Yahshua the Mahshyah and submits this Motion For Supersedeas Bond to move the Court to issue an immediate order granting Appellant a non-monetary bond or reasonable bond during his appeal. Appellant properly filed an appeal bond in the lower court and was denied bond without the court setting forth the reasons or factual basis on which the decision was made nor provided an order specifically outlining any justifiable reasons which is in violation of Fla. R. App. P. Rule 9.140(h)(3).

Pursuant to Fla. R. App. P. Rule 9.140(h)(2), "An incarcerated defendant charged with a bailable offense shall on motion be released on the defendant's own recognizance pending an appeal by the state unless the lower tribunal for good cause stated in an order determines otherwise."

As set forth above, there was no order and there was no reasons therefor.

Rule 9.140(h)(4) mandates a review of an order relating to post-trial release shall be by the court on motion and Appellant submits this motion for review and granting of the appeal bond, as outlined in his appeal to the lower court. (See Attached Exhibit A)

Appellant has been unlawfully convicted, sentenced and incarcerated to terms of incarceration and probation that

are illegal, unlawful, retaliatory and oppressive and exceeds the statutory maximum sentence.

In the interest of justice pursuant to Rule 9.140 (i), the court may grant any relief to which any party is entitled.

WHEREFORE, due to the foregoing facts, Appellant moves this court to grant Appellant's motion with undue delay to prevent the continued violation of the rights of the Appellant.

Righteously Submitted,

Anthony Williams

Anthony Williams #05863-422

P.O. Box 30080

Honolulu, Hawaii 96820

Common Law Counsel for Defendant

#### CERTIFICATE OF SERVICE

I hereby certify that I placed a copy of the foregoing in the hands of officer J. Hevi for mailing to:

Attorney General

1515 Palm Beach Lakes Blvd. Suite 900

West Palm Beach, FL 33401

on the 27th day of December 2017.

Anthony Williams

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA  
FOURTH DISTRICT, 110 SOUTH TAMARIND AVENUE, WEST PALM BEACH, FL 33401

January 22, 2018

CASE NO.: 4D17-1674

L.T. No.: 17-74 CF10A

ANTHONY WILLIAMS

v. STATE OF FLORIDA

---

Appellant / Petitioner(s)

Appellee / Respondent(s)

**BY ORDER OF THE COURT:**

Petitioner's motion for supersedeas bond is stricken by this Court for lack of jurisdiction.  
His petition for writ of prohibition was denied July 13, 2017.

Served:

cc: Attorney General-W.P.B.      Anthony Williams

dl



**LONN WEISSBLUM, Clerk**  
Fourth District Court of Appeal

