

From: GARY NORTINGTON

Date: 7/9/2020 1:54:20 PM

To: Rudy Davis

Attachments: □

Dear Rudy & Erin,

I did not have any text left to tell you the following at Rudy's end note to "POMafia #17, MICHIGAN JUDICIAL CORRUPTION", sent on 07 JULY 2020: You MAY DELETE PAGES 2 THROUGH 7 of the CIVIL RIGHTS COMPLAINT because they are defendants' names with legal introduction, AND 32 THROUGH 34 because they are the legal "causes of action". I forgot to remove them. THE TEXT OF EVENTS IS THE IMPORTANT PART.

After "POMafia #17, MICHIGAN JUDICIAL CORRUPTION" was sent by email to add to my snail mail of the same, I've been the target of inferred threats of harm and violence, undue hostility from MDOC STAFF, a myriad of attempts to distract me from the ongoing MISSION, and intended intimidation. Among this were at least 5 different descriptions of how MDOC STAFF murder prisoners who they don't like. This morning, an officer asked me if I felt "THREATENED" because someone either sent a "SNITCH KITE" or MDOC WANTS an excuse TO TAKE MY court DOCUMENTS by transferring me. These acts of The Beast are FREE ENTERTAINMENT that don't require buying a TV or batteries for a radio (smile emoji) but are wasted efforts of The Beast. Why watch TV when you can watch real life. This occurs when a NERVE of The Beast is struck, so I'm on the right Way. Yippee! Ti! Yi! Yo!

There were thoughts and prayers for Robert David NEAL and other Saints as the aforesaid was written and your 11 JUNE 2020 letter was recalled.

It's Guerrilla Warfare on at least 5 fronts at one time because MY GOD IS AN AWESOME GOD!!! "I went to the enemy's camp and I took back what he stole from me...". In addition to POMafia #17, I just emailed my sister an affidavit that points out corruption of Federal Judge Paul D. Borman and my serious medical needs he ignored in the 2016 CIVIL RIGHTS COMPLAINT that is in the U.S. Court of Appeals. JPay was used to create the affidavit so MDOC stealing my typewriter was another wasted act.

MI Attorney General Dana NESSEL responded to my 06 JUNE 2020 letter with a form from the CONVICTION INTEGRITY UNIT to have the Office of Attorney General investigate my prosecution. This letter is in the snail mail of "POMafia #17 MICHIGAN JUDICIAL CORRUPTION". Time will tell where this leads.

We are stuck in our cells for the 14-day quarantine because 5-guys upstairs were positive for COVID-19. On 08 JULY 2020, it was 105° to 110° in my cell so a personal air-conditioner was used to prevent heatstroke; a wet T-shirt. I picture that Rudy is likely doing O.T. in this weather.

Hey! In the midst of all this, I've been busy passing out Bible tracts and spreading The Word when there is an opportunity. Jesus doesn't quit.

We operate in the Spirit of Love. JOHN 4:24; I JOHN 4:8, 16. I hope and pray You all are well. God Bless! Gary M.

From: GARY NORTHINGTON

Date: 7/7/2020 1:44:13 PM

To: Rudy Davis

Attachments: ▫

PO MAFIA #17; MICHIGAN JUDICIAL CORRUPTION (this goes with JUNE snail mail):
(note 4 Rudy @ end)

A. BASIS FOR CIVIL RIGHTS COMPLAINT DESCRIBED IN "B" TO "D":

When I filed my AUGUST 2016 CIVIL RIGHTS COMPLAINT on HEART ATTACKS, STROKES, LEFT LEG PARALYSIS CAUSED BY months of failure to treat MRSA INFECTION, CHRONIC MASTOIDITIS, and OTHER INJURIES caused by STATE ACTORS refusing to give medical care, they RETALIATED BY DAMAGING, refusing to repair AND TAKING MY GUITAR AND TYPEWRITER. The CIVIL RIGHTS COMPLAINT addressed HEREAFTER IS ON that RETALIATION.

B. PROCEDURE FOLLOWED IN SNAIL MAIL DOCUMENTS:

In most cases, a BARE BONES CIVIL RIGHTS COMPLAINT is filed stating a summary of facts. Then, the Defendants file a Motion to Dismiss that the judge decides. Then, if the COMPLAINT is not dismissed, everyone files affidavits stating critical facts which are decided by the judge. To save going through that, I stated all needed facts to survive a motion to dismiss, and made the COMPLAINT in AFFIDAVIT form to survive final judgment. Rules of LAW and U.S. Supreme Court precedent CLEARLY STATE my Complaint, in itself, cannot be beaten by Defendants on a motion to dismiss because it states a cause of action, nor on final judgment because the facts are cognizable legal claims.

On 23 DECEMBER 2019, I mailed a well-written STATE CIVIL RIGHTS COMPLAINT that held all needed facts and law. On 13 JANUARY 2020, Jackson County Circuit JUDGE SUSAN BEEBE-JORDAN ((517) 768-8527) refused to file the Complaint by FALSELY saying "The pleadings are incomprehensible and fail to set forth a cause of action" (ORDER, 13 JAN 2020).

On 01 FEBRUARY 2020, I remailed the COMPLAINT to Chief Judge Thomas D. WILSON with a letter describing JUDGE JORDAN'S prior REFUSAL TO FILE it. On 01 APRIL 2020, Law CLERK ELYSE K. LISZNYAI for JUDGE SUSAN JORDAN (517-768-8527) responded: "While the Court is SYMPATHETIC TO what seem to be TRYING MEDICAL ISSUES, WE CAN OFFER NO RECOURSE without being presented with legally cognizable claims". CLERK LISZNYAI FALSELY SAID KIDNEY/RENAL FAILURE, HEART ATTACKS with INJURY, and Strokes all CAUSED BY UNTREATED HIGH CHOLESTEROL, UNTREATED CHRONIC MASTOIDITIS WITH OTIS MEDIA INFECTION THAT slowly EATS INTO THE BRAIN, LEG PARALYSIS CAUSED BY MRSA INFECTION that was untreated for months DESERVE ONLY SYMPATHY, ARE

NOT "CRUEL OR UNUSUAL PUNISHMENT" (MICH. CONSTITUTION, Article I, Section 16), and present no legal recourse to require medical care.

Contrary to LIES OF JUDGE JORDAN and CLERK LISZNYAI: (1) This Complaint won on motions to dismiss and for summary judgment in another court wherein it "set forth a cause of action" and "presented legally cognizable claims".

A number of other STATE ACTORS were notified up to the Office of MICHIGAN ATTORNEY GENERAL which has been behind prior OBSTRUCTION OF MY COURT ACCESS. Defendants' deliberate indifference to such serious medical needs and/or IMMINENT DANGER OF further severe physical injury or Premature DEATH means nothing to CORRUPT JUDGES and other STATE ACTORS committing GENOCIDE/MURDER.

C. MOTIVE BEHIND THE STATE CORRUPTION:

The 2020 JACKSON COUNTY CIRCUIT COURT letters to me and non-responses of certain STATE ACTORS are probative they are manipulated by the PUBLIC OFFICE MAFIA that has been at WAR with me since 1987. Since 1987 to 2020, MONROE COUNTY JUDGES or OFFICIALS of this MAFIA CARTEL INCLUDE MARK BRAUNLEICH, PAUL BRAUNLEICH, Defrocked Prosecutor WILLIAM D. FREY who has been pumping gas in Erie, Special Prosecutor GREGORY JONES (deceased?), twice disciplined Special Prosecutor JAMES ROSTASH and others. Presently participating WAYNE COUNTY JUDGES OF THIS MAFIA CARTEL ARE ULYSSES S. BOYKIN and MICHAEL J. TALBOT (forced to retire but still reaches into MDOC prisons).

This ALSO involved and/or involves FBI AGENT DENNIS B. ANDERSON (retired?) of Ingham County, FEDERAL JUDGE PAUL DAVID BORMAN of Bay City, FBI AGENT HAL N. HELTERHOFF (retired) of Jackson County, FEDERAL MAGISTRATE MONA K. MAJZOUB of Washtenaw County, other active FBI AGENTS (UNNAMED to not disclose info sources), and unknowns ROBERT M. GRUBBS of WAYNE COUNTY and STEVEN GRUBBS of JACKSON COUNTY. A friend in JACKSON COUNTY was murdered in 2005 by one or more of the PUBLIC OFFICE MAFIA ACTORS because he knew about a drug ring that involves the MAFIA. For this reason, I believe these MAFIA MEMBERS were and/or are part of a Lower MICHIGAN DRUG CARTEL that I reported in FEBRUARY 2000.

THIS S.E. MICHIGAN DRUG CARTEL LIKELY INCLUDES JACKSON COUNTY JUDGE SUSAN BEEBE JORDAN (517) 768-8527 who refused to file my CIVIL RIGHTS COMPLAINT, a fired STATE POLICE OFFICER who worked in JACKSON COUNTY and ran drugs to Detroit (we intercepted communications), some present and/or former CITY or County OF JACKSON OFFICIALS and certain MDOC STAFF who bring drugs into COTTON CORRECTIONAL FACILITY (JCF) where I am.

D. FACTS OF THE COMPLAINT:

My 2019 CIVIL RIGHTS COMPLAINT shows THEY ATTEMPTED TO COVERTLY MURDER ME WITH "DIESEL THERAPY" 5-days after my 2016 release from the hospital for Open Heart Surgery. The 3-day transfer and first 12-hour bus ride of "DIESEL THERAPY" hospitalized me at the point of IMMINENT DEATH from 06 to 08 AUGUST 2016 when it caused blood clots in my left leg that went into my brain, heart and lungs.

Law says: "The right to sue and defend in courts is the alternative of force". CHAMBERS v B & O, 207 US 142, 148 (1908). This defines JUDGE JORDAN as advocating force. HOLY BIBLE, Matt. 7:12; Luke 6:38.

They seem afraid that I am protected by God. Psalm 91. I have a Friend who protects me. PSALM 105:15. OUR GOD IS AN AWESOME GOD!!!


Dear Rudy,

Please scan in my JUNE 2020 SNAIL MAIL if it's not too much to scan. THIS EMAIL WITH THE SNAIL MAIL is "POMafia #17". Thank You, very much.

May God Bless & Protect You All! Roadrunner

U.S. POSTAGE PITNEY BOWES
ZIP 49201 \$ 003.00⁰
02 4W
0000344127 JUN 29 2020




Cotton Correctional Facility
3510 N. Elm
Jackson, MI 49201

NOthing



Rudy Davis
P.O. Box 2088
Forney, TX 75126

MEDICAL RECORDS
CONFIDENTIAL

20 DEC 2019

Gary M. Northington 193035
3510 N. Elm
Jackson, MI 49201

Jackson County Circuit Court, Clerk
312 S. Jackson
Jackson, MI 49201

RE: Northington v Bart, et al,

Dear Clerk,

Please file my enclosed civil Rights Complaint
and Motion for Waiver of Fees and Costs.

Thank You.

I will call at my cost on Tuesday.

Sincerely,
Gary M. Northington

Returned 01 FEB 2020

01 FEB 2020

Handwritten notes and stamps, including a date stamp "01 FEB 2020" and a signature.

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF JACKSON

Garry Northington
Plaintiff
193035

vs.

File No.

Honorable _____

Defendant.

ORDER AFTER REVIEW OF PRO PER PLEADINGS

This Pro Per matter has been reviewed by the court.

- IT IS ORDERED that this case is dismissed on the Court's own motion for the following reasons:
- The complaint and/or summons fail to contain a statement as to whether there has been a prior action or occurrence alleged in the complaint as required by MCR 2.113(C)(2)(a).
 - The pleadings do not have a proper caption as required by MCR 2.113(C).
 - The pleadings are not signed by the plaintiff as required by MCR 2.114(C).
 - The pleadings fail to establish residence by either party in Jackson County as required by MCL 600.1621(a) or under Paprocki v Jackson County Clerk, 142 Mich App 785 (1985), or Curry v Jackson Circuit Court, 151 Mich 754 (1986). Living in a DOC facility does not establish residency. An inmate filing a divorce case must establish that the spouse is a resident of Jackson County, or that the inmate was a resident of Jackson County before going to the Department of Corrections.
 - The pleadings are incomprehensible and fail to set forth a cause of action.

IT IS ORDERED:

This case may be accepted for filing and the Clerk may issue Summons.

Dated: January 13, 2020



Circuit Court Judge

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF JACKSON

Gary M. Northington # 193035

Plaintiff,

FILE NO.

HON.

vs.

Burt, et al

Defendant.

ORDER

You have requested a waiver of filing fees pursuant to MCR 2.002 and it appears that you are an inmate. The filing fee for this action is \$_____.

- Pursuant to MCL 600.2963(1) your case is being returned because you did not include a certified copy of your institutional account showing the current balance and a 12-month history of deposits and withdrawals.
- Your documents and two certified copies of this Order are being returned to you. At the time the civil action was filed, the balance in your account equals or exceeds the full filing fee so you must pay the full filing fee.
- Your documents and two certified copies of this Order are being returned to you. At the time the civil action was filed, the balance in your account is less than the full amount of the filing fee, so you must pay an initial partial filing fee.
 - 50% of the average monthly deposits for 12 months: \$_____
 - The average monthly balance for the last 12 months: \$_____
- Within 21 days you may resubmit to the Court these documents, one copy of the Order and the amount indicated above. If you fail to return the documents and the filing fee within 21 days, the action will not be filed. If you pay the partial filing fee, you must continue to pay 50% of the deposits made each month to your account until the total filing fee is paid in full. Upon payment of the partial filing fee, the Summons will be issued. If the follow-up payments are not made as ordered, your case is subject to dismissal.
- Fees are being waived.

Dated: _____

Returned with 13 JAN 2020 order _____
Circuit Court Judge

01 FEB 2020

Gary M. Northington 193035
3510 N. Elm
Jackson, MI 49201

Chief Judge Thomas D. Wilson
Jackson County Circuit Court
312 S. Jackson
Jackson, MI 49201

RECEIVED

FEB 07 2020
JUDGE JORDAN
4th CIRCUIT COURT

RE: Civil Rights Complaint returned w/o

Dear Chief Judge,

I mailed the enclosed Civil Rights Complaint with Certificate of Prisoner Account and Motion for Waiver of Fees to the Court Clerk on 23 DECEMBER 2019 (enclosed mail receipt). On 31 JANUARY 2020, it was returned to me without being filed.

Also enclosed was a copy of an ORDER AFTER REVIEW OF PRO PER PLEADINGS dated 13 JANUARY 2020, issued by Circuit Judge Lisa B. Jordan. The ORDER was stamped as filed by the clerk on 22 JANUARY 2020. The ORDER with Complaint were returned to me in an envelope postmarked on 29 JANUARY 2020.

Judge Jordan's ORDER ~~stated~~ falsely said: "The pleadings are incomprehensible and fail to set forth a cause of action". Contrary to Judge Jordan's ruling, the federal court has ruled that the related prior federal complaint stated a cause of action, on a Motion to Dismiss.

The enclosed Complaint is a redacted version of my federal Complaint filed in AUGUST 2019 with federal law changed to State law. Please have the Court Clerk file my enclosed Complaint nunc pro tunc as being filed 23 DECEMBER 2019; the date of my original mailing. It is filed when mailed. Houston v Lack, 487 US 266, 270-271 (1988), was adopted by the Michigan Supreme Court on the mail box rule.

I am a disabled person under the ADA, 42 USC, Sec. 12132. It is difficult to write pleadings, after having multiple strokes and heart attacks in MAY and JUNE 2016.

When I filed my medical lawsuit in 2016, MDOC STAFF transferred me 5-days after release from the hospital where I was held after CABG X3 Open Heart Surgery. I almost died from the transfer.

The enclosed Complaint is about retaliatory transfers, retaliatory taking of my guitar and typewriter for damage done to them by MDOC STAFF that could be repaired, and refusal of a doctor to thereafter treat me for high cholesterol that totally blocked my 2016 CABG X3 Surgery by JUNE 2019.

I have been in and out of the hospital at least 10-
times since JUNE 2019, when stents had to be put in my
heart and renal artery because MDOC doctors refused to
treat me for hyperlipidemia since 2010, then again ~~from~~ from
2016 to 2019. I have been weak and shaky since a
myelogram on 31 JANUARY 2019 after which my blood
pressure went above stroke level to 211/112 mmHg. I
need further surgery.

I am terminally ill and may have from 2-weeks
to 3-years left on earth. It's a shame when NAZI-like
MDOC STAFF repeatedly put me through life-threatening
transfers punctuated by MDOC STAFF deliberately
damaging and taking my property for damage they
deliberately did. They're attempting to torture me during
my last few days alive or murder me by the stress they
deliberately cause with their NAZI-ISM.

Please see that my enclosed Complaint is filed
nunc pro tunc as 23 DECEMBER 2019.

Thank You,

Sincerely,
Gary M. Northcutt

PS: My guitar held in the JCF 300 building
basement was a gift from my ~~a~~ sister who died on
21 JUNE 2017 from medical malpractice.

It's a shame that corrupt State actors abuse
those of us who served to defend our country. ~~and~~
I'm a Vietnam Veteran and ^{was} radar tech at SAC headquarters
on the Airborne Launch Control Centers for nukes.

G M N

23 ~~MAR~~ ^{MAR} 2020

Gary M. Northington 193035
3510 N. Elm
Jackson, MI 49201

Thomas D. Wilson, Chief Judge
Jackson County Circuit Court
312 S. Jackson
Jackson, MI 49201

RE: Northington v Burt, et al,
Civil Rights Complaint

Dear Judge Wilson,

I mailed a Civil Rights Complaint to the Jackson County Circuit Court on 23 December 2019 that was returned to me without filing by Circuit Judge ~~John~~ ^{Susan} B. Jordan. I returned it to you, on 03 FEBRUARY 2020, with request to see that you have the court clerk file it. You have never responded. What is the problem with getting my complaint filed?

My complaint was properly written with all required documents.

Sincerely,
Gary M. Northington



STATE OF MICHIGAN

4TH JUDICIAL CIRCUIT – FAMILY – PROBATE COURT

SUSAN B. JORDAN
CIRCUIT COURT JUDGE

312 S. JACKSON STREET
JACKSON, MICHIGAN 49201
(517) 788-4360
FAX (517) 788-4361

April 1, 2020

Gary M. Northington, #193035
G. Robert Cotton Correctional Facility
3500 N. Elm Road
Jackson, MI 49201

Re: Rejection of “Civil Rights Complaint”

Mr. Northington:

We are in receipt of your “Civil Rights Complaint,” postmarked February 4, 2020.

As Chief Judge Susan B. Jordan indicated in her order dated January 13, 2020, your pleadings remain incomprehensible, failing to set forth a cause of action.

While the Court is sympathetic to what seem to be trying medical issues, we can offer no recourse without being presented with legally cognizable claims.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elyse Lisznyai".

Elyse K. Lisznyai
Law Clerk to the Honorable Susan B. Jordan
4th Circuit Court Jackson County
(517) 768-8527

13 APRIL 2020

Gary M. Northington
3510 N. Elm
Jackson, MI 49201

MICHIGAN SENATE
Judiciary Committee or Law & Justice Committee, Chairman
P.O. Box 30036
Lansing, MI 48909

RE: CIVIL RIGHTS COMPLAINT, JACKSON COUNTY CIRCUIT COURT;
DENIAL OF COURT ACCESS RIGHTS

Dear Chairman,

On 23 DECEMBER 2019, I mailed a completed version of the enclosed DRAFT of CIVIL RIGHTS COMPLAINT to the Jackson County Circuit Court Clerk to be filed (Due to COVID-19 Pandemic, a copy of completed version cannot be made). It is a factually well-written complaint that adequately sets forth causes of action for:

(1) DENIAL OF DISABILITY RIGHTS and discrimination thereon (Mich. Const., Art. I, Sec. 2; MCL 37.1101, et seq.) as defined by Federal law (pp. 31-32). Title 42 USC, § 12132 (denial of programs, services and/or activities & discrimination against disabled persons).

(2) Harassment, Intimidation and RETALIATION FOR ASSERTION AND EXERCISE OF LAWFUL FIRST AMENDMENT RIGHTS (Mich. Const., Art. I, Secs. 2, 3, 13, 16, 17 and 23; MCL 750.85, other laws; and MDOC Policies (p. 32). CRAWFORD-EL v BRITTON, 523 US 574 (1998) (retaliation for exercise of court access prohibited).

(3) DENIAL OF COURT ACCESS by using physical and other coercive force to obstruct prisoner representation (Mich. Const., Art. I, Secs. 2, 13 and 17; MDOC Rules and Policies) (pp. 32-33). LEWIS v CASEY, 518 US 343, 349 (1996) (prohibiting State from causing present or future denial of court access by obstructive acts); STUTSON v U.S., 516 US 193, 196-197 (on coercive power & abuse by prison officials).

(4) DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS/IMMINENT DANGER OF DEATH by repeated 12-hour bus rides and 3-day transfers of a MEDICALLY FRAIL Heart Attack/Stroke Victim that cause Deep Vein Thrombosis and Pulmonary Emboli (Mich. Const., Art. I, Secs. 2, 3, 16, 17 and 23) (p. 33). HELLING v McKINNEY, 509 US 25, 39 (1993) (prohibiting future injury from lack of care); ESTELLE v GAMBLE, 429 US 96, 102-103 (prohibiting wanton infliction of pain), 104 (prohibiting deliberate indifference to serious medical need) (1976).

(5) CRUEL AND/OR UNUSUAL PUNISHMENT by refusal for 10-years to treat HYPERLIPIDEMIA, CONGESTIVE HEART FAILURE, ISCHEMIC HEART DISEASE, KIDNEY FAILURE, RENAL FAILURE, and LOWER LEG PARALYSIS; all caused by the REFUSAL TO TREAT HYPERLIPIDEMIA, also refusal to treat Chronic Fungal MASTOIDITIS/Eustachian Tube Dysfunction with SEROUS OTIS MEDIA Infection that is terminal when it eats into the brain, and other serious medical needs (Mich. Const., Art. I, Sec. 16) (pp. 33-34). HELLING v McKINNEY, 509 US 25, 39 (1993) (prohibiting future injury from lack of care); ESTELLE v GAMBLE, 429 US 97, 102-103 (1976) (prohibiting wanton infliction of pain).

(6) And, DENIAL OF Right to COURT ACCESS, DUE PROCESS and EQUAL PROTECTION in MDOC Actors denying use of Grievance Process required by 42 USC, § 1997e for prisoner Access to Courts (Mich. Const., Art. I, Secs. 2, 3, 13, 17 and 23). U.S. CONSTITUTION, Amendment 14 (due process & equal protection); LEWIS v CASEY, 518 US 343, 349 (1996) (prohibiting State from causing present or future denial of court access). These are a minimum of 6 CAUSES OF ACTION. Jackson County Circuit Court Judge Susan Beebe JORDAN FALSELY RULED the Complaint "fail(s) to set forth a cause of action" (enclosed ORDER, 13 JAN 2020). Judge

JPAY Tell your friends and family to visit www.jpays.com to write letters and send money!

Jordan lied.

I elucidated all facts very well to avoid the "failure to state a claim" mode that corrupt judges use to fraudulently dismiss bare bones prisoner complaints. Judge Susan Beebe JORDAN saying "The pleadings are incomprehensible" (enclosed ORDER, 13 JAN 2020) is another fraudulent act. Maybe JORDAN wants me to handwrite a bare bones complaint she could easily dismiss because of her NAZI-like hatred. This Complaint won motions to dismiss and for summary judgment in the Michigan Court of Claims as proof that Judge SUSAN JORDAN lied (Court of Claims dismissed Complaint for other reasons; State actors removed documents from envelope mailed to Court).

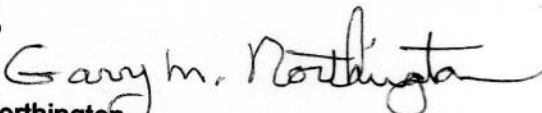
On 30 JANUARY 2020, enclosed 13 JANUARY 2020 ORDER and Complaint were received by me from the Jackson Circuit Court. On 01 FEBRUARY 2020, I returned the Complaint and request for Waiver of Fees to Chief JUDGE THOMAS D. WILSON of the Jackson Circuit Court (enclosed 01 FEB 2020 letter). On 23 MARCH 2020 when nothing was done, I mailed the enclosed 23 MARCH 2020 letter to again request filing of Judge WILSON.

Finally on 01 APRIL 2020, Judge Susan Beebe JORDAN had Law Clerk ELYSE K. LISZNYAI return the Complaint to me, effectively falsely stating I had no "legally cognizable claims" (enclosed letter, 01 APR 2020). Clerk LISZNYAI said that subjection to Cruel and/or Unusual Punishment, denials of Court Access, Due Process and/or Equal Protection, all proscribed by the Michigan Constitution as wrongful denials, are not legally cognizable State court claims. This is contrary to Michigan Constitution, Art. I, Section 13; it's NAZI-ism.

The Complaint is written in the manner it is because MDOC STAFF damaged my typewriter, then took it from me for the damage they did, after I filed a Federal Civil Rights Complaint for denial of medical care causing severe physical injury. NORTHINGTON v ABDELLATIF, et al, No. 2:16-cv-12931 (ED MI). I had to write the Complaint on my email tablet, which is not easy.

Please see that something is done about and to stop this judicial corruption of State judges who often take bribes and MDOC STAFF who depend on that corruption to hide their abuses (I've seen the money change hands and been a victim of State corruption for 33-years).

Sincerely,


Gary M. Northington

JPAY Tell your friends and family to visit www.jpayers.com to write letters and send money!

STABENOW #1 (p. 1 of 2):

01 MAY 2020

Gary M. Northington 193035
3510 N. Elm
Jackson, MI 49201
(517) 780-5000 email @ JPay.com

DEBBIE STABENOW, SENATOR
731 Hart Building
Washington, DC 20515
(202) 224-4822

RE: ABUSIVE DENIAL OF FIRST AMENDMENT RIGHT;
RETALIATION FOR MEDICAL CIVIL RIGHTS COMPLAINT

Dear Senator Stabenow,

A. GENOCIDE BY MDOC/CORIZON REFUSING TO TREAT SERIOUS MEDICAL NEEDS:

MICHIGAN DEPT. OF CORRECTIONS (MDOC) medical treatment is horrendous. It is the "lingering death" of GENOCIDE, ESTELLE v GAMBLE, 429 US 97, 103 (1976), then MDOC RETALIATES FOR SEEKING CARE.

From 08 APRIL to 20 JUNE of 2008, Nurse Practitioner Susan H. Wilson refused to treat me for Strep Pneumonia. It began as a 103.6° fever that lasted four days, then went on 2.5-months as Walking Pneumonia. WILSON finally prescribed Levaquin antibiotic on 20 JUNE 2008. A JUNE 2016 CAT Scan showed the pneumonia scarred my heart and lungs, which proves how abusively long it takes to get diagnosed; 8-years.

In JANUARY through AUGUST of 2013, Dr. Badawi KHADER ABDELLATIF refused to treat a fungus infection on my left great toe that broke my skin, which then became infected by MRSA at the break. For at least 3-months while my Lower Left Leg was swollen to 3-times normal size and in severe pain, Dr. ABDELLATIF told me: "It's nothing", "It will be okay", and finally "God will take care of it" a week before I was hospitalized. On 07 AUGUST 2013, I was finally hospitalized at the insistence of RN Diane Herring, and put on an I-V antibiotic, Vancomycin, for 45-days. The months of refusal to treat the infection, severe pain and swelling : (1) damaged muscle and nerve tissue to cause paralysis of my left leg; and (2) damaged vascular tissue to cause 50% loss of circulation and events of lower leg blood stagnation while sleeping or still that is IMMINENT DANGER OF AMPUTATION. The daily NEUROPATHIC PAIN caused thereby is like severe heart attack pain in my feet and legs; torture contrary to the Eighth Amendment and Michigan Compiled Law 750.85.

From 2007 to JUNE 2019, Dr. ABDELLATIF and others never treated me for severe HYPERLIPIDEMIA because I cannot take STATINS which drive my liver enzymes to dangerous levels near 900. When I requested Questran, which I can take, Dr. ABDELLATIF said, "costs too much", "can't do that", etc. As result of refusal to treat the HYPERLIPIDEMIA from 2012 to 12 JUNE 2016, I had daily ANGINA PAIN that worsened as time passed. From 15 MAY to 11 JUNE of 2016, Dr. Badawi K. ABDELLATIF sent me back to my cell 8-times to die while I was having Heart Attacks. On 12 JUNE 2016, RN Sandy Pfiel checked my blood pressure at 260/130 mmHg, then at 235/108 mmHg after taking a Nitroglycerine tablet, while I was having a heart attack. RN Sandy had SHIFT COMMAND send me to the hospital. My Coronary Arteries were 70 to 95% blocked by Dr. ABDELLATIF refusing to treat me for HYPERLIPIDEMIA from 2007 to 2016, so CABG X3 Open Heart Surgery was done.

In 2017 and 2018, Dr. Charles S. JAMSEN still refused to treat me for HYPERLIPIDEMIA. As proximate result, my JUNE 2016 CABG X3 bypasses were 100% blocked in JUNE 2019. It took only 3-years to totally block my JUNE 2016 triple-bypass grafts because of the poor diet MDOC feeds us and refusal to treat HYPERLIPIDEMIA.

On 27 JULY 2016, I was released from hospital care for my CABG X3 OPEN HEART SURGERY. I was MEDICALLY FRAIL, unable to stay awake for more than 2-hours per day, and had great difficulty understanding

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meanings of words and phrases. I could not recall my sister's face when she visited me which was an uncomfortable feeling.

B. RETALIATION FOR FILING CIVIL RIGHTS COMPLAINT:

On 29 JULY 2016, I gave ARUS Amie JENKINS an envelope to mail that held a lawsuit regarding: (1) the JANUARY to AUGUST 2013 refusal to treat infection that PARALYZED MY LEFT LEG; and (2) the 2012 through 2016 refusal to treat HYPERLIPIDEMIA THAT DAMAGED MY HEART in 2013 through 2016. NORTHINGTON v ABDELLATIF, U.S. District Court No. 2:16-cv-12931.

Because I filed the lawsuit, on 03 AUGUST 2016 ARUS Amie JENKINS and other MDOC STAFF RETALIATED by transferring me from MACOMB PRISON (MRF) to CARSON CITY PRISON (DRF) about 5-days after release from the hospital for CABG X3 OPEN HEART SURGERY. As result of this transfer while I was MEDICALLY FRAIL, I was hospitalized for life-threatening DEEP VEIN THROMBOSIS (DVT) and PULMONARY EMBOLI (PE) from 06 to 08 AUGUST 2016. THIS TRANSFER WAS PREMEDITATED MURDER BY JENKINS who said I was TOO MEDICALLY FRAIL to have a light-duty job cleaning a microwave oven.

Because CARSON CITY PRISON (DRF) did not have the Special MEDICAL DIET ordered by the Cardiologist, on 25 AUGUST 2016 I was transferred to MUSKEGON PRISON (MCF). This, effectively, had me "on-the-road" between prisons from 03 to 25 AUGUST 2016. This SECOND TRANSFER caused me to again be hospitalized a few days later, for CONGESTIVE HEART FAILURE and PLEURAL EFFUSION this time, which was likely related to the prior DVT and PE (blood clot) injuries.

Five months later on 17 JANUARY 2017, while still weak from the JUNE 2016 CABG X3 OPEN HEART SURGERY, MDOC STAFF transferred me, for the 3rd time, from MUSKEGON PRISON (MCF) to COTTON PRISON (JCF). This transfer was RETALIATION BECAUSE I TWICE REQUESTED MEDICAL CARE at MCF WHEN I PASSED OUT UPON EATING CHOW HALL food (for 20-years MDOC refused to diagnose this). My vision became very poor and I was so weak I could barely push my WALKER after another 12-hour bus ride, that should have been 1-hour, of the 3-day transfer process.

On 18 JANUARY 2017, COTTON PRISON (JCF) Prison Guards _____ STEPHENS and Brenda SCHMELTZ confiscated my 28-year-old guitar (a gift from sister in 1990), memory typewriter and other property for alleged damage done by MDOC STAFF during transfer WHICH THEY WOULD NOT LET ME SEE. They said scotch tape, on a removable soundhole PICKUP, was alleged ground for taking my guitar. The PICKUP IS like a removable string; NOT PART OF THE GUITAR. They would not let me send the guitar out to repair the alleged damage, WHICH WAS NO DAMAGE AT ALL. MDOC Policy, PD 04.07.112, § X, allows me to send out the guitar for repair. I or they could have pulled the tape off the soundhole pickup, LIKE REMOVING A STAPLE FROM PAPERS. This taking was CONTINUED RETALIATION for me having filed the 29 JULY 2016 CIVIL RIGHTS COMPLAINT (see EXHIBITS attached to enclosed COMPLAINTS) on denial of medical treatment causing my PARALYZED LEFT LEG, MULTIPLE HEART ATTACKS, DEGENERATIVE RETINOPATHY, CHRONIC FUNGAL MASTOIDITIS, etc. (2016 Civil Rights Complaint not enclosed).

This is classic abuse of power by massive State PUBLIC OFFICE MAFIA against the private citizen that is defined by the Supreme Court. "The right to sue and defend in the courts is the alternative of force". CHAMBERS v B & O RR, 207 US 142, 148 (1908). Corrupt and abusive State actors are attempting to CAUSE MY MEDICALLY FRAIL DEATH THROUGH UNDUE STRESS.

C. EFFECT OF RETALIATORY 12-HOUR BUS RIDES:

Every time I am on a 12-hour transfer bus ride, the blood in my left leg stagnates and causes physical deterioration of muscle, nerve and vascular tissues that never repair to what they were. I've had DEEP VEIN THROMBOSIS (DVT), PULMONARY EMBOLI (PE), LUNG DAMAGE, INCREASED LOWER LEG DETERIORATION OF TISSUES that are IMMINENT DANGER OF GANGRENE AND AMPUTATION. It seems the stagnated and/or clotted blood is the cause of diminished vision, hearing, mental functions and other problems when the stagnated blood gets into those body areas after each 12-hour ride.

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D. JUDICIAL CORRUPTION:

For years Federal District Court Judges have committed fraud when I filed Civil Rights Complaints. Starting around 1996, I recall: (1) A case was falsely dismissed as "failure to exhaust administrative remedies" (grievances) when I filed 200-pages of grievances and a refusal of Grievance Administrator to process a grievance on a 24 JUNE 1996 attempt to murder me; (2) A few cases were falsely dismissed as failure to state a claim by the judge wrongfully holding me to the standard of an attorney, contrary to ERICKSON v PARDUS, 551 US 89, 93 (2007); (3) NORTHINGTON v ARMSTRONG, No. 2:10-cv-00424 was unduly dismissed for improper and too many filings because MDOC STAFF shookdown my cell at 0130 hours and put a crude cartoon in my legal mail that I never caught, then Magistrate ELLEN S. CARMODY appears to have made 4 photocopies of a motion I mailed to the Court and filed 5 copies at once which she used as basis for dismissal; (4) NORTHINGTON v ABDELLATIF, No. 2:16-cv-12931 was falsely dismissed as no Constitutional claims when Magistrate MONA K. MAJZOUB falsely said I sued only for a cough and chest pain. However, (5) the case is about: (a) PARALYSIS OF MY LEFT LEG from not treating MRSA infection; (b) Refusals to treat HYPERLIPIDEMIA for years causing HEART ATTACKS, CONGESTIVE AND ISCHEMIC HEART FAILURE, STROKES and RENAL FAILURE that are terminal when untreated; (c) Refusal to treat Chronic Fungal MASTOIDITIS that is very painful and terminal when untreated; (d) Refusal for over 20-years to treat Hypotensive Emergencies, Syncope and passing-out caused by eating that was found in 2019 to be daily events of Postprandial Hypotension triggered ATRIAL FIBRILLATION that is IMMINENT DEATH at each event; and (e) inter alia, Refusal to treat COPD based reaction to certain airborne triggers that cause near-death asphyxiation at each event.

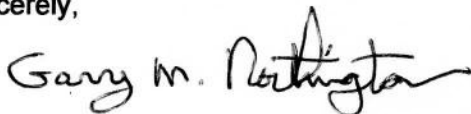
I am a witness to MICHIGAN JUDGES AND PROSECUTORS TAKING AND PAYING BRIBES to render court decisions to the highest bidder in Monroe and Wayne Counties. I also discovered facts of Michigan State Police Officers running drug rings while MONITORING Communications OF PUBLIC OFFICE MAFIA members who incite hostilities toward me. There have been 3 OVERT attempts of this Criminal Cabal to murder me in prison and 2 attempts before prison (enclosed EXHIBIT A, page 2, paragraphs B, C and H, in prison). I believe CORIZON HEALTH INC./MDOC doctors denying me medical care were unduly influenced by the PUBLIC OFFICE MAFIA as COVERT ATTEMPTS TO MURDER me. I believe the Federal and State Judges unduly dismissing and refusing to file my Civil Rights Complaints were unduly influenced and/or bribed by the PUBLIC OFFICE MAFIA to cover-up the wrongs done by the doctors because they are party with said Criminal Cartel.

This PUBLIC OFFICE MAFIA has been behind many hostile acts directed at me, such as acts of enclosed EXHIBIT A and aforesaid retaliatory transfers. I believe the 12-hours bus-rides are attempts to murder me. I am put into a 12-inch by 17-inch area where I cannot move which causes the life-threatening DEEP VEIN THROMBOSIS (DVT) and PULMONARY EMBOLI (PE) that develop from blood stagnation on the 12-hour ride.

This criminal cartel appears to have manipulated Federal Judge Paul D. Borman to have wrongfully dismissed my Federal Complaint (enclosed) on retaliatory transfers and denial of medical care. This PUBLIC OFFICE MAFIA also appears to have manipulated State Judge Susan Beebe Jordan to wrongfully not file my State Complaint (enclosed). Corrupt FBI agents may be involved, and according to info: Robert M. Grubbs of the Detroit area and Steven Grubbs of the Jackson area may be involved (whoever they are).

PLEASE PUT AN END TO THIS CORRUPTION OF FEDERAL AND STATE JUDGES. THANK YOU.

Sincerely,



Gary M. Northington

MI SUPREME COURT #1:
07 MAY 2020

Gary M. Northington 193035
3510 N. Elm
Jackson, MI 49201
(517) 780-5000 email @ JPay.com

CHIEF JUSTICE
Michigan Supreme Court
P.O. Box 30052
Lansing, MI 48909

RE: ADA VIOLATIONS; LOWER COURT CORRUPTION; PUBLIC OFFICE MAFIA

Dear Chief Justice:

A. BRIBE-TAKING PROSECUTORS & JUDGES OF S.E. MICHIGAN:

I have been falsely IMPRISONED 33-years on lies made by a bribe-taking prosecutors, judges and police OF EVENTS THAT NEVER OCCURRED. Before and after I was imprisoned: (1) there were ATTEMPTS TO MURDER ME because I witnessed such corruption; (2) Prosecution Witness Walter E. Verdun put a bullet in the back of a man's head; (3) Taylor Policeman Walter J. Verdun helped cleaned up the crime scene for WALTER E; and (4) then Chief County Prosecutor William D. Frey took a \$2,000 bribe to make it look like a suicide.

Regarding attempts to murder me before prison: (1) At a time before 0500 hours on 08 JANUARY 1987, someone entered my home and put about 4 millimeters of Dursban 4E pesticide in a plastic drinking tumbler that I usually used. I swallowed some caustic tasting liquid before spitting out the rest. In a few minutes, my vision flashed white, and there have since been red, green and white flashing lights in my left eye. (2) Walter E. Verdun had many bottles of this then banned pesticide; and (3) someone later assaulted me and left me for dead who I recognized as possibly Walter E. Verdun or Timothy Paul Baker who were later prosecution witnesses against me (EXHIBIT A, p. 1, § 4). See EXHIBIT A, p. 2, §§ 1, 3 and 8 on attempts to murder me after imprisonment.

Some facts on corruption of then Chief County Prosecutor Frey and Deputy Sheriffs are written on page 1 of EXHIBIT A. On 21 JUNE 1987, WALTER JOHN VERDUN of the Taylor Police Department helped make false testimony of MARTIN McCARTY falsely alleging I SAID THREATS toward an alleged victim, GD words and MF words that I HAVE NEVER SAID IN MY LIFE. WALTER J. VERDUN put writings on this false evidence into manila folder that is either in his home or the Monroe County Sheriff's Department file on my case. (Info from sources monitoring them). Any judges later put on the case are of the bribe-taking PUBLIC OFFICE CARTEL.

I cannot get any relief from judgment of conviction because all judges later put on the case are part of the BRIBE-TAKING AND PAYING CARTEL of S.E. Michigan that also involves certain law enforcement and prosecutors attempting to create more false cases. This PUBLIC OFFICE MAFIA CARTEL has unduly influenced State actors of MDOC, in part as said in EXHIBIT A, page 2, and judges outside of their S.E. Michigan jurisdiction.

B. LAWSUIT ON HEART ATTACKS, PARALYSIS, STROKES, ETC:

In 2011 through 2016, MDOC medical refused to treat me for SEVERE HYPERLIPIDEMIA that has caused KIDNEY/RENAL FAILURE, MANY HEART ATTACKS, STROKES, RETINOPATHY, MASTOIDITIS and other problems. I AM DISABLED THEREBY. The CARTEL and others unduly influenced CORIZON/MDOC doctors and nurses to deny me medical care in attempts to murder me. I SUED FOR THIS.

C. RETALIATION FOR JULY 2016 LAWSUIT:

On 29 JULY 2016, I filed a Federal Civil Rights lawsuit on aforesaid denial of medical care. Five days after I was released from hospitalization from OPEN HEART SURGERY, VERY WEAK and MEDICALLY FRAIL:

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CORIZON/MDOC transferred me, which caused me to have DEEP VEIN THROMBOSIS (DVT), PULMONARY EMBOLI (PE) and other BLOOD CLOTS. This again hospitalized me at the point of IMMINENT DEATH. They, again, transferred me twice after release from 2nd and 3rd hospitalizations. These transfers were ATTEMPTS TO MURDER ME incited by aforesaid PUBLIC OFFICE MAFIA CARTEL (Complaint, pp. 11-17).

On 18 JANUARY 2017, because of aforesaid undue acts not stopping me from pursuing the Civil Rights Case, MDOC STAFF used false pretenses to take most of my legally-owned personal property. CORIZON/MDOC also continued to deny me medical care as aforesaid (Section B) which caused me to again be hospitalized for the same maladies of Section B and enclosed Complaint (pp. 8-11).

D. STATE LAWSUIT ON RETALIATION:

In AUGUST 2019, I attempted to file the enclosed lawsuit in State Circuit Court but MDOC STAFF found out and repeatedly transferred me. This forced me to take out pages 12 to 14 due to limitations when later mailed to the Circuit Court in DECEMBER 2019. The COMPLAINT was factually well written so it will survive summary judgment largely on its own.

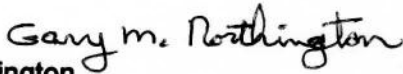
Circuit Court Judge SUSAN BEEBE JORDAN lied and refused to file the enclosed COMPLAINT (enclosed ORDERS and LETTERS); an ADA violation. MICHIGAN CONSTITUTION, Art. I, Sec. 13 & Art. 8, Sec. 8; MICHIGAN COMPILED LAW 600.601, et seq. and Court Rules require the COMPLAINT to be filed. "The right to sue and defend in the courts is the alternative of force". CHAMBERS v B & O RR, 207 US 142, 148 (1908). Is the Judge implying force? Being in prison is back-to-the-wall entrapment that invokes lawful rights. JOHN BAD ELK v U.S., 177 US 529, 535 (1900).

E. COVER UP OF CRIMINAL CARTEL ACTIVITY:

Refusal of Circuit Judge Susan Beebe Jordan to file the Complaint was the Criminal Cartel of S.E. Michigan reaching outside their area to suppress facts of attempts to murder me. You are Chief Justice over the one court system and the SCAO has done nothing. MICH. CONST., Art. VI, Sec. 1; MCL 600.151. Please make Circuit Judge SUSAN BEEBE JORDAN file my COMPLAINT and criminally investigate them.

Sincerely,

Gary M. Northington



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NESSSEL #1: (D @ end) 07 JUN 2020

Gary M. Northington 193035
3510 N. Elm
Jackson, MI 49201
(517) 780-5000 email @ JPay.com

DANA NESSEL
MICHIGAN ATTORNEY GENERAL
P.O. Box 30754
Lansing, MI 48909

----- RE: ADA VIOLATIONS; County COURT CORRUPTION; PUBLIC OFFICE MAFIA

Dear A.G. NESSEL:

----- A. BRIBE-TAKING JUDICIARY OF S.E. MICHIGAN:

----- I have been falsely IMPRISONED 33-years on lies made by bribe-taking prosecutors, judges and police OF EVENTS THAT NEVER OCCURRED. Before and after I was imprisoned: (1) there were ATTEMPTS TO MURDER ME because I witnessed such corruption; (2) "retired" MAFIA enforcer Walter E. Verdun put a bullet in the back of a man's head; (3) Taylor Policeman Walter J. Verdun helped cleaned up the crime scene; and (4) then Chief County Prosecutor William D. Frey took a \$2,000 bribe to make it look like a suicide.

----- Attempts to murder me before prison were: (1) Sometime before 0500 hours on 08 JANUARY 1987, someone entered my home and put about 4 millimeters of Dursban 4E pesticide in a plastic drinking tumbler that I usually used. I swallowed some caustic tasting liquid before spitting out the rest. In a few minutes, my vision flashed white, and there have since been red, green and white flashing lights in my left eye. (2) Walter E. Verdun had many bottles of this then BANNED PESTICIDE; and (3) someone later assaulted me and left me for dead who I recognized as possibly Walter E. Verdun or Timothy Paul Baker who were later prosecution witnesses against me (EXHIBIT A, p. 1, § 4). EXHIBIT A, p. 2, §§ 1, 3 and 8 describes attempts to murder me in prison.

----- Some facts on corruption of then Chief County Prosecutor Frey and Deputy Sheriffs are written on page 1 of EXHIBIT A. On or about 21 JUNE 1987, WALTER JOHN VERDUN of the Taylor Police Department helped make false testimony of MARTIN McCARTY falsely alleging I SAID THREATS toward an alleged victim, GD words and MF words that I HAVE NEVER SAID IN MY LIFE. WALTER J. VERDUN put writings on this into a manila folder that may be in his home or a Monroe County Sheriff's Department file (from sources monitoring them). Judges later put on the case are of the bribe-taking S.E. MI PUBLIC OFFICE MAFIA.

----- I cannot get relief from judgment of conviction because all judges later put on the case are part of the BRIBE-TAKING AND PAYING MAFIA of S.E. Michigan that also involves certain law enforcement and prosecutors attempting to create more false cases. This PUBLIC OFFICE MAFIA has unduly influenced State actors of MDOC, in part as said in EXHIBIT A, page 2, and judges outside of their S.E. Michigan jurisdiction.

----- B. LAWSUIT ON HEART ATTACKS, PARALYSIS, STROKES, ETC:

----- In 2011 through 2016, MDOC medical refused to treat me for SEVERE HYPERLIPIDEMIA that has caused KIDNEY/RENAL FAILURE, HEART ATTACKS, STROKES, RETINOPATHY, MASTOIDITIS and other MALADIES. I AM DISABLED THEREBY. The MAFIA and others unduly influenced CORIZON/MDOC doctors and nurses to deny me medical care in attempts to murder me. I SUED FOR THIS.

----- C. RETALIATION FOR 2016 LAWSUIT:

----- On 29 JULY 2016, I filed a Federal Civil Rights lawsuit on aforesaid denial of medical care. Five days after I was released from hospitalization for OPEN HEART SURGERY, VERY WEAK and MEDICALLY FRAIL: CORIZON/MDOC transferred me. The transfer caused me to have DEEP VEIN THROMBOSIS (DVT), PULMONARY EMBOLI (PE) and other BLOOD CLOTS. This again hospitalized me at point of IMMINENT DEATH.

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They, again, transferred me twice after release from 2nd and 3rd hospitalizations. These transfers were ATTEMPTS TO MURDER ME incited by aforesaid PUBLIC OFFICE MAFIA (enclosed Complaint, pp. 11-17).

----- On 18 JANUARY 2017, because said undue acts did not stop me from pursuing the Civil Rights Case, MDOC STAFF used false pretenses to take most of my legally-owned personal property. CORIZON/MDOC also continued to deny me medical care which caused me to again be hospitalized for the same maladies of above Section B (see Complaint, pp. 8-11).

----- D. STATE LAWSUIT ON RETALIATION:

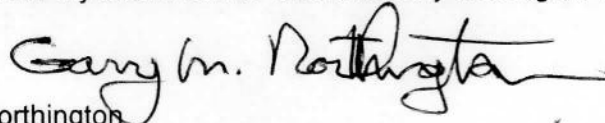
----- In AUGUST 2019, I attempted to file the enclosed lawsuit in State Circuit Court but MDOC STAFF found out and repeatedly transferred me. This forced me to take out pages 12 to 14 due to limitations when later mailed to the Circuit Court on 23 DECEMBER 2019. The COMPLAINT is factually well written to survive summary judgment largely on its own.

----- Jackson Circuit Judge SUSAN BEEBE JORDAN lied and refused to file the enclosed COMPLAINT (enclosed ORDERS and LETTERS); an ADA violation. MICHIGAN CONSTITUTION, Art. I, Sec. 13 & Art. 8, Sec. 8; MICHIGAN COMPILED LAW 600.601, et seq. and Court Rules required the COMPLAINT filed. "The right to sue and defend in the courts is the alternative of force". CHAMBERS v B & O, 207 US 142, 148 (1908). Is the Judge implying force be used against me? Being in prison is back-to-the-wall that invokes lawful rights. JOHN BAD ELK v U.S., 177 US 529, 535 (1900).

----- E. COVER UP OF CRIMINAL CARTEL ACTIVITY:

----- Refusal of Circuit Judge Susan Beebe Jordan to file the Complaint was the Criminal CARTEL of S.E. Michigan reaching out to her to suppress facts of attempts to murder me. The SCAO did nothing. Please make Circuit Judge SUSAN BEEBE JORDAN file my COMPLAINT and criminally investigate them.

Sincerely,



Gary M. Northington

■ On 04 JUNE 2020, 9 prisoners in Unit B were COVID-19 positive. B is now locked down. That's the first major outbreak on the COTTON Side. I B FYN. Love, G3 15 more were positive on 10 JUNE 2020.

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25 JUNE 2020

Gary M. Northington

193035

3510 N. Elm

Jackson, MI 49201

Dear Rudy,

When I filed my 2016 Civil Rights Complaint, MDOC STAFF repeatedly transferred me, then on 18 JANUARY 2017 took most of my personal property in retaliation. The enclosed Complaint #2 is about the retaliatory transfers and ~~the~~ taking of my property in retaliation for filing Complaint #1.

The enclosed Complaint is very well written with intent to overcome a Motion to Dismiss and a Motion for Summary Judgment. Most Complaints are not this well-written, with supporting facts. Judge Susan Beebe Jordan refused to file it because it is not a "bare-bones" Complaint that would tie me up in years of tedious and time-consuming litigation. Jackson County Judge Jordan was instructed by the Public Office Mafia to not file this Complaint.

Also enclosed are all letters and documents, in chronological order, written to various State officials, done in attempts to get enclosed Complaint #2 filed. No State official has done anything.

I will write later about those involved but not named.

God Bless,

Gary M. Northington

Public Office Mafia #

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR JACKSON COUNTY

Gary M. Northington,
Plaintiff Pro Se,

vs

1. SHERRI L. BURT,
2. JCF PROPERTY OFFICER _____ GRAHAM,
3. SCOTT HOLMES,
4. CHARLES S. JAMSEN,
5. GARY S. KIRSTEIN,
6. CARMEN McINTYRE,
7. PATRICK E. MISETA,
8. RICHARD D. RUSSELL,
9. BRENDA SCHMELTZ,
10. JAMES E. SIMS,
11. JCF PROPERTY OFFICER STEPHENS,
12. UNKNOWN CORIZON STAFF
(Regional Director for MI),
13. UNKNOWN MDOC STAFF
(Lansing MDOC Transfer Coordinator),
14. MELODY WALLACE,
15. HEIDI WASHINGTON,
16. LINDA C. WITTMAN,
17. CHRISTOPHER YOUNG,
Defendants.

STATE CIVIL RIGHTS COMPLAINT

JURY DEMAND

Plaintiff demands jury trial. USCA 1, 5, 7, 14

Gary M. Northington #193035
Cotton Corr. Facility
3510 N. Elm
Jackson, MI 49201
(517) 780-5000 email @JPay.com
Plaintiff Pro Se

This is the Complaint I mailed to the Jackson County Circuit Court and with all following letters.

FACTUAL ALLEGATIONS 4 15

RETALIATORY TRANSFER FROM DRF & DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEED;
BACKGROUND TO PRESENT CLAIMS

FACTUAL ALLEGATIONS 5 17

RETALIATORY TRANSFER FROM MCF & DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEED

FACTUAL ALLEGATIONS 6 18

UNDUE TAKING AT JCF, RETALIATORY TRANSFER FROM JCF & DELIBERATE INDIFFERENCE

FACTUAL ALLEGATIONS 7 24

CONCLUSION TO ALLEGATIONS 3 TO 6 & DELIBERATE INDIFFERENC

FACTUAL ALLEGATIONS 8 27

DENIAL OF FIRST AMENDMENT, DUE PROCESS AND EQUAL PROTECTION RIGHTS

FACTUAL ALLEGATIONS 9 29

2017-2018 DENIAL OF TREATMENT WITH DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEED
AND IMMINENT DANGER OF PREMATURE DEATH

CAUSES OF ACTION 31

FACTUAL ALLEGATIONS 1; IMMINENT DANGER OF FURTHER
SEVERE PHYSICAL INJURY OR PREMATURE DEATH:

A. Introduction and Symptoms:

1. Plaintiff is in Imminent Danger of Further Severe Physical Injury or Premature Death by DEFENDANTS' past, present and continuing deliberate indifference to his serious medical need(s) and failure(s) to treat such need(s) as described herein. He is a disabled person under the ADA, MCL 37.1101, et seq.
2. Plaintiff has severe physical, emotional and mental injury, pain and suffering from Defendants' past failure(s) to treat his serious medical need(s) with their deliberate indifference thereto as described herein. Such injuries caused by Defendants require LIFETIME MEDICAL CARE. Plaintiff's left leg is paralyzed
3. Plaintiff had and has severe life-threatening allergic INTOLERANCES and/or REACTIONS to digestive/food triggers that causes Severe Anaphylaxis, Pulmonary Edema, Acute Heart Failure, Hives, Severe Hypotensive Emergencies near 50/20 mmHg, Severe Peripheral Nerve Damage with Paralysis, Severe Neuropathic Pain, swollen

appendages, swollen abdomen and intestinal injury, and other symptoms. Defendants CORIZON, JAMSEN, KIRSTEIN and McINTYRE said it is their CUSTOM and policy to not test for or treat this malady so it was and is untreated by all Defendants. Such allergies cause plaquing of arteries through leaks in damaged villi.

4. Plaintiff daily had and has severe NEUROLOGICAL INTOLERANCES and/or REACTIONS to digestive/food triggers that cause him to have severe Cold Sweats, Acute Heart Failure(s), Severe Hypotensive Emergencies near 50/20 mmHg with life-threatening BRADYCARDIA near 23 to 35 beats per minute, daily Pre-syncope Emergencies every morning, syncope at times, and uncontrolled defecations and vomiting during the Hypotension. (This all began after 1968-1972 Exposure to AGENT ORANGE in the USAF of which Plaintiff told Defendants.) Defendants CORIZON, JAMSEN, KIRSTEIN and McINTYRE said it is their CUSTOM and policy to not test for or treat the malady so it was untreated by all Defendants. Every event is IMMINENT DEATH.

5. Plaintiff daily had and has often severe life-threatening allergies INTOLERANCES and/or REACTIONS to airborne/respiratory triggers that cause him to have severe BURNING ANGINA, Dyspnea with Hypoxia near 85%, Pulmonary Edema with Expiratory Flow dropping to less than 33% of his personal best peak airflow, Acute and/or Congestive Heart Failure with Hypertensive Emergencies near 220/101 mmHg, and coughing-up very large amounts of fluid during which he feels asphyxiated and wonders if he will live through the PAINFUL TORTURE.

6. From JULY 2013 to present, Plaintiff also had and has the following maladies untreated by Medical Defendants of which treatment was and is obstructed by other DEFENDANTS:

(a) Chronic right-sided MASTOIDITIS determined by non-Defendant CAT SCAN that said mastoid opacity, which non-Defendants tested to be caused by Candida Parapsilosis fungal infection, that causes right-side HEARING LOSS, severe PAIN in right temple area and right sinuses. Serous OTIS MEDIA of that will likely eat into the brain to cause further severe physical injury and Premature Death if not soon treated;

(b) HYPERLIPIDEMIA-caused, untreated Right-Side Carotid Stenosis with ~~60%~~ 70% blockage that seriously increases said hearing loss and likelihood of death by said MASTOIDITIS and/or Stroke if not soon treated;

(c) Severe untreated Retinopathy, due in part to untreated Carotid Stenosis and said Mastoiditis, that causes Plaintiff to repeatedly go legally blind in his right eye for hours to days, with progressively deteriorating vision after each event, and will lead to total blindness if not soon treated, ^{caused} ~~cause~~ by chronic HYPERLIPIDEMIA;

(d) Untreated Left Iliac and Femoral Stenosis with serious 50% loss of blood flow to Plaintiff's Left Leg that will lead to amputation thereof if not treated, caused by years of untreated HYPERLIPIDEMIA;

(e) Said lower leg loss of blood flow due to said Stenosis caused and causes daily severely painful events severe untreated NEUROPATHY and Lower Leg paralysis that is further aggravated by hereafter described low cardiac output (pg. f herein), caused by untreated HYPERLIPIDEMIA. Nightly pain and cramping are severe;

(f) HYPERLIPIDEMIA-caused Ischemic Heart Disease, Heart Failure with low cardiac output and 95% blockage of a Coronary Artery with severely painful ANGINA, for which he had CABG X3 Open Heart Surgery in JUNE 2016 and Heart Surgery again in JUNE 2019 caused by failure to treat in 2017 to 2019;

(g) HYPERLIPIDEMIA-caused untreated stroke(s) with loss of memory and constant mental slowness;

(h) Untreated severe food allergy and Postprandial Hypotension with daily painful pre-syncope or syncope with Hypotensive Emergencies for which Plaintiff was first hospitalized in 01-04 JULY 2019; and

(i) Other serious untreated disease and/or injury to be described upon diagnosis that also caused and causes daily severe pain and suffering, and injury of untreated Hyperlipidemia.

7. Plaintiff also has severe untreated airborne respiratory allergy(s) that caused life-threatening Hypertensive Emergencies with severely painful ANGINA that Defendants, by custom, refused to treat.

8. Aforesaid maladies were untreated by Defendants from JULY 2016 to JUNE 2019, caused Plaintiff the severe distress, injury, pain and suffering of the lingering death of GENOCIDE for about 3-years. Such failure to treat is cruel and unusual punishment, contrary to Constitution and continues by edict of KIRSTEIN/McINTYRE.

FACTUAL ALLEGATIONS 2; DENIAL OF ADA & CARE BY CUSTOM & DELIBERATE INDIFFERENCE

9. All prior paragraphs incorporated by reference herein.

10. When transferred between prisons, Plaintiff was put on a 12-hour bus ride and processing when his frail and weakened condition mandated that he should be put on no longer than a 2-hour-ride in the MDOC wheelchair van available at each prison. Defendants KIRSTEIN/McINTYRE, WALLACE, WASHINGTON and WITTMAN had custom, order and policy to not put Plaintiff in a wheelchair van which is contrary to the ADA, MCL 37.1101, et seq. The issue of transfer is live and capable of repetition because Plaintiff is only temporarily at prison where this is filed and will be transferred upon serving Summons and Complaint.

11. Plaintiff was and is disabled within meaning of the ADA, 42 USC, § 12101, et seq; MCL 37.1101, et seq. All Defendants were deliberately indifferent to his serious medical needs as described herein. They also discriminated against and excluded Plaintiff from participation in or denied him benefits of the services, programs, or activities of the State as of course and custom. All Defendants herein have no State immunity(s). All Defendants' actions relevant to Plaintiff's disabilities were based on customs, edicts, orders and policies issued by Defendants McINTYRE, KIRSTEIN, WALLACE, WASHINGTON and WITTMAN described in part as follows.

12. Claims herein are attributable to CORIZON and MDOC custom and policy where MDOC Defendants are sued in official capacity. Defendants KIRSTEIN, McINTYRE, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN MDOC STAFF issued and/or signed the edicts to commit and admitted to said custom, policy, and authorizing wrongful acts with DELIBERATE INDIFFERENCE to Plaintiff's serious medical needs described herein.

13. "Defendants" herein shall be deemed to include UNKNOWN MDOC STAFF hereinafter "UMS" until the name is revealed in discovery (the MDOC Lansing, Transfer Coordinator).

FACTUAL ALLEGATIONS 3; SUBSTANTIAL RETALIATION AND MRF TRANSFER WHILE IN RECOVERY FROM HEART SURGERY WITH DELIBERATE INDIFFERENCE:

14. All prior paragraphs incorporated by reference herein.

A. BACKGROUND INFORMATION:

15. On or about 18 OCTOBER 2011, Plaintiff was transferred to MRF Prison (Macomb). By MDOC Policy, his annual review date for any later transfer was required to be within 3 days of 18 OCTOBER in years 2012 through 2018. PD 05.01.140. Each later transfer was and is Imminent Danger of Death.

16. Each such transfer, which takes about 12-hours, after the aforesaid was done without a wheelchair van despite Plaintiff's disability of lower leg blood stagnation and Deep Vein Thrombosis caused by such 12-hour rides, and left leg paralysis.

17. Each such transfer is deliberate indifference to serious medical need and Imminent Danger of further severe physical injury and/or Premature Death, caused by all Defendants named herein.

~~(paragraphs 18-32 and pages 12-14 deleted)~~

(a) Plaintiff had been on the job waiting list for this about 5-years while prisoners with less seniority were promoted ahead of him for this high paying \$75 per month job because he was disabled.

18. On or about 20 DECEMBER 2015, Defendant VONHILTMAYER asked JENKINS, STEPHENSON, WALLACE and/or UNKNOWN MDOC STAFF to violate MDOC Policy by transferring Plaintiff outside transfer time limits of MDOC Policy PD 05.01.140. This 2015 attempted transfer was cancelled by Health Unit Manager Cooper because Plaintiff was on medical hold for an over-40 exercise program with cycles, jogging and walking. Plaintiff was using the program in attempts to rehabilitate his paralyzed left leg and minimize the ANGINA of his Ischemic Heart Disease and CONGESTIVE HEART FAILURE that was caused by ABDELLATIF ^{and Kirsten} failing to treat HYPERLIPIDEMIA.

B. MATERIAL FACTS TO DELIBERATE INDIFFERENCE REGARDING TRANSFER

19. Between 28 MAY 2016 and 11 JUNE 2016, Plaintiff gave Defendant JENKINS a letter holding 2 original Federal Civil Rights Complaints in NORTHINGTON v ABDELLATIF to be mailed to the Court for filing. On 29 JULY 2016, he found this mailing envelope in his property that had been packed by MDOC STAFF when he was hospitalized on 12 JUNE 2016 for multiple Heart Attacks and Stroke.

20. From 12 JUNE 2016 to 29 JULY 2016: Plaintiff was hospitalized for multiple HEART ATTACKS and STROKES where he had CABG X3 OPEN HEART SURGERY and other treatments. He daily did two-hour exercises at the hospital. After Plaintiff's 29 JULY 2019 release from hospitalization and CABG X3 Surgery, he was returned to MACOMB PRISON (hereinafter "MRF") in about the same health as he had been for years before the JUNE 2016 Heart Attacks. Plaintiff was thereafter denied a light duty job he could do because of his DISABILITY.

21. After return from the hospital, on 01 AUGUST 2016: Plaintiff gave MRF Defendant JENKINS said envelope holding said federal Civil Rights Complaint of NORTHINGTON v ABDELLATIF, U.S. District Court No. 2:16-cv-12931 to JENKINS to be mailed to the Court. At that time, Plaintiff requested of JENKINS to have his old light-duty porter job back because it was still open and pursuant to MDOC Policy PD 05.01.100, § P still his job. Upon Plaintiff requesting his old job, JENKINS said to Defendants STEPHENSON and VONHILTMAYER, "The old guy is back, again". JENKINS then told Plaintiff, "You have not been released to return to work because you are too frail and weak". Plaintiff then said, "I was released from the hospital and Cardiologist on 29 JULY 2016 with orders to exercise as I want". JENKINS and VONHILTMAYER refused to give Plaintiff the available job.

C. FIRST TRANSFER FROM MRF WITH DELIBERATE INDIFFERENCE TO MEDICAL NEED

22. On or about 01 to 03 AUGUST 2016, Defendants ABDELLATIF, ADRAY, a RED HAired NURSE and UNKNOWN MDOC STAFF made false medical records, other records and/or statements to allow the 02-03 AUGUST transfer. They, inter alia, as a premise to send Plaintiff to DRF Prison, falsely said (Gr 173):

(a) Plaintiff did not need a special diet when he needed Special 2-gram Low-Sodium diet. He had to fight to get low-sodium foods on his own for 23-days at DRF.

(b) Special diets were available at DRF when special diets were NOT AVAILABLE at DRF;

(c) Plaintiff was in good health for the strenuous transfer when he was frail, weak and confused by cognitive dysfunction of recent STROKE(S); and

(d) No medical holds were on Plaintiff at MRF when there were holds for said rehabilitation program and follow-up treatment(s).

This falsification of medical and other information by Defendants ABDELLATIF, ADRAY and RED-HAired NURSE and said transfer by the other Defendants was deliberate indifference to serious medical need and IMMINENT DANGER of further severe physical injury and/or Premature Death during transfer.

23. On 01 AUGUST 2016, MRF Defendants JENKINS, STEPHENSON, VONHILTMAYER, WALLACE and UNKNOWN MDOC STAFF said Plaintiff was too frail for his old light-duty job of daily wiping-down a microwave oven 2 or 3 times. These Defendants then put Plaintiff into a transfer process that required of him at least 3-days of packing his property, a severely exhausting 12-hour bus ride and unpacking his property that was much more strenuous than a total month of work at his old job. They discriminated against Plaintiff due to his disability.

24. On 02 to 03 AUGUST 2016, rather than at his annual review date of 18 OCTOBER: Defendants JENKINS, STEPHENSON, VONHILTMAYER, WALLACE and/or UNKNOWN STAFF had Plaintiff transferred from MRF to DRF (Gr 172). Lansing MDOC Defendants RUSSELL, WALLACE, WASHINGTON WITTMAN and/or UNKNOWN MDOC STAFF had issued edicts, ORDER(S) and/or communications to MRF Defendants JENKINS, STEPHENSON, VONHILTMAYER, to cause this transfer of Plaintiff from MRF to DRF Prison (Carson City).

D. INJURY FROM DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEED AT FIRST TRANSFER

25. On 02-03 AUGUST 2016, about 4-days after Plaintiff's 29 JULY release from the hospital with fresh Open Heart Surgery and other treatments, Plaintiff was transferred from MRF. As proximate result of transfer, Plaintiff was in 3-days of severe pain and overpowering fatigue at DRF: On 06 to 08 AUGUST 2016 Plaintiff was hospitalized at the point of IMMINENT DEATH for severe injury(s) of Deep Vein Thrombosis (DVT) and Pulmonary Emboli (PE) caused by abusive conditions of said transfer (Gr 172, 176). Defendants ignored Plaintiff's disability rights.

26. On 08 AUGUST 2016, Plaintiff returned from the hospital for the second time after being treated for DVT and PE that had been caused by Defendants ABDELLATIF, ADRAY, JENKINS, MRF RED-HAIRED NURSE, STEPHENSON, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN STAFF forcing Plaintiff to sit immobile on a bus for 12-hours during transfer. Severe injury and pain caused thereby were TORTURE for years.

27. Said transfer was done by these Defendants to harass, intimidate and punish Plaintiff for requesting to return to his prior good paying porter job and for exercise of right to petition thereon, and assertion of ADA Rights. They treated Plaintiff different than similarly situated persons.

28. Said transfer was also done by these Defendants to harass, intimidate and punish Plaintiff for exercise of his First Amendment Right for having attempted to file, then having filed, the Civil Rights Complaint in Federal Court, NORTHINGTON v ABDELLATIF, No. 2:16-cv-12931 on or about 01 AUGUST 2016. Plaintiff had given the Complaint in said case to Defendant JENKINS on or about 30 MAY 2016 to be mailed. It was never mailed but was stored in his property held by MDOC in JUNE and JULY 2016 while he was hospitalized.

29. As proximate result of said transfer, Plaintiff was put through a series of subsequent of abusive transfers with severe injury(s) and loss caused thereby that would not have otherwise occurred as described herein.

30. As proximate result of said transfer, about \$2,700 worth of Plaintiff's personal property was deliberately damaged beyond repair, taken and/or lost while in possession of MDOC STAFF as described hereinafter (Gr 172, ST2, 175, 178, 179, 211, 214, 220-222, 224, 231, 233, 234, 237, 238, 241, 246, 270, 282).

31. As proximate result of said transfer, Plaintiff has lost up to \$10,000 in income from loss of his MRF work assignment and a series of subsequent transfers caused thereby with long-term loss of work assignment (1,512) (Gr 172, 173, 176). This was done by Defendants to punish Plaintiff for assertion of ADA rights.

32. As proximate result of said transfer, Plaintiff had to daily struggle to get his own food for 23 days at DRF

33. These Defendants treated Plaintiff different than similarly situated persons.

34. These Defendants denied Plaintiff procedural and substantive due process: (a) when they failed and/or refused to follow ~~Michigan~~ State Constitutions and laws and procedures; and (b) when they violated MDOC Policies and procedures which include but are not limited to PD01.01.100, PD 03.03.130, 04.07.112, and 05.03.130.

35. Aforesaid wrongful acts were retaliation for Plaintiff's said exercise and assertion of **First, Eighth and Fourteenth Amendment Rights; ^{and} Michigan Constitution, Art. I, Secs. 2, 3, 13, 16, 17, 23.**

36. Defendants aforesaid actions were CRUEL AND UNUSUAL PUNISHMENT that caused Plaintiff severe pain, suffering and FURTHER SEVERE INJURY to his heart and lungs that required 2019 ~~Open~~ ^{Further} Heart Surgery and ^{he} ~~needs~~ ^{needs} LIFETIME MEDICAL CARE as result thereof.

(a) This should have been a 2-hour transfer in a wheelchair van, not a 12-hour ride.

(b) These Defendants' were deliberately indifferent to his serious medical need(s) and IMMINENT DANGER of further severe physical injury.

37. These Defendants, for aforesaid reasons, cannot be defended by the Office of Michigan Attorney General pro bono and must hire an attorney to represent them or defend pro se by virtue of having violated MDOC Policy and State law.

FACTUAL ALLEGATIONS 4: TAKING OF MEMORY TYPEWRITER AND 2ND DRF TRANSFER CAUSING UNDUE STRESS; BACKGROUND

38. All prior paragraphs incorporated herein. The following taking was proximate result of aforesaid retaliatory transfer and second hospitalization caused thereby:

A. TAKING OF TYPEWRITER AND 1983 COMPLAINT; BACKGROUND

39. On 06 AUGUST 2016, Plaintiff was hospitalized for the medical emergency of Deep Vein Thrombosis (DVT) and Pulmonary Emboli (PE), occurring at MDOC's Carson City Prison (hereinafter "DRF") (pgs. 25-33 herein), caused by transfer from MRF. As result, his legal document footlockers and typewriter were packed-up and taken to

the DRF Secure Property Room by Defendant _____ HENGESBACH (Gr 174). Until at least 15 AUGUST 2016, the Property was kept there under control of Property Sgt. _____ Collins and Warden Sherman Campbell who were the only persons with access to the Room (Gr #174, 175). Campbell was informed of this by Plaintiff and responded. *with apathy at best, ignoring Plaintiff's disability.*

40. Also from 06 to 08 AUGUST 2016, while Plaintiff was hospitalized for treatment of the DVT and PE, his Duffel Bag and Guitar were kept in the Housing Unit Secure Locker to which only Housing Unit Guards and Defendant Campbell had access. On 09 AUGUST 2016, Plaintiff was given his guitar and duffel bag but not his MEMORY TYPEWRITER (Gr #174 & 175). HENGESBACH claimed he knew nothing about the typewriter (Gr #174).

41. On 12 AUGUST 2016, Plaintiff entered the DRF Property Room for an appointment and saw his allegedly missing MEMORY TYPEWRITER carried across the Property Room from his footlockers to a shelf as an UNKNOWN GUARD hid it in the shadow behind Plaintiff's typewriter packing box, then ordered Plaintiff, "Get out of here"! The typewriter and box were very distinguishable because of the bright blue tape on them.

42. When Plaintiff was transferred from DRF to MUSKEGON PRISON on 25 AUGUST 2016, Defendants CAMPBELL and COLLINS said they would not transfer Plaintiff's typewriter with him, contrary to MDOC Policy PD

04.07.112. COLLINS got obstinate upon Plaintiff's request to transfer it (Gr 178, 179).

B. SECOND TRANSFER; FROM DRF

43. As proximate result of the 02-03 AUGUST 2016 retaliatory transfer (pgs. 22-32 herein), since DRF Prison did not have the 2-gram low sodium diet prescribed by the Cardiologist for Plaintiff, he was transferred from DRF to MCF Prison on or about 25 AUGUST 2016 with another 12-hour bus ride that again hospitalized him for half a day for pleural effusion.

(a) To wit, for about a month, Defendants ~~_____~~ JENKINS, MRF RED-HAIRED NURSE, RUSSELL, STEPHENSON, VONHILTMAYER, WALLACE, WASHINGTON and WITTMAN had denied Plaintiff the JUNE 2016 treatment of low sodium diet prescribed by the Medical Provider, Cardiologist James Fenton, and deliberately subjected Plaintiff to a second predetermined retaliatory transfer from DRF.

44. This 12-hour bus transfer from DRF to MCF Prison subjected Plaintiff to further injury to his Heart and Lungs, including pleural effusion for which he was hospitalized, but should have been a 2-hour ride in a wheelchair van.

FACTUAL ALLEGATIONS 5; MCF TAKING OF LEGAL DOCUMENTS AND TYPEWRITER
FOR 5-MONTHS AND 3RD TRANSFER FROM MCF:

A. TAKING TYPEWRITER & LEGAL DOCUMENT FILES

45. Upon 25 AUGUST 2016 arrival at MCF Prison, Defendant SHERRI L. BURT had deliberately ordered all of Plaintiff's legal document footlockers taken from him and stored until 16 JANUARY 2017 when he was packed-up for 17 JANUARY 2017 transfer to JCF Prison (Cotton). At time of pack up, a typewriter alleged to be Plaintiff's was found stashed by UNKNOWN MDOC STAFF in one of Plaintiff's footlockers where the typewriter may have been kept by UNKNOWN MDOC STAFF since 12 AUGUST 2016 at DRF, of which he told BURT.

46. To wit, these legal document footlockers holding his typewriter in issue were never in Plaintiff's possession from 06 AUGUST 2016 to 17 JANUARY 2017 but always in full control of MDOC STAFF at DRF, during transfer and at MCF Prison. Plaintiff's Swintec memory typewriter worked well prior to 06 AUGUST 2016.

B. THIRD TRANSFER IN LESS THAN 6-MONTHS

47. On or about 10 to 15 JANUARY 2017, Defendants BURT and MISETA ordered transfer of Plaintiff from MCF Prison because of his exercise and assertion of right to petition in grievances on medical treatment and \$25 in false charges to Plaintiff's account for medical COPAY done without required hearing of MDOC Policy.

(a) From OCTOBER to DECEMBER of 2016, MISETA wrongfully ordered at least 3 MEDICAL COPAY charges of \$5 each to Plaintiff's account without holding the hearing required by MDOC Policy PD 03.04.101 and MDOC Rules R791.3310 and R791.6639;

(b) Plaintiff spoke to BURT about the wrongful charges on and about 30 NOVEMBER 2016 and 05 JANUARY 2017 but she refused to correct them. BURT later made a comment that she wanted to retire without being sued by Plaintiff. Plaintiff was charged to stop him from seeking treatment for his disability(s).

48. This 16-17 JANUARY 2017 transfer from MCF was contrary to MDOC Policy because not on the anniversary date of Plaintiff's transfer into MCF of 25 AUGUST 2016. This transfer was done to harass, intimidate, punish and retaliate against Plaintiff for his exercise and assertion of Mich. Const., Art. I, Sec. 2, 3, 13, 16, 17 Rights.

49. As proximate result of the 3 transfers within 6-months, Plaintiff was denied due process and equal protection contrary to State Constitution and discriminated against because of his disability, contrary to the ADA. Mich. Const., Art. I, Secs, 2, 3, 13, 16, 17; Art. 8, Sec. 8; MCL 37.1101, et seq.

50. As proximate result of the 3 transfers within 6-months while Plaintiff was recovering from CABG X3 OPEN HEART SURGERY: Plaintiff was subjected to severe emotional, mental and physical pain and suffering by Defendants ABDELLATIF, ADRAY, BURT, ~~WALLACE, WASHINGTON, WITTMAN~~ MISETA, ~~STEPHENS, RUSSELL, WALLACE~~ WALLACE, WASHINGTON, WITTMAN and UNKNOWN MDOC STAFF causing said transfer.

(a) During the 16-17 JANUARY 2017 transfer from MCF Prison to JCF Prison ordered by Defendants BURT, MISETA, RUSSELL, WALLACE and UNKNOWN MDOC STAFF: Plaintiff's vision had become so degraded from the stress that he could not see anything past 10-feet other than as a shadow with or without his glasses.

51. These Defendants were deliberately indifferent to Plaintiff's serious medical needs, Imminent Danger of further severe physical injury and Premature Death when they repeatedly transferred Plaintiff.

52. As proximate result of said transfers, injuries caused thereby, and undue stress, these Defendants subjected Plaintiff to severely painful TORTURE of further severe injury to his heart, lungs and paralysis of appendages that requires LIFETIME MEDICAL CARE.

FACTUAL ALLEGATIONS 6; CONTINUED UNDUER TAKING OF TYPEWRITER AND OTHER PROPERTY:

A. UNDUE DESTRUCTION AND TAKING OF TYPEWRITER TO INTIMIDATE

53. On 18 JANUARY 2017 around 0930 hours: Defendants SCHMELTZ and STEPHENS called Plaintiff to the JCF Property Room and said Plaintiff could not have his typewriter because the LCD indicator wire had been cut in half. The blue tape that had sealed Plaintiff's typewriter shut since 03 AUGUST 2016 had been removed by these Defendants before Plaintiff arrived and while the MEMORY TYPEWRITER was in full control of UNKNOWN MDOC STAFF either during the transfer between MCF and JCF Prisons or by aforesaid Defendants (Gr 220).

54. When packed-up and sealed with blue tape on 03 AUGUST 2016, Plaintiff's MEMORY TYPEWRITER worked properly and had no damage. Upon 16-17 JANUARY 2017 transfer to JCF Prison, Plaintiff's typewriter was put into the JCF Property Room to which only Defendants SCHMELTZ, STEPHENS and their subordinates had access. On 18 JANUARY 2017, before Plaintiff entered the JCF Property Room at 1000 hours, the blue tape sealing Plaintiff's typewriter shut had been removed without him being present and the typewriter wiring was visibly damaged.

55. On 11 FEBRUARY 2017: Defendant SCHMELTZ spoke on the telephone with Defendants RUSSELL, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN STAFF who told SCHMELTZ to take the TYPEWRITER from Plaintiff for damage done by MDOC STAFF. These Defendants refused to let Plaintiff have the typewriter repaired as allowed by MDOC Policy, PD 04.07.112. SCHMELTZ then wrongfully disposed of Plaintiff's typewriter that had been deliberately damaged by Defendants and/or UNKNOWN MDOC STAFF.

56. Prior to 16 JANUARY 2017, Plaintiff's MEMORY typewriter held an amended version of the Complaint in NORTHINGTON v ABDELLATIF, U.S. District Court No. 2:16-cv-12931, containing due process and equal protection claims against Defendants RUSSELL and TROUTEN that Plaintiff was denied filing by the delay of said taking of his typewriter and having to hand write a Supplemental Complaint (ECF #112 & 128 therein). Plaintiff takes 1 to 3 days to write a page because of his cognitive and physical disability caused by Stroke(s) in 2016. Plaintiff was, therefore, DENIED COURT ACCESS by said acts of all Defendants and their discrimination against him contrary to the ADA (pgs. 1-59 herein). They denied him use of activities, programs and services of MDOC.

57. This obstructing access to, destroying and taking of Plaintiff's typewriter was done to harass, intimidate and punish Plaintiff for his exercise and assertion of **his Michigan Constitutional** Rights regarding medical treatment through grievances, letters of complaint and having filed NORTHINGTON v ABDELLATIF, et al, U.S. District Court No. 2:16-cv-12931. It was retaliation by Defendants that exploited Plaintiff's disabilities.

58. Defendants BURT, CAMPBELL, COLLINS, HENGESBACH, MISETA, RUSSELL, SCHMELTZ, STEPHENS, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN MDOC STAFF denied Plaintiff procedural and substantive due process, as also did Graham, Sims and Young in later described acts:

(a) When they refused and/or failed to follow Federal and State Constitutions, laws and procedures;

(b) When they failed and/or refused to follow MDOC Policies and procedures which include but are not limited to PD 01.01.100, PD 03.03.130, PD 04.07.112 and PD 05.03.130;

(c) When they failed and/or refused to follow State/MDOC Rules on Administrative hearings; and

(d) That they knew or reasonably should have known they had to follow.

59. These Defendants treated Plaintiff different than similarly situated persons.

60. Therefore, Defendants ~~ABDELLATIF, ABDELLATIF, ABDELLATIF~~ BURT, ~~ABDELLATIF, ABDELLATIF~~ RUSSELL, SCHMELTZ, STEPHENS, ~~STEPHENS~~ UNKNOWN MDOC STAFF, ~~ABDELLATIF~~, WALLACE, WASHINGTON and WITTMAN have denied Plaintiff Court Access in NORTHINGTON v ABDELLATIF, et al, U.S. District Court No. 2:16-cv-12931, in violation of First and Fourteenth Amendments. It is res judicata by prior order in ABDELLATIF, supra (ECF #112, 128).

61. These Defendants, for aforesaid reasons cannot be defended by the Office of Michigan Attorney General pro bono and must hire an attorney to represent them or defend pro se for having violated MDOC Policy and State law.

B. UNDUE JCF TAKING OF GUITAR AND OTHER ITEMS WITHOUT DUE PROCESS & HEARING:

62. All prior paragraphs incorporated by reference herein.

63. On 16 JANUARY 2017 at MCF Prison: Plaintiff's guitar was packed and an MDOC seal put on the case by MCF STAFF so no one could get into the case to steal items or damage the guitar. The guitar is worth about about \$1,300 and its accessories about \$800 for a total of \$2,100. When the guitar was put into the transfer van with the van cargo door locked and sealed at MCF, there were no broken-taped guitar wires.*

64. The van then delivered all of Plaintiff's property to the JCF Property Room where it was in full possession and control of Defendants SCHMELTZ and STEPHENS. No other persons could enter the JCF Property Room without these Defendants' authorization.

65. On 18 JANUARY 2017 at 0930 hours: Plaintiff was called to the JCF Property Room to allegedly get his property that had been there since 17 JANUARY 2017. Because of Plaintiff's disability caused by multiple Heart Attacks and Stroke(s) in 2016 and stress of the 16-17 JANUARY 2017 transfer, Plaintiff was severely weak, easily confused, and his vision greatly diminished by retinopathy and carotid stenosis. He had great difficulty understanding and seeing events on 18 JANUARY 2017. due to his disability.

66. At this 18 JANUARY 2017 meeting: Defendants SCHMELTZ and STEPHENS took advantage of Plaintiff's then severe cognitive and physical disability(s) contrary to MDOC Policy PD 03.03.130 and the ADA, 42 USC, §§ 12101, et seq; MCL 37.1101. Plaintiff told them he was nearly blind; They exploited disability. Mich. Const., Art. 8, Sec. 8.

* The alleged tape, ^{and broken} and/or twisted wire is not part of the guitar. It is part of a replaceable electromagnetic pickup, that is like replaceable guitar strings that are changed every 6-months.

MDOC STAFF broke the back of the guitar by jamming it into a concrete floor and broke the pickup wire to harass, intimidate and punish Plaintiff. The soundhole pickup pops out.

67. On 18 JANUARY 2017 at 1000 hours before Plaintiff arrived at the JCF Property Room: The seal put on Plaintiff's guitar case at MCF had been removed by SCHMELTZ and STEPHENS. A wire that was not part of the guitar, nor Plaintiff's, was tied to a guitar string. There was no wire tied to a guitar string nor any broken or taped wires on or in Plaintiff's guitar when the case was sealed by MDOC STAFF at MCF Prison. Defendants would not let Plaintiff get within 10-feet of his guitar to see what they were describing about alleged damage (Gr #211).

Defendants' supervisor and associates at JCF Prison had previously deliberately broken the backboard and pickup of the guitar, and laughed about it, after Plaintiff had filed a lawsuit; STEPHENS mentioned this prior event. The prior damaged wiring and pickup were long ago replaced by a repair facility as allowed by MDOC Policy PD 04.07.112. Nothing was wrong with the wiring or parts of the guitar before handled by Defendants on 17-18 JANUARY 2017.

68. At 1000 hours on 18 JANUARY 2017: SCHMELTZ and STEPHENS had the previously sealed guitar case laying fully open and all of Plaintiff's musical accessories, batteries, and personal property having NOTHING to do with the guitar laying on various tables. He could barely see this from 10-feet away.

69. Defendants SCHMELTZ and STEPHENS then falsely contrived and wrote a Contraband Removal Record ^{wherein} ~~because~~ they falsely said a wire was broken and taped together on or in the guitar. Plaintiff requested to send his guitar to an authorized vendor, Music Manor, for repair of the alleged damage.

(a) This alleged damage was either done by Defendants and/or normal wear and tear for which MDOC Policy PD 04.07.112 allowed the guitar to be sent to a service entity at Plaintiff's request without holding a hearing.

70. On or about 25 JANUARY 2017: Defendant Young told Plaintiff that Young would call Plaintiff for hearing on his guitar at a later date. Plaintiff had never received Notice of Intent to hold a hearing but understands it was issued by Young. Plaintiff only responded, "I want the guitar here when you hold the hearing because SCHMELTZ and STEPHENS refused to let Plaintiff see it in the Property Room on 18 JANUARY". Young responded, "I'll call you out for the hearing". Plaintiff NEVER SAW the alleged DAMAGE nor Notice of Hearing.

71. On 25 JANUARY 2017: Defendant Christopher Young issued a Hearing Report, regarding alleged damage to Plaintiff's guitar, for an alleged NOI Hearing that never occurred. Defendant Young never brought Plaintiff's guitar to any alleged hearing. Plaintiff was surprised when he got a hearing Report without the hearing or Notice of Intent (Gr 211, 221, 222, 237, 238, 246).

72. Such failure and/or refusal of Defendants SCHMELTZ, STEPHENS and YOUNG to allow repair, for Plaintiff to see alleged damage they falsely claimed, and to produce Plaintiff's guitar as evidence at a hearing denied procedural and substantive due process to Plaintiff contrary to Constitution and MDOC Policies PD 01.01.100, PD 04.07.112 and Rule R791.3310. Mich. Const., Art. I, Secs 2, 17.

73. Aforesaid were constructive acts of said Defendants to harass, intimidate, punish, and retaliate against Plaintiff for exercise and assertion of his Constitutional/Lawful Rights in filing and pursuing grievances, letters of complaint and the Civil Rights case of NORTHINGTON v ABDELLATIF.

74. Aforesaid 17 JANUARY 2017 to MARCH 2017 wrongful actions of all Defendants was ordered by Defendants RUSSELL, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN MDOC STAFF to cause Plaintiff undue stress and, thereby, endanger his life or cause Premature Death (Gr 221). (Defendant WALLACE has caused threats, and assault and battery, on Plaintiff when he filed court actions of which one event was on 24 JUNE 1996.)

75. From 21 MARCH 2017 to JULY 2017: Defendants RUSSELL, SCHMELTZ, STEPHENS, WALLACE, WASHINGTON and WITTMAN obstructed Plaintiff's access to the JCF Prison music program while other prisoners have free and open access (Gr 222). They, thereby, discriminated against Plaintiff, contrary to the ADA, because he was and is disabled (Gr 238). He was denied use of his guitar to rehabilitate his paralyzed left arm.

C. JCF TAKING OTHER PROPERTY WITHOUT DUE PROCESS

76. From 05 MARCH 2017 to present: Defendants GRAHAM, RUSSELL, SCHMELTZ, SIMS, STEPHENS, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN MDOC STAFF refused to give Plaintiff required hearing for his legally-owned property worth about \$800 (Gr 234) which, inter alia, includes: Plaintiff's prisoner store goods (20-batteries, headphone extension cords, headphone adapters, SONY earbuds, cassette tape adapter, etc.) (Gr 224), musical accessories and sheet music papers (Gr 231).

77. These Defendants also fraudulently took Plaintiff's beard trimmer and calculator by falsely saying they were altered. They were 28-years old and had normal wear and tear from use but neither of them had been changed from the original factory design or purpose (Gr 233).

78. Aforesaid actions of Defendants violated Due Process and MDOC Policies PD 01.01.100, PD 03.03.130 and PD 04.07.112, and MDOC Rule R791.3310, and equal protection. Mich. Const., Art. I, 2, 3, 16, 17; Art. 8, Sec. 8.

D. FOURTH RETALIATORY TRANSFER:

79. On 27-28 JUNE 2018: Defendants RUSSELL, WALLACE, WASHINGTON, WITTMAN, YOUNG and/or UNKNOWN MDOC STAFF transferred Plaintiff from JCF to LCF Prison where he now resides.

80. This transfer, like the three others was not within time limits of MDOC Policy PD 05.04.140 of being within 7 days of his anniversary date of 17 JANUARY 2017 when Plaintiff arrived at JCF.

E. REFUSAL TO TRANSFER PROPERTY WITH PRISONER VIOLATING DUE PROCESS

81. From 17 JANUARY 2017 to the present: Defendants GRAHAM, RUSSELL, SCHMELTZ, SIMS, STEPHENS, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN MDOC STAFF have held Plaintiff's guitar, musical accessories needed to teach music theory class, and various prisoner store items that have nothing to do with the guitar or instrument practice, as SIMS says, "pending the outcome of your litigation" (Gr 282, 283, and EXHIBIT attached hereto). SIMS took over in place of STEPHENS around DECEMBER 2017.

82. To wit, Defendant SIMS admitted he wrongfully took and is wrongfully holding Plaintiff's typewriter, guitar, music accessories and papers, legally-owned store goods, and other property to harass, intimidate and punish Plaintiff in retaliation for Plaintiff's exercise and assertion of *his Michigan Constitutional* Rights regarding grievances, letters of complaint and ongoing medical litigation in the court(s). This is custodial coercion which has unduly affected and injured Plaintiff in the enjoyment of said rights, and caused serious deterioration in Plaintiff's emotional, mental and physical health and well-being. See attached EXHIBIT written by SIMS.

83. Whenever an MDOC prisoner is transferred from one prison ~~to~~^{to} another prison, the prisoner's property is required to be transferred with the prisoner to the new prison under MDOC Policy PD 04.07.112, § W (now § X).

84. These Defendants treated Plaintiff different than similarly situated persons.

85. These Defendants denied Plaintiff procedural and substantive due process: (a) when they failed and/or refused to follow ~~Michigan~~ State Constitutions and laws and procedures; and (b) when they violated MDOC Policies and procedures which include but are not limited to PD 01.01.100, PD 03.03.130, PD 04.07.112, PD 05.01.100 and PD 05.03.130, and MDOC Rule R791.3310. Mich. Const., Art. I, Secs. 2, 3, 13, 16, 17, 23; Art. 8, Sec. 8.

a. *This issue of refusal to transfer Plaintiff's property with him upon transfer is capable of repetition as said in paragraph 10 herein and should be forthwith enjoined for property to transfer with Plaintiff.*

86. Said taking of Plaintiff's property was done by all Defendants to harass, intimidate and punish Plaintiff for exercise and assertion of his **Constitutional/Lawful** Rights for having filed his Civil Rights Complaint in Federal Court of NORTHINGTON v ABDELLATIF, No. 2:16-cv-12931. The **court access** Right involves both due process and equal protection. Plaintiff's lawsuit is about medical treatment under the Eighth Amendment.

87. Given Plaintiff's cognitive and physical disabilities caused by multiple Heart Attacks and Stroke(s): the acts and omissions of Defendants GRAHAM, RUSSELL, SCHMELTZ, SIMS, STEPHENS, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN MDOC STAFF have subjected Plaintiff to cruel and unusual punishment contrary to **State Constitution**, violated the ADA, MCL 37.1101, et seq. and ^{They} have no immunity.

88. These Defendants, for aforesaid reasons cannot be defended by the Office of Michigan Attorney General pro bono and must hire an attorney to represent them or defend pro se for having violated MDOC Policy and State law.

FACTUAL ALLEGATIONS 7; CONCLUSION TO RETALIATORY TRANSFERS, CRUEL AND UNUSUAL PUNISHMENT AND UNDUE TAKINGS OF #3 TO #6:

89. All prior paragraphs incorporated by reference herein.

A. RETALIATORY HARASSMENT, INTIMIDATION AND PUNISHMENT BY TRANSFER AND TAKINGS

90. Michigan Constitution, Article I, Sections 2, 3, 13, 16, 17 and 23, and

MDOC Policies PD 03.03.130 and PD 05.01.140 require that no MDOC employee may harass, intimidate or punish a prisoner, or retaliate, for the prisoner's exercise of Federal or State Constitutional rights, and that screens for transfer of a prisoner from a prison may only be done within 7 days of the anniversary date of when the prisoner arrived at the prison where the prisoner then resides.

91. None of herein described four (4) transfers of Plaintiff were done within the time limits required by aforesaid Constitution, Laws and MDOC Policy (pghs. 22-24, 43-44, 47-52, 79-80).

92. The acts and omissions of Defendants ~~ABDELLATIF ADRAI~~ BURT, ~~WALLACE, WASHINGTON~~, MISETA, RUSSELL, ~~WALLACE~~ UNKNOWN MDOC STAFF, ~~WALLACE~~, WALLACE, WASHINGTON, WITTMAN and YOUNG in transferring Plaintiff, or causing him to be transferred, for exercise and assertion of his First, Eighth and Fourteenth Amendment Rights was harassment, intimidation, punishment and retaliation that cause severe emotional, mental and physical injury to Plaintiff. Plaintiff was and is terrified by said malicious, sadistic and wanton acts of Defendants done to him. 10 to 12-hour transfers in busses cause him further severe physical injury.

93. As proximate result of said Defendants' undue acts and omissions of harassment, intimidation, punishment and retaliation: (a) Plaintiff has suffered loss of at least \$3,000 worth of personal property; (b) been hospitalized with severe physical injury, pain and suffering at least four (4) times; (c) lost about \$10,000 in personal income; (d) suffered severe degradation in his emotional, mental and mental physical health and well-being; and other severe injury yet to be determined, all of which will require LIFETIME MEDICAL CARE.

B. CRUEL AND UNUSUAL PUNISHMENT

94. Article I, Sec. 16 of State Constitution prohibits cruel ~~and~~ ^{and/or} unusual punishment, deliberate indifference to serious medical needs, and Imminent Danger of further severe injury.

95. As aforesaid, Defendants' acts and omissions of transferring Plaintiff from prison to prison on 12-hour bus rides, when he should have been given 90-minute rides in a wheelchair van, caused Plaintiff severe physical injury, pain and suffering.

96. Defendants ABDELLATIF, ADRAY, BURT, ~~SMITH, GIBSON~~, MISETA, RUSSELL, ~~SMITH~~, UNKNOWN MDOC STAFF, ~~SMITH~~ WALLACE, WASHINGTON, WITTMAN and YOUNG were deliberately indifferent to Plaintiff's serious medical needs and Imminent Danger of further severe physical injury or Premature Death when they put him on multiple 3-day transfer procedures that caused him to have DVT, PE, further heart attacks and strokes, pleural effusion, and further severe injury to his heart and lungs.

C. UNDUE TAKING OF PROPERTY

97. MDOC Policy PD 04.07.112, says in relevant part:

"When a prisoner transfers between institutions (sic), all of the prisoner's personal property must be packed [and] carried separately by transportation officers pursuant to PD 04.04.135". "Any property stored for the prisoner shall also transfer with the prisoner". PD 04.07.112, § X.

"For purposes of this policy, contraband is defined as any personal property which is not specifically authorized by this policy, authorized property which is in excess of allowable limits, authorized property which has been altered, authorized property which was obtained or sent from an unauthorized source, metered envelopes that reflect tampering, and authorized property which belongs to another prisoner. Contraband also includes personal property that is no longer functional as to its intended purpose unless the item can be repaired through the institution by an approved vendor and the prisoner agrees to immediately mail the item out for repair and can pay for cost of the mailing and repair". PD 04.07.112, § DD.

"An item believed to be contraband shall be confiscated. Unless the prisoner was provided a Personal Property Receipt (CSJ-241-B) due to a property reduction resulting from an increase in custody, the prisoner shall be issued a Contraband Removal Record (CSJ-284), and ... a Notice of Intent to Conduct an Administrative Hearing (CSJ-282). ... A hearing on the Notice shall be conducted as set forth below". PD 04.07.112, § FF.

"Unless the prisoner waives the administrative hearing in writing and the prisoner and staff agree on the disposition of the property as authorized by this policy, hearing shall be conducted pursuant to Administrative Rule 791.3310 for the facility hearing officer to determine if the property is contraband and, if so, the applicable disposition of the property. The hearing officer shall not be the person who issued the Notice or, if reviewed with the prisoner prior to the hearing, the person who reviewed the Notice with the prisoner. The hearing officer shall complete an Administrative Hearing Report (CSJ-144) to document the findings made at the hearing, including the hearing officer's determination as to the disposition of the property found to be contraband. Contraband property may be disposed of only as set forth below. ... Property determined to not be contraband shall be returned to the prisoner". PD 07.07.112, § GG.

"Except for money and postage, items determined to not belong to the prisoner shall be returned to its rightful owner or, if ordered by the facility hearing officer, destroyed or donated to a charity approved by the Warden, after exhaustion of available administrative remedies unless determined by a Class II misconduct hearing to be stolen from an identified prisoner. The facility hearing officer shall take into account the circumstances involved when determining the appropriate disposition". PD 04.07.112, § KK.

98. Aforesaid takings were constructive acts of Defendants ~~GRAHAM, WALLACE, WASHINGTON, WITTMAN~~, GRAHAM, ~~WALLACE, WASHINGTON, WITTMAN~~, SCHMELTZ, SIMS, STEPHENS, YOUNG and/or UNKNOWN MDOC STAFF who were following customs, edicts, orders and/or practices of Defendants RUSSELL, WALLACE, WASHINGTON, WITTMAN and/or UNKNOWN MDOC STAFF to take Plaintiff's property as harassment, intimidation, punishment and retaliation for exercise and assertion of Mich. Const., Art. I, Sec. 2, 3, 16, 17 Rights by damaging Plaintiff's property then taking it for damage Defendants did.

99. Defendants ~~GRAHAM, WALLACE, WASHINGTON, WITTMAN~~ GRAHAM, ~~WALLACE, WASHINGTON, WITTMAN~~, RUSSELL, SCHMELTZ, SIMS, STEPHENS, WALLACE, WASHINGTON, WITTMAN, YOUNG and/or UNKNOWN MDOC STAFF denied Plaintiff procedural and substantive due process when they took his aforesaid property in violation of due process requirements of **State Constitution** and MDOC Policies PD 01.01.100, PD 03.03.130, PD 04.07.112, and Administrative Rule R791.3310.

(a) On 11 FEBRUARY 2017 with Plaintiff present: RUSSELL, WALLACE and/or WITTMAN spoke to Defendant SCHMELTZ and told her to take Plaintiff's typewriter and other property.

100. These Defendants treated Plaintiff different than similarly situated persons.

101. Contrary to aforesaid MDOC Policy PD 04.07.112, § X, Defendants GRAHAM and SIMS refused to transfer Plaintiff's property from JCF to LCF Prison, on 27-28 JUNE 2018, when Plaintiff was transferred to LCF (Gr 282, 283). Plaintiff has not seen this property since before it was delivered to JCF on 16 JANUARY 2017.

102. Therefore, these Defendants should be ordered to send Plaintiff's property, held at JCF, to him and pay Plaintiff \$10,000 in compensatory damages.

FACTUAL ALLEGATIONS 8; DENIAL OF DUE PROCESS AND EQUAL PROTECTION IN GRIEVANCE
PROCEDURE WITH INTENT TO DENY COURT ACCESS:

103. All prior paragraphs incorporated by reference herein.

104. Defendants RUSSELL, WALLACE, WASHINGTON, WITTMAN and UNKNOWN MDOC STAFF have instructed and still instruct local prison grievance coordinators to falsely reject medical grievances with intent to deny court access thereon. This is a deliberate malicious, sadistic and wanton intent to violate **Constitutional and Lawful** Rights with indifference thereto and regardless of severe injury caused thereby.

105. ~~Defendant~~^{CRR} TROUTEN deliberately did not time-stamp grievance forms when receiving or sending them. He also sent them through State ID mail to prisons that do not have ID mail with malicious, sadistic and wanton intent to cause undue delay in receiving STEP 1 Responses and in sending STEP 2 Appeal forms. TROUTEN then rejects STEP 1 grievances and STEP 2 appeals with "REJECTED - UNTIMELY" for TROUTEN'S own constructive acts of causing the delay. This is the custom, policy and practice of Defendants RUSSELL, ~~TROUTEN~~ WALLACE, WASHINGTON and WITTMAN upon whose edicts such abuses are based.

106. MDOC Policy PD 03.03.130, § G(4), in pertinent part says: "A grievance also may be rejected for any of the following reasons: (sic) 4. The grievance is filed in an untimely manner. The grievance shall not be rejected if there is a valid reason for delay; e.g., transfer". PD 03.02.130, § G(4). Mail delay is also NOT culpable to a prisoner under MDOC Policy PD 03.02.130, §§ P and S, and OP 03.02.130, §§ 26-28.

107. Plaintiff has and/or will be denied court access in ongoing and prospective MEDICAL litigation involving cruel and/or unusual punishment(s) proscribed by the *Michigan Constitution, Art. I, Secs. 2, 16, 17.*

108. Plaintiff's timely grievances in issue that TROUTEN falsely rejected, listed by number and date are: #160 (03 JUL 2016); #165 (09 JUL 2016); #169 (22 JUL 2016); #182 (15 JUL 2016); #210 (23 JAN 2016); and #215 (30 JAN 2017). TROUTEN falsely rejected these STEP 2 Appeals as "UNTIMELY" when each was returned to TROUTEN on the day each form was received by Plaintiff. Plaintiff wrote on each form, "Mailed to STEP 2 on day STEP 2 APPEAL form received by me. PD 03.02.130, G(4)". TROUTEN also did not process Plaintiff's STEP 1 grievances #168, 170 and 171 on MEDICAL issues; TROUTEN never gave Plaintiff grievance numbers which was contrary to MDOC Policy PD 03.02.130.

109. On 15 OCTOBER 2016: When Plaintiff filed a grievance on TROUTEN'S aforesaid wrongs, then TROUTEN falsely put Plaintiff on Modified Access to grievance procedure. TROUTEN then refused to give Plaintiff a *grievance form to grieve the modified access (Gr 183-215).*

110. The use of MDOC Grievance Procedure is covered by *Right to Petition*, Due Process and Equal Protection Clauses of the *Michigan Constitution, Art. I, Secs. 2, 13, 17.*

111. In 2016 through 2017: Defendants RUSSELL, WALLACE, WASHINGTON and WITTMAN were informed of TROUTEN'S aforesaid wrongs by Plaintiff but Defendants refused to correct the problem(s) when they responded to Plaintiff.

112. Defendants RUSSELL, TROUTEN, WALLACE, WASHINGTON and/or WITTMAN unduly chilled Plaintiff's exercise and assertion of his Constitutional and Lawful Rights. It was custom, policy and practice of these Defendants to deny all complaints of prisoners by stating they were investigated and found without merit.

113. Defendants RUSSELL, TROUTEN, WALLACE, WASHINGTON and/or WITTMAN were acting in their capacity as policymaker for the MDOC when they implemented the unwritten practice to deny all complaints of prisoners by stating they were investigated and found without merit.

114. Therefore, these Defendants unduly committed harassment, intimidation, and punishment and retaliation against Plaintiff to violate his due process, equal protection and Constitutional Rights and should pay \$215,000.

FACTUAL ALLEGATIONS 9; DENIAL OF MEDICAL TREATMENT WITH DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEED AND IMMINENT DANGER OF FURTHER SEVERE PHYSICAL INJURY OR PREMATURE DEATH:

115. All prior paragraphs incorporated by reference herein.

A. DELETION OF CARDIAC AND OTHER ONGOING MALADIES FROM RECORD:

116. In JUNE and JULY of 2016: Plaintiff was treated for multiple Heart Attacks, Stroke(s) and other related maladies by a non-defendant. This included CABG X3 OPEN HEART SURGERY, MASTOIDITIS and severe Hypertension near 239/108 mmHg.

117. On 08 AUGUST 2016: Without ever having seen Plaintiff, Defendant HOLMES, UNKNOWN CORIZON STAFF and/or KIRSTEIN/McINTYRE (officially for KIRSTEIN) made a false medical record saying that Plaintiff did NOT have any food allergies or Hypotensive Emergencies caused by food (Gr 232). Contrary to this, on 01 JUNE 2015, 19 JANUARY 2016 through 15 MARCH 2016, 01 to 05 JULY 2019, and other times, Plaintiff's medical record shows he has Hypotensive Emergencies caused by food where his blood pressure drops to near 50/20 mmHg and pulse to near 35 beats per minute. This is, in part, Postprandial Hypotension with daily pre-syncope and sometimes syncope. *They refused to treat medical needs of paragraphs 1-8 herein.*

118. On or about 25 AUGUST 2017: Defendant JAMSEN, UNKNOWN CORIZON STAFF and/or KIRSTEIN/McINTYRE (officially for KIRSTEIN) removed, or had removed, all references to Plaintiff having heart attacks, coronary disease and cardiovascular disease from Plaintiff's medical record (Gr 250); *done to unduly deprive the court of jurisdiction in ABDELLATIF.*

119. Defendants HOLMES, JAMSEN, KIRSTEIN/McINTYRE (officially for KIRSTEIN) and/or UNKNOWN CORIZON STAFF did these things to harass, intimidate and punish Plaintiff for exercise and assertion of First, Eighth and Fourteenth Amendment Rights in NORTHINGTON v ABDELLATIF, et al, U.S. District Court No. 2:16-cv-12931. Such fraud was a typical custom and practice of CORIZON HEALTH INC. employees when one of their associates is sued as in ABDELLATIF.

120. Said wrongful acts of Defendants HOLMES, JAMSEN, KIRSTEIN/McINTYRE (officially for KIRSTEIN) and/or UNKNOWN CORIZON STAFF were done to kill Plaintiff's representation in the ABDELLATIF case, as was once done in the prior case where COPD was removed there. It's a common practice with CORIZON STAFF to do such things with intent to deprive federal courts of jurisdiction.

121. Such acts and omissions fall under the Constitutional provision Defendants sought to harm which in this case is *Michigan Constitution, Art. I, Secs, 2, 3, 13, 16, 17 and 23.*

B. DELIBERATE INDIFFERENCE AND IMMINENT DANGER OF FURTHER SEVERE PHYSICAL INJURY

122. From JANUARY 2017 to 28 JUNE 2018, Defendants JAMSEN, KIRSTEIN/McINTYRE (officially for KIRSTEIN) and/or UNKNOWN CORIZON STAFF failed to treat Plaintiff for:

(a) Severe HYPERLIPIDEMIA which JAMSEN said was because the required non-formulary medication was more expensive than the generic formulary medications allowed by CORIZON HEALTH INC and MDOC. This caused Plaintiff to need a second Heart Surgery in JUNE 2019 because his blood pressure again got unstable, from near 50/20 mmHg to 220/101 mmHg and his coronary arteries were again blocked, like in JUNE 2016;

(b) ARRHYTHMIAS and PALPITATIONS caused largely by daily Hypotensive EMERGENCIES of Postprandial Hypotension, but sometimes food allergy (Gr 229). This untreated malady caused Plaintiff to be hospitalized from 01 to 04 JULY 2019 while at the point of IMMINENT DEATH with Hypotensive Emergency near 50/20 mmHg and pulse near 35 beats per minute;

(c) Hypertensive Emergencies causing severe BURNING ANGINA (Gr 272); and

(d) Severely painful daily NEUROPATHY that occurs every time Plaintiff rests, and related paralysis caused by 50% loss of blood flow to Plaintiff's left leg (Gr 258). Plaintiff received an EMG in DECEMBER 2018, a leg brace and MRI for this in 2019, and for the paralysis and is scheduled for long overdue surgery to cure this.

123. These fraudulent concealments of maladies by HOLMES, JAMSEN, KIRSTEIN/McINTYRE (officially for KIRSTEIN) and/or UNKNOWN CORIZON STAFF and failure to treat caused undue delay and further severe physical injury and disability to Plaintiff that subjected him to a "lingering death". From MARCH 2017 to JULY 2019, as proximate result of this, Plaintiff was terrified when his pain was at 10/10 level, and his pulse, blood pressure and **blood oxygen kept dropping to near nothing on the vital signs monitor.**

124. These Defendants were deliberately indifferent to Plaintiff's serious medical needs and Imminent Danger of further severe physical injury or Premature Death.

125. As proximate result of said Defendants' actions, Plaintiff endured and endures severe emotional, mental and physical pain and suffering and severe injury to his heart, lungs and cardiovascular system with an ever-increasing and abnormal degradation of his health and well-being with Imminent Danger of further severe physical injury and Premature Death.

(a) Therefore, Defendants HOLMES, JAMSEN, KIRSTEIN/McINTYRE (officially for KIRSTEIN) and/or UNKNOWN CORIZON STAFF have subjected Plaintiff to cruel ~~and~~ ^{and/or} unusual punishment and TORTURE contrary to **State Constitution** and failed to treat his curable disability contrary to the ADA.

CAUSES OF ACTION

COUNT 1: DENIAL OF AMERICANS WITH DISABILITY RIGHTS; DISCRIMINATION

126. All other paragraphs incorporated by reference and fully restated herein.

127. The acts and omissions of Defendants ~~ABDELATIF ADEBO~~ BURT, ~~AMBERLYN JOSEPH~~ GRAHAM, ~~ANDREW AUSTIN~~ HOLMES, JAMSEN, ~~ANDREW~~ KIRSTEIN/McINTYRE (officially for KIRSTEIN), MISETA, RUSSELL, SCHMELTZ, SIMS, STEPHENS, ~~STEPHEN A. CROWEN~~ UNKNOWN MDOC STAFF, ~~CHRISTOPHER~~ WALLACE, WASHINGTON, WITTMAN and YOUNG were done with the subjective intent, by reason of Plaintiff's disability(s), to exclude him from participation in and be denied the benefits of the services, programs, and/or activities of the MDOC and prisons where he resided, and to subject him to discrimination by Defendants said wrongful acts and omissions.

128. Defendants BURT, ~~AMBERLYN~~ RUSSELL, ~~CHRISTOPHER~~ UNKNOWN MDOC STAFF, WALLACE, WASHINGTON and WITTMAN are liable for their failure to control aforesaid Defendants of paragraph 127 when they became aware of aforesaid actions of their agents but failed to eliminate the wrongs of excluding Plaintiff from participation in and/or denying him the benefits of the services, programs, and/or activities of MDOC and the prisons where he resided, and/or the discrimination by their agents, associates and/or subordinates.

129. The acts and omissions of Defendants ~~ABDELATIF ADEBO~~ BURT, ~~AMBERLYN JOSEPH~~ GRAHAM, ~~ANDREW AUSTIN~~ HOLMES, JAMSEN, ~~ANDREW~~ KIRSTEIN/McINTYRE (officially for KIRSTEIN), MISETA, RUSSELL, SCHMELTZ, SIMS, STEPHENS, ~~CHRISTOPHER~~ UNKNOWN MDOC STAFF, ~~CHRISTOPHER~~ WALLACE, WASHINGTON, WITTMAN and YOUNG described in paragraphs 126 to 128 unduly excluded Plaintiff, by reason of his disability, from participation in and/or denied him the benefits of the services,

DECLARATION

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 15 AUG 2019 _____

Gary M. Northington
Gary M. Northington

RELIEF REQUESTED

WHEREFORE, Plaintiff Gary M. Northington Pro Se requests this Honorable Court to grant the following relief:

(a) ORDER DEFENDANTS to forthwith return to Plaintiff all of his property they are holding, including his guitar or replace it with a MARTIN OM28E, and his DM 2416 MEMORY TYPEWRITER or replace it with a laptop computer and printer;

(b) ORDER DEFENDANTS to treat the severely painful right-sided Chronic Fungal MASTOIDITIS or tumor and treat related hearing loss, the Carotid Stenosis, and provide LIFETIME MEDICAL CARE;

(c) ORDER DEFENDANTS to treat Plaintiff's vision defects, including removal of the cataracts and to provide polarized tinted spectacles; **provide replacement teeth, enforce his ADA rights, etc.;**

(d) ORDER that Defendants, et al, should transfer Plaintiff in a wheelchair van directly between prisons rather than 12-hour bus rides that cause him further severe physical injury; **during each event;**

(e) Issue judgment declaring DEFENDANTS' acts and omissions in violation of State and Federal Constitutions;

(f) An award of compensatory damages in excess of \$3,000,000;

(g) An award of punitive and exemplary damages, each in excess of \$3,000,000;

(h) Reasonable attorney fees to Plaintiff; and

(i) Any other relief deemed necessary and just.

Respectfully submitted,

Dated: 15 AUG 2019

Gary M. Northington

Gary M. Northington 193035
3510 N. Elm
Jackson, MI 49201
(517) 780-5000 email @ JPay.com

To:

LCF H/4 E2-28

From: Gary M. Nottingham 193035 27 APR 2019
and other property

You said you would send my guitar when the
court case was over, It's over, Have you sent
it yet?
GMN

~~To: James E. Sims, Property Room~~

RECEIVED

MAY 03 2019

JCF PROPERTY ROOM

Mr. Nottingham -
your property is currently
on litigation hold. When we receive
a decision we will proceed as the
decision states.

Thank you,
G. M. Abraham
& Sims

20 July 2010

From: Gary M. Northington 193035

Please send my guitar and bag of EA-28 accessories to wherever I'm transferred.
GMN



To: ~~Property Room,~~
~~Mr. Sims~~

Return to
LCF

Mr. Northington -

Your guitar is here and will stay here pending the outcome of your litigation.

C/S
7/2/10

Exhibit

Gr# 282,
p. 3

STEP I GRIEVANCE RESPONSE SUPPLEMENTAL FORM

(Use if space on the CSJ-247A is insufficient for a full response by stating on the CSJ-247A "See attached CSJ-247S")

Prisoner Last Name:	Prisoner #:	Lock/Location:	Grievance #:
Northington	625654	B1-51/Lakeland Correctional Facility	JCF-19-07-0121-3019A
Prisoner Interviewed:	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	If "NO", Reason:	Prisoner at another Facility
Extension Granted:	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	If "YES", Enter End Date:	Click or tap to enter a date.

COMPLAINT SUMMARY:

Prisoner Northington stated that multiple staff members made false statements to prevent him from receiving his guitar, which is or was being kept in the 300 Building Basement.

INVESTIGATION SUMMARY:

I emailed Grievance Coordinator C. Henry about prisoner Northington's. She informed me that prisoner Northington has filed similar grievances in the past. She also sent me copies of prisoner Northington's Administrative Hearing Report for his guitar, accessories to the guitar and a typewriter. In the reports, the guitar is listed as altered and the accessories to it were not needed by prisoner Northington because the guitar itself was considered contraband. In the report dated 1/26/17, prisoner Northington was directed to kite the property room with his choice of having the guitar sent home or destroyed. In the report dated 4/20/17, prisoner Northington stated that he wished to have the accessories to the guitar sent home. I also emailed Officer Sims who stated that the items are still in the basement of the 300 Building at G. Robert Cotton Correctional Facility.

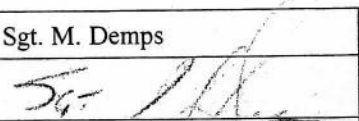
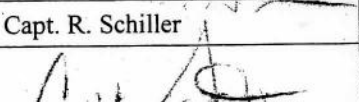
Prisoner Northington was not interviewed because he is currently housed at Lakeland Correctional Facility.

APPLICABLE POLICY, PROCEDURE, ETC.:

04.07.112 Prisoner Personal Property

DECISION SUMMARY:

Prisoner Northington's claim of false statements made by staff at Cotton Correctional Facility do not address the heart of the issue in this grievance. Ultimately the issue is that his property is being held in the basement of the 300 Building for no clear reason. Prisoner Northington was given two clear options for his guitar according to the Administrative Hearing Report dated 1/26/17: the guitar would be destroyed or sent to his outside residence along with the accessories. If there is no standing litigation, as prisoner Northington stated in his grievance, then he needs to decide which of these two options he wishes to proceed with regarding the instrument and notify the property room at Cotton Correctional. If there is pending litigation, then that litigation needs to run its course before anything else is done with the guitar and the accessories. Prisoner Northington's grievance is denied.

RESPONDENT NAME:	Sgt. M. Demps	TITLE:	CSS-1
RESPONDENT SIGNATURE:		DATE:	7/29/2019
REVIEWER NAME:	Capt. R. Schiller	TITLE:	CSS-3
REVIEWER SIGNATURE:		DATE:	7/29/2019

Distribution: Original - Step I Grievance Coordinator Copies - 3 To Grievant (1 Prisoner Copy; 1 for Step II filing; 1 for Step III filing)