

**STATE OF OREGON  
APPELLANT'S OPENING BRIEF  
CRIMINAL CASE**

IN THE SUPREME COURT FOR THE STATE OF OREGON

STATE OF OREGON

Plaintiff-Respondent,

v.

GREG MICHAEL REYNOLDS

Defendant-Appellant.

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]  
]  
]  
]

Lane County Circuit Court  
Case No. 10-93-10439

Appellate Case No. A182808

APPELLANT'S OPENING BRIEF AND EXCERPT OF RECORD

Appeal from the Judgment of the Lane County Circuit Court  
Honorable Lyle C. Velure

Greg M. Reynolds  
corbettgreg@comcast.net  
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Corbett, OR 97019-0333  
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Attorney Pro-Se since 1994

Ellen F. Rosenblum  
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Oregon Department of Justice  
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1162 Court St., NE  
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Attorneys for Plaintiff-Respondent

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## ASSIGNMENT OF ERROR.....5

The trial court erred when it denied the defendant his right to legal counsel on January 13, 1994, resulting in the defendants civil rights being violated. Defendants civil rights which are are hampered, to this day.

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## APPELLANT'S BRIEF

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### STATEMENT OF THE CASE

#### **Nature of the Proceeding**

This is a criminal case where the defendant seeks reversal of his conviction for unlawful delivery of a controlled substance to a minor in the Circuit Court of the State of Oregon for Lane County Case 10-93-10439.

#### **Indictment**

Defendant was charged by a three-count indictment with violating ORS 475.992(1), as follows:

“The above named defendant is accused by the Lane County Grand Jury of the crimes of

“\*\*\*\*

#### “COUNT 1

The defendant on or about the 12<sup>th</sup> day of November, 1993, in the county aforesaid, being over the age of eighteen (18), did unlawfully and knowingly deliver marijuana to Jose Seele, a person under the age of eighteen (18) who was at least (3) years younger than the defendant; contrary to statute and against the peace and dignity of the State of Oregon;

#### COUNT 2

The defendant on or about the 12<sup>th</sup> day of November, 1993, in the county aforesaid, being over the age of eighteen (18), did unlawfully and knowingly deliver marijuana to Skye B. Peppard, a person under the age of eighteen (18) who was at least (3) years younger than the defendant; contrary to statute and against the peace and dignity of the State of Oregon;

### COUNT 3

The defendant on or about the 12<sup>th</sup> day of November, 1993, in the county aforesaid, being over the age of eighteen (18), did unlawfully and knowingly deliver marijuana to Donald D. Reynolds, a person under the age of eighteen (18) who was at least (3) years younger than the defendant; contrary to statute and against the peace and dignity of the State of Oregon.”

### **Nature of the Judgment**

The judgment being questioned, and the ensuing guilty plea resulting from it occurred on the 13<sup>th</sup> of January 1993, when Honorable Lyle C. Velure signed an “order denying attorney”, with the defendant being indigent at the time. The defendant went on to plead guilty on the 14<sup>th</sup> of February 1994 to, COUNT 1, Manufacture and Delivery of a controlled substance-schedule 1, with COUNT 2 and COUNT 3 being dismissed. Defendant was sentenced to 36 month probation, 85.00 fine, and 260 hours of community service. This is all of the record that remains, except what defendant retains to this day. A copy of the Certificate of NOT ASSIGNING to Reporter/Transcriber is attached.

### **Jurisdiction**

This court has jurisdiction pursuant to ORS 19.205. The “Equitable Tolling” doctrine has been used to preserve jurisdiction in *D.H.M. v. Oregon Youth Authority* Case 06-143-KI (D.OR, Apr.9, 2008). Equitable Tolling was denied in *Moore v. State of Oregon* Case 6:2020-cv-00641 (D,OR,2001), however, defendant in this case can prove substantial denial of constitutional rights pursuant to 28 U.S.C § 2253(c)(2) and ORS 137.106 (1)(3). Defendant believes he can show “good cause”. And Continuing Violations Doctrine allow for allowances to time limits if constitutional rights violations can be proven to be ongoing, which the defendant can prove beyond any reasonable doubt they are continuing to the date of the authoring of this Brief. Pursuant to Rule 9.05 ORAP this Brief is being filed timely. All supported by ORS 138.650(2)(a)(A)(B).

## **Notice of Appeal**

A Notice of Appeal was file with the Trial Court on the, 23<sup>rd</sup> of October 2023, and with the Appellate Court on, Friday, December 1<sup>st</sup>, 2023 by USPS certified mail article 7016 2710 000 7746 1128.

A previous Petition for a Writ of Habeas Corpus Case 16-07-01781 (Lane County Circuit Court, 2016) was also denied.

## **Question Presented**

On or about the 13<sup>th</sup> of January 1994, when Honorable Lyle C. Velure signed the Order Denying Attorney, did he violate the defendant's rights in the following ways; defendant's right to legal counsel under the United State Constitution 6<sup>th</sup> Amendment, Oregon's Constitution Article 1, Section 2 and Section 20, ORS 135.045, 42 U.S.C. § 1983, ORS 9.160, ORS 9.320, Oregon UTCR's 5.010 and 7.010, the Equal Protection Clause as well as the Due Process Clause of the 14<sup>th</sup> Amendment, as well as rights under Title VI of the Civil Rights Act of 1964? In light of evidence post-conviction it may have violated the defendant's rights under Title II of the American's with Disabilities Act and Title IX of the Education Amendments as well.

## **Summary of Argument**

The State made clear Colorable Error of Law when it denied legal counsel the defendant, who was indigent at the time. And very possibly disabled. The State failed to consider the cases previously covered in the JURISDICTION section of this brief when it cited State of Oregon v. Hart, 188 OR App 650, 72 P3d 671 (2003). The defendant can, has previously, and will again demonstrate convincing evidence as required for ORS 138.650(2)(a)(A)(B) and 28 U.S.C. § 2253(c)(2), that this case is subject to appeal. Supported by both the Continuing Violations Doctrine and the Equitable Tolling Concept.

## **Statement of Facts**



By this appeal, the defendant challenges whether the State's argument that this case is not appealable, is in fact subject to appeal, that the exception from the time limits normally imposed are in fact extraordinary, have substantially denied the constitutional and civil rights of the defendant, are part of long pattern of abuse, and are part of clearly demonstrated error under the color of law.

As part of the defendant's Social Security Disability Case, which this case also affects, there is evidence that the defendant was removed from his parents home as a teenager due to an abuse relationship. Had the court performed the required mental health evaluations, and appointed legal counsel to and indigent defendant, there are many cases which could have been prevented. Specifically this one considering the lack of marijuana seized at the time of citations being issued. Since we have no record, this seems moot.

The defendant has tendered countless applications for pardons, lost employment opportunities, been expelled from a Master's program, found to be mentally ill, forced to pay back more than \$97,000 in student loans to spite being disabled, all connected to this case. "Fruit of the poisonous tree?" The defendant has filed complaints against State judges, Federal judges, filled BAR complaints against attorneys', and the (1) public defender he did get, T.J. Hester, tell him, "I'm not sure I quite believe you on this.". Document attached. All in effort to right this miscarriage of justice.

The State of Oregon has a long history of denying legal counsel to its most vulnerable citizens. It's front page news and I have attached a simple Google search to demonstrate the State's enormous difficulty with this. The defendant's case definitely demonstrates the lengths the State is willing to go to protect bad decisions. And by is no means an "isolated incident". How long did it take to overturn Roe v. Wade? The defendant still has some time.

This case also exemplifies the State of Oregon's current mental health disaster. Even when they have to make up mental illness to get a hold. Dr. Perry-Rose

incidentally works at the Oregon State Hospital now. Another Google Search will show the disastrous system the defendant has been subjected to as a result of this case.

### **Assignment of Error**

The trial court erred in failing to grant legal counsel to the defendant.

### **Standard of Review**

The 6<sup>th</sup> Amendment to United States Constitution, as well both the Equal Protection Clause and the Due Process Clause of the 14<sup>th</sup> Amendment, provide for legal counsel. Does this case further deny the defendant's right under Article I, Section II and Section 20 of Oregon's Constitution? The defendant has proven substantial denial of constitutional rights and this case is appealable to the Federal Courts under 28 U.S.C § 2253(c)(2).[Moore v. State of Oregon 6:2020:cv00641(D.OR.2021)] The defendant believes this case meets the standard for exception mentioned in JURISDICTION.

### **ARGUMENT**

Defendant was charged with violations of ORS 475.991(1) Unlawful Delivery of a Controlled Substance to a Minor. A Class A Felony. The defendant was nineteen years old (19) at the time, resided with the family of (1)one of the alleged victims, was on food stamps, and had no idea the difference between a felony, misdemeanor, and infraction at the time he was denied legal counsel. This was in a jurisdiction 168 miles from where he lived.

There is no doubt that hasn't changed the defendant's life. The defendant is currently seeking to get on the ballot for Oregon's 3<sup>rd</sup> Congressional District, documentation attached. In no small part because of this case. This, and future events, will probably be connected to this case through the Continuing Convictions Concept (Amtrak v. Morgan, 2002). And have opened [www.reynoldsministries.org](http://www.reynoldsministries.org) to tell the story of this case, and the cases related to it.

On a fateful November night in 1993 the defendant was going to Eugene, OR to visit an old high school friend who had moved to Eugene. The defendant's roommate

had a son, one of the alleged victims from the indictment, who had a mother lived in Creswell, OR with her new husband. Defendant was asked to take the roommate's son to Creswell while he was in Eugene. At some point in the evening someone felt it prudent to serve, "white Russian's" to all the minors and show them the movie, "Stand by Me", before smoking marijuana with them and sending them off into the night. The defendant was a minor as well and could not purchase alcohol.

The defendant was cited and released with a court date. When the defendant appeared on the 13<sup>th</sup> of January, 1994 an attorney was requested and denied by Honorable Lyle C. Velure. This is where the case should have been dismissed. Any Google Search will show Oregon's long history of this very same problem. Failing to provide adequate representation. Defendant believes the Honorable Lyle C. Velure violated Oregon Rules of Professional Conduct (RPC 1.1, and RPC 1.3) for the rules of attorneys to do their duties and act diligently. Had the application for legal counsel been reviewed per ORS 135.050, counsel would have been appointed. Documentation is part of the Appellate record. Also, had the State completed its investigation with diligence and in accordance with the law, the court may have discovered the presence of, "paranoid delusional schizophrenia" as diagnosed in Multnomah County Circuit Court Case 12-0970073. A disability which has since been deemed, "permanent and irreversible" by the State through Portland State University. See *United States v. Greg M. Reynolds*(3:14-cr-00317-mo) and *Greg M. Reynolds v. Portland State University*(3:14-cv-01733-mo). Appealed to US 9<sup>th</sup> Circuit Case 15-35618. The Social Security Administration has also issued documentation, which is attached, demonstrating that they concur and no medical review is necessary until the year 2119. This significance of all this, is that, "paranoid delusional schizophrenia" doesn't magically manifest itself at (37) years old, it would have had to be present in 1994 as well. Which means that the denial of legal representation further impeded the defendant's ability to provide adequate defense and is clear and convincing that the lack

of filing in a timely manner was not attributable to the defendant, pursuant to ORS 138.650(2). This case is also significant in that it has found its way into the defendant's student loan discharge. If this case is dismissed, it is likely the defendant will remain disabled, and likely was in 1994, should this case be overturned, it is quite likely that it will determine that this case likely caused the disability and other consequences. The Continuing Violations Doctrine holds the harms will likely continue without intervention.

### CONCLUSION

For the reasons stated above, and the extraordinary circumstances presented, defendant's conviction should be immediately reversed.

Respectfully Submitted,

 12/123

Greg M. Reynolds  
Attorney Pro-Se since 1994  
Defendant-Appellant

# EXCERPT OF RECORD

## INDEX

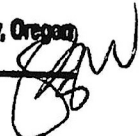
|   |             |
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\_Verified Correct Copy of Original 11/21/2023.\_

**FILED**  
AT ..... O'CLOCK ..... M

NOV 21 2023

Circuit Court For Lane County, Oregon  
BY



IN THE COURT OF APPEALS IN THE STATE OF OREGON

STATE OF OREGON,  
Plaintiff-Respondent,

Lane County Circuit Court

v.

Case 10-93-10439  
Appellate Case No. A182808

GREG MICHAEL REYNOLDS,  
Defendant-Appellant.

**CERTIFICATE OF NOT ASSIGNING  
TO REPORTER/TRANSCRIBER**

**Date Notice of Appeal Received by Trial Court:** November 17, 2023

**Date Notice of Appeal Filed:** November 13, 2023

**Date Due:** Not Assigning Transcriber

I hereby certify that a copy of the **NOTICE OF APPEAL** in the case was received by the office of the Trial Court Administrator of the Circuit Court of Lane County, attention Transcript Coordinator, on November 17, 2023. I have notified, on the date indicated, the following individuals of the notice of appeal and designation of record and the due date of the transcript.

A copy of the Notice of Appeal was forwarded to the following Court Reporter(s)/Transcriber(s)

Date Notified: November 21, 2023

Transcriber: **NOT ASSIGNING TRANSCRIBER**

Hearing dates requested but not included: 1/10/1994, 2/14/1994

Hearing dates done by court reporters and purged due to retention time schedule

No audio/transcripts available

Dated: November 21, 2023



Shawna Bush-Nankin  
Transcript Coordinator  
Lane County Circuit Court  
125 East 8<sup>th</sup> Avenue  
Eugene, Oregon 97401



\_ Verified Correct Copy of Original 11/21/2023.\_

I hereby certify that I served the enclosed Certificate of **NOT ASSIGNING** to Reporter/Transcriber on November 21, 2023 by mailing a certified true copy thereof in a sealed envelope addressed to each of the following.

Notes: **E-notifications sent as available**

State Court Administrator  
Supreme Court Building  
1163 State Street  
Salem, Oregon 97301  
[AppealsClerk@ojd.state.or.us](mailto:AppealsClerk@ojd.state.or.us)

Solicitor General  
Benjamin Gutman  
1162 Court St NE  
Salem, OR 97301  
[e-transcripts@doj.state.or.us](mailto:e-transcripts@doj.state.or.us)

Trial Court Administrator  
Lane County Circuit Court  
125 E 8th Avenue  
Eugene, OR 97401

Lane County District Attorney  
125 E 8<sup>th</sup> Ave  
Eugene, OR 97401

Transcriber – NOT ASSIGNED

Pro Se Appellant  
Greg Michael Reynolds  
PO Box 333  
Corbett, OR 97019  
[Corbettgreg@comcast.net](mailto:Corbettgreg@comcast.net)

Dated: November 21, 2023



Shawna Bush-Nankin  
Transcript Coordinator  
Lane County Circuit Court



SEARCHED INDEXED  
SERIALIZED FILED  
NOV 21 2023  
CLERK OF COURT  
LANE COUNTY  
EUGENE, OREGON



### Case Information

109310439 | State of Oregon VS. GREG MICHAEL REYNOLDS

Case Number  
109310439  
File Date  
12/20/1993

Court  
Lane  
Case Type  
Offense Felony

Case Status  
Appeal

### Party

Plaintiff  
State of Oregon

Active Attorneys ▼  
Lead Attorney  
PUGH, D MICHAEL

Defendant  
REYNOLDS, GREG MICHAEL  
DOB  
XX/XX/1973

### Charge

Charges  
REYNOLDS, GREG MICHAEL



|   | Description              | Statute  | Level          | Date       |
|---|--------------------------|----------|----------------|------------|
| 1 | Manu/Del Cntrld sub-SC 1 | 4759921A | Felony Class A | 11/12/1993 |
| 2 | Manu/Del Cntrld sub-SC 1 | 4759921A | Felony Class A | 11/12/1993 |
| 3 | Manu/Del Cntrld sub-SC 1 | 4759921A | Felony Class A | 11/12/1993 |

## Disposition Events

01/10/1994 Plea ▼

Judicial Officer

Van Rysselberghe, Pierre L

|   |                          |            |
|---|--------------------------|------------|
| 1 | Manu/Del Cntrld sub-SC 1 | Not Guilty |
| 2 | Manu/Del Cntrld sub-SC 1 | Not Guilty |
| 3 | Manu/Del Cntrld sub-SC 1 | Not Guilty |

02/14/1994 Plea ▼

Judicial Officer

Van Rysselberghe, Pierre L

|   |                          |        |
|---|--------------------------|--------|
| 1 | Manu/Del Cntrld sub-SC 1 | Guilty |
|---|--------------------------|--------|

02/15/1994 Disposition ▼

Judicial Officer

Unassigned, Judge

|   |                          |           |
|---|--------------------------|-----------|
| 1 | Manu/Del Cntrld sub-SC 1 | Convicted |
|---|--------------------------|-----------|

02/14/1994 Disposition ▼

Judicial Officer

Unassigned, Judge

|   |                          |           |
|---|--------------------------|-----------|
| 2 | Manu/Del Cntrld sub-SC 1 | Dismissed |
|---|--------------------------|-----------|

3 Manu/Del Cntrld sub-SC 1 Dismissed

02/14/1994 Sentence ▼

1 Manu/Del Cntrld sub-SC 1 Sentence

Converted Disposition

Status: Superseded on: Feb 22 1994 12:00AM re jail: begin 2-21-94 at 7:30 am

Converted Disposition

Status: Superseded on: Feb 22 1994 12:00AM Unitary Assessment \$85.00

Converted Disposition

Status: Superseded on: Feb 22 1994 12:00AM Probation to State - Month(s): 36.00

02/14/1994 Amended Clerical Revision of Sentence ▼

Amend Reason

Supersedes Previous Judgment

1 Manu/Del Cntrld sub-SC 1 Clerical Revision of Sentence

Converted Disposition

Status: Superseded on: Sep 9 1996 12:00AM re jail: begin 2-21-94 at 7:30 am \*\*to

Converted Disposition

Status: Superseded on: Sep 9 1996 12:00AM Unitary Assessment \$85.00

Converted Disposition

Status: Superseded on: Sep 9 1996 12:00AM Probation to State - Month(s): 36.00

08/20/1996 Amended Sentence - Modified ▼

Amend Reason

Supersedes Previous Judgment

1      Manu/Del Cntrl'd sub-SC 1                              Sentence - Modified

Converted Disposition

Terminating Probation

Converted Disposition

Unitary Assessment \$85.00

Converted Disposition

Probation to State - Month(s): 36.00      Terminated

## Events and Hearings

12/20/1993 Secret Indictment ▼

| Judicial Officer | Comment               |
|------------------|-----------------------|
| FOOTE, GREGORY   | Judge: GREGORY FOOTE; |

01/10/1994 Arraignment - Confidential ▼

Hearing Time  
08:40 AM

01/10/1994 Arraignment ▼

| Judicial Officer              | Comment   |
|-------------------------------|---|
| Van Rysselberghe,<br>Pierre L | Judge: Pierre L VanRysselberghe; Reporter: M JOHNSTON |

01/10/1994 Remove - Inactive Status

01/10/1994 Plea - Not Guilty ▼

| Judicial Officer              | Comment   |
|-------------------------------|---|
| Van Rysselberghe,<br>Pierre L | Judge: Pierre L VanRysselberghe; Reporter: M JOHNSTON |

01/13/1994 Order - Denying Attorney ▼

| Judicial Officer | Comment               |
|------------------|-----------------------|
| Velure, Lyle C   | Judge: Lyle C Velure; |

02/14/1994 Dismissed

02/14/1994 Plea - Guilty ▼

| Judicial Officer              | Comment   |
|-------------------------------|---|
| Van Rysselberghe,<br>Pierre L | Comment: COP-guilty; Judge: Pierre L VanRysselberghe; Reporter: H WHEELER |

02/14/1994 Judgment ▼

Comment  
Court Action: Signed; Court Action Date: 02/15/1994; Judge: Pierre L VanRysselberghe;

02/14/1994 Hearing - Pre-Trial ▼

Hearing Time

12:00 AM

Comment

Comment: 35-day notice;

02/15/1994 Convicted

02/15/1994 Sentence ▼

Judicial Officer

Van Rysselberghe,

Pierre L

Comment

Court Action: Signed; Court Action Date: 02/15/1994; Judge: Pierre L VanRysselberghe; Reporter: H WHEELER

02/15/1994 Closed

02/18/1994 Probation - Check ▼

Comment

Room: XPBX;

02/22/1994 Sentence - Clerical Revision

12/01/1994 Disposition - Printed ▼

Comment

Defendant: GREG MICHAEL REYNOLDS

08/16/1995 Order ▼

Judicial Officer

Van Rysselberghe,

Pierre L

Comment

Comment: Adding Condition No Alcohol to Def's probation; Court Action: Signed; Court Action Date: 08/16/1995; Judge: Pierre L VanRysselberghe;

09/09/1996 Modification - Sentence ▼

Judicial Officer

Van Rysselberghe,

Pierre L

Comment

Comment: Terminating Probation; Court Action: Signed; Court Action Date: 09/09/1996; Judge: Pierre L VanRysselberghe;

09/09/1996 Closed

10/23/2023 Letter ▼

Comment

Requesting to Vacate Judgment (TO KHS FOR PVR)

11/06/2023 Letter ▼

Comment  
 Re: Motion to Vacate Judgment (TO KHS)

11/07/2023 Order - Denial ▼

|                  |                                   |
|------------------|-----------------------------------|
| Judicial Officer | Comment                           |
| Shugar, Kamala H | Def't's motion to vacate judgment |

11/17/2023 Notice - Appeal ▼

Comment  
 No COA case# yet

11/17/2023 Application - Fee Deferral Waiver ▼

Comment  
 for purposes of appeal, original filed with COA

11/21/2023 Assignment - Transcriber ▼

Comment  
 A182808 NOT assigning transcriber, no hearings available, for purposes of appeal

11/27/2023 Order - Dismissal ▼

|                              |                          |
|------------------------------|--------------------------|
| Judicial Officer             | Comment                  |
| Authority,<br>Administrative | A182808 Appeal dismissed |

### Financial

REYNOLDS, GREG MICHAEL

|                            |          |
|----------------------------|----------|
| Total Financial Assessment | \$145.00 |
| Total Payments and Credits | \$145.00 |

|           |                        |                   |         |          |
|-----------|------------------------|-------------------|---------|----------|
| 2/18/1994 | Transaction Assessment |                   |         | \$85.00  |
| 2/15/2001 | Counter Payment        | Receipt # 1775504 | UNKNOWN | (\$3.00) |
| 1/31/2006 | Counter Payment        | Receipt # 2106408 | UNKNOWN | (\$0.25) |

## Details

|            |                        |                   |         |           |
|------------|------------------------|-------------------|---------|-----------|
| 11/8/2010  | Counter Payment        | Receipt # 2487149 | UNKNOWN | (\$17.00) |
| 11/8/2010  | Transaction Assessment |                   |         | \$10.25   |
| 11/8/2010  | Counter Payment        | Receipt # 2487177 | UNKNOWN | (\$10.25) |
| 12/23/2010 | Counter Payment        | Receipt # 2497467 | UNKNOWN | (\$18.00) |
| 7/31/2014  | Transaction Assessment |                   |         | \$11.50   |
| 7/31/2014  | Counter Payment        | Receipt # 2798696 | UNKNOWN | (\$11.50) |

IN THE COURT OF APPEALS OF THE STATE OF OREGON

STATE OF OREGON,  
Plaintiff-Respondent,

v.

GREG MICHAEL REYNOLDS,  
Defendant-Appellant.

Lane County Circuit Court No. 109310439

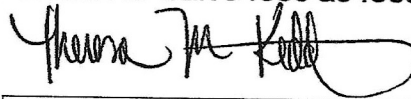
Court of Appeals No. A182808

**ORDER OF DISMISSAL**

On November 13, 2023, appellant filed a notice of appeal from an order denying a motion to vacate judgment that was entered in the trial court on November 7, 2023. An order in a criminal case denying a motion to correct or amend a judgment is not appealable. *State v. Hart*, 188 Or App 650, 72 P3d 671 (2003). Therefore, the court dismisses the appeal on its own motion.

Appeal dismissed.

The court takes no action on appellant's motion to waive fees as fees are not required in this case type.



THERESA M. KIDD  
APPELLATE COMMISSIONER  
11/27/2023 5:04 PM

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**DESIGNATION OF PREVAILING PARTY AND AWARD OF COSTS**

Prevailing party: Respondent

[ X ] No costs allowed

---

c: Greg Michael Reynolds  
Benjamin Gutman  
Lane County Transcript Coordinator

knt

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**ORDER OF DISMISSAL**

REPLIES SHOULD BE DIRECTED TO: State Court Administrator, Records Section,  
Supreme Court Building, 1163 State Street, Salem, OR 97301-2563  
Page 1 of 1



IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR LANE COUNTY  
LANE COUNTY COURTHOUSE  
125 East Eighth, Eugene, Oregon 97401  
(541) 682-4020

February 12, 2007

GREG MICHAEL REYNOLDS  
35612 SE MACINNES RD  
CORBETT OR 97019-9657

Reynolds Greg Michael/State Of Oregon  
Case#: 160701781 C Civil Habeas Corpus

NOTICE OF ENTRY OF JUDGMENT  
NOT DOCKETED

A Judgment was entered in the register of the Court in the above-noted case on February 9, 2007.

Judgment Dismissal General  
was NOT docketed in the circuit Court judgment docket.

This notice is sent in accordance with ORCP 70B.

Note: Docketing a judgment in the circuit court judgment docket is necessary for purposes of creating a lien on real property when there is a judgment for the payment of money.

# Social Security Benefit Information

From: SOCIAL SECURITY ADMINISTRATION

Refer To: XXX-XX-9915

17925 SE Division St  
Portland, OR 97236  
Date: March 8, 2023

GREG M REYNOLDS  
PO BOX 333  
CORBETT OR 97019-0333

You requested the attached Benefits Planning Query (BPQY). The BPQY includes information about an individual's:

- Disability cash payment;
- Health Insurance;
- Scheduled medical reviews; and
- Work history

The BPQY can help plan a successful return to work. For information on how work may affect an individual's benefits and our work incentive programs, request a copy of our free pamphlet, **Working While Disabled-How We Can Help (SSA Publication Number 05-10095)** or the **Red Book**, a summary guide to our employment support programs for persons with disabilities. Both of these publications are available online at [www.ssa.gov/pubs/EN-05-10095.pdf](http://www.ssa.gov/pubs/EN-05-10095.pdf) or [www.ssa.gov/redbook](http://www.ssa.gov/redbook). Also, these publications include information about the Ticket to Work program, which can help you work or increase your earnings. To learn more, call 1-866-968-7842 (TTY 1-866-833-2967) or visit [www.ssa.gov/work/](http://www.ssa.gov/work/).

## Suspect Social Security Fraud?

If you suspect Social Security fraud, please visit <https://oig.ssa.gov/report/> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101)

## Need more help?

1. Visit [www.ssa.gov](http://www.ssa.gov) for fast, simple, and secure online service.
2. Call us at 1-800-772-1213, weekdays from 8:00 am to 7:00 pm. If you are deaf or hard of hearing call TTY 1-800-325-0778. Please mention this letter when you call.

Social Security Administration

# Benefits Planning Query (BPQY)

Confidential Social Security Data

Name: GREG M REYNOLDS

SSN: XXX-XX-9915

|                               | Social Security Disability Insurance<br>(SSDI) | Supplemental Security Income<br>(SSI) |
|-------------------------------|--|---------------------------------------|
| <b>RECORD</b>                 | See Below                                      | See Below                             |
| <b><u>CASH</u></b>            |  |                                       |
| Type of Benefit               | Disabled Worker                                | Disabled Individual                   |
| Current Status                | Denied Claim - Medical Denial                  | Current Pay                           |
| Statutory Blindness           |  | No                                    |
| Date of Disability Onset      |  | 07/26/12                              |
| Date of Entitlement           |  | 07/12                                 |
| Full Amount                   | \$0.00   | \$914.00                              |
| Net Amount                    | \$0.00   | \$914.00                              |
| Others Paid On This Record    | No   | No                                    |
| Total Family Cash Benefit     | \$0.00   | Not Applicable                        |
| Overpayment Balance           | \$0.00   | None                                  |
| Monthly Amount Withheld       | \$0.00   |                                       |
| <b><u>MEDICAL REVIEWS</u></b> |  |                                       |
| Next Medical Review           |  | 08/01/19                              |
| Medical Re-exam Cycle         |  | 3+ years                              |
| <b><u>REPRESENTATION</u></b>  |  |                                       |
| Representative Payee          |  | No                                    |
| Authorized Representative     |  | No                                    |

# Benefits Planning Query (BPQY)

Confidential Social Security Data

Name: GREG M REYNOLDS

SSN: XXX-XX-9915

## HEALTH INSURANCE

## MEDICARE

## MEDICAID

Type

PART A

PART B

State determination

Start

Stop

Buy-In

No

No

## SSI WORK EXCLUSIONS

Blind Work Expenses

Impairment Related Work Expenses

Student Earned Income Exclusions

PASS Exclusion

## SSDI WORK ACTIVITY

Trial Work Months

Start:

End:

Used:

Month of Cessation

Current SGA Level

Last Work Review Action

## DEMONSTRATION PROJECT INFORMATION

None

## SSI Recorded Earnings (Monthly)

Month Earnings Month Earnings

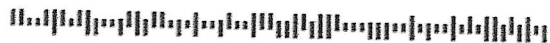
## Posted SSDI Monthly Earnings (Last Five Years)

# Social Security Administration

## Important Information

Western Program Service Center  
P.O. Box 2000  
Richmond, California 94802-1791  
Date: October 5, 2023  
BNC#: 23D2853C46477

# 000004121 I=000000 CDR 2 0927



4117 1AB 0.534



GREG MICHAEL REYNOLDS  
PO BOX 333  
CORBETT, OR 97019-0333

We sent you a letter telling you that we were going to review your disability case. However, we do not need to review your case at this time. Therefore, we will not contact your doctor now. We will keep any information that you have given us.

We will contact you later if we need to review your case.

### Things To Remember

It is important that you report changes right away. Be sure to tell us about any of the following changes:

- You return to work.
- Your job, pay or work expenses change, if you are working now.
- Your doctor says your health is better.
- Your income or resources change.

### Suspect Social Security Fraud?

Please visit <http://oig.ssa.gov/r> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

### If You Have Questions

#### Need more help?

1. Visit [www.ssa.gov](http://www.ssa.gov) for fast, simple, and secure online service.
2. Call us at 1-800-772-1213, weekdays from 8:00 am to 7:00 pm. If you are deaf or hard of hearing, call TTY 1-800-325-0778. Please mention this letter when you call.

See Next Page

0.436 oz 76523-001-04222411 0004121 0008241 I=000000



01014UOQJ00037NOTAFPX3PHCDRNOT.PCS.R23027.PAM

61000000

0029010356072075469701003333

3. You may also call your local office at 1-866-331-6402.

SOCIAL SECURITY  
17925 SE DIVISION ST  
PORTLAND, OR 97236

**How are we doing?** Go to [www.ssa.gov/feedback](http://www.ssa.gov/feedback) to tell us.

*Social Security Administration*

FEDERAL PUBLIC DEFENDER  
DISTRICT OF OREGON

LISA C. HAY  
Federal Public Defender  
STEPHEN R. SADY  
Chief Deputy Defender  
Bryan E. Lessley ▲  
Craig Weirnerman ▲  
Mark Bennett Weintraub ▲  
Gerald M. Needham  
Thomas J. Hester  
Ruben L. Iñiguez  
Anthony D. Bornstein  
Susan Russell  
Francesca Freccero  
C. Renée Manes  
Neil Brown  
Kristina Hellman  
Fidel Cassino-DuCloux  
Alison M Clark  
Brian Butler +

101 SW Main Street, Suite 1700  
Portland, OR 97204  
503-326-2123 / Fax: 503-326-5524

Branch Offices:

859 Willamette Street  
Suite 200  
Eugene, OR 97401  
541-465-6937  
Fax: 541-465-6975

15 Newtown Street  
Medford, OR 97501  
541-776-3630  
Fax: 541-776-3624

Thomas E. Price  
Michelle Sweet  
Mark Ahlemeyer  
Susan F. Wilk  
Oliver W. Loewy  
Elizabeth G. Daily  
Conor Huseby  
CeCelia E. Valentine  
Jessica Snyder ★  
Lisa Ma ★

*In Memoriam*  
Nancy Bergeson  
1951 - 2009

▲ Eugene Office  
+ Medford Office

★ Research/Writing Attorney

July 24, 2017

VIA EMAIL: [pacificgreg@gmail.com](mailto:pacificgreg@gmail.com)

Re: *United States v. Reynolds*  
No. 3:14-cr-00317-MO-1

Dear Mr. Reynolds:

As you know, I received your message last Friday to which I responded with a phone call and voicemail message. I have also received your two messages to this office from this morning. Pursuant to your general request left on the office voicemail, you will find a copy of the full discovery file received from the government in your case.

In your message, you indicated there are personal problems between us, and I should not be your lawyer. I want to stress I have not been your lawyer for quite a long time. You also said you had been advised to appeal your conviction. The time for filing a notice of appeal has long since run. There is also a one-year statute of limitations that generally applies to a claim of ineffective assistance of counsel (these are claims under 28 U.S.C. § 2255). Nevertheless, if you wish to try to raise a claim that I did not represent you properly, I believe that is the appropriate mechanism for you to do so. Although, under these circumstances, you shouldn't look for legal advice from me.

Once again, I am not your lawyer, and I have not been since your sentencing on the underlying criminal case.

Sincerely,



Thomas J. Hester  
Assistant Federal Public Defender

TJH/tlr  
Attachments



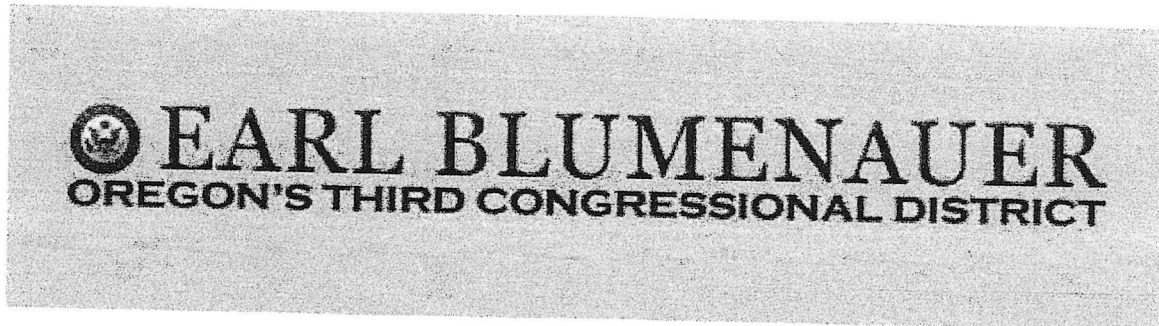
Greg Reynolds <greynolds73@gmail.com>

**Congressional Assistance [CASE#:00504061-74463]**

1 message

**Congressman Earl Blumenauer** <or03ebinbox@mail.house.gov>  
Reply-To: Congressman Earl Blumenauer <or03ebinbox@mail.house.gov>  
To: greynolds@portlandstate.org

Fri, May 17, 2013 at 10:54 AM



May 17, 2013

Greg Reynolds  
PO Box 333  
Corbett, OR 97019

Dear Greg Reynolds,

Thank you for contacting my office to request assistance. My staff would be happy to see if we can assist you with your inquiry.

You will need to fill out and return to my Portland office the enclosed Privacy Release Form which is required by all government agencies to exchange information with my office. Please also include any pertinent information that would assist in looking into your case.

Please contact Emily Hebbbron on my staff if you have any further questions. Her email address is emily.hebbbron@mail.house.gov and her phone number is 503-231-2300. The Portland office address is:

729 NE Oregon St., Suite 115  
Portland, Oregon, 97232

Thank you again for your letter. I look forward to hearing from you.

Sincerely,



# Candidate Filing

Individual Electors-Nonaffiliated

SEL 114

rev 09/23

ORS 249.705, ORS 249.740

## 2024 General Election Filing Dates

Candidate Filing

June 5, 2024 to August 27, 2024

Voters' Pamphlet Filing

July 8, 2024 to August 27, 2024

Nomination Withdrawal

August 30, 2024

**i** All information must be completed or the form will be rejected.

## Filing Information

This filing is an

Original

Amendment

## Office Information

Filing for Office of: US House of Representatives

District, Position or County: Oregon's 3rd District

Prospective Petition

Some circulators may be paid

Yes

No

## Name of Chief Sponsor

First

MI

Last

Suffix

Greg

M

Reynolds

## Candidate Information

### Name of Candidate

First

MI

Last

Suffix

Greg

M

Reynolds

How you would like your name to appear on the ballot

Greg M. Reynolds

## Candidate Residence / Route Address

Street Address

City

State

Zip

County

35612 SE MacInnes Rd.

Corbett

OR

97019

Multnomah

Candidate Mailing Address and Contact Information Only one phone number and an email is required.

Street Address or PO Box

City

State

Zip

PO Box 333

Corbett

OR

97019-0333

Work Phone

Home Phone

Cell Phone

Fax

971-220.3869

Email Address

Web Site, if applicable

corbettgreg@comcast.net

www.reynoldsministries.org

## Race and Ethnicity Optional

White

Occupation (present employment) If not employed, enter "Not Employed".

Political Activist and Civil Rights Attorney Pro-Se.

**Occupational Background (previous employment)** If no relevant experience, None or NA must be entered.

Textron Financial Corporation, CIMCO Insurance Corporation, Portland State University, The Home Depot.

**Educational Background (schools attended)**

| Complete Name of School   | Last Grade Completed | Diploma/Degree/Certificate | Course of Study |
|---------------------------|----------------------|----------------------------|-----------------|
| Portland State University | 17                   |                            | MS Education    |
| Portland State University | 16                   | BS                         | BS Bus. Admin.  |
| Rogue Community College   | 12                   | GED                        | General Ed.     |

**Educational Background (other)** Attach a separate sheet if necessary.

**Prior Governmental Experience (elected or appointed)** If no relevant experience, None or NA must be entered.

**Campaign Finance Information** Not applicable to candidates for federal office.

A candidate must file a Statement of Organization not later than three business days of first receiving a contribution or making an expenditure and no later than the deadline for filing a nominating petition, declaration of candidacy, or certificate of nomination, whichever occurs first, unless they meet the criteria for an exemption. To meet the criteria, the candidate must serve as their own treasurer, not have an existing candidate committee, and not expect to spend or receive more than \$750 during the entire calendar year (including in-kind contributions and personal funds).

If you have an existing candidate committee you must amend the statement of organization not later than 10 days after a change in information. This includes changes to the election you are active in and the office you are running for.

See the Campaign Finance Manual for the procedural and legal requirements of establishing and maintaining a candidate committee.

**Candidate Attestation**

By signing this document, I hereby state that:

- I will accept the nomination for the office indicated above;
- I will qualify for said office if elected;
- If nominated for a partisan office, I am not, and have not been, a member of a political party since February 29, 2024 and
- All information provided by me on this form is true to the best of my knowledge.

**Warning**  
Supplying false information on this form may result in conviction of a felony with a fine of up to \$125,000 and/or prison for up to 5 years. (ORS 260.715). A person may only file for one lucrative office or not more than one precinct committee person at the same election. Unless the person has withdrawn from the first filing, all filings are invalid. (ORS 249.013 and ORS 249.170)

  
Candidate Signature

12/1/2023  
Date

Chief Sponsor Signature

Date


**CERTIFICATION OF COMPLIANCE  
WITH BRIEF LENGTH AND TYPE SIZE REQUIREMENTS**

Brief Length

I certify that (1) this brief complies with the word-count limitation in ORAP 5.05(2)(b) and (2) the word count of this brief (as described in ORAP 5.05(2)(a)) is 1,935 words.

Type Size

I certify that the size of the type in this brief is not smaller than 14 point for both the text of the brief and footnotes as required by ORAP 5.05(2)(d)(ii) and 5.05(4)(g).

  
Greg M. Reynolds  
Attorney Pro-Se since 1994  
Defendant-Appellant

12/1/2023

## PROOF OF SERVICE

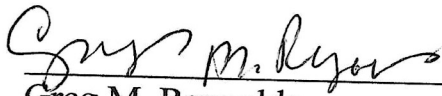
I certify that on the 1<sup>st</sup> day of December, 2023 the original foregoing Defendant-Appellant's Brief was deposited in the United States Post Office at Corbett, Oregon, with Certified, Return Receipt requested, postage paid article number 7016 2710 0000 7746 1128, thereon addressed to:

Appellate Court Administrator  
Appellate Courts Records Section Records Section  
Supreme Court Building  
1163 State Street  
Salem, OR 97301-2563  
AppealsClerk@ojd.state.or.us

I further certify that on the 1<sup>st</sup> day of December, 2023 two (2) copies of the foregoing Defendant-Appellant Brief were deposited in the United States Post Office at Corbett, Oregon, with first class postage prepaid thereon addressed to:

Solicitor General  
Benjamin Gutman  
1162 Court St. NE  
Salem, OR 97301  
e-transcripts@doj.state.or.us

Lane County District Attorney  
125 E. 8<sup>th</sup> Ave.  
Eugene, OR 97401

 12/11/2023  
Greg M. Reynolds  
Attorney Pro-Se since 1994  
Defendant-Appellant