

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,
Plaintiff,

CASE NO. 2018-CA-010270-O

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,
Defendants.

PLAINTIFF WILLIAM M. WINDSOR’S VERIFIED MOTION
TO DISQUALIFY JUDGE JEFFREY L. ASHTON AND
VERIFIED MOTION TO RECUSE JUDGE JEFFREY L. ASHTON

Comes Now, William M. Windsor (“Windsor” or “Plaintiff”), and asks that Jeffrey L. Ashton (“Judge Ashton”) be disqualified from the above-entitled matter or recused from the above-entitled matter due to the following;

- a. Oath of Office,
- b. The United States Constitution,
- c. The Due Process Clause of the Fifth Amendment to the U.S. Constitution,
- d. Florida Statute Section 876.05,
- e. The First, Fifth, Sixth, Eighth, and Fourteenth Amendments to the United States Constitution,
- f. The Constitution of the State of Florida,
- g. Chapter 13 of the United States Bankruptcy Code,
- h. Florida Statute 38.10,
- i. Florida Statute 90.604,
- j. Florida Statute 90.605,

- k. Florida Statute 90.802,
- l. Florida Statute 90.957,
- m. Florida Statute 92.525,
- n. Florida Rules of Judicial Administration Rule 2.160,
- o. Florida Rules of Judicial Administration Rule 2.330,
- p. Florida Rules of Judicial Administration Rule 2.515,
- q. Administrative Order 2012-03,
- r. Canon 1 of the Code of Judicial Conduct,
- s. Canon 2 of the Code of Judicial Conduct,
- t. Canon 2 (A) of the Code of Judicial Conduct,
- u. Canon 2 (B) of the Code of Judicial Conduct,
- v. Canon 3 of the Code of Judicial Conduct,
- w. Canon 3 (B) (1) of the Code of Judicial Conduct,
- x. Canon 3 (B) (2) of the Code of Judicial Conduct,
- y. Canon 3 (B) (3) of the Code of Judicial Conduct,
- z. Canon 3 (B) (4) of the Code of Judicial Conduct,
- aa. Canon 3 (B) (5) of the Code of Judicial Conduct,
- bb. Canon 3 (B) (7) of the Code of Judicial Conduct,
- cc. Canon 3 (B) (8) of the Code of Judicial Conduct,
- dd. Canon 3 (B) (9) of the Code of Judicial Conduct,
- ee. Canon 3 (C) (1) of the Code of Judicial Conduct,
- ff. Canon 3 (C) (2) of the Code of Judicial Conduct,
- gg. Canon 3 (D) (1) of the Code of Judicial Conduct,

- hh. Canon 3 (D) (2) of the Code of Judicial Conduct,
- ii. Canon 3 (E) (1) of the Code of Judicial Conduct,
- jj. Canon 4 of the Code of Judicial Conduct;
- kk. and all other relevant statutory and state and federal case law, as well as the Court's inherent powers.

Based upon this Verified Motion to Disqualify, the Verified Motion to Recuse; the Affidavit of Prejudice, and the Certificate that the Motion to Disqualify is filed in Good Faith, Windsor moves for recusal and/or disqualification of Judge Jeffrey L. Ashton from all further proceedings in this case or any other case involving William M. Windsor. (“THIRD MOTION TO DISQUALIFY”) [EXHIBIT 1288].

INTRODUCTION

1. Judge Jeffrey L. Ashton may have set a new record for the greatest number of violations in a Motion to Disqualify or Recuse. Everything he has done has been due to his prejudice and bias. He has even destroyed evidence, and Windsor has filed criminal charges against him in Orange County, Florida with the Orange County Sheriff's Department – Case Number 23-15214.

2. There are 28 grounds for him to remove himself. In responding to this Motion, Judge Jeffrey L. Ashton must respond to each of the 28.

LEGAL REQUIREMENTS FOR DISQUALIFICATION

3. Specific laws and statutes provide for disqualification of a judge by law without any special requirements. Florida Statute §38.10 provides litigants with the substantive right to

seek disqualification of trial judges with a specific set of requirements. (*Wickham v State*, 998 So. 2d 593, 596 (Fla. 2008); *Pasteur Medical Center, Inc. v. Wellcare of Florida, Inc.*, 943 So. 2d 144, 146-47 (Fla. 3d D.C.A. 2006).

4. Disqualification of judge by law.

- a. Oath of Office,
- b. The United States Constitution,
- c. The First, Fifth, Sixth, Eighth, and Fourteenth Amendments to the United States Constitution,
- d. The Due Process Clause of the Fifth Amendment to the U.S. Constitution,
- e. The Constitution of the State of Florida.

5. Recusal by Florida Statute §38.10.

- a. All 28 of the grounds apply to a judge's decision on a motion for recusal.

FACTUAL ARGUMENT

6. The factual background in this case is recited in the Affidavit of Prejudice (“AFFIDAVIT OF PREJUDICE 3/17/2023”) and the exhibits identified therein. The APPENDIX is provided on a Flash Drive that is either enclosed or sent in a separate envelope. Each document is numbered 100 to 4090. There are many documents not referenced herein, but some of these could be of interest. The Flash Drive contains virtually every document the Plaintiff has thus far accumulated in the six years since he was disabled by the Defendants. EXHIBIT 1289 is a list of all the documents in chronological order. EXHIBIT 1290 is a list of all the documents in alphabetical order by the “Description” field. EXHIBIT 1291 is a list of all the documents in numerical order by the Exhibit Number.

**GROUNDS FOR RESIGNATION, REMOVAL, RECUSAL,
AND/OR DISQUALIFICATION**

**GROUND #1 – JUDGE JEFFREY L. ASHTON WILL BE A MATERIAL
WITNESS IN THIS CASE, AND HE IS DISQUALIFIED AS A JUDGE
PURSUANT TO CANON 3 (E) (1).**

7. Judge Jeffrey L. Ashton has been notified that he will be a material witness in this case. [EXHIBIT 4013.] The Complaint in 2018-CA-010270-O [EXHIBIT 1172] includes two causes of action for “Intentional Infliction of Emotional Distress.” Judge Jeffrey L. Ashton is a key witness.

**GROUND #2 – JUDGE JEFFREY L. ASHTON HAS VIOLATED HIS OATH
OF OFFICE, AND HE IS DISQUALIFIED AS A JUDGE PURSUANT TO
CANON 3 (E) (1).**

8. Judge Jeffrey L. Ashton has violated his Oath of Office.

9. **876.05 Public employees; oath.**

(1) All persons who now or hereafter are employed by or who now or hereafter are on the payroll of the state, or any of its departments and agencies, subdivisions, counties, cities, school boards and districts of the free public school system of the state or counties, or institutions of higher learning, except candidates for federal office, are required to take an oath before any person duly authorized to take acknowledgments of instruments for public record in the state in the following form:

I, , a citizen of the State of Florida and of the United States of America, and being employed by or an officer of and a recipient of public funds as such employee or officer, do hereby solemnly swear or affirm that I will support the Constitution of the United States and of the State of Florida. [EXHIBIT 3012.]

10. Judge Jeffrey L. Ashton has violated the Constitutions repeatedly.

**GROUND #3 – JUDGE JEFFREY L. ASHTON HAS VIOLATED FLORIDA
STATUTE SECTION 876, AND HE IS DISQUALIFIED AS A JUDGE.**

11. Judge Jeffrey L. Ashton has committed crimes. He intentionally gave a false oath.

12. Florida Statute Section 876 is a criminal law statute. **“CRIMINAL ANARCHY, TREASON, AND OTHER CRIMES AGAINST PUBLIC ORDER.”**

876.05 Public employees; oath.

(1) All persons who now or hereafter are employed by or who now or hereafter are on the payroll of the state, or any of its departments and agencies, subdivisions, counties, cities, school boards and districts of the free public school system of the state or counties, or institutions of higher learning, except candidates for federal office, are required to take an oath before any person duly authorized to take acknowledgments of instruments for public record in the state in the following form:

I, , a citizen of the State of Florida and of the United States of America, and being employed by or an officer of and a recipient of public funds as such employee or officer, do hereby solemnly swear or affirm that I will support the Constitution of the United States and of the State of Florida. [EXHIBIT 3012.]

876.08 Penalty for not discharging. Any governing authority or person, under whom any employee is serving or by whom employed who shall knowingly or carelessly permit any such employee to continue in employment after failing to comply with the provisions of ss. 876.05-876.10, shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 or s. 775.083.

876.10 False oath; penalty. If any person required by the provisions of ss. 876.05-876.10 to execute the oath herein required executes such oath, and it is subsequently proven that at the time of the execution of said oath said individual was guilty of making a false statement in said oath, he or she shall be guilty of perjury.

Florida Statute 38.10 Disqualification of judge for prejudice. Whenever a party to any action or proceeding makes and files an affidavit stating fear that he or she will not receive a fair trial in the court where the suit is pending on account of the prejudice of the judge of that court against the applicant or in favor of the adverse party, the judge shall proceed no further, but another judge shall be designated in the manner prescribed by the laws of this state for the substitution of judges for the trial of causes in which the presiding judge is disqualified. Every such affidavit shall state the facts and the reasons for the belief that any such bias or prejudice exists and shall be accompanied by a certificate of counsel of record that such affidavit and application are made in good faith.

13. EXHIBIT 1292 is Windsor's AFFIDAVIT OF PREJUDICE 03/17/2023. It contains evidence.

14. This disqualification motion is "legally sufficient."

15. Judge Jeffrey L. Ashton has been identified as a witness in the case and is likely to be a material witness in the proceeding. This disqualifies him as a judge. [EXHIBIT 4013.] CANON 3 (D) (1) (IV).] [EXHIBIT 1297.]

16. Canon 3 (D) (1): A judge shall disqualify himself or herself in a proceeding in which the judge's impartiality might reasonably be questioned, including but not limited to instances where: (iv) is to the judge's knowledge likely to be a material witness in the proceeding.

**GROUND #4 -- JUDGE JEFFREY L. ASHTON VIOLATED THE
CONSTITUTIONAL RIGHTS OF WINDSOR, WHICH CLEARLY
DISQUALIFIES HIM AND ESTABLISHES HIS BIAS.**

17. Judge Jeffrey L. Ashton has violated Windsor's Constitutional rights. This violates his Oath of Office and should be considered a mortal sin by someone pretending to be a judge.

18. The Constitutional right to self-representation should be enjoyed without fear of harassment or judicial prejudice. Furthermore, no law, regulation, or policy should exist to abridge or surreptitiously extinguish that right. Theoretically, *Pro Se* Litigants have no less of a right to effective due process as those who utilize an attorney.

19. The Due Process Clause entitles a person to an impartial and disinterested tribunal in both civil and criminal cases. This requirement of neutrality in adjudicative proceedings safeguards the two central concerns of procedural due process, the prevention of unjustified or mistaken deprivations and the promotion of participation and dialogue by affected individuals in the decision-making process. See *Carey v. Piphus*, 435 U.S. 247, 259-262, 266-267 (1978). The neutrality requirement helps to guarantee that life, liberty, or property will not be taken on the basis of an erroneous or distorted conception of the facts or the law. See *Matthews v. Eldridge*, 424 U.S. 319, 344 (1976). At the same time, it preserves both the appearance and reality of fairness, 'generating the feeling, so important to a popular government, that justice has been done,' *Joint Anti-Fascist Committee v. McGrath*, 341 U.S. 123, 172, (1951) (Frankfurter, J., concurring), by ensuring that no person will be deprived of his interests in the absence of a proceeding in which he may present his case with assurance that the arbiter is not predisposed to find against him. *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242 (1980).

20. Canon 3E, Fla. Code Jud. Conduct, and Rule 2.160, Fla. R. Jud. Admin., mandate that a judge disqualify himself in a proceeding “in which the judge’s impartiality might reasonably be questioned.” The disqualification rules require judges to avoid even the appearance of impropriety: It is the established law of this State that every litigant is entitled to nothing less than the cold neutrality of an impartial judge. It is the duty of the court to scrupulously guard this right of the litigant and to refrain from attempting to exercise jurisdiction in any manner where his qualification to do so is seriously brought into question. The exercise of any other policy tends to discredit and place the judiciary in a compromising attitude which is bad for the administration of justice. *Crosby v. State*, 97 So.2d 181 (Fla. 1957); *State ex rel. Davis v. Parks*, 141 Fla. 516, 194 So. 613 (1939); *Dickenson v. Parks*, 104 Fla. 577, 140 So. 459 (1932); *State ex rel. Mickle v. Rowe*, 100 Fla. 1382, 131 So. 3331 (1930).

21. For due process and to secure Constitutional rights judges may not take the law into their own hands. But this is precisely what Judge Jeffrey L. Ashton has done. He has ignored the law, ignored the facts, and claimed laws and rules provide something they do not provide, while abusing and disadvantaging Windsor.

22. Judge Jeffrey L. Ashton has lied and demeaned Windsor in open court hearings. It’s as if he never read the Code of Judicial Conduct or the Bible.

23. For due process to be secured, the laws must operate alike upon all and not subject the individual to the arbitrary exercise of governmental power. (*Marchant v. Pennsylvania R.R.*, 153 U.S. 380, 386 (1894).) Judge Jeffrey L. Ashton has violated Windsor’s rights by using his power to inflict his bias.

24. For due process, Windsor has the right to protections expressly created in statute and case law. Due process allegedly ensures the government will respect all of a person’s legal

rights and guarantee fundamental fairness. Judge Jeffrey L. Ashton violated Windsor's rights by using his power to ignore facts and the law.

25. Due process requires an established course for judicial proceedings designed to safeguard the legal rights of the individual. Action denying the process that is "due" is unconstitutional. Inherent in the expectation of due process is that the judge will abide by the rules. Judge Jeffrey L. Ashton has interfered with the process and violated rules for the purpose of damaging Windsor.

26. An inherent Constitutional right is the honesty of the judge. Judge Jeffrey L. Ashton has not been honest. He has violated Canons 1, 2, 3, and 4 of the Code of Judicial Conduct. He's a friggin liar!

27. Due process guarantees basic fairness and to make people feel that they have been treated fairly. Windsor has not been treated fairly.

28. Judge Jeffrey L. Ashton has denied Windsor's rights of equal protection under the law, and his mission seems to be to bury him any way he can.

**GROUND #5 -- JUDGE JEFFREY L. ASHTON FAILED TO PROVIDE
DUE PROCESS AND EQUAL PROTECTION TO WINDSOR, WHICH
CLEARLY ESTABLISHES HIS BIAS.**

29. Judge Jeffrey L. Ashton has violated Windsor's civil and Constitutional rights under color of law. It is like he has never even heard of due process.

"...[t]rial before an 'unbiased judge' is essential to due process." *Johnson v. Mississippi*, 403 U.S. 212, 216 (1971); accord *Concrete Pipe & Prods. V. Constr. Laborers Pension Trust*, 508 U.S. 602, 617 (1993) (citation omitted). (See also *Levine v. United States*, 362 U.S. 610, 80 S.Ct. 1038 (1960), citing *Offutt v. United States*, 348 U.S. 11, 14, 75 S. Ct. 11, 13 (1954); *Mathews v. Eldridge*, 424 U.S. 319, 344 (1976); *Peters v. Kiff*, 407, U.S. 493, 502 (1972)

30. EXHIBIT 1292 is the Affidavit of Prejudice Windsor has wanted to file but has been denied the right.

31. The due process clauses of both the Constitutions of Florida and the United States guarantee a party an impartial and disinterested tribunal in civil cases. *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242, 100 S.Ct. 1610, 1613 (1980).

Partiality in favor of the government may raise a defendant's due process concerns." *In re United States of America*, 441 F.3d at 66 (citing *In re Murchison*, 349 U.S. 133 (1955).

28 U.S.C. 155 may sometimes bar trial by judges who have no actual bias and who would do their very best to weigh the scales of justice equally between contending parties, but due process of law requires no less." *Taylor v. Hayes*, 418 U.S. 488, 501 (1974) (citations and quotation marks omitted). See also *Murchison*, 349 U.S. at 136.

32. Judge Jeffrey L. Ashton has effectively denied Windsor's rights of the equal protection under the law under Article VI of the Constitution.

33. This violates Canon 2 of the Florida Code of Judicial Conduct.

34. The Amendments to the United States Constitution provide the Constitutional right to self-representation. That right should be enjoyed without fear of harassment or judicial prejudice. Furthermore, no law, regulation, or policy should exist to abridge or surreptitiously extinguish that right. Theoretically, *Pro Se* Litigants have no less of a right to effective due process as those who utilize an attorney.

35. But Judge Jeffrey L. Ashton violated the Constitution and took that right away on 2/21/2023. He entered an order on the docket sua sponte REVOKED Windsor's right of self-representation ("REVOCATION ORDER"). [EXHIBIT 4056.]

36. There is no legal basis for him to do such a thing. There is no statute or rule to allow a judge to revoke a Plaintiff's right to represent himself in a civil case.

37. The arbitrary and irrational exercise of power by Judge Jeffrey L. Ashton violated Windsor's substantive due process rights. (*WCI Cmtys., Inc. v. City of Coral Springs*, 885 So.2d 912, 914 (Fla. 4th DCA 2004).)

38. The rights of parties cannot be taken without notice and opportunity for hearing. The action by Judge Jeffrey L. Ashton was unreasonable and unjust. Windsor did nothing wrong. Judge Jeffrey L. Ashton's purported complaint was that he was filing evidence after being denied an evidentiary hearing after the Defendants filed and submitted to the Court 275 pages of documents. [EXHIBIT 3991 -- DOCKET, 02/10/2013.] If you cannot submit evidence at a hearing, then a sworn affidavit authenticating the exhibits is the only other option.

39. American courts have secured the right to represent oneself in court since the beginning of the nation. The Judiciary Act of 1789 and U.S.C. The Judiciary Act of 1789 recognized the right to personally present oneself in court without a lawyer. In 1948, this right was reaffirmed under U.S.C. § 1654 which reads: "In all courts of the United States the parties may plead and conduct their own cases personally or by counsel as, by the rules of such courts, respectively, are permitted to manage and conduct causes therein."

40. U.S. Supreme Court Cases reaffirming the right to self-representation include: *Osborn v. Bank of the United States* (1824); *Haines v. Kerner* (1972); *Faretta v. California* (1975).

41. The Rules of Judicial Conduct Recognize this Right further. The Rules of Judicial Conduct published by the American Bar Association reaffirm this right as well. Rule 2.6 Enduring the Right to Be Heard, reminds judges to uphold the right to be heard. Either by oneself or with a lawyer. "(A) A judge shall accord to every person who has a legal interest in a

proceeding, or that person's lawyer, the right to be heard according to law." ABA Model Code of Judicial Conduct Rule 2.6 "A judge shall accord [all]... the right to be heard..."

42. *Elmore v. McCammon* (1986) 640 F. Supp. 905 "... the right to file a lawsuit pro se is one of the most important rights under the constitution and laws."

43. In *Picking v. Pennsylvania Railway*, 151 F.2d. 240, Third Circuit Court of Appeals: The plaintiff's civil rights pleading was 150 pages and described by a federal judge as "inept". Nevertheless, it was held "Where a plaintiff pleads pro se in a suit for protection of civil rights, the Court should endeavor to construe Plaintiff's Pleadings without regard to technicalities."

44. See also *Jenkins v. McKeithen*, 395 U.S. 411, 421 (1959); *Pucket v. Cox*, 456 2nd 233; *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938; *Sherar v. Cullen*, 481 F. 2d 946 (1973) "There can be no sanction or penalty imposed upon one because of his exercise of Constitutional Rights."

45. In *Boyd v. United*, 116 U.S. 616 at 635 (1885) Justice Bradley wrote: "It is the duty of the Courts to be watchful for the Constitutional Rights of the Citizens, and against any stealthy encroachments thereon. Their motto should be *Obsta Principiis*."

46. In *Downs v. Bidwell*, 182 U.S. 244 (1901): "It will be an evil day for American Liberty if the theory of a government outside supreme law finds lodgement in our constitutional jurisprudence. No higher duty rests upon this Court than to exert its full authority to prevent all violations of the principles of the Constitution."

47. *Gomillion v. Lightfoot*, 364 U.S. 155 (1966), cited also in *Smith v. Allwright*, 321 U.S. 649.644 "Constitutional 'rights' would be of little value if they could be indirectly denied."

48. *Miranda v. Arizona*, 384 U.S. 426, 491; 86 S. Ct. 1603 “Where rights secured by the Constitution are involved, there can be no ‘rule making’ or legislation which would abrogate them.”

49. *Norton v. Shelby County*, 118 U.S. 425 p. 442 “An unconstitutional act is not law; it confers no rights; it imposes no duties; affords no protection; it creates no office; it is in legal contemplation, as inoperative as though it had never been passed.”

50. *Sherar v. Cullen*, 481 F. 2d 946 (1973): “There can be no sanction or penalty imposed upon one because of his exercise of constitutional rights.” *Simmons v. United States*, 390 U.S. 377 (1968) “The claim and exercise of a Constitution right cannot be converted into a crime”... “a denial of them would be a denial of due process of law”. *Warnock v. Pecos County, Texas*, 88 F3d 341 (5th Cir. 1996) Eleventh Amendment does not protect state officials from claims for prospective relief when it is alleged that state officials acted in violation of federal law.

51. *See also Butz v. Economou*, 98 S. Ct. 2894 (1978); *United States v. Lee*, 106 U.S. at 220, 1 S. Ct. at 261 (1882): “No man [or woman] in this country is so high that he is above the law. No officer of the law may set that law at defiance with impunity. All the officers of the government from the highest to the lowest, are creatures of the law, and are bound to obey it.” *Cannon v. Commission on Judicial Qualifications*, (1975) 14 Cal. 3d 678, 694 Acts in excess of judicial authority constitutes misconduct, particularly where a judge deliberately disregards the requirements of fairness and due process. *Geiler v. Commission on Judicial Qualifications*, (1973) 10 Cal.3d 270, 286 Society’s commitment to institutional justice requires that judges be solicitous of the rights of persons who come before the court. *Gonzalez v. Commission on Judicial Performance*, (1983) 33 Cal. 3d 359, 371, 374 Acts in excess of judicial authority

constitutes misconduct, particularly where a judge deliberately disregards the requirements of fairness and due process. *Olmstead v. United States*, (1928) 277 U.S. 438 “Crime is contagious. If the Government becomes a lawbreaker, it breeds contempt for law; it invites every man to become a law unto himself; it invites anarchy.”

52. *U.S. v. Lee*, 106 U.S. 196, 220 1 S. Ct. 240, 261, 27 L. Ed 171 (1882) “No man in this country is so high that he is above the law. No officer of the law may set that law at defiance, with impunity. All the officers of the government, from the highest to the lowest, are creatures of the law are bound to obey it.” “It is the only supreme power in our system of government, and every man who, by accepting office participates in its functions, is only the more strongly bound to submit to that supremacy, and to observe the limitations which it imposes on the exercise of the authority which it gives.”

53. *Duncan v. Missouri*, 152 U.S. 377, 382 (1894) says: “Due process of law and the equal protection of the laws are secured if the laws operate on all alike, and do not subject the individual to an arbitrary exercise of the powers of government.”

54. *Giozza v. Tiernan*, 148 U.S. 657, 662 (1893), Citations Omitted: “Undoubtedly it (the Fourteenth Amendment) forbids any arbitrary deprivation of life, liberty or property, and secures equal protection to all under like circumstances in the enjoyment of their rights... It is enough that there is no discrimination in favor of one as against another of the same class. ...And due process of law within the meaning of the [Fifth and Fourteenth] amendment is secured if the laws operate on all alike, and do not subject the individual to an arbitrary exercise of the powers of government.”

55. *Kentucky Railroad Tax Cases*, 115 U.S. 321, 337 (1885): “The rule of equality... requires the same means and methods to be applied impartially to all the constituents of each

class, so that the law shall operate equally and uniformly upon all persons in similar circumstances”.

56. *Truax v. Corrigan*, 257 U.S. 312, 332: “Our whole system of law is predicated on the general fundamental principle of equality of application of the law. ‘All men are equal before the law.’ ‘This is a government of laws and not of men,’ ‘No man is above the law,’ are all maxims showing the spirit in which legislatures, executives, and courts are expected to make, execute and apply laws. But the framers and adopters of the (Fourteenth) Amendment were not content to depend... upon the spirit of equality which might not be insisted on by local public opinion. They therefore embodied that spirit in a specific guaranty.”

57. *The Florida Supreme Court* says this: “A person should not be forced to have an attorney represent his legal interests if he does not consent to such representation. All citizens in our state are also guaranteed access to our courts by Article I, Section 21, Florida Constitution (1968).” [*Florida Bar v. Brumbaugh*, 355 So.2d 1186 (Fla. 1978).]

58. The Constitutions of the United States and Florida guarantee due process of law. U.S. Const. amend. XIV, § 1; Fla. Const. art. I, § 9. “The denial of due process rights, including the opportunity to be heard, to testify, and to present evidence, is fundamental error.” *Weiser v. Weiser*, 132 So. 3d 309, 311 (Fla. 4th DCA 2014). [*Wanda I. Ruffin, P.A. v. Borga*, 294 So.3d 916 (Fla. App. 2020).]

59. The Due Process Clause entitles a person to an impartial and disinterested tribunal in both civil and criminal cases. This requirement of neutrality in adjudicative proceedings safeguards the two central concerns of procedural due process, the prevention of unjustified or mistaken deprivations and the promotion of participation and dialogue by affected individuals in the decision-making process. See *Carey v. Piphus*, 435 U.S. 247, 259-262, 266-267 (1978). The

neutrality requirement helps to guarantee that life, liberty, or property will not be taken on the basis of an erroneous or distorted conception of the facts or the law. See *Matthews v. Eldridge*, 424 U.S. 319, 344 (1976). At the same time, it preserves both the appearance and reality of fairness, ‘generating the feeling, so important to a popular government, that justice has been done,’ *Joint Anti-Fascist Committee v. McGrath*, 341 U.S. 123, 172, (1951) (Frankfurter, J., concurring), by ensuring that no person will be deprived of his interests in the absence of a proceeding in which he may present his case with assurance that the arbiter is not predisposed to find against him. *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242 (1980).

60. Canon 3E, Fla. Code Jud. Conduct, and Rule 2.160, Fla. R. Jud. Admin., mandate that a judge disqualify himself in a proceeding “in which the judge’s impartiality might reasonably be questioned.” The disqualification rules require judges to avoid even the appearance of impropriety: It is the established law of this State that every litigant is entitled to nothing less than the cold neutrality of an impartial judge. It is the duty of the court to scrupulously guard this right of the litigant and to refrain from attempting to exercise jurisdiction in any manner where his qualification to do so is seriously brought into question. The exercise of any other policy tends to discredit and place the judiciary in a compromising attitude which is bad for the administration of justice. *Crosby v. State*, 97 So.2d 181 (Fla. 1957); *State ex rel. Davis v. Parks*, 141 Fla. 516, 194 So. 613 (1939); *Dickenson v. Parks*, 104 Fla. 577, 140 So. 459 (1932); *State ex rel. Mickle v. Rowe*, 100 Fla. 1382, 131 So. 3331 (1930).

61. For due process and to secure Constitutional rights judges may not take the law into their own hands. But this is precisely what Judge Jeffrey L. Ashton has done. He has ignored the law, ignored the facts, and claimed laws and rules provide something they do not provide, while abusing and disadvantaging Windsor.

62. Judge Jeffrey L. Ashton has lied and demeaned Windsor in open court hearings. It's as if he never read the Code of Judicial Conduct or the Bible.

63. For due process to be secured, the laws must operate alike upon all and not subject the individual to the arbitrary exercise of governmental power. (*Marchant v. Pennsylvania R.R.*, 153 U.S. 380, 386 (1894).) Judge Jeffrey L. Ashton has violated Windsor's rights by using his power to inflict his bias.

64. For due process, Windsor has the right to protections expressly created in statute and case law. Due process allegedly ensures the government will respect all of a person's legal rights and guarantee fundamental fairness. Judge Jeffrey L. Ashton violated Windsor's rights by using his power to ignore facts and the law.

65. Due process requires an established course for judicial proceedings designed to safeguard the legal rights of the individual. Action denying the process that is "due" is unconstitutional. Inherent in the expectation of due process is that the judge will abide by the rules. Judge Jeffrey L. Ashton has interfered with the process and violated rules for the purpose of damaging Windsor.

66. Windsor has just cause to believe that he cannot be given a fair trial. This is an understatement. He hasn't been given a fair trial, and he won't be given a fair trial as long as the infamous Casey Anthony and Ashley Madison judge is involved. In fact, there won't be a trial. Judge Jeffrey L. Ashton plans to dismiss the case because Windsor has no attorney, cannot afford an attorney, and has been denied his Constitutional right to represent himself.

67. Judge Jeffrey L. Ashton refused to show even a smidgen of common decency when Windsor was hospitalized and unable to participate in a hearing. [EXHIBIT 1292.] He has continued to allow every filing by the Defendants to be made unsigned much less verified or

supported by affidavit. [EXHIBIT 1292.] He has endorsed the many motions of the Defendants seeking to find Windsor in contempt without question, and he accepted as proper their unprecedented motion to have Windsor declared mentally incompetent to represent himself as a plaintiff. Windsor's email addresses seem to have been blocked for as long as three weeks by the E-Portal. Judge Jeffrey L. Ashton has coached the attorneys for the Defendants, and he has made false statements in his orders.

68. See five docket entries on 2018-CA-0102170-O, 02/02/2021; and see EXHIBIT 4052 – Plaintiff's Motion to Disqualify Judge Jeffrey L. Ashton Due to Denial of Due Process file stamped 04/01/2021.

69. See EXHIBIT 4049 and the Docket entries on 2018-CA-0102170-O, 04/01/2021. Note that the file-stamped Motion to Disqualify has disappeared from the Docket. A check of the dates thereafter indicate that Judge Jeffrey L. Ashton never responded to the Motion to Disqualify. Docket entries on 2018-CA-0102170-O, 04/01/2021 to Present. OMG, see EXHIBIT 4057, 04/01/2021 – Motion to Disqualify or Recuse Due to Denial of Due Process. Windsor periodically prints the Docket because he has experienced disappearing filings quite often. EXHIBIT 4053 is additional proof of the filing that has vanished.

70. An inherent Constitutional right is the honesty of the judge. Judge Jeffrey L. Ashton has not been honest. He has violated Canons 1, 2, and 3 of the Code of Judicial Conduct.

71. Due process guarantees basic fairness and to make people feel that they have been treated fairly. Windsor has not been treated fairly.

72. Judge Jeffrey L. Ashton has denied Windsor's rights of equal protection under the law under Article VI of the Constitution, and his mission seems to be to bury him any way he can.

73. Judge Jeffrey L. Ashton is Hell-bent on ignoring Windsor’s rights while working for the Defendants’ attorneys.

Every person “has a constitutional and statutory right to an impartial and fair judge at all stages of the proceeding.” *Liteky v U.S.*, 510 US 540 (1994).

**GROUND #6 – JUDGE JEFFREY L. ASHTON HAS BEEN MANDATED
BY CANON 3E OF THE FLORIDA CODE OF JUDICIAL CONDUCT
AND RULE 2.160 OF THE FLORIDA RULES OF JUDICIAL
ADMINISTRATION TO DISQUALIFY HIMSELF
IN THIS PROCEEDING BECAUSE “...THE JUDGE’S IMPARTIALITY
MIGHT REASONABLY BE QUESTIONED.”
BUT HE HAS IGNORED THIS CANON AND RULE
SO HE CAN CONTINUE TO INFLICT HIS TERMINAL BIAS.**

74. Canon 3E, Fla. Code Jud. Conduct, and Rule 2.160, Fla. R. Jud. Admin., mandate that a judge disqualify himself in a proceeding “in which the judge’s impartiality might reasonably be questioned.” The disqualification rules require judges to avoid even the appearance of impropriety: “It is the established law of this State that every litigant is entitled to nothing less than the cold neutrality of an impartial judge. It is the duty of the court to scrupulously guard this right of the litigant and to refrain from attempting to exercise jurisdiction in any manner where his qualification to do so is seriously brought into question. The exercise of any other policy tends to discredit and place the judiciary in a compromising attitude which is bad for the administration of justice. For due process and to secure Constitutional rights judges may not take the law into their own hands.”

75. But this is precisely what Judge Jeffrey L. Ashton has done. He has ignored the law, ignored the facts, and claimed laws and rules provide something they do not provide, while

abusing and disadvantaging Windsor. He has intentionally inflicted emotional distress.

76. Judge Jeffrey L. Ashton has a legal duty to disqualify himself. But he seems allergic to anything legal. He appears to be mentally ill, and only a very sick person could deny his appearance of impropriety.

**GROUND #7 – JUDGE JEFFREY L. ASHTON HAS LOST JURISDICTION,
AND HIS CONTINUING EFFORTS TO RUN THE CASE
CLEARLY ESTABLISH HIS BIAS.**

77. Judge Jeffrey L. Ashton has violated Windsor’s Constitutional rights.

78. Judge Jeffrey L. Ashton’s authority comes from the United States Constitution and the Florida Constitution. [EXHIBIT 3476.] [EXHIBIT 3241.]

79. The Constitution is the Supreme Law of the Land, and it has never been amended to give Judge Jeffrey L. Ashton the authority to violate the Constitution.

80. All judges must take an oath. Florida Statute Section 876.05 requires this oath:

“I, a citizen of the State of Florida and of the United States of America, and being employed by or an officer of the court system and a recipient of public funds as such employee or officer, do hereby solemnly swear or affirm that I will support the Constitution of the United States and of the State of Florida.”

81. Florida Statute Section 876.05 is a law. [EXHIBIT 3012.]

82. Amendments provide the Constitutional right to self-representation. That right should be enjoyed without fear of harassment or judicial prejudice. Furthermore, no law, regulation, or policy should exist to abridge or surreptitiously extinguish that right.

Theoretically, *Pro Se* Litigants have no less of a right to effective due process as those who utilize an attorney.

83. The Constitution has never been amended or rescinded to give Judge Jeffrey L. Ashton the authority to violate the Constitution and deny the Constitutional right to self-representation.

84. But Judge Jeffrey L. Ashton has violated the Constitution and has denied Windsor his Constitutional right to self-representation. [EXHIBIT 4056.]

85. Prior to taking away rights, a judge has an obligation to provide notice and an opportunity to be heard. That was not done by Judge Jeffrey L. Ashton. The Big Dog believes he's like James Cameron, "the King of the world."

86. Judge Jeffrey L. Ashton claims to have stripped Windsor of his right to represent himself in this case. In Jeff Ashtonland, Windsor is now a party, the sole Plaintiff, and he cannot do a damn thing except hire an attorney that he cannot afford and cannot get.

87. For Judge Jeffrey L. Ashton to deny removing himself from this case, he will have to claim he can do anything he darn well pleases, and the Constitutions and laws do not apply in Jeff Ashtonland.

88. When you swear to support the Constitution and then violate it and deny others their Constitutional rights, you lose jurisdiction. You are not authorized to violate the Constitution, and you are not authorized to take away the Constitutional rights that others have been told they have.

GROUND #8 – JUDGE JEFFREY L. ASHTON MAY NOT RELY ON
THE VOID ORDERS HE HAS ISSUED
TO CONTINUE TO INFLICT HIS BIAS.

89. EXHIBIT 3825 and EXHIBIT 4056 are VOID ORDERS.

90. A void order is one that is not enforceable because it is missing some essential element that makes it valid. For example, an order made by a judge who lacked jurisdiction over the matter, or an order that violates due process of law, would be considered void. A void order has no legal effect and cannot be enforced by the courts.

91. Both EXHIBIT 3825 and EXHIBIT 4056 are VOID ORDERS because they violated due process.

92. Both EXHIBIT 3825 and EXHIBIT 4056 are VOID ORDERS because Judge Jeffrey L. Ashton did not have jurisdiction to violate the Constitutions and laws.

GROUND #9 – JUDGE JEFFREY L. ASHTON IS A LIAR
WHO CANNOT BE BELIEVED,
WHICH CLEARLY ESTABLISHES HIS BIAS.

93. There are liars and damn liars. Judge Jeffrey L. Ashton is a damn liar.

94. To accomplish his sinister goals in destroying Windsor, he simply lies. And lies. And lies some more.

95. Jeff Ashton has lied to women he claims he has never met on AshleyMadison.com.

96. Married JEFF ASHTON has sent emails to fellow clients of the Ashley Madison sex site saying he has a skillful tongue and fingers, and member.

97. He posted this from the Orange County Courthouse. The Ashley Madison accounts under Jeff Ashton name were accessed from the IP address 66.193.236.254 tracks to “host-204.ocnjcc.org” and the Ninth Judicial Circuit internal network. His precise statement was:

“Please be real. I want someone that fantasizes about being brought to a climax by a lover with a skillful tongue and fingers as well as his member.”

98. Ewwwww. First, how stupid can a government official be to write something like this. Second, how dumb can you be to follow in the footsteps of Anthony Weiner. Third, since he lies about everything, you can bet he has nothing skillful.

99. Jeff Ashton’s message to this one purported woman also said: "Also a big toy collection is a plus. I am looking for someone who has fantasies we can act out. Who knows what she wants and isn’t afraid to ask for it. You must be discrete, not looking to change my situation just want to get excited again.”

100. When the Ashley Madison Scandal broke, Jeff Ashton said it was all an accident. What a damn liar. Fifteen uses of the sex site using two different credit cards.

101. Jeff Ashton has absolutely no business dealing with the issues of others.

102. I am writing a book about this ordeal. The cover will feature a black-and-white photo of Richard Nixon saying “I am not a crook. It’s Jeff Ashton.”

GROUND #10 -- JUDGE JEFFREY L. ASHTON IS CORRUPT.

103. Judge Jeffrey L. Ashton operates illegally with a vicious and fraudulent intention to evade the prohibition of the law. He wrongfully uses his station to procure some benefit for himself or for another person, contrary to duty and the rights of others.

104. Judges are under oath to tell the truth at all times. Jeff Ashton can’t tell the truth, and he commits perjury repeatedly. He’s a criminal.

105. He has very intentionally done all of these things to Windsor to defraud him and violate the law. He may have been paid off to do this, or he may simply dislike Windsor because he is pro se or he heard Windsor had a more skillful finger, tongue, and member.

GROUND #11 -- JUDGE JEFFREY L. ASHTON APPEARS TO BE IN A RACKETEERING INFLUENCED CRIMINAL ORGANIZATION WORKING TO DAMAGE WINDSOR AND HELP THE DEFENDANTS.

106. Black's Law Dictionary Free Online Legal Dictionary defines "corruption" as "illegality; a vicious and fraudulent intention to evade the prohibition of the law. The act of an official or fiduciary person who unlawfully and wrongfully uses his station or character to procure some benefit for himself or for another person, contrary to duty and the rights of others."

107. Windsor is planning to file a RICO action against Jeffrey L. Ashton, Rita Ashton, Keitra Davis, Judge Lisa T. Munyon, David Harris, William Hyland, David Wynne, Scott L. Astrin, Scott Warburton, Steven Kranz, Jonathan Blake Mansker, and every judge in the Ninth Judicial Circuit of Florida.

GROUND #12 -- JUDGE JEFFREY L. ASHTON ENTERED A VOID ORDER TO DAMAGE WINDSOR WITH AN UNLAWFUL ORDER TO SHOW CAUSE. THIS WASN'T A LEGAL ERROR; THIS WAS HIS BIAS IN FULL DISPLAY.

108. Judge Jeffrey L. Ashton has violated Windsor's civil and Constitutional rights under color of law.

**GROUND #13 -- JUDGE JEFFREY L. ASHTON ENTERED A VOID ORDER
REQUIRING WINDSOR TO GET AN ATTORNEY TO SIGN HIS
PLEADINGS, WHICH HAS HAD AN EXTREMELY HARMFUL IMPACT
ON THE PLAINTIFF'S CASE PREPARATION.
THIS IS A MANIFESTATION OF CLEAR BIAS.**

109. EXHIBIT 3825 and EXHIBIT 4056 are VOID ORDERS, but Judge Jeffrey L. Ashton pretends otherwise. Windsor has been denied his right to prepare for trial, and the actions of Judge Jeffrey L. Ashton have simply made Windsor's inability to obtain medical treatment just that much worse.

**GROUND #14 -- JUDGE JEFFREY L. ASHTON ENTERS ORDERS WITH
NO LEGAL OR FACTUAL SUPPORT OR WITH FALSE FACTUAL
CLAIMS. HE DOES THIS TO INFLICT HIS BIAS DISEASE.**

110. The AFFIDAVIT OF PREJUDICE 3/17/2023 identifies order entered with no factual support or false factual support. The AFFIDAVIT also identifies those with no legal basis such as EXHIBIT 4056.

**GROUND #15 -- JUDGE JEFFREY L. ASHTON HAS VIOLATED
ARTICLE I SECTION 2, SECTION 9, AND SECTION 21
OF THE FLORIDA CONSTITUTION,
WHICH DEMONSTRATE HIS BIAS.**

111. Judge Jeffrey L. Ashton is an unbiased violator. It does not matter what government entity, what statute, which Constitution... he violates them all. He is an equal opportunity violator.

GROUND #16 – DISQUALIFICATION OF JUDGE JEFFREY L. ASHTON
PURSUANT TO FLORIDA STATE 38.10 AND MOVING TO DISQUALIFY
JUDGE JEFFREY L. ASHTON DUE TO BIAS.

112. Florida Rules of Judicial Administration Rule 2.330(b) provides: “**Any party... may move to disqualify the judge assigned to the case on grounds provided by rule, statute, code of judicial conduct, or general law....**” [EXHIBIT 4061.] [**emphasis added.**]

113. So, Windsor is moving, or attempting to move, but Judge Jeffrey L. Ashton docketed an order on 2/21/2023 revoking my right of self-representation (“REVOCATION ORDER”). [EXHIBIT 4056.] This violates both the United States Constitution and the Florida Constitution, but the staff of the Orange County Clerk of Courts doesn’t seem to recognize the Supreme Law of the Land.

114. If the REVOCATION ORDER was valid, Windsor would have no way to file this Third Motion to Recuse or Disqualify Judge Jeffrey L. Ashton. The Clerk is expected to reject it. But Rule 2.30(b) does not require filing, just moving.

115. West's Encyclopedia of American Law, edition 2 defines “moving” as: “To make an **application to a court** for a rule or order, or **to take action in any matter.** **The term comprehends all things necessary to be done by a litigant** to obtain an order of the court directing the relief sought.” [**emphasis added.**]

116. There is nothing to say moving to disqualify has to be done in a specific manner, and the means for a pro se party who has been denied an attorney or the right to represent himself is not addressed anywhere.

117. So, Windsor is moving in the following ways: (1) He is going to the Offices of the Clerk of Court of Orange County to deliver his THIRD MOTION TO DISQUALIFY in person.

[EXHIBIT 1288.] He will take witnesses and bodyguards. If they refuse to accept it, he will demand to see the Clerk of Courts, Tiffany Moore Russell and David Harris, the staff attorney for the Ninth Judicial District. (2) He is sending it by certified mail return receipt to Judge Jeffrey L. Ashton at his courthouse address. (3) He is sending it by certified mail return receipt to Judge Jeffrey L. Ashton at his home address. (4) He is sending it by certified mail return receipt to Tiffany Moore Russell. (5) He is sending it by certified mail return receipt to David Harris. (6) He is sending it by certified mail return receipt to Monique Worrell, Florida State Attorney for Orlando. (7) He is sending it by certified mail return receipt to Lisa T. Munyon, Chief Judge of the Ninth Judicial District. (8) He is e-filing it with the Sixth District Court of Appeals. (9) He is sending it to the Florida Supreme Court. (10) He is sending it to the United States Supreme Court. (11) He is sending it to Governor Ron DeSantis. (12) He is sending it by certified mail return receipt to Florida Attorney General, Ashley Moody. (13) He is sending it to the Florida Judicial Qualifications Commission. (14) He is sending it to the Florida Bar Association. (15) He is sending it to the 69 judges in the Ninth Judicial District. (16) He is sending it to the United States Department of Justice. (17) He is sending it to President Joe Biden. (18) He is publishing it on Lawless Ameica.com. (19) He is publishing it on JeffreyLAshton.com. (20) He is mailing it to every newspaper and television station in Central Florida as well as 60 minutes, Dateline, 20/20, and other such programs.

118. Florida Rules of Judicial Administration Rule 2.330(b) provides: “Any party... may move to disqualify the judge assigned to the case on **grounds provided by rule, statute, code of judicial conduct, or general law....**”

119. The United States Constitution, the Florida Constitution, the Florida Rules of Civil Procedure. None of these rules, statutes, code of judicial conduct, or general laws provide that “moving” must be done in a specific manner.

GROUND #17 – JUDGE JEFFREY L. ASHTON HAS BEEN ABUSIVE TO WINDSOR IN PUBLIC HEARINGS. THIS GIVES A CLEAR EXPRESSION OF BIAS FOR ALL TO SEE AND HEAR.

120. Judge Jeffrey L. Ashton has accused Windsor of being a liar in open court on several occasions. He has outrageously accused Windsor of making a threat to him. Windsor has never lied, and he has never made a threat.

121. Windsor sent three emails to Judge Jeffrey L. Ashton’s Judicial Assistant from Thursday April 1, 2021 to Monday April 5, 2021. THREE (3) not 214 as Judge Jeffrey L. Ashton claimed in open court. Judge Jeffrey L. Ashton is a liar and calling Windsor a liar in open court is a violation of the Code of Judicial Conduct. As Judge Jeffrey L. Ashton does not have 214 emails as evidence, this proves he is a damn liar. This is perjury. This is fraud upon the court.

122. Windsor believes Judge Jeffrey L. Ashton will say and do anything. Windsor never threatened a witness during cross examination resulting in the Court requiring the continuation of the deposition to be taken by a licensed attorney or before a Special Master. The transcript and tape-recording show that Windsor was polite and attempting to protect the dishonest witness by encouraging him to have legal counsel because he was preparing to sue him and had already reported him to his superiors with the Florida Highway Patrol. This was explained to Judge Jeffrey L. Ashton in open court, and he said, “I don’t believe for a second anything you said.” Windsor cannot afford the TRANSCRIPT of the 2/10/2023 Hearing, but he

does have a tape recording of the hearing that he will use in his lawsuit against Jeff Ashton to prove just how significant he is as a liar. I am also working several angles in an effort to get my eye son the other Ashley Madison emails sent by Jeff Ashton (aka “the Dog”).

123. Judge Jeffrey L. Ashton, not known for his honesty a la Ashley Madison, outrageously claimed Windsor threatened to un-necessarily prolong the questioning of the witness at trial. What a liar. Windsor said if Judge Jeffrey L. Ashton denied a deposition, Windsor would just have to ask the questions at the trial. That was no threat. Judge Jeffrey L. Ashton will prolong the trial if Windsor continues to be denied all forms of discovery, but it is the fault of the Big Liar.

GROUND #18 – JUDGE JEFFREY L. ASHTON HAS LIED IN HEARINGS TO JUSTIFY HIS UNLAWFUL ORDERS. THIS IS DONE TO MANIFEST HIS BIAS AND DAMAGE WINDSOR

124. Judge Jeffrey L. Ashton is a liar. Plain and simple.

125. As detailed in the AFFIDAVIT OF PREJUDICE 3/17/2023, he has lied, and Windsor has proof. He lies about the facts. He lies about the law.

126. No honest judge will be able to believe the things this man has done and said.

GROUND #19 – JUDGE JEFFREY L. ASHTON HAS ALLOWED THE DEFENDANTS TO PURSUE ABSOLUTELY FRIVOLOUS MOTIONS IN THEIR JOINT EFFORTS TO DAMAGE THE CASE WITH THE JUDGE JEFFREY L. ASHTON’S BIAS.

127. The Defendants have filed more than a dozen groundless motions to dismiss. They have filed frivolous motions with approval of Judge Jeffrey L. Ashton.

128. Windsor believes Judge Jeffrey L. Ashton and the attorneys for the Defendants are all part of a Racketeering Influenced Corrupt Organization.

GROUND #20 – JUDGE JEFFREY L. ASHTON HAS ALLOWED THE DEFENDANTS TO ROUTINELY FILE DOCUMENTS THAT ARE UNSIGNED AND UNVERIFIED. THIS IS DONE TO INFLICT HIS BIAS AND DAMAGE WINDSOR.

129. EXHIBIT 3920 is the 3/16/2023 Docket. Look at every filing by the Defendants, and know that they are all unsigned and unverified.

130. Judge Jeffrey L. Ashton lets them do this in clear violation of the Rules of Civil Procedure and Rules of Evidence.

GROUND #21 – JUDGE JEFFREY L. ASHTON EITHER DOESN'T KNOW THE LAW OR LIES ABOUT IT BECAUSE HE VIOLATES THE LAW, THE RULES, AND THE CODE MORE OFTEN THAN HE GETS ANYTHING RIGHT. IT'S INTENTIONAL TO INFLICT HIS BIAS.

131. Windsor is flabbergasted by the magnitude of the violations by Judge Jeffrey L. Ashton.

132. Perhaps he has Dementia. Perhaps he is just plain crazy. And maybe he is just plain stupid.

133. Windsor believes he does it simply to inflict his uncontrollable bias. But he really does not seem to understand what certain legal terms mean. He blew it in the Casey Anthony case, and he committed the ultimate in stupidity with Ashley Madison.

134. Regardless of the reason, Windsor is severely damaged by it.

GROUND #22 – JUDGE JEFFREY L. ASHTON APPEARS TO BE MENTALLY ILL, AND HE MAY HAVE THE MENTAL DISORDERS MYTHOMANIA OR PSEUDOLOGIA FANTASTICA. THESE MENTAL DISEASES MAY CAUSE HIM TO INFLICT BIAS.

135. Windsor believes Judge Jeffrey L. Ashton is mentally ill. He cannot believe that a sane person would be this evil.

136. Judge Jeffrey L. Ashton should voluntarily commit himself to a mental facility for a lengthy period of evaluation and therapy.

137. It's also probable that he has a substance abuse problem.

GROUND #23 – JUDGE JEFFREY L. ASHTON HAS ALLOWED DEFENDANTS' ATTORNEYS TO VIOLATE HUNDREDS OF RULES WITH NO RECOURSE. THIS IS BIAS ON STEROIDS.

138. On 8/29/2020, Windsor filed motions for fraud on the court. [EXHIBIT 1281.] [EXHIBIT 1282.] When Judge Jeffrey L. Ashton became the judge, Windsor asked him to reconsider the order denying the order claiming Windsor's motions were motions for reconsideration. Judge Jeffrey L. Ashton dismissed without any consideration Windsor's motion to have him reconsider Judge John Marshall Kest's orders. No honest judge could do that.

Windsor's motions identified 298 violations by the Defendants and their attorneys including perjury, contempt, attempted fraud, fraud on the court, concealing evidence, unsigned and unsworn answers and objections to interrogatories, false sworn answers, false admissions, over 30 violations of the Florida Rules of Professional Conduct, a variety of violations of the Florida Rules of Civil Procedure, and more.

139. In the hearing on 4/5/2021, Windsor discovered that Judge Jeffrey L. Ashton had not even read Judge John Marshall Kest's orders much less Windsor's motion.

140. Since 8/9/2020, the attorneys for the Defendants continue to violate the rules in just about everything they do. It is like they know they have a free pass with the corrupt Jeffrey L. Ashton.

**GROUND #24 – JUDGE JEFFREY L. ASHTON DENIED WINDSOR'S
REQUEST FOR A CONTINUANCE WHEN HE WAS HOSPITALIZED AND
USED THE HEARING TO ENTER OUTRAGEOUS ORDERS AGAINST
THE ABSENT PLAINTIFF. WHAT A SICK EXAMPLE OF BIAS AND
PREJUDICE BY THIS MENTALLY ILL JUDGE.**

141. Judge Jeffrey L. Ashton OUTRAGEOUSLY refused to reschedule the 2/2/2021 hearing with no justification whatsoever. Windsor's Motion for Contrinunce was denied. [EXHIBIT 3782.] That he refused to reschedule the 2/2/2021 hearing when Windsor had a medical emergency and was hospitalized is outrageous bias. [EXHIBITS 3358, 3790, 3803.]

142. Windsor believes Judge Jeffrey L. Ashton is mentally ill. He must be removed from office.

**GROUND #25 – JUDGE JEFFREY L. ASHTON HAS COMMITTED
MULTIPLE CRIMINAL ACTS AGAINST WINDSOR IN HIS CAMPAIGN
OF PREJUDICE AND BIAS.**

143. As discussed above and in the AFFIDAVIT OF PREJUDICE 3/17/2023, Judge Jeffrey L. Ashton has committed criminal acts.

144. Several of the criminal acts have been lodged with the Orange County Sheriff's Department, including Case # 23-15214.

**GROUND #26 – JUDGE JEFFREY L. ASHTON HAS INTENTIONALLY
INFLECTED EMOTIONAL DISTRESS ON WINDSOR THROUGH HIS
OUTRAGEOUS ACTIONS.**

145. Judge Jeffrey L. Ashton has inflicted emotional distress on Windsor since he entered the case. Everything he has done has been designed to hurt Windsor, and it has. The things he has done have been outrageous. He has ignored crimes and committed crimes. He has ignored the law and invented his own law. He has bullied Windsor in online hearings. He has blocked Windsor from obtaining medical care. He has conducted hearings and ruled against Windsor when he was hospitalized and unable to attend. He has denied Windsor's rights to represent himself. He has allowed the attorneys for the defendants to commit hundreds of violations. He has lied. He has cheated. He has threatened him. About the only thing he has not done is threaten Windsor with his fingers, tongue, or member. The AFFIDAVIT OF PREJUDICE 3/17/2023 [EXHIBIT 1292] is filled with examples.

**GROUND #27 – JUDGE JEFFREY L. ASHTON HAS IGNORED MOTIONS
FOR DISQUALIFICATION PRESENTED BY WINDSOR.**

146. Florida Rules of Judicial Administration Rule 2.330 allows a party to seek disqualification of the assigned trial judge where the party feels he will not receive a fair trial or hearing because of a specifically described prejudice or bias of the judge. Florida Rule of Judicial Administration 2.330 (f) provides that, upon receipt of a legally sufficient motion to disqualify, “the judge shall immediately enter an order granting disqualification and proceed no further in the action.

147. Judge Jeffrey L. Ashton lied and ignored the law in response to Windsor’s First Motion to Disqualify. He had the second motion to disqualify unlawfully removed from the Docket. This wrongdoing is detailed in the AFFIDAVIT OF PREJUDICE 3/17/2023 and on the Flash Drive.

148. The principal facts constituting the grounds for this Motion have been recognized for some time but became absolutely clear once again with an order that appeared 2/21/2023. Windsor attempted to present this to the Court for a ruling, but Judge Jeffrey L. Ashton has arranged for the Clerk of Court to deny access to the e-Portal, and he has blocked Windsor from emailing his Judicial Assistant, Keitra Davis. This motion should be considered timely filed since Windsor may need an order from the 6DCA to get the Motion filed.

149. The Plaintiff KNOWS he will not receive a fair hearing because of continuing demonstrable prejudice by Judge Jeffrey L. Ashton against him.

150. A recitation of the facts forming the basis for this fear will demonstrate this fear is well-founded. This is provided in the Affidavit of Prejudice. The AFFIDAVIT OF PREJUDICE 3/17/2023 contains factual details of the prejudice as is required by the statute and rules.

151. Prejudice and bias may be either for or against. In the instant action, there is both. Judge Jeffrey L. Ashton has a raging bias against the unrepresented Plaintiff. Judge Jeffrey L. Ashton has a prejudice in favor of the represented Defendants.

152. Judge Jeffrey L. Ashton has demonstrated to Windsor that he has a bias against pro se parties. BUT "... the right to file a lawsuit pro se is one of the most important rights under the constitution and laws." *Elmore v. McCammon* (1986) 640 F. Supp. 905.

153. Windsor then sent detailed letters to the home and courthouse addresses on 3/6/2023 and 3/9/2023 asking Judge Jeffrey L. Ashton to disqualify himself. Judge Jeffrey L. Ashton has not responded. On 3/16/2023, Windsor then sent an email to Judge Jeffrey L. Ashton through his judicial assistants with extensive case law instructing him to disqualify himself [EXHIBITS 1295, 1296, 1297]:

**PLEASE ASK JUDGE ASHTON TO DISQUALIFY
HIMSELF AS HE IS OBLIGATED TO DO BY THE
CODE OF JUDICIAL CONDUCT.**

154. Judge Jeffrey L. Ashton has not responded, nor have his judicial assistants or Jonathan Blake Mansker, boy attorney. This MOTION TO DISQUALIFY and my AFFIDAVIT OF PREJUDICE 3/17/2023 have been filed less than 10 days after Windsor discovered Judge Jeffrey L. Ashton was not going to comply with due process after being presented with overwhelming case law on this Constitutional right.

155. Windsor has not been treated fairly by Judge Jeffrey L. Ashton. Judge Jeffrey L. Ashton has not demonstrated the impartiality required of a judge. He is demonstrating that he is a heartless person who has no business sitting in judgment on people.

**GROUND #28 – JUDGE JEFFREY L. ASHTON HAS VIOLATED CANONS
1, 2, 3, AND 4 OF THE CODE OF JUDICIAL CONDUCT.**

156. These violations are detailed in the AFFIDAVIT OF PREJUDICE 3/17/2023.

LEGAL ARGUMENT

DISQUALIFICATION IS APPROPRIATE: ALL REQUIREMENTS ARE MET

157. Disqualification is a legal requirement pursuant to some statutes and rules. For example, violating your Oath and violating the Constitution have no required procedure. Judge Jeffrey L. Ashton must simply comply.

158. A Motion to Disqualify may also be governed by Florida Statute 38.10 and Florida Rule of Judicial Administration 2.330.

Gregory v. State, 118 So.3d 770, 778 (Fla. 2013) (quoting *Gore v. State*, 964 So.2d 1257, 1268 (Fla. 2007)). “The statute requires that the moving party file an affidavit in good faith ‘stating fear that he or she will not receive a fair trial . . . on account of the prejudice of the judge’ as well as ‘the facts and the reasons for the belief that any such bias or prejudice exists.’” *Peterson v. State*, 221 So.3d 571, 581 (Fla. 2017) (quoting § 38.10, Fla. Stat. (2014)).

159. **MOTION:** This Motion to Disqualify is in writing. Windsor is serving an Affidavit of Prejudice stating his fear that he will not receive a fair trial due to the prejudice of Judge Jeffrey L. Ashton. It provides the facts and the reasons for the belief that such bias and prejudice exist. This Motion is signed under oath. There has been one previously granted motion to disqualify a former judge. There has been one previously denied motion to disqualify Judge Kest and Judge Jeffrey L. Ashton. A Certificate of Good Faith is also served. This Motion to Disqualify needs to be filed with the Clerk .

160. **GROUNDS:** This Motion to Disqualify shows that the Plaintiff fears he will not

receive a fair trial because of specifically described prejudice or bias of Judge Jeffrey L. Ashton.

161. **TIME:** The Motion to Disqualify was drafted within a reasonable time not to exceed 10 days after discovery of the facts constituting the grounds for the Motion, but when Windsor attempted to file it, he discovered that the Clerk of Court has blocked Windsor's ability to file anything. Windsor then sent detailed letters to the home and courthouse addresses on 3/6/2023 and 3/9/2023 asking Judge Jeffrey L. Ashton to disqualify himself. Judge Jeffrey L. Ashton has not responded. On 3/16/2023, Windsor then sent an email to Judge Jeffrey L. Ashton through his judicial assistants with extensive case law ordering him to disqualify himself [EXHIBITS 1295, 1296, 1297]:

**PLEASE ASK JUDGE ASHTON TO DISQUALIFY
HIMSELF AS HE IS OBLIGATED TO DO BY THE
CODE OF JUDICIAL CONDUCT.**

Judge Jeffrey L. Ashton has not responded, nor has his judicial assistants or Jonathan Blake Mansker, boy attorney. This MOTION TO DISQUALIFY and Windsor's AFFIDAVIT OF PREJUDICE 3/17/2023 have been made less than 10 days after Windsor discovered Judge Jeffrey L. Ashton was not going to comply with due process after being presented with overwhelming case law on this Constitutional right.

**IT IS THE DUTY OF JUDGE JEFFREY L. ASHTON TO ACKNOWLEDGE
THE SUFFICIENCY OF THE MOTION.**

162. Judge Jeffrey L. Ashton must now determine the legal sufficiency of the Motion.

The rule provides that "[t]he judge against whom an initial motion to disqualify . . . is directed shall determine only the legal sufficiency of the motion and shall not pass on the truth of the facts alleged." *Pasha v. State*, 225 So.3d 688, 703 (Fla. 2017) (quoting Fla. R. Jud. Admin. 2.330(f)). "The disqualification [statute and] rules are designed to keep the

courts free from bias and prejudice.” *Tableau Fine Art Group, Inc. v. Jacoboni*, 853 So.2d 299, 301 (Fla. 2003). “[T]he disqualification statute and rules are [also] designed to ensure confidence in the judicial system, ‘as well as to prevent the disqualification process from being abused for the purposes of judge-shopping, delay, or some other reason not related to providing for the fairness and impartiality of the proceeding.’” *Id.* (quoting *Livingston v. State*, 441 So.2d 1083, 1086 (Fla. 1983)). (*Law Offices of Herssein and Herssein, P.A. v. United Services Automobile Association*, SC17-1848 (Fla. 11/15/2018).)

163. Judge Jeffrey L. Ashton shall rule on this Third Motion to Disqualify immediately and on the Third Motion to recuse no later than 30 days after the service of the motion.

THIS MOTION IS PROCEDURALLY ADEQUATE, AND JUDGE JEFFREY L. ASHTON MUST ACCEPT THAT THE AFFIDAVIT IS TRUE.

164. This Third Motion to Recuse Judge Jeffrey L. Ashton is procedurally adequate, and Judge Jeffrey L. Ashton must determine so. This is a proper application for a change of judge.

165. Windsor has a well-grounded fear that he will not receive a fair trial. The motion is legally sufficient if it shows the party’s well-grounded fear that the party will not receive a fair trial. See *Livingston v. State*, 441 So.2d 1083, 1087 (Fla.1983). In other words, would the facts (which must be taken as true in a motion to disqualify) prompt a reasonably prudent person to fear that he could not get a fair and impartial trial. See e.g., *Peterson v. Asklepious*, 833 So. 2d 262 (Fla. 4th DCA 2002).

The facts alleged in the motion need only show that “the party making it has a well grounded fear that he will not receive a fair trial at the hands of the judge.” *Dewell*, 131 Fla. at 573, 179 So. at 697. “If the attested facts supporting the suggestion are reasonably sufficient to create such a fear, it is not for the trial judge to say that it is not there.” *Parks*, 141 Fla. at 518, 194 So. at 614. Further, “it is a question of what feeling resides in the affiant's mind and the basis for such feeling.” *Dewell*, 131 Fla. at 573, 179 So. at 697-98. (*Livingston v. State*, 441 So.2d 1083 (Fla. 10/27/1983).)

166. In determining the legal sufficiency of a motion to disqualify, a court looks to see whether the facts alleged would place a reasonably prudent person in fear of not receiving fair and impartial treatment from the trial judge. *See, e.g., Johnson v. State*, 769 So. 2d 990 (Fla. 2000). In the instant case, a reasonably prudent person, would be in fear that Judge Jeffrey L. Ashton, because of his prejudice or bias, deprived him of fair and impartial treatment.

167. Judge Jeffrey L. Ashton has to accept the truth of Windsor's statements.

When a party seeks to disqualify a judge under section 38.10, the judge cannot pass on the truth of the statements of fact set forth in the affidavit. *State v. Dewell*, 131 Fla. 566, 179 So. 695 (1938). The facts and reasons for the belief of prejudice must be taken as true, and the judge may only pass on the legal sufficiency of the motion and supporting affidavits to invoke the statute. *Raybon v. Burnette*, 135 So.2d 228 (Fla. 2d DCA 1961). Section 38.10 creates a substantive right to seek the disqualification of a trial judge, but the process of the disqualification is procedural. *Livingston v. State*, 441 So.2d 1083 (Fla.1983).

THE IMPARTIALITY OF JUDGE JEFFREY L. ASHTON MUST BE QUESTIONED.

168. An objective observer, lay observer, and/or disinterested observer must entertain significant doubt of the impartiality of Judge Jeffrey L. Ashton.

169. The Code of Judicial Conduct requires that Judge Jeffrey L. Ashton disqualify himself.

The Code of Judicial Conduct sets forth basic principles of how judges should conduct themselves in carrying out their judicial duties. Canon 3-C(1) states that “[a] judge should disqualify himself in a proceeding in which his impartiality might reasonably be questioned” This is totally consistent with the case law of this Court, which holds that a party seeking to disqualify a judge need only show “a well grounded fear that he will not receive a fair trial at the hands of the judge. It is not a question of how the judge feels; it is a question of what feeling resides in the affiant’s mind and the basis for such feeling.” *State ex rel. Brown v. Dewell*, 131 Fla. 566, 573, 179 So. 695, 697-98 (1938). *See also Hayslip v. Douglas*, 400 So.2d 553 (Fla. 4th DCA 1981). The question of disqualification focuses on those matters from which a litigant may reasonably question a judge’s impartiality rather than the judge’s perception of his ability to act fairly and impartially.

JUDGE JEFFREY L. ASHTON IS REQUIRED TO RULE IMMEDIATELY.

170. Judge Jeffrey L. Ashton is required to immediately address the Motion to Disqualify and promptly address the Motion to Recuse.

This Court has strictly applied the above language because an allegation of judicial prejudice is always a serious matter. Thus, the rule provisions concerning “immediate” resolution have been accorded their plain meaning, which the Court has explained requires action that is “prompt” and “with dispatch.” *Livingston v. State*, 441 So.2d 1083, 1085 (Fla. 1983). Our comment on the adoption of rule 2.160 emphasizes a trial judge’s responsibility to act quickly on such a motion: “We find the motion [to disqualify] should be ruled on immediately following its presentation to the court.” *Florida Bar re Amendment to Fla. Rules of Judicial Admin.*, 609 So.2d 465, 466 (1992). When a trial court fails to act in accord with the statute and procedural rule on a motion to disqualify, an appellate court will vacate a trial court judgment that flows from that error. See, e.g., *Cave v. State*, 660 So.2d 705, 708 (Fla. 1995) (“[W]e find that Judge Walsh’s conduct failed to follow the procedural process outlined in rule 2.160 and his error requires us to vacate Cave’s sentence.”). (*Escalona v. Wisotsky*, 781 So.2d 1063, 25 Fla. L. Weekly S1080 (Fla. 11/30/2000).)

WINDSOR IS ENTITLED TO THE COLD NEUTRALITY OF AN IMPARTIAL JUDGE.

171. Windsor is entitled to an impartial judge, and that is not Judge Jeffrey L. Ashton.

“Every litigant is entitled to nothing less than the cold neutrality of an impartial judge. It is the duty of Courts to scrupulously guard this right and to refrain from attempting to exercise jurisdiction in any matter where his qualification to do so is seriously brought in question. *Hayslip v. Douglas*, 400 So.2d at 557 (quoting *State ex rel. Davis v. Parks*, 141 Fla. 516, 194 So. 613, 615 (1939)).

“We find that the motion and supporting affidavits were legally sufficient, and the proper procedure, in light of the serious allegation of bias, was for the judge to grant the motion. (*James v. Theobald*, 557 So.2d 591, 15 Fla. L. Weekly D215 (Fla.App. Dist.3 01/16/1990).)

“Where there is any legally sufficient basis, whether factually accurate or not, for a founded fear of possible prejudice to exist in the mind of a defendant, recusal is mandated.” See, e.g., *Management Corporation of America, Inc. v. Grossman*, 396 So.2d 1169 (Fla. 3rd DCA 1981).

**JUDGE JEFFREY L. ASHTON FAILED TO PROVIDE DUE PROCESS
AND EQUAL PROTECTION TO WINDSOR.**

172. Judge Jeffrey L. Ashton has violated Windsor’s civil and Constitutional rights under color of law.

“[t]rial before an ‘unbiased judge’ is essential to due process.” *Johnson v. Mississippi*, 403 U.S. 212, 216 (1971); accord *Concrete Pipe & Prods. V. Constr. Laborers Pension Trust*, 508 U.S. 602, 617 (1993) (citation omitted). (See also *Levine v. United States*, 362 U.S. 610, 80 S.Ct. 1038 (1960), citing *Offutt v. United States*, 348 U.S. 11, 14, 75 S. Ct. 11, 13 (1954); *Mathews v. Eldridge*, 424 U.S. 319, 344 (1976); *Peters v. Kiff*, 407, U.S. 493, 502 (1972)

173. Windsor has just cause to believe that he cannot be given a fair trial.

174. The due process clauses of both the Florida and the United States Constitutions guarantee a party an impartial and disinterested tribunal in civil cases. *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242, 100 S.Ct. 1610, 1613 (1980).

Partiality in favor of the government may raise a defendant’s due process concerns.” *In re United States of America*, 441 F.3d at 66 (citing *In re Murchison*, 349 U.S. 133 (1955).

28 U.S.C. 155 may sometimes bar trial by judges who have no actual bias and who would do their very best to weigh the scales of justice equally between contending parties, but due process of law requires no less.” *Taylor v. Hayes*, 418 U.S. 488, 501 (1974) (citations and quotation marks omitted). See also *Murchison*, 349 U.S. at 136.

175. Judge Jeffrey L. Ashton has effectively denied Windsor’s rights of the equal protection under the law under Article VI of the Constitution.

**JUDGE JEFFREY L. ASHTON IS VIOLATING
THE CONSTITUTIONAL RIGHTS OF WINDSOR.**

176. Judge Jeffrey L. Ashton has violated Windsor’s Constitutional rights.

177. The Amendments provide the Constitutional right to self-representation. That right should be enjoyed without fear of harassment or judicial prejudice. Furthermore, no law,

regulation, or policy should exist to abridge or surreptitiously extinguish that right. Pro Se Litigants have no less of a right to effective due process as those who utilize an attorney.

178. For due process and to secure the Constitutional rights of Windsor, judges may not take the law into their own hands. But this is precisely what Judge Jeffrey L. Ashton has done. He has ignored the law, ignored the facts, and claimed laws and rules provide something that they do not provide, while abusing and disadvantaging Windsor.

179. For due process to be secured, the laws must operate alike upon all and not subject the individual to the arbitrary exercise of governmental power. (*Marchant v. Pennsylvania R.R.*, 153 U.S. 380, 386 (1894).) Judge Jeffrey L. Ashton has violated Windsor's rights by using his power to inflict his bias.

180. For due process, Windsor has the right to protections expressly created in statute and case law. Judge Jeffrey L. Ashton has violated Windsor's rights by using his power to ignore facts and the law.

181. Due process allegedly ensures that the government will respect all of a person's legal rights and guarantee fundamental fairness and justice. Judge Jeffrey L. Ashton's actions have violated Windsor's rights and denied justice.

182. Due process requires an established course for judicial proceedings designed to safeguard the legal rights of the individual. Action denying the process that is "due" is unconstitutional. Inherent in the expectation of due process is that the judge will abide by the rules. Judge Jeffrey L. Ashton has interfered with the process and violated rules for the purpose of damaging Windsor.

183. An inherent Constitutional right is the honesty of the judge. Judge Jeffrey L. Ashton has not been honest. Judge Jeffrey L. Ashton has violated Canons 1, 2, and 3 of the

Code of Judicial Conduct.

184. Due process guarantees basic fairness and to make people feel that they have been treated fairly. Windsor has not been treated fairly.

185. Judge Jeffrey L. Ashton has effectively denied Windsor's rights of the equal protection under the law.

PRAYER FOR RELIEF

WHEREFORE, having now filed this Verified Motion to Disqualify Judge Jeffrey L. Ashton, Verified Motion to Recuse Judge Jeffrey L. Ashton, the sworn Affidavit of Prejudice, and the Certificate of Good Faith, Plaintiff Windsor respectfully requests as follows:

- (1) that Windsor's Motion to Disqualify Judge Jeffrey L. Ashton is granted;
- (2) that Windsor's Motion to Recuse Judge Jeffrey L. Ashton is granted;
- (3) that this Motion be referred to another judge for a hearing;
- (4) that the Court issue an order disqualifying Judge Jeffrey L. Ashton;
- (5) that the Court reconsider or strike all orders by Judge Munyon, Judge Kest, and Judge Jeffrey L. Ashton; and
- (6) that the Court grant such other and further relief as justice requires.

This 17th day of March 2023,



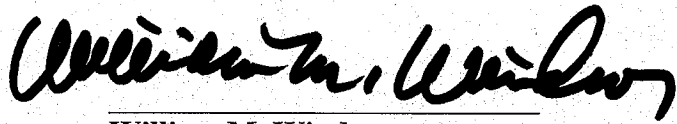
William M. Windsor
5013 S Louise Ave #1134
Sioux Falls, South Dakota 57108
352-661-8472
windsorinsouthdakota@yahoo.com

VERIFICATION

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification and that the facts alleged in the foregoing are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

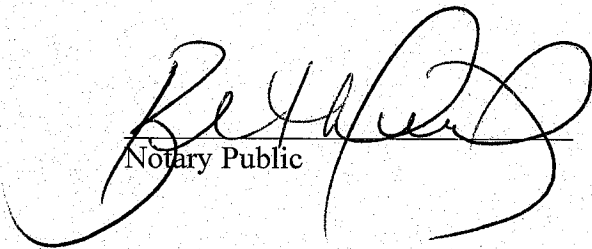
I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 17th day of March 2023,

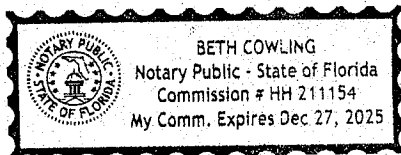


William M. Windsor
5013 S Louise Ave #1134
Sioux Falls, South Dakota 57108
352-661-8472
windsorinsouthdakota@yahoo.com

Sworn and subscribed before me this 17th day of March 2023, by means of physical presence.



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing by Electronic Mail or United States Postal Service:

**Blake Mansker
Scott Warburton**

Adams | Coogler, P.A., 1555 Palm Beach Lakes Blvd. Suite 1600
West Palm Beach, FL 33401-2329
561-478-4500 -- Fax: 561-478-7847
bmansker@adamscoogler.com, rurban@adamscoogler.com,
swarburton@adamscoogler.com, and ajohnson@adamscoogler.com

Judge Jeffrey L. Ashton

1023 Tuscany Place, Winter Park, FL 32789, 407-836-2008
37orange@ninthcircuit.org, jdog4068@att.net, wpsenior@sbcglobal.net, vet2b813@aol.com,
jeffrey.ashton@hotmail.com, jdog4068@aol.com, pestv@aol.com,
5jdog4068@aol.com, jdog406806@aol.com, jdog4068v1@aol.com,
vet2b@aol.com, famash@earthlink.net, jeffreyashton@netscape.net,
jashton@sao9.org, michelle.ashton79@gmail.com, jlashtonlaw@gmail.com

This 17th day of March 2023,



William M. Windsor
5013 S Louise Ave #1134
Sioux Falls, South Dakota 57108
352-661-8472
windsorinsouthdakota@yahoo.com