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 AFFIDAVIT OF PREJUDICE OF JUDGE JEFFREY L. ASHTON DATED MARCH 17, 2023

I, William Michael Windsor, the undersigned, hereby declare under penalty of perjury:

- 1. My name is William Michael Windsor ("Windsor"). I am 74 years old, am absolutely competent to testify and represent myself, and have personal knowledge of the matters stated herein.
- 2. Several courts have written: "The right to represent oneself in a civil proceeding is on a scale of importance equal to the right of trial by jury." Today, it is estimated that 60% of the people appearing in court do not have attorneys.
- 3. Eighty percent of state criminal defendants cannot afford to pay for a lawyer, and only those who are actually incarcerated are Constitutionally entitled to appointed counsel. In some states, as many as 80 to 90 percent of litigants are unrepresented, even though their opponent has a lawyer. The number of these "pro se litigants" has risen substantially in the last decade. The Legal Services Corporation, the single largest funder of civil legal aid for low-income Americans in the nation, reported in June 2017 that 86 percent of low-income Americans receive inadequate or no professional legal help for the civil legal problems they face. In

Georgia, state courts heard more than 800,000 cases involving self-represented litigants in 2016 alone. The Self-Represented Litigation Network reported on 2/17/2023 that approximately 1 out of 10 people in the United States is involved in a newly filed case each year and that 3 out of 5 in civil cases do not have a lawyer.

- 4. I am the Plaintiff in this action, and I have been representing myself pro se. <sup>1</sup> I first represented myself pro se in 1990, and I won. In Orders that I believe are VOID, Judge Jeffrey L. Ashton claims I may not represent myself and must retain an attorney. He is well aware that I'm in Chapter 13 Bankruptcy, cannot afford an attorney, and have tried unsuccessfully to get an attorney. [EXHIBITS 3825 and 4056.] He is simply working to destroy me with an uncontrollable prejudice for attorneys and bias against pro se parties. The truth is I believe I am better thana any attorney. I am more intelligent. I am more thorough. I am an excellent reader. I care. And I am FREE.
- 5. I have several websites that provide background on me and this case, including http://www.BillWindsor.com; http://www.LawlessAmerica.com; facebook.com/billwindsor1; and http://jeffreylashton.com.
- 6. This Affidavit of Prejudice of Judge Jeffrey L. Ashton ("AFFIDAVIT OF PREJUDICE 3/17/2023") is offered in support of the 3/17/2023 Motion to Disqualify and Motion to Recuse Judge Jeffrey L. Ashton ("THIRD MOTION TO DISQUALIFY") [EXHIBIT 1288] and a Judicial Misconduct Complaint against Judge Jeffrey L. Ashton ("MISCONDUCT COMPLAINT")

  <sup>2</sup> I allege specifically the facts and reasons upon which I rely as the grounds for disqualification,

<sup>&</sup>lt;sup>1</sup> I am divorced and live alone in a trailer. I have no assistance in my legal work. Due to the accident that caused this case, I have lost all balance and can no longer walk. I am a two-finger typist, but I no longer have use of my left hand, so this has been typed with my right index finger and copy and paste from previous filings.

<sup>&</sup>lt;sup>2</sup> The APPENDIX is provided on a Flash Drive that is either enclosed or sent in a separate envelope, with each document numbered 100 to 4090. There are many documents not referenced herein, but some of these could be of interest. The Flash Drive contains virtually

and identify the precise date when the facts constituting the grounds for the motion were discovered by me.

7. The Florida Code of Judicial Conduct has seven (7) Canons. Canons 1 to 4 are relevant to Jeffrey L. Ashton.

## 8. <u>CANON 1. A JUDGE SHALL UPHOLD THE INTEGRITY AND INDEPENDENCE OF THE JUDICIARY.</u>

- 9. An independent and honorable judiciary is indispensable to justice in our society. A judge should participate in establishing, maintaining, and enforcing high standards of conduct, and shall personally observe those standards so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.
- 10. Deference to the judgments and rulings of courts depends upon public confidence in the integrity and independence of judges. The integrity and independence of judges depend in turn upon their acting without fear or favor. Although judges should be independent, they must comply with the law, including the provisions of this Code. Public confidence in the impartiality of the judiciary is maintained by the adherence of each judge to this responsibility. Conversely, violation of this Code diminishes public confidence in the judiciary and thereby does injury to the system of government under law.

#### 11. Judge Jeffrey L. Ashton violates Canon 1.

12. Canon 1 of the Florida Code of Judicial Conduct: A JUDGE SHALL UPHOLD

every document that 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.

THE INTEGRITY AND INDEPENDENCE OF THE JUDICIARY: An independent and honorable judiciary is indispensable to justice in our society. A judge should participate in establishing, maintaining, and enforcing high standards of conduct, and shall personally observe those standards so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.

- depends upon public confidence in the integrity and independence of judges. The integrity and independence of judges depend in turn upon their acting without fear or favor. Although judges should be independent, they must comply with the law, including the provisions of this Code. Public confidence in the impartiality of the judiciary is maintained by the adherence of each judge to this responsibility. Conversely, violation of this Code diminishes public confidence in the judiciary and thereby does injury to the system of government under law.
- 14. Judge Jeffrey L. Ashton is not honorable. He maintains the lowest possible standards. He does not comply with the law or the Code of Judicial Conduct. My only confidence is that Judge Jeffrey L. Ashton should be removed as a judge and disbarred. He is a menace to the citizens of the State of Florida.
- 15. Judge Jeffrey L. Ashton's failure to comply with the law, the Code of Judicial Conduct, and the rules as well as his propensity for committing crimes is detailed herein. Public confidence in the impartiality of the judiciary is maintained by the adherence of each judge to this responsibility. There can be no public confidence in Judge Jeffrey L. Ashton. He is well-known nationwide as a liar.
- 16. CANON 2. A JUDGE SHALL AVOID IMPROPRIETY AND THE

  APPEARANCE OF IMPROPRIETY IN ALL OF THE JUDGE'S ACTIVITIES

- 17. Canon 2 A. A judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.
- 18. "Impropriety" is defined by The Brittanica Dictionary as "rude or immoral behavior; improper behavior."
- 19. He has been extremely rude calling me a liar and falsely and maliciously of accusing me of making a threat to him.
- 20. Judge Jeffrey L. Ashton's Ashley Madison activities are clearly immoral and improper.
  - 21. As detailed herein, Judge Jeffrey L. Ashton does not comply with the law.
- 22. He does not comply with The United States Constitution; The First, Fifth, Sixth, Eighth, and Fourteenth Amendments to the United States Constitution; The Due Process Clause of the Fifth Amendment to the U.S. Constitution; The Constitution of the State of Florida; Chapter13 of the United States Bankruptcy Code; Florida Statute 38.10; Florida Statute 90.604; Florida Statute 90.605; Florida Statute 90.802; Florida Statute 90.957; Florida Statute 92.525; Florida Statute Section 876.05; Florida Rules of Judicial Administration Rule 2.160; Florida Rules of Judicial Administration Rule 2.330; Florida Rules of Judicial Conduct; Canon 2 of the Code of Judicial Conduct; Canon 2 of the Code of Judicial Conduct; Canon 3 of the Code of Judicial Conduct; Canon 3 (B) (1) of the Code of Judicial Conduct; Canon 3 (B) (2) of the Code of Judicial Conduct; Canon 3 (B) (3) of the Code of Judicial Conduct; Canon 3 (B) (5) of the Code of Judicial Conduct; Canon 3 (B) (7) of the Code of Judicial Conduct; Canon 3 (B) (8)

of the Code of Judicial Conduct; Canon 3 (B) (9) of the Code of Judicial Conduct; Canon 3 (C) (1) of the Code of Judicial Conduct; Canon 3 (C) (2) of the Code of Judicial Conduct; Canon 3 (D) (1) of the Code of Judicial Conduct; Canon 3 (D) (2) of the Code of Judicial Conduct; Canon 3 (E) (1) of the Code of Judicial Conduct; Canon 4 of the Code of Judicial Conduct; and more.

- 23. As stated in the Commentary to Canon 2A, "Irresponsible or improper conduct by judges erodes public confidence in the judiciary. A judge must avoid all impropriety and appearance of impropriety."
- 24. Judge Jeffrey L. Ashton is the poster child for impropriety. He has brought national publicity to Florida for his infidelity with his wife, Rita Brockway Ashton, his perverted sexual desires, and his braggadocios claims about his purported sexual prowess for the world to read.

## 25. Judge Jeffrey L. Ashton violated Canon 2A when he made himself a candidate for judge.

- 26. The lies and wrongdoing of Judge Jeffrey L. Ashton in this case will also receive national publicity eroding public confidence in the judiciary.
- 27. As stated in the Commentary to Canon 2A, "The prohibition against behaving with impropriety or the appearance of impropriety applies to both the professional and personal conduct of a judge. ... Actual improprieties under this standard include violations of law, court rules, or other specific provisions of this Code. The test for appearance of impropriety is whether the conduct would create in reasonable minds, with knowledge of all the relevant circumstances that a reasonable inquiry would disclose, a perception that the judge's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired."

- 28. No one could be aware of the outrageous actions of Judge Jeffrey L. Ashton in this case and have any perception other than he is unable to carry out judicial responsibilities with integrity, impartiality, or competence. The history of Jeff Ashton shows that he is an impaired human being who has no business being a judge.
- 29. Canon 2 B. A judge shall not allow family, social, political or other relationships to influence the judge's judicial conduct or judgment. A judge shall not lend the prestige of judicial office to advance the private interests of the judge or others; nor shall a judge convey or permit others to convey the impression that they are in a special position to influence the judge. A judge shall not testify voluntarily as a character witness.
- 30. As stated in the Commentary to Canon 2B, "Maintaining the prestige of judicial office is essential to a system of government in which the judiciary functions independently of the executive and legislative branches. Respect for the judicial office facilitates the orderly conduct of legitimate judicial functions. Judges should distinguish between proper and improper use of the prestige of office in all of their activities.
- 31. Jeff Ashton had no business being a candidate for public office. He is an infamous liar as established in the Ashley Madison Scandal. I am collecting Jeff Ashton videos:
  - https://jeffreylashton.com/jeffrey-l-ashton-videos/.
     https://www.youtube.com/watch?v= OHejEc1178
  - https://jeffreylashton.com/jeff-ashton-says-on-ashley-madison-he-has-a-skillfultongue-and-fingers-and-member/
- 32. Judge Jeffrey L. Ashton routinely violates Canon 2 of The Code of Judicial Conduct.

- 33. Judge Jeffrey L. Ashton does not comply with the law or act in a manner that promotes public confidence in the integrity and impartiality of the judiciary. ANY reasonable mind, with knowledge of all the relevant circumstances that a reasonable inquiry would disclose, would find that Judge Jeffrey L. Ashton 's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired. He has no integrity. He is hopelessly biased against me, and he may be absolutely incompetent to serve as a judge. He's a rude, condescending bully.
  - 34. This Affidavit is filled with examples of violations of Canon 2.
- 35. CANON 3. A JUDGE SHALL PERFORM THE DUTIES OF JUDICIAL

  OFFICE IMPARTIALLY AND DILIGENTLY
  - 36. The Code of Judicial Conduct, Canon 3, says:
  - "A JUDGE SHALL PERFORM THE DUTIES OF JUDICIAL OFFICE IMPARTIALLY AND DILIGENTLY."
  - 37. Judge Jeffrey L. Ashton violates Canon 3.
  - 38. Judge Jeffrey L. Ashton does nothing impartially.
- 39. He is not patient, dignified, or courteous to me. I believe he has caused his assistant, Keitra Davis, and the staff of the Clerk of Court to ignore my inquiries, filings, and requests for hearings.
- 40. The accident that disabled me took place on 5/5/2017. The complaint was filed on 9/20/2018. His 2/21/2023 REVOCATION ORDER unlawfully revokes my right of self-representation and cites two cases as justification that do not give him legal authority and proves his violation of due process which establishes he is disqualified in this case.

- 41. With Judge Jeffrey L. Ashton, it's like he sees it as his duty to violate Canon 3 every time he does anything in this case.
- 42. Canon 3 (B) (1) says a judge shall hear and decide matters assigned to the judge except those in which disqualification is required.
- 43. Judge Jeffrey L. Ashton has been disqualified to hear matters in this case as he has been obligated to remove himself.

#### 44. Judge Jeffrey L. Ashton violates Canon 3 (B) (1).

45. Canon 3 (B) (2) requires that a judge shall be faithful to the law and maintain professional competence in it.

#### 46. Judge Jeffrey L. Ashton violates Canon 3 (B) (2).

47. As this AFFIDAVIT details, Judge Jeffrey L. Ashton has been totally unfaithful to the law, and if he is not terminally corrupt, he has no professional competence. Just ask Casey Anthony.

#### 48. Judge Jeffrey L. Ashton violates Canon 3 (B) (3).

- 49. Judge Jeffrey L. Ashton violated Canon 3 repeatedly as he has not been faithful to the law and he seems to lack professional competence. From my analysis, he became the judge in this case so he could ensure that my rights were violated, and I would lose. He has violated the Constitutions. He has allowed the Defendants to violate a host of rules and laws.
- 50. Canon 3 (B) (4) requires: "A judge shall be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity, and shall require similar conduct of lawyers, and of staff, court officials, and others subject to the judge's direction and control."

#### 51. Judge Jeffrey L. Ashton violates Canon 3 (B) (4).

- 52. He been anything but patient, dignified, and courteous to me. He has accused me of being a liar in open court on several occasions. He has outrageously accused me of making a threat to him. I have never lied, and I have never made a threat.
- 53. Canon 3 (B) (5) requires: "A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the performance of judicial duties, by words or conduct manifest bias or prejudice, including but not limited to bias or prejudice based upon race, sex, religion, national origin, disability, age, sexual orientation, or socioeconomic status, and shall not permit staff, court officials, and others subject to the judge's direction and control to do so. This section does not preclude the consideration of race, sex, religion, national origin, disability, age, sexual orientation, socioeconomic status, or other similar factors when they are issues in the proceeding."

#### 54. Judge Jeffrey L. Ashton violates Canon 3 (B) (5).

- 55. I am disabled, and Judge Jeffrey L. Ashton has ignored or denied my requests for accommodations. I am 74, and I must speculate that Judge Jeffrey L. Ashton is prejudiced against an old man trying a case in his court. He is clearly prejudiced against non-attorneys. He has repeatedly told me I need an attorney. He lied about the reasons, and it is none of his business whether I have an attorney. I am in Chapter 13 bankruptcy, and he discriminates against me because of my socioeconomic status. He has made his bias extremely clear to the Defense Attorneys, and he has coached them on what he wants them to do. I believe he is biased against me because he recognizes that I am much more intelligent than he is or any of the defense attorney are or have been.
- 56. Judge Jeffrey L. Ashton has spoken, made gestures, and committed other conduct that screams bias and prejudice. Judge Jeffrey L. Ashton is mentally incapable of performing his

judicial duties impartially and fairly. By manifesting his bias, he impairs the fairness of the proceeding and brings the judiciary into disrepute. Facial expression and body language, in addition to oral communication, can give to parties or lawyers in the proceeding, jurors, the media and others an appearance of judicial bias.

57. Canon 3 (B) (7) requires: "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."

#### 58. Judge Jeffrey L. Ashton violates Canon 3 (B) (7).

- 59. He has denied my right to represent myself, which is the law, from close to the start of his involvement in this case over 800 days ago. The ultimate violation was an order issued 2/21/2023 that denies me the right to represent myself. [EXHIBIT 4056.] His alleged authority for this does not exist. He cited two cases, and in both of the cases, notice and an opportunity to be heard was given. In my case, this order came out of the blue with no notice and no opportunity to be heard. The Fourteenth Amendment to the United States Constitution is clear: "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."
- 60. Canon 3 (B) (8) requires: "A judge shall dispose of all judicial matters promptly, efficiently, and fairly."

#### 61. Judge Jeffrey L. Ashton violates Canon 3 (B) (8).

62. He has done nothing promptly, efficiently, or fairly. In just 49 days, my personal injury case will have been pending for six years. The latest unlawful acts of Judge Jeffrey L.

Ashton make it impossible for there to be a trial on 5/22/2023. I have serious injuries, and I cannot afford to get medical treatment until this lawsuit is resolved.

- 63. Judge Jeffrey L. Ashton has not demonstrated due regard for my rights to be heard and to have issues resolved without unnecessary cost or delay.
- 64. My requests for hearings have been routinely ignored. I believe he has instructed the Clerk of Court to fail to issue my subpoenas for production from non-parties
- 65. Canon 3 (B) (9) requires: "A judge shall not, while a proceeding is pending or impending in any court, make any public comment that might reasonably be expected to affect its outcome or impair its fairness or make any nonpublic comment that might substantially interfere with a fair trial or hearing."

#### 66. Judge Jeffrey L. Ashton violates Canon 3 (B) (9).

- 67. He has made public comments during hearings that demean me, lie about me, and give the attorneys for the Defendants the green light to file anything and everything without legal or factual foundation knowing they can get away with it.
- 68. Canon 3C (1) requires: "A judge shall diligently discharge the judge's administrative responsibilities without bias or prejudice and maintain professional competence in judicial administration and should cooperate with other judges and court officials in the administration of court business."

#### 69. Judge Jeffrey L. Ashton violates Canon 3 (C) (1).

70. EVERYTHING he has done and not done in this case has been done with extreme bias against me. He has no competence in a fundamental requirement of the United States Constitution. At least he ignores his obligations under the Constitution because he thinks he can get away with violating due process and making up his own laws.

71. Canon 3C (2) requires: "A judge shall require staff, court officials, and others subject to the judge's direction and control to observe the standards of fidelity and diligence that apply to the judge and to refrain from manifesting bias or prejudice in the performance of their official duties.

#### 72. Judge Jeffrey L. Ashton violates Canon 3 (C) (2).

- 73. I believe he has instructed his Judicial Assistant, Keitra Davis, and the Clerk of the Court, Tiffany Moore Russell, to ignore their ethical and legal obligations and damage me through inaction.
- 74. Canon 3D (1) commands: "A judge who receives information or has actual knowledge that substantial likelihood exists that another judge has committed a violation of this Code shall take appropriate action."

#### 75. Judge Jeffrey L. Ashton violates Canon 3 (D) (1).

- 76. Judge Jeffrey L. Ashton is well aware that both Judge Lisa T. Munyon and John Marshall Kest have violated the Code of Judicial Conduct, but he did not take appropriate action.
- 77. Canon 3D (2) also requires: "A judge who receives information or has actual knowledge that substantial likelihood exists that a lawyer has committed a violation of the Rules Regulating the Florida Bar shall take appropriate action."

#### 78. Judge Jeffrey L. Ashton violates Canon 3D (2).

- 79. Judge Jeffrey L. Ashton is well aware that all of the defense attorneys in this case have violated many of the Rules Regulating the Florida Bar, and he has taken no action other than to aid and abet them in their unlawful acts.
- 80. Canon 3E (1) requires: "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."

#### 81. Judge Jeffrey L. Ashton violates Canon (3) (E) (1).

- 82. Under this rule, a judge is disqualified whenever the judge's impartiality might reasonably be questioned, regardless of whether any of the specific rules in Section 3 (E) (1) apply.
- 83. There can be no doubt in any honest person's mind that the impartiality of Judge Jeffrey L. Ashton might reasonably be questioned.
- 84. Judge Jeffrey L. Ashton also knows he has been named as a material witness in the case.

# 85. CANON 4. A JUDGE IS ENCOURAGED TO ENGAGE IN ACTIVITIES TO IMPROVE THE LAW, THE LEGAL SYSTEM, AND THE ADMINISTRATION OF JUSTICE

- 86. Judge Jeffrey L. Ashton is incapable of performing his judicial duties without bias or prejudice. He expresses his bias and prejudice in hearings.
- 87. <u>Black's Law Dictionary</u> defines "bias as "a preconceived opinion; a predisposition to decide a cause or an issue in a certain way". <u>The Legal Dictionary</u> defines "bias" as a "predisposition against or in favor of one or another side in a lawsuit which, under certain circumstances, is grounds for disqualification of a judge or exclusion of a juror." <u>Black's Law Dictionary</u> defines "prejudice" as "To decide beforehand; to lean in favor of one side of a cause for some reason or other than its justice."

- 88. Judge Jeffrey L. Ashton has an extreme bias against me as I am po se and also possibly because of my disability, age (74), bankruptcy, my intellect, and the reality that, unlike members of the BAR, I am creative and fearless.
- 89. Judge Jeffrey L. Ashton does not dispose of all judicial matters promptly, efficiently, or fairly. My requests for hearings are routinely ignored.
- 90. Judge Jeffrey L. Ashton makes a mockery of his Administrative Responsibilities: He is a biased, prejudiced bully. He seems to lack professional competence. He doesn't understand the definition of basic words. He has said he would charge me with contempt for making a threat to him. I've never threatened him. A threat is a "menace of destruction or injury to the lives or property of those against whom it is made." See Paragraphs 351 to 355.
- 91. I have filed two Motions for recusal and disqualification against Judge Jeffrey L. Ashton, and he denied the first one by falsely claiming it was based on judicial rulings.

  [EXHIBITS 4051, 3256, 3505.] A quick read of the FIRST MOTION makes it extremely clear that it is not based on judicial rulings.
- 92. He never responded to the second one and had it unlawfully removed from the Docket. See Paragraphs 171 to 174
- 93. I would have already filed a third, but Judge Jeffrey L. Ashton will not allow me to. So, I am "moving" in every way I can think of.
- 94. Canon 1 of the Florida Code of Judicial Conduct states: "A JUDGE SHALL UPHOLD THE INTEGRITY AND INDEPENDENCE OF THE JUDICIARY."
- 95. Judge Jeffrey L. Ashton disgraces the Great State of Florida with his terminal violations of Canon 1.

- 96. Judge Jeffrey L. Ashton is not honorable. He maintains the lowest possible standards. He does not comply with the law or the Code of Judicial Conduct. Judge Jeffrey L. Ashton should be removed as a judge and disbarred. He is a menace to the citizens of the State of Florida.
- 97. I am not an attorney. However, I have studied law, and I know improper actions by attorneys and judges when I see them. Judge Jeffrey L. Ashton has committed one improper action after another. Judge Jeffrey L. Ashton is maliciously biased against me. As I testified previously on 4/5/2021, the extent of his bias against me is truly overwhelming. [EXHIBIT 4060 Transcript of Hearing 4/5/021 P.6: 12-16.]
  - 98. A few key things happened before Judge Jeffrey L. Ashton appeared in this case.
- 99. In 2007, I was surprised to discover that federal judges in Georgia were corrupt. I committed to expose this.
- 100. Since 2008, I have helped people who could not afford an attorney. I did this at no charge as a friend and paralegal. I have helped over 2,000 people and have met face-to-face with 1,500 victims of INjustice in every state. I am not an attorney, and I do not give legal advice. I simply help friends who have nowhere to turn.
  - 101. On 10/15/2016, I moved to Leesburg, Florida.
- 102. On 5/5/2017, I was hit by an 18-wheeler at 70 miles-per-hour. [EXHIBIT 185.] That's what this case started out to be about. Now it is also about corruption and intentional infliction of emotional distress. It is also possible that what I thought was an accident on 5/5/2017 was attempted murder.
- 103. Over the last 6 years, I have seen dozens of medical personnel and have had many MRIs, CT-SCANS, X-rays, and other tests. I have been diagnosed with five herniated discs in

my neck, four in my back, and Diastasis Recti, an abdominal injury. On 12/26/2022, I fell and hit my behind, back, neck, and head. It caused me to lose the use of my left hand. Three MRIs still need to be conducted, but after a dozen X-Rays, it is believed the 5/5/2017 injury to my neck is the cause. EXHIBIT 1290 is an alphabetical list of the EXHIBITS on the Flash Drive. Go down the list to MEDICAL, and all of the medical records will be grouped together,

- 104. On 8/8//2017, Judge Elizabeth Starr held a hearing in Ocoee and found me not guilty of Citation Number A7M2MGE. [EXHIBITS 120, 138, 3204.]
- 105. On 9/20/2018, after 16 months, the law office of Dan Newlin finally filed the lawsuit. It was assigned to Judge Lisa T. Munyon.
  - 106. On 2/26/2020, I fired Dan Newlin and began representing myself.
- 107. It was obvious to me that the attorneys for the Defendants were doing everything possible to stall the case.
  - 108. They have made statements they know are false in their Answer.
  - 109. They have made statements they know are false in their Interrogatories.
  - 110. They have made statements they know are false in their Admissions.
- 111. They stalled the Inspection of the truck that caused the accident for five years.

  And I have reason to believe the truck they produced is not the one that was in the accident.
- 112. The judges have aided and abetted in the denial of discovery. Judge Lisa T.

  Munyon granted a protective order to stop discovery when there was no legal authority to do so.
- 113. Judge John Marshall Kest allowed that to continue. Judge John Marshall Kest allowed hearings on frivolous motions by the Defendants while ignoring violations of his own rules and orders. Judge John Marshall Kest outrageously stated in an order that two motions

were not being set for hearings because they were motions for reconsideration when clearly they were no such thing.

- 114. Judge John Marshall Kest claimed I made a false statement to the Court denying that the case had been stayed. The case was never stayed, and saying I made a false statement to the Court was both improper and erroneous.
- 115. Judge John Marshall Kest ignored the fact that there was no legal basis given by the Defendants for either of the motions that Judge John Marshall Kest ordered to be set for hearing.
- 116. Judge John Marshall Kest extended the trial date for another year when he would not even be a judge, with no consideration given to my medical condition.
- 117. Judge John Marshall Kest announced at the Case Management Conference that he treats pro se parties the same as attorneys, but this is neither true, fair, nor the law. Judge John Marshall Kest indicated at the Case Management Conference that he had independently researched cases I had been involved in, and he threatened me with sanctions for frivolous motions under Florida Statute 57.105. I have never filed anything frivolous.
- 118. Judge John Marshall Kest argued with me over whether there had been the required "meet and confer" with the Defendants' attorneys. Judge John Marshall Kest claimed that a telephone bullying by Attorney Scott L. Astrin amounted to a "confer." I tried to explain that confer means an actual discussion. Judge John Marshall Kest rejected that, yet he knew the specifics of the law while I as a pro se party did not. I was absolutely right about the requirements to confer, and Judge John Marshall Kest lied and claimed I was wrong. Judge John Marshall Kest is a past president and Governor of the Bar Association, so he has been a very active member of a club that the Defense attorneys belong to that I will never belong to.

- 119. Judge John Marshall Kest had been an attorney for 48 years and a judge for 17 years. He seemingly developed disdain for pro se parties over those 48 years. I developed these feelings because after studying the developments in this case, I saw Judge John Marshall Kest acting with bias again and again. Judge Jeffrey L. Ashton dismissed without any consideration my motion to have him reconsider Judge John Marshall Kest's orders. No honest judge could do that. In the hearing on 4/5/2021, I learned that Judge Jeffrey L. Ashton had not even read my motion.
- 120. On 5/10/2020, my insurance company, Progressive, informed me that I had no more benefit on the accident. As a result, I have not been able to obtain medical treatment for the last three years, and that will be my predicament until the trial of this case is over.
- Determine if Pro Se Plaintiff William Windsor was Mentally Competent to Represent Himself, a frivolous motion with no legal basis whatsoever. [EXHIBIT 3436.] It was unsigned and unverified, and Scott L. Astrin had not made an appearance in the case. Judge John Marshall Kest and Judge Jeffrey L. Ashton did not take action against Scott L. Astrin or the Defendants. There is absolutely no legal authority for this, and there has never been an appellate decision in the history of Florida over such a frivolous motion.
- 122. Judge Jeffrey L. Ashton's endorsement of this outrageous frivolous motion puts him in a class with the most corrupt of judges.
- 123. Scott L. Astrin seems to be a pathological liar. Upon information and belief, he may have the mental disorders mythomania or pseudologia fantastica. He may share those mental problems with Judge Jeffrey L. Ashton

- 124. On 7/27/2020, an attorney for the Defendants filed a Motion to Dismiss and for Sanctions. [EXHIBIT 3502.]
- 125. It was unsigned and unverified, and Scott L. Astrin had not made an appearance in the case. Judge John Marshall Kest and Judge Jeffrey L. Ashton did not take action against Scott L. Astrin or the Defendants. Again, there is absolutely no legal authority for this, and there has never been an appellate decision in the history of Florida over such a frivolous motion. Once again, Judge Jeffrey L. Ashton's endorsement of this outrageous frivolous motion puts him in a class with the most corrupt of judges.
- 126. The Notice of Appearance of Scott L. Astrin was filed 8/19/2020. [EXHIBIT 3520.] It is unsigned. It and all of the filings by the attorneys for the Defendants at that time used a fake address as confirmed to me by a Hillsborough County Deputy Sheriff.
- 127. Judge Jeffrey L. Ashton has allowed the attorneys for the Defendants to file over 100 unsigned pleadings. Pleadings must be signed, and unsigned pleadings must be stricken. I filed a Verified Motion to Strike Pleadings and Award Sanctions. The Motion sought to strike 75 unsigned pleadings. [EXHIBIT 4091.] It will never be heard. [EXHIBIT 4060.]
- 128. On 8/4/2020, I filed a Motion for Contempt against the Defendants. [EXHIBIT 3445.]
- 129. On 8/19/2020. I filed a Third Amended Motion for leave to file an Amended Complaint. [EXHIBIT 3487.]
- 130. On 8/25/2020. I filed a Motion to Disqualify Judge Lisa T. Munyon. [EXHIBIT3507.] She recused herself the same day. [EXHIBIT 3812.]
- 131. On 8/29/2020, I filed motions for fraud on the court. [EXHIBIT 1281.] [EXHIBIT 1282.] When Judge Jeffrey L. Ashton became the judge, I asked him to reconsider the order

denying the order claiming my motions were motions for reconsideration. Judge Jeffrey L. Ashton dismissed without any consideration my motion to have him reconsider Judge John Marshall Kest's orders. No honest judge could do that. My 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. In the hearing on 4/5/2021, I discovered that Judge Jeffrey L. Ashton had not even read Judge John Marshall Kest's orders much less my motion.

- 132. An 8/25/2020 Docket Entry showed the assignment to Judge John Marshall Kest following Judge Lisa T. Munyon's recusal.
- 133. Judge John Marshall Kest issued an "Order Requiring Compliance by Attorneys and *PRO SE* Litigants with Procedures and Administrative Orders on 9/1/2020. [EXHIBIT 3826.] This Order states:
  - "Administrative Order 2012-03 requires that a mandatory meet and confer be undertaken before a hearing or motion is scheduled. It is the responsibility of the party scheduling the hearing to arrange the conference. Failure to 'meet and confer' on each motion will result in a hearing being cancelled if it was scheduled and/or sanctions may be imposed." [emphasis added.]
- 134. The attorneys for the Defendants have repeatedly violated Administrative Order 2012-03. The judges did nothing.
- 135. I believe Judge Jeffrey L. Ashton appeared in the case solely for the purpose of damaging me and ensuring that I will lose.
- 136. Judge Jeffrey L. Ashton somehow took over Case 2018-CA-010270-O following the retirement of Judge John Marshall Kest. The Docket does not show an assignment of Judge

- Jeffrey L. Ashton while an 8/25/2020 Docket Entry showed the assignment to Judge John Marshall Kest following Judge Lisa T. Munyon's recusal.
- 137. On 1/27/2021 at 19-47-35 PM, I filed a Motion-for-Stay-and-or-Continuance for insufficient time for the 2/2/2021 hearing and need to get the Clerk to issue two subpoenas for testimony at the hearing. [EXHIBIT 3515.]
- 138. On 1/27/2021, I filed an Emergency Motion for Stay and/or Continuance until the Fifth District Court of Appeal ruled on my Petition for Writ of Prohibition. [EXHIBIT 3515.]
- 139. On 1/28/2021, Judge Jeffrey L. Ashton denied my Emergency Motion for Stay and/or Continuance claiming it was moot, which it was not. [EXHIBIT 3788.]
- 140. On 1/27/2021, Judge Jeffrey L. Ashton's Judicial Assistant, Keitra Davis, emailed me for the first time to introduce herself. She stated that "Hearing Notebooks, memorandums, and case law must be provided at least five (5) business days prior to the hearing." [EXHIBIT 3526 Exhibit 2 thereto.] The hearing was only four (4) business days away, so I requested that the 2/2/2021 hearing be reset for another date as the documentation could not be timely submitted. This was indicated as the necessary procedure in the email from Keitra Davis. There was no response to this Request or my emails.
- 141. On 1/27/2021 at 20-19-54 PM, I filed a Notice Request-for-Cancellation of Hearing for 02/02/2021. [EXHIBIT 3526.]
- 142. Judge Jeffrey L. Ashton first showed up in the case on 1/28/2021 at 17-08-21-PM when he denied my Motion for Stay. [EXHIBIT 3788.] He claimed EXHIBIT 3515 was moot. It wasn't moot, and he ignored the important issue of the 2/2/2021 hearing. One could chalk this up to haste or a mistake, but this proved to be the way Judge Jeffrey L. Ashton operated in inflicting his prejudice against me.

- 143. Within five days, he entered five orders adverse to me and five orders favorable to the Defendants.
- 144. On 1/28/2021 at 18-28-49-PM, I filed a Motion for Reconsideration of Emergency Motion for Stay and/or Continuance. [EXHIBIT 3463.] I explained that my Motion wasn't moot, and that he ignored the important issue of the 2/2/2021 hearing.
- 145. On 1/30/2021 at 6-33-18 AM, I filed a SECOND Motion to Stay AND CONTINUANCE. [EXHIBIT 3514.] This was due to medical complications with my eyes following my COVID-19 vaccination and inability to comply with the 1/27/2021 instructions of Keitra Davis. I spent a full day at Waterman Hospital at Moderna's expense in an effort to find out why I was having hallucinations. After eight hours, the ER Doctor told me I needed to see my ophthalmologist for further evaluation.
- 146. On 1/31/2021 at 5-42-17 AM, I filed a Motion for Reconsideration of Orders of Judge John Marshall Kest. [EXHIBIT 3471]
- 147. On 1/31/2021 at 15-34-13-PM, I filed an Amended Motion for Reconsideration of Orders of Judge John Marshall Kest. [EXHIBIT 3472.] It added two paragraphs to the ARGUMENT.
- 148. On 2/1/2021, Judge Jeffrey L. Ashton denied my Emergency Motion for Stay and/or Continuance. [EXHIBIT 3782.] Judge Jeffrey L. Ashton does not comply with his own Rules, much less the Constitutions.
- 149. On 2/1/2021, Judge Jeffrey L. Ashton entered an Order denying my Emergency Motion for Reconsideration of orders of Judge John Marshall Kest. [EXHIBIT 3781.] At the 4/5/2021 Hearing, Judge Jeffrey L. Ashton indicated he had not even read the orders. [EXHIBIT 4060.]

- 150. 2/1/2021 at 17-08-21-PM, an Order Denying plaintiff's emergency motion to stay and/or continuance was docketed. [EXHIBIT 3782.]
- 151. On 2/2/2021 at 4:07:19 a.m., I filed an AFFIDAVIT OF WILLIAM M. WINDSOR DATED FEBRUARY 1, 2021-medical-emergency-indigent. [EXHIBIT 3562.]
- 152. On 2/2/2021 at 10-09-12-AM, the Clerk docketed my Affidavit OF PREJUDICE OF JUDGE JEFFREY L. ASHTON [EXHIBIT 3256.]
- 153. On 2/2/2021 at 10-09-12-AM, the Clerk docketed my Motion to Disqualify or Recuse Judge Jeffrey L. Ashton. [EXHIBIT 4051.]
- 154. On 2/2/2021 at 10-09-12-AM, the Clerk docketed my Motion to Disqualify or Recuse IS FILED IN GOOD FAITH. [EXHIBIT 3505.]
- 155. On 2/2/2021 at 11-03-51-AM, it took Judge Jeffrey L. Ashton just 54 minutes to enter an Order denying William Windsor's 42-page Motion to Disqualify or Recuse him.

  [EXHIBIT 3790]. My Motion cited 48 cases, multiple statutes and rules and the Constitution. Judge Jeffrey L. Ashton couldn't even read 42 pages that quickly much less research anything. His claim about the documents (he couldn't have even read) was that "Adverse rulings do not support a reasonable fear of personal bias. *Rivera v. State*, 717 So. 2d 477 (Fla. 1998)." My Motion to Disqualify or Recuse [EXHIBIT 4051] included far more. Jeff Ashton didn't address what he obviously didn't read. He violated the rules, as he always did.
- 156. Rivera was a prisoner under sentence of death. The ruling in the case is much more than a claim about prior decisions. The Court said: "We have repeatedly held that a motion to disqualify a judge 'must be well-founded and contain facts germane to the judge's undue bias, prejudice, or sympathy." "Rivera did not proffer legally sufficient reasons requiring the judge's disqualification."

- 157. Judge Jeffrey L. Ashton is simply corrupt.
- 158. On 1/30/2021, I filed a Second Emergency Motion for Stay [EXHIBIT 3514] as a hearing was scheduled for 2/2/2021 when I would be in the hospital.
- 159. Judge Jeffrey L. Ashton held a hearing without me on 2/2/2021 at 11:03 a.m. The Court Minutes [EXHIBIT-3358] show he refused to reconsider orders of Judge John Marshall Kest that were issued without the required hearings. He awarded \$2,500 in sanctions against me for doing nothing improper and completely ignoring my indigence and inability to pay.
- 160. Judge Jeffrey L. Ashton Issued four More Orders Against me in February 2021.

  Running Total for Corrupt Judge Jeffrey L. Ashton: Windsor = 0 ... DEFENDANTS = 9.
- 161. It was 22 months before I finally had a ruling somewhat in my favor when the judge set the case for trial. But the reality is that Jeff Ashton was simply ready to strike the death blow. In 804 days as the judge in this case as of 3/17/2023, Judge Jeff Ashton never granted one single, solitary motion by me, the Plaintiff, WILLIAM M. WINDSOR.
- 162. Jeff Ashton is so corrupt that he can't even figure out how to fake it. To keep everyone from realizing you're a crook, you throw the good guy a would-be-bone every once in a while. Jeff Ashton apparently lacks the intelligence to have thought of that.
- 163. On 2/5/2021 at 9-59-02-AM, Judge Jeffrey L. Ashton entered an Order granting Defendants' Motion for Attorney's Fees. [EXHIBIT 3803.] There was no evidence, and I darn sure never did anything to justify any such thing. I was denied my right to be heard.
- 164. On 2/14/2021 at 14-13-45-PM, I filed a Motion for Reconsideration of the 2/4/2021 Order of Judge Jeffrey L. Ashton. [EXHIBIT 3473.]
- 165. On 2/15/2021 at 06-37-49-AM, PLAINTIFF-Petition-for-Writ-of-Prohibition-2021-02-05-06-37-49-AM was filed.

- 166. On 2/16/2021, Judge Jeffrey L. Ashton denied another of my motions. [EXHIBIT 3574.] ORDER-on-Defendants-Motion-for-Reconsideration.
- 167. On 2/16/2021 at 15-34-26-PM, Judge Jeffrey L. Ashton denied yet another of my motions. [EXHIBIT 3814.]
- 168. On 2/17/2021 at 16-47-35-PM, Scott L. Astrin filed Defendants' Emergency Motion to Require Pro Se Plaintiff, William Windsor's Submissions and/or Pleadings to the Court Be Reviewed, Approved and Signed by a Member of the Florida Bar ("BAR MOTION"). [EXHIBIT 3511.] It was unsigned, unverified, and did not comply with Administrative Order 2012-03 or the Florida Rules of Civil Procedure. [EXHIBIT 1283.] It contained all kinds of false and deceptive claims about other litigation I have been involved in over the last 17 years Montana, Georgia, Texas, and Florida.
- 169. On 2/18/2021 at 16-22-20-PM, I filed a Motion to Strike the BAR MOTION. [EXHIBIT 3835.]
- 170. On 2/19/2021, Judge Jeffrey L. Ashton entered an Order denying my Motion for Reconsideration of the 2/4/2021 Order. [EXHIBIT 3789.] [EXHIBIT 3794.]
- 171. Judge Jeffrey L. Ashton has caused very important documents to disappear from the Docket. These are criminal offenses. I have provided complete proof to the Orange County Sheriff's Department, and I am seeking the arrest of Jeff Ashton. See the docket entries on EXIBIT 4057, and note the 4/1/2021 entries to see the 81-page MOTION TO DISQUALIFY and RECUSE on the Docket; and see EXHIBIT 4092 Plaintiff's Motion to Disqualify Judge Jeffrey L. Ashton Due to Denial of Due Process file stamped 04/01/2021 at 05-29-58-AM. This was my second written effort to get Judge Jeffrey L. Ashton removed. It was in my EXHIBITS folder, so it took just a second to find it after days of indexing all of my files for search in File Explorer.

- 172. I never delete email. So, I realized I needed to see if I still had emails from 4/1/2021. It took a while, but I found the Orange County Clerk's Proof of Filing and Service, [EXHIBIT 4053] filed 4/1/2021 at 05-30 AM. HALLELUJAH!!! Now I need to see it on the DOCKET! so, off I go online to the Clerk's search site. IT'S NOT ON THE 2/27/2023 DOCKET [EXHIBIT 4049.] Please see EXHIBIT 4091 (3/16/2023 Docket) 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 T. Ashton never responded to the Motion to Disqualify. Docket entries on 2018-CA-0102170-O, 04/01/2021 to Present.
- 173. Fortunately, I learned years ago that corrupt judges and corrupt court clerks delete docket entries that are problematic for judges and beneficial to litigants. I used to make copies of the dockets regularly, but too many 18-wheeler accidents and too many people to help. So, I wasn't confident as I checked my massive files. But I have a 2021 pdf of the Docket when it showed that filing!!!!! [EXHIBIT 4057.] Go to 4/1/2021.
- 174. Judge Jeffrey L. Ashton has caused very important documents to disappear from the Docket. He needs to go straight to jail.
- 175. Judge Jeffrey L. Ashton is Hell-bent on ignoring my rights while working for the Defendants' attorneys.
- 176. On 2/23/2021 at 15-43-27-PM, Judge Jeffrey L. Ashton entered an Order denying my Motion to Strike the unsigned, unverified, unlawful BAR MOTION. [EXHIBIT 3789.]

  Corrupt judges like Judge Jeffrey L. Ashton ignore the law and violate the law whenever it pleases them.

- 177. See EXHIBIT-3573-PLAINTIFFS-Notice-of-Filing-Letter-to-Judge-Jeffrey-L-Ashton-2021-02-25-23-22-23-PM. See.EXHIBIT-3435-PLAINTIFF-Memorandum-of-Law-Regarding-Pleadings-Signed-by-a-Member-of-the-Florida-Bar-2021-02-26-22-51-31-PM. See EXHIBIT-3470-PLAINTIFF-Motion for Reconsideration of Motion-to-Strike-Defendants-Emergency-Motion-to-Require-Pro-Se-Plaintiffs-Submissions-to-the-Court-be-Reviewed-by-Member-of-Florida-Bar-2021-02-26-23-57-05-PM.
- 178. On 2/26/2021, I filed a Memorandum of Law regarding Pleadings Signed by a Member of the Florida Bar. [EXHIBIT 3435.]
- 179. 2/26/2021, I filed a Motion for Reconsideration of the Order denying my Motion to Strike the BAR MOTION. [EXHIBIT 3470.]
- 180. On 3/3/2021, Judge Jeffrey L. Ashton entered an Order denying my Motion for Reconsideration of Order denying my Motion to Strike the BAR MOTION. [EXHIBIT 3787] It was never served on me.
- 181. On 3/10/2021, I requested 16 hours for the Hearing on the Order to Show Cause. Judge Jeffrey L. Ashton was allowing only 15 or 20 minutes. [EXHIBIT 3453.] [EXHIBIT 3452.] I filed this because I knew it would take a significant amount of time to present evidence against the BAR MOTION (EXHIBIT 3511).
- 182. On 3/2/2021, Judge Jeffrey L. Ashton entered an Order to Show Cause.

  [EXHIBIT 3827.] It was never served on me. The ORDER TO SHOW CAUSE claims

  "Defendants request the issuance of an Order to Show Cause," **but the Defendants' Motion makes no such request**. [EXHIBIT 3511.] He lied. This was a complete set-up by a criminal racketeering operative, Judge Jeffrey L. Ashton.

- 183. The introductory paragraph in the BAR MOTION makes no such request. It reads:
  - "Defendants ROBERT KEITH LONGEST AND BOISE CASCADE BUILDINGS MATERIALS DISTRIBUTION L.L.C. by and through their undersigned counsel files this Emergency Motion to Require Pro Se Plaintiff, William Windsor's Submissions and/or Pleadings to the Court Be Reviewed, Approved and Signed by a Member of the Florida Bar and in support thereof states as follows...."
  - 184. The Prayer for Relief in the BAR MOTION makes no such request. It reads:
  - "WHEREFORE, the Defendants, ROBERT LONGEST and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., respectfully request this Court require Pro Se Plaintiff, William M. Windsor's Submissions and Pleadings to the Court Be Reviewed, Approved and Signed by a Member of the Florida Bar and/or in the alternative an attorney ad litem be appointed to review and execute any filings in this case any other relief the Court deems appropriate."
- 185. A search of the 42-page BAR MOTION reveals the term "show cause" does not appear at all.
- 186. I emailed the attorneys for the Defendants and Judge Jeffrey L. Ashton's judicial assistant, Keitra Davis, requesting any such request. The Docket does not show any such request. [DOCKET 4049.] Neither Keitra Davis nor the attorneys responded. The ORDER TO SHOW CAUSE is legally deficient. [EXHIBIT 1284.] The resulting order [EXHIBIT 3825] is VOID.
- 187. The Defendants did not have standing to seek an injunction, and they failed to state the essential elements. I detailed these in EXHIBIT 3470 and referenced Florida Rules of Civil Procedure Rule 1.610. See also EXHIBIT 3435.
- 188. Judge Jeffrey L. Ashton's Order is false. Upon information and belief, this was Judge Jeffrey L. Ashton coaching the attorneys for the Defendants on what to do.
- 189. There was nothing attached to the ORDER TO SHOW CAUSE, which is a requirement. [DOCKET 4049.]

- 190. The only Motion by the Defendants is unsigned, unverified, and without an affidavit. [EXHIBIT 3511.]
- 191. When an ORDER TO SHOW CAUSE does not state the essential facts constituting the reason for the ORDER TO SHOW CAUSE, and the Motion filed was not attached to the Order to Show Cause, it must be declared legally insufficient. (*Mayo v. Mayo*, 2D17-3140 (Fla.App. Dist.2 12/07/2018).) *See also Mix v. State*, 827 So.2d 397, 399 (Fla. 2d DCA 2002); *Fanagan v. State*, 840 So.2d 379, 380 (Fla. 1st DCA 2003); *Brown v. State*, 595 So.2d 259, 260 (Fla. 2d DCA 1992). See *Eubanks v. Agner*, 636 So.2d 596, 598 (Fla. 1st DCA 1994; *Lindman v. Ellis*, 658 So.2d 632, 634 (Fla. 2d DCA 1995); *Levine v. State*, 4D20-118 (Fla.App. Dist.4 02/03/2021); *Hagerman v. Hagerman*, 751 So.2d 152 (Fla. 2d DCA 2000).)
- 192. In this case, there is an unsworn motion, and there are no sworn affidavits whatsoever.
- 193. But Judge Jeffrey L. Ashton and the attorneys for the Defendants have pretended it is valid.
- 194. Judge Jeffrey L. Ashton has not handled the proceedings in a regular way and according to the law. 73 of the pleadings by the attorneys for the Defendants had not been signed, but Judge Jeffrey L. Ashton accepted them and denied my motions to strike.
- 195. For example, EXHIBIT 3511 is the Defendants' Emergency Motion to Require my Submissions and/or Pleadings to the Court Be Reviewed, Approved and Signed by a Member of the Florida Bar ("BAR MOTION"). If was filed 2/17/2021. It is unsigned. It must be stricken.
- 196. EXHIBIT 3835 Page 9 is from the BAR MOTION marked to show where the signature is supposed to be. There is the required signature on the Certificate of Service, but

NOT on the BAR MOTION. EXHIBIT 3835 – Pages 14 and 15 is a fairly recent filing by Assistant State Attorney David Asti to show the proper signature. EVERY filing by me shows I always properly signed.

197. Rule 2.515 of the Florida Rules of Judicial Administration dictates the requirement:

"Every document of a party represented by an attorney shall be signed by at least 1 attorney of record in that attorney's individual name whose current record Florida Bar address, telephone number, including area code, primary e-mail address and secondary e-mail address, if any, and Florida Bar number shall be stated, and who shall be duly licensed to practice law in Florida or who shall have received permission to appear in the particular case as provided in rule 2.510. The attorney may be required by the court to give the address of, and to vouch for the attorney's authority to represent, the party. Except when otherwise specifically provided by an applicable rule or statute, documents need not be verified or accompanied by affidavit. The signature of an attorney shall constitute a certificate by the attorney that:

- (1) the attorney has read the document;
- (2) to the best of the attorney's knowledge, information, and belief, there is good ground to support the document;
- (3) the document is not interposed for delay; and
- (4) the document contains no confidential or sensitive information, or that any such confidential or sensitive information has been properly protected by complying with the provisions of rules 2.420 and 2.425. If a document is not signed or is signed with intent to defeat the purpose of this rule, it may be stricken and the action may proceed as though the document had not been served." [emphasis added.]

198. EXHIBIT C to the March 12, 2021 Affidavit of William M. Windsor [EXHIBIT 3571 - Pages: 3 to 23] is a spreadsheet listing each document filed in Orange County Case #2018-010270-O in the 903 days the case had been pending. Column A is my Docket Number since the Clerk of the Court does not number the Docket entries; Column B is the Party who filed; Column C is the Category of the filings; Column D is whether the document was sworn as true and correct under penalty of perjury; Column E shows whether or not the document was signed; Column F is the title of the filing; Column G is the date of the filing; Column H is the

number of pages; and Column I shows the Legal Authority specified in the opening paragraph of the Filing.

- 199. This shows there has been only one filing signed by an attorney for the Defendants; it is an agreed motion that was prepared by my attorney on 1/17/2020.
- 200. It shows 46 filings were filed by me and sworn as true and correct under penalty of perjury. Not one filing by the Defendants or their attorneys in 903 days was sworn as true and correct, much less under penalty of perjury. My 46 filings add 655 pages of sworn testimony plus exhibits. This gave me a grand total of 813 pages of sworn testimony in Case # 2018-010270-O.
- 201. There is no proof that Scott L. Astrin or anyone read the motions and other filings, and there is no certification that, to the best of his knowledge, information, and belief, there is good ground to support these filings.
- 202. None of the Defendants' filings since 3/12/2021 have been signed, but Judge Jeffrey L. Ashton has allowed them in violation of the Rules. These are all shown on EXHIBIT 3920, the current Docket.
- 203. Judge Jeffrey L. Ashton is not handling the proceedings in a regular way and according to the law because he accepts the unverified claims of the attorneys for the Defendants as fact. This disqualifies him.
- 204. Judge Jeffrey L. Ashton accepted the BAR MOTION filed by Attorney Scott L. Astrin. It was unverified, and there was no affidavit. Based on the unverified factual claims in the BAR MOTION, Judge Jeffrey L. Ashton instructed the Defendants' attorney to issue an Order to Show Cause. Then he granted a motion when there was absolutely no evidence but mine.

- 205. Many of the false statements in the BAR MOTION are identified under oath under penalty of perjury in my sworn affidavit that is EXHIBITS 3243, 3246, 347, 3248, 3245, 3244, 3376, 3377, and 3569.
- 206. At the hearing on the Order to Show Cause, Judge Jeffrey L. Ashton used information provided by Attorney Scott L. Astrin that was not verified or provided under oath. [EXHIBIT 4060 -- P.19: 24-25, P. 20, 21, 22, 23.] It was not entered into evidence at the Hearing, and Scott L. Astrin failed to comply with the Procedures established for the Hearing. [EXHIBIT 3824.] But Judge Jeffrey L. Ashton had no other factual basis to issue his orders.
- 207. In Orange County Case # 2018-010270-O, the attorneys have made statements that purport to be facts without an affidavit sworn under penalty of perjury and at evidentiary hearings when the attorneys were never sworn to tell the truth under penalty of perjury. Judge Jeffrey L. Ashton has allowed this and has rejected all motions to strike.
- 208. APPENDIX 85 Pages: 003874 to 003894 lists all the pleadings. The second column identifies the Party. The fourth column shows No if the pleading was neither sworn nor accompanied by an affidavit.
- 209. 82 of the Defendants' motions and filings are not verified. There are no affidavits and claims of facts had to be stricken but were not.
- 210. Attorneys may not present facts, only legal arguments. This legal requirement must be made clear to the attorneys as they had violated this requirement in every pleading and at every hearing in Case # 2018-010270-O.
- 211. An attorney's unsworn statements of fact do not establish a fact. I have cited a lot of case law on this.
  - 212. Argument of counsel is not evidence.

- 213. This is clearly established by the Eleventh Circuit and every federal appellate court. I have cited extensive case law on this.
- 214. The 6DCA must stop the Circuit Court from allowing unverified claims of the attorneys for the Defendants to be accepted as facts. All of the judges in Case # 2018-010270-O have done this.
- 215. The actions of the Circuit Court are a material departure from the essential requirements of law. Evidence of facts must be presented under oath. Verification of documents is required by Florida Statute 92.525, but the attorneys for the Defendants have never verified any document.
- 216. Arguments of the Defendants' attorneys violate Florida Statute 90.604 due to lack of personal knowledge; violate Florida Statute 90.605 as there has been no oath or affirmation of the attorney as a witness; violate Florida Statute 90.802 as hearsay rule; violate Florida Statute 90.901 due to failure to provide authentication or identification of evidence; violate Florida Statute 90.957 as there is not testimony or written admissions; and violate Florida Case Law that the unsworn statements of fact by attorneys do not establish facts.
  - 217. This violation results in a real miscarriage of justice.
- 218. The error will cause me irreparable harm throughout the remainder of the proceedings. This violates my Constitutional rights that cannot be fixed by an appeal at the end of the case. I will lose the case, and I will be unable to appeal. I felt I would probably be forced into bankruptcy, and I was.
- 219. Judge Jeffrey L. Ashton did not handle the proceedings in a regular way and according to the law when he ordered filing restrictions against me without notice or an opportunity to be heard.

- 220. Judge Jeffrey L. Ashton denied due process to me, and he did it to make it impossible for me to properly respond to his totally biased and unlawful Order to Show Cause [EXHIBIT 3809.] [EXHIBITS 3779, 3810, 3834, 3268, 3269.]
- 221. This is Judge Jeffrey L. Ashton's Order Denying me the right to file anything in this case unless signed by a member of the Florida Bar entered 3/25/2021 without notice or an opportunity to be heard: [EXHIBIT 3809.]

"WHEREAS, the Court, on March 2, 2021 set for hearing an Order to Show Cause to Plaintiff as to why the Court should not grant Defendant's Emergency Motion to Require Pro Se Plaintiff William Windsor's Submissions to the Court be Reviewed and Signed by a Member of the Florida Bar on April 5, 2021. WHEREAS, since the issuance of the Order to Show Cause, Plaintiff has filed twenty six items with the Clerk of the Court in this matter. Among the motions, was a request for sixteen hours of hearing time on the Order to Show Cause. Among the matters filed, are item described as affidavits of exhibits totaling one thousand six hundred and seventy pages. The Clerk is hereby directed to decline to file any further documents by the pro se Plaintiff unless they contain a certificate by a member of the Florida Bar that have reviewed the matter and that the filing is appropriate. This Order shall remain in effect until close of business April 5, 2021."

- 222. The truth is I filed motions totaling 23-pages and 15½-pages of sworn affidavits. The rest was EVIDENCE. ALL was filed electronically on pdfs. The evidence was necessitated by the BAR MOTION and Judge Jeffrey L. Ashton's denial of my request for a 16-hour hearing that I felt would be needed to make oral argument, testify, and tender the exhibits. I had no choice but to file the mountain of evidence I had or prepared to defeat the unworn lies and distortions of the attorneys for the Defendants. The following is what was filed and why:
- 223. EXHIBITS 3453 and 3452 Motion requesting the amount of time I estimated to be necessary to respond to the BAR MOTION and Order to Show Cause. Judge Jeffrey L. Ashton asked for a letter from me in this regard, but I wanted this issue in the record of the court. 1½-pages. Truth verified under penalty of perjury.

- 224. EXHIBIT 3841 Motion to strike strange, hidden docket entry. I suspect foul play over this. 1½-pages. Truth verified under penalty of perjury.
- 225. EXHIBIT 3837 My Verified Motion to Strike Answer and Amended Answer; Enter a Decree Pro Confesso; enter Judgment in Favor of the Plaintiff; and Schedule the Jury Trial for Damages. This should end the case in my favor. 4-pages. Truth verified before a notary and sworn under penalty of perjury.
- 226. EXHIBITS 3563,3559, 3571, 3243, 3246, 3247, 3248, 3245, 3244, 3376, 3377, 3569 -- Verified Affidavit of William M. Windsor dated March 12, 2021. This is my response to the BAR MOTION [EXHIBIT 3512.] This Affidavit is sworn under penalty of perjury before a notary. It dissects the unsigned, unsworn, unverified BAR MOTION and attaches over 1,000 pages of evidence that prove the motion is frivolous and that Scott L. Astrin lied to the Court. The purpose of Judge Jeffrey L. Ashton's 3/25/2021 Order was to stop me from filing my evidence to defeat the BAR MOTION and gut the Order to Show Cause. This was a truly outrageous act by a hopelessly biased "judge." 14½-pages.
- 227. EXHIBIT 3264 -- Verified Affidavit of William M. Windsor regarding Prior Sworn Statements. One page of testimony sworn under penalty of perjury before a notary.
- 228. EXHIBIT 3444 -- Motion to find Defendants in Contempt. 3-page Motion and 23 pages of evidence. Verified as true and correct under penalty of perjury.
- 229. EXHIBIT 3442 -- Motion for Accommodations for a Senior Citizen with Disabilities. I am disabled. 4-pages. Verified as true and correct under penalty of perjury.
- 230. EXHIBIT 3490 Motion to Declare that All Statements by Attorneys that Purport to be Facts in Pleadings or in Hearings Must be Stricken Unless the Attorney filed an Affidavit Sworn Under Penalty of Perjury or is at an Evidentiary Hearing when Sworn to tell the Truth

Under Penalty of Perjury. This was filed because Judge Jeffrey L. Ashton violates this fundamental legal requirement. 3½-pages. Verified as true and correct under penalty of perjury.

- 231. EXHIBIT 3491 –Motion to Compel Defendants and All Non-Parties to Produce Each Separate Item Requested for Production in a File Folder Marked to show the Date Requested and the Item Number of the Request. 1½-pages. Verified as true and correct under penalty of perjury.
- 232. EXHIBIT 3485 Motion Regarding Pro Se Verifications. This addresses the issue that I cannot always obtain a notary. 1-page. Verified as true and correct under penalty of perjury.
- 233. EXHIBIT 3489 Motion to Compel Defendant and all Non-Parties to Comply with Florida Rules of Civil Procedure Rule 1.280 (B) (6) when producing documents. 1½-pages. Verified as true and correct under penalty of perjury.
- 234. APPENDIX 59 -- Motion to Declare I am Not Obligated to Comply with the Florida Handbook on Civil Discovery or the Florida Rules of Professional Conduct. This addresses problems encountered by me in this and other cases. 2-pages. Verified as true and correct under penalty of perjury.
- 235. If these filings deny an American the right to represent himself in court, that sound you hear is our forefathers turning over in their graves.
- 236. What Judge Jeffrey L. Ashton should have written is what I believe he was thinking "OH \_\_\_\_\_. That damn Windsor has evidence, case law, and a motion that will blow Wynne and Astrin out of the water. I've got to stop him."
- 237. Judge Jeffrey L. Ashton must be stopped from doing what is doing. I have no means of redress but this.

- 238. As a Pro Se party, I have limited knowledge regarding jurisdiction, but it would seem that Judge Jeffrey L. Ashton is without jurisdiction to enter filing restrictions without any manner of due process. Judge Jeffrey L. Ashton's authority comes from the Constitutions, and he has violated Article I Section 2, Section 9, and Section 21 of the Florida Constitution.
- 239. The actions of the trial court are a material departure from the essential requirements of law. Departure from the essential requirements of law means there is a violation of a clearly established principle of law. This violation results in a real miscarriage of justice or a denial of due process.
- 240. The error has caused me irreparable harm throughout the proceedings. The orders violate my Constitutional rights that cannot be fixed by an appeal at the end of the case. I cannot afford an attorney, so I will lose my case.
- 241. Judge Jeffrey L. Ashton is not handling the proceedings in a regular way and according to the law by granting the BAR MOTION.
  - 242. There is no legal authority for the BAR MOTION.
- 243. My research indicates there have been 172 appellate court decisions in the history of Florida containing the phrase "signed by a member of the Florida Bar" or "signed by a member in good standing of The Florida Bar." I have reviewed all the cases that could be relevant to the instant case.
- 244. EXHIBIT 3435 contains a spreadsheet listing all 172. 148 of those required to have pleadings signed a member of the Florida Bar were prisoners. 5 of the 177 were attorneys limited by The Florida Bar while disbarred. So, 19 were not prisoners or attorneys.
- 245. Nineteen (19) Florida citizens in the entire history of the state! I have summarized the opinions in each of the 19 cases. [EXHIBIT 3435.]

- 246. Attorney Scott L. Astrin and Judge Jeffrey L. Ashton wanted to make me the 20th. Scott L. Astrin is dishonest, and Judge Jeffrey L. Ashton is maliciously biased.
- 247. The cases reviewed show there is no way in the world for any court to require me to have my pleadings signed by a member of the Florida Bar.
- 248. The first column on these spreadsheets numbers them. The second column shows the Case Style. The third column shows if the Plaintiff was a Prisoner. The fourth column provides a brief summary of the Issues. The fifth column indicates whether the Plaintiff had been ruled to be a Vexatious Litigant under Florida law. The sixth column indicates whether the case was further addressed in a Memorandum of Law. [EXHIBIT 3435.] The seventh column indicates whether the opinion indicated a Show Cause Order had been issued by the appellate court. The eighth and ninth columns provide the remainder of the citation (in addition to the first column).
- 249. Three of the 19 had been declared Vexatious Litigants pursuant to Florida statutes. I could not be so declared. I'd never lost a Florida case.
- 250. The 19 penalized people included a frivolous and flagrant attempt to circumvent the Court's previously entered sanction order. One plaintiff filed identical petitions in multiple cases in violation of a court order. I have not violated any court order, and I have never filed an identical petition.
- 251. The other penalized plaintiffs had 17 cases filed with no relief and determined frivolous; 85 cases filed; multiple meritless petitions; 22 cases showing a profound lack of understanding of the court system in general and of the appellate system in particular; 45 cases dismissed; 26 baseless Florida pleadings; numerous pleadings devoid of merit and failure to properly pursue actions; numerous meritless filings; 25 appellate proceedings found to have no

merit; relitigating matters decided earlier and 12 federal court actions against judges. I had never had anything declared frivolous or baseless; I had never been found to have filed a meritless petition. I have had cases wrongfully dismissed, and they are on appeal. I have an excellent understanding of the court system; I have never filed an appellate proceeding found to have no merit.

- 252. Not a single one of the 172 was restricted in Florida because of something that purportedly happened in another state. Not a single one of the 172 was restricted for filing evidence and valid motions as I have done.
- 253. The BAR MOTION fails to meet the requirements for the entry of an injunction. The Relief requested by Scott L. Astrin is an injunction. The Defendants do not have standing to seek an injunction, and these attorneys failed to state the essential elements. This was argued in EXHIBIT 3470. Judge Jeffrey L. Ashton completely ignored this.
- 254. The actions of the trial court are a material departure from the essential requirements of law. There is a violation of a clearly established principle of law. Citizens are allowed to represent themselves pro se and file evidence in support of their pleadings. Denying me this right results in a real miscarriage of justice or a denial of due process.
- 255. The error has caused me irreparable harm throughout the remainder of the proceedings. The orders violate my Constitutional rights that cannot be fixed by an appeal at the end of the case. I cannot afford an attorney, so I will lose my case.
- 256. The United States Constitution provides me the 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.

- 257. Section 21 of the Florida Constitution provides: "The courts shall be open to every person for redress of any injury, and justice shall be administered without sale, denial or delay." My right is being denied.
- 258. Judge Jeffrey L. Ashton has expressed his disdain for pro se parties. He has harassed me and demonstrated extreme judicial prejudice. Consider these statements by Judge Jeffrey L. Ashton at the Hearing on the Order to Show Cause on April 5, 2021:

THE COURT: "... this matter has been about a year since Counsel was withdrawn from the case and this case has not proceeded at all towards trial or resolution. [EXHIBIT 4060 - P.4:8-11).]

THE COURT: "So that's one of the issues I'm having with you is if you were a lawyer you wouldn't say that because you would know that that's not how it works. And, see, that's why I'm concerned about the progress of your litigation is because you appear to have become so wrapped up in a personal argument with Counsel or with me that you've lost sight of the actual lawsuit itself. Because all the stuff that you're doing is not advancing your lawsuit. It's not getting you to a favorable resolution. And a lawyer would know that. And that's my concern is that you have become so obsessed with a battle with the lawyer or with the judge that you completely lose sight of the endgame, which is getting your case prepared, ready and presented to a jury." [EXHIBIT 4060 -- P.29:3-18.)]

THE COURT: "They have no basis in law. I've looked at them. If you were a lawyer you would know that. But I understand that you've done some research and you're obviously a very bright man, but that's the difficulty here, is that right now I'm presented with a choice, either allow this thing to continue to spiral out of control or require you to have a lawyer help you get this case to move forward." [EXHIBIT 4060 -- P.29:25, P.30:1-8.)]

THE COURT: "Well, sir, this is another area that you fail to understand the subtlety of. But if you were going to be held in contempt you'd be correct. But the order to show cause was simply to show cause why I shouldn't grant a motion. That has a different legal implication. So this is just another example of how what you interpret something a certain way that isn't accurate and if you were an attorney you would understand more how those things happen." [EXHIBIT 4060 -- P.33:1-10.)]

- 259. Judge Jeffrey L. Ashton then granted the BAR MOTION and ordered that I may not file anything unless approved and signed by a member of the Florida BAR.
- 260. I could not afford an attorney as Judge Jeffrey L. Ashton was well aware. I testified to this under oath at the April 5, 2021 Hearing. [EXHIBIT 4060 P.8 Lines 10-16; P. 25 Lines 19-20.] There are many other references on the Flash Drive of my inability to pay, and the Cleek of Court declared me indigent in this case.
- 261. At the April 5, 2021 Hearing on the Order to Show Cause, I asked Judge Jeffrey L. Ashton to recuse himself five times:

MR. WINDSOR: "Your Honor, I have absolutely done nothing wrong that would justify a Court requiring that I have a member of the Florida Bar review and sign -- absolutely nothing. The order to show cause is entirely bogus. And I believe only a dishonest judge would allow a hearing on a matter such as this. In my opinion the hearing is judicial wrongdoing. I object to the hearing. I have filed an Exhibit 400. I tender it to the Court for admission. It explains the reasons why this meeting should be cancelled."

THE COURT: "It will not be considered. Sir, the purpose of the rule to show cause is to address the allegations in the motion. So go ahead." [EXHIBIT 4060 -- P.5:14-25, P. 6: 1-2.]

MR. WINDSOR: "...The extent of your bias against me is truly overwhelming. I attempt to tender Exhibits 353 and 356, which explain this."

THE COURT: "It will not be accepted."

MR. WINDSOR: "Okay. So you refuse to recuse yourself, Your Honor?"

THE COURT: "Sir, there's been no motion filed, pursuant to the rules. And based on the outcome of this hearing will determine whether you will be able to file one. That's the point of this hearing."

MR. WINDSOR: "All right. I'm asking Your Honor to recuse yourself because you have done nothing but demonstrate extreme bias and prejudice. Will you recuse yourself?"

THE COURT: "Mr. Windsor, you have 20 minutes to say whatever you want. And that time is running."

- MR. WINDSOR: "I'm asking you to recuse yourself and you have refused." [EXHIBIT 4060 -- P.6:12-25, P. 7: 1-7.]
- 262. EXHIBIT 4053 asks Judge Jeffrey L. Ashton to disqualify himself. The DOCKET shows it was filed at the time of the Hearing. [EXHIBIT 4049.] Judge Jeffrey L. Ashton said "It will not be considered." EXHIBIT 4053 is "Plaintiff William M. Windsor's Motion to Disqualify Judge Jeffrey L. Ashton due to Denial of Due Process."
  - 263. The Motion to Disqualify was docketed. [EXHIBIT 4049.]
- 264. The Due Process Clause entitles a person to an impartial and disinterested tribunal in both civil and criminal cases. I have briefed this.
- 265. 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. 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 me.
  - 266. Judge Jeffrey L. Ashton has a legal duty to disqualify himself.
- 267. 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. Judge Jeffrey L. Ashton

has violated my rights by using his power to inflict his bias. Judge Jeffrey L. Ashton hates me because I am pro se, because I have spent 14 years of my life helping other pro se plaintiffs while investigating judicial corruption, and because, unlike attorneys, I am not afraid of him, and I will identify his corrupt acts for the world to see.

- 268. For due process, I theoretically have 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 my rights by using his power to ignore facts and the law.
- 269. 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 me.
- 270. An inherent Constitutional right is the honesty of the judge. Judge Jeffrey L. Ashton has not been honest. He has violated Canon 2 and other Canons of the Code of Judicial Conduct.
- 271. Due process guarantees basic fairness and to make people feel that they have been treated fairly. I have not been treated fairly. I have been treated corruptly.
- 272. Judge Jeffrey L. Ashton has denied my rights of equal protection under the law and his mission seems to be to bury me any way he can.
- 273. Following the so-called Hearing on Order to Show Cause, Judge Jeffrey L. Ashton entered six (6) orders against me. The volume and content of the orders seem schizophrenic. [EXHIBITS 3779, 3810, 3834, 3268, 3269, 3825.]

- 274. Judge Jeffrey L. Ashton did not handle the proceedings in a regular way and according to the law regarding orders to show cause.
- 275. There is no legal authority in the Florida Rules of Civil Procedure or the Florida Rules of Judicial Administration for a Circuit Court judge to issue an order to show cause in a case of auto negligence that is not criminal.
- 276. Orange County Case # 2018-010270-O is about auto negligence. It is not a criminal case.
- 277. I have searched Google, Yahoo, and every appellate court case in Florida history, and I can find no rule or statute to provide a legal basis for an order to show cause in this case.
  - 278. The BAR MOTION fails to meet the requirements for the entry of an injunction.
- 279. The Relief requested by the Defendants is an injunction. The Defendants do not have standing to seek an injunction, and they failed to state the essential elements. This was argued in EXHIBIT 3470. Judge Jeffrey L. Ashton completely ignored this.
- 280. The actions of the lower tribunal are a material departure from the essential requirements of law. The law on injunctions is clear. The law on a citizen's right to represent himself is clear. Denying my rights results is a real miscarriage of justice and a denial of due process.
- 281. The error has caused irreparable harm to me throughout the proceedings. The orders violate my Constitutional rights that cannot be fixed by an appeal at the end of the case. I cannot afford an attorney, so I will lose my case. I will be unable to appeal.
- 282. Judge Jeffrey L. Ashton did not handle the proceedings in a regular way and according to the law by issuing a legally deficient order to show cause.
  - 283. The Order to Show Cause is legally deficient. This is the entire content:

"THIS CAUSE, having come before this Court on DEFENDANTS ROBERT KEITH LONGEST AND BOISE CASCADE BUILDINGS MATERIALS DISTRIBUTION L.L.C. EMERGENCY MOTION TO REQUIRE PRO SE PLAINTIFF WILLIAM WINDSOR'S SUBMISSIONS TO THE COURT BE REVIEWED, APPROVED AND SIGNED BY A MEMBER OF THE FLORIDA BAR AND MEMORANDUM OF LAW.

"Defendants request the issuance of an Order to Show Cause why the Court should not grant the relief requested in Defendant's Motion to require Pro Se Plaintiff, William Windsor's submissions and/or pleadings to the Court be reviewed, approved and signed by a member of the Florida Bar; and the Court being fully advised in the premises;

"Defendant's request for issuance of an Order to Show Cause is granted; and

"IT IS HEREBY ORDERED, that Pro Se Plaintiff, William Windsor, shall appear before this Court to show cause why the Court should not grant the relief requested in Defendant's Motion to require Plaintiff's submissions and/or pleadings to the Court be reviewed, approved and signed by a member of the Florida Bar. The hearing shall be held before the Honorable Jeffrey L. Ashton, via Microsoft Teams on the 5th day of April, 2021 at 10:30 a.m.

"DONE AND ORDERED at Orange County, Florida on this 1st day of March, 2021.

"(Signed) JEFFREY L. ASHTON, CIRCUIT COURT JUDGE" [EXHIBIT 3827.]

- 284. The Defendants did not request an Order to Show Cause. There is no such "Motion." See the Docket DOCKET 4049. Judge Jeffrey L. Ashton's Order is false. Upon information and belief, this was Judge Jeffrey L. Ashton coaching the attorneys for the Defendants on what to do.
- 285. There was nothing attached to the Order to Show Cause, which is a requirement. [EXHIBIT 3827.]
- 286. The only Motion by the Defendants is unsigned, unverified, and without an affidavit. [EXHIBIT 3511.]

- 287. There are no facts stated in the Order to Show Cause constituting the reasons for the Order to Show Cause. The existence of an unsigned, unverified, unsupported Motion does not qualify.
- 288. When an Order to Show Cause does not state the essential facts constituting the reason for the Order to Show Cause, and the Motion filed was not attached to the Order to Show Cause, it must be declared legally insufficient. I have provided the case law on this.
- 289. In the instant case, there is an unsworn motion, and there are no sworn affidavits whatsoever.
- 290. Prior to taking away Constitutional rights, a judge has an obligation to provide notice and an opportunity to be heard.
  - 291. I was never served with the Order to Show Cause.
- 292. When I discovered it existed, I requested 16 hours to present my defense to the wide range of claims made by Attorney Scott L. Astrin. Judge Jeffrey L. Ashton denied the request by email from Keitra Davis and then ignored my Motion.
- 293. Then he refused to consider my evidence filed and docketed. EXHIBIT 4049 shows the evidence was docketed. EXHIBIT 4060 shows Judge Jeffrey L. Ashton repeatedly refused to allow it to be admitted or considered. After the Hearing, he had the Clerk of Court remove the evidence from the DOCKET. The Court is asked to take judicial notice of the DOCKET to see this. [-EXHIBIT 4091-DOCKET in 2018-CA-010270-O.]
  - 294. I have motions that have been ignored, including case dispositive motions.
- 295. Judge Jeffrey L. Ashton has demonstrated that there isn't an unbiased bone in his large body.

- 296. On 3/11/2021, I filed a Notice of Taking Deposition of David I. Wynne. [EXHIBIT 3752.]
- 297. On 3/11/2021, I filed a Notice of Taking Deposition of Scott L. Astrin. [EXHIBIT 3753.]
- 298. On 3/11/2021, I requested Subpoenas Duces Tecum for David I. Wynne and Scott L. Astrin. [EXHIBIT 3890.] I was denied to have them as witnesses at the 4/5/2021 hearing where these attorneys made a cornucopia of claims against me that were not signed or verified.
- 299. On 3/12/2021, I filed a Motion to Strike Strange Hidden Docket Entry. [EXHIBIT 3841.] This hasn't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 300. On 3/12/2021, I filed a Verified Motion to Strike Answer and Amended Answer; Enter a Decree Pro Confesso; Enter Judgment in Favor of the Plaintiff; and Schedule the Jury Trial for Damages. [EXHIBIT 3837.] The Answer and Amended Answer were unsigned. This is a dispositive motion that should have been heard. This has not been heard and will not be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 301. On 3/15/2021, the Defendants filed a Motion for Protective Order. [EXHIBIT 1285.] It was unsigned and unverified.
- 302. On 3/16/2021, a Subpoena was issued by the Clerk of Court for Scott L. Astrin. [EXHIBIT 3893.]
- 303. On 3/16/2021, a Subpoena was issued by the Clerk of Court for David I. Wynne. [EXHIBIT 3892.]
- 304. On 3/16/2021 and 3/17/2021, I filed the Verified Affidavit of William M. Windsor dated March 12, 2021 with 1,645 pages of Exhibits. This is very important as it

- debunks all of the frivolous claims of Astrin. [EXHIBITS 3243, 3246, 3247, 3248, 3245, 3244, 3376, 3377, 3559, 3563, 3571, 3569.] This was ignored.
- 305. On 3/17/2021, I filed a Verified Affidavit Regarding Prior Sworn Statements. [EXHIBIT 3264.] This hasn't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 306. On 3/17/2021, I filed a Verified Motion to Strike Pleadings and Award Sanctions. The Motion sought to strike 75 unsigned pleadings. [EXHIBIT 3480.] This dispositive motion has not been set for a hearing and won't be by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 307. On 3/18/2021, the Defendants filed Additional Exhibits in Support of Defendants' First Amended BAR MOTION. It is unsigned and unverified. [EXHIBIT 3560.]
- 308. On 3/18/2021, I filed a Motion for Accommodations for Senior Citizen with Disabilities. [EXHIBIT 3442.] This hasn't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 309. On 3/18/2021, I filed a Motion to Declare that All Statements by Attorneys that Purport to be Facts in Pleadings or in Hearings Must Be Stricken Unless the Attorney Filed an Affidavit Sworn Under Penalty of Perjury or is at an Evidentiary Hearing when Sworn to Tell the Truth Under Penalty of Perjury. [EXHIBIT 3492.] This hasn't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 310. On 3/18/2021, I filed a Motion to Compel Defendant and All Non-Parties to Produce Each Separate Item Requested for Production in a File Folder Marked to show the Date Requested and the Item Number of the Request. [EXHIBIT 3491.] This hasn't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]

- 311. On 3/18/2021, I filed a Motion Regarding Pro Se Verifications. [EXHIBIT 3485.] This hasn't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 312. On 3/18/2021, I filed a Motion to Compel Defendant and All Non-Parties to Comply with Rule 1.280(b)(6). [EXHIBIT 3489.] This hasn't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 313. On 3/18/2021, I filed a Motion to Declare I am Not Obligated to Comply with The Florida Handbook on Civil Discovery or the Florida Rules of Professional Conduct.

  [APPENDIX 59 Pages: 000917 to 000921.] This hasn't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.]
- 314. On 3/24/2021, Judge Jeffrey L. Ashton entered an Order granting the Motion for Protective Order. [EXHIBIT 3804.] It was never served on me.
- 315. On 3/24/2021, Judge Jeffrey L. Ashton entered an Order on My Motion to Strike Answer and Amended Answer and my Emergency Motion to Strike Strange Hidden Docket Entry and Memorandum of Law. [EXHIBIT 3822.] These haven't been heard and won't be set for a hearing by Judge Jeffrey L. Ashton. [EXHIBIT 4060.] It was never served on me.
  - 316. On 3/25/2021, I was preparing to file a Motion to Strike the Order to Show Cause.
- 317. On 3/25/2021, Judge Jeffrey L. Ashton entered an "Interim Order" order without notice or an opportunity to be heard directing the Clerk of the Court to refuse to process my filings. [EXHIBIT 3809.] There was no legal authority for such an order and no factual basis for it.

- 318. On 3/25/2021, I requested subpoenas from the Clerk of Court for testimony at the April 5, 2021 hearing on Order to Show Cause. The requests were ignored. [EXHIBIT 4060, 03/30/2021.]
- 319. On 3/26/2021, Judge Jeffrey L. Ashton entered an Order on Procedures for the Show Cause Hearing. [EXHIBIT 3824.]
- 320. From 2/23/2021 to 3/26/2021, I was not served with any orders entered by Judge Jeffrey L. Ashton.
- 321. On 3/27/2021, I provided Keitra Davis with the information required in the Order on Procedures. [APPENDIX 60 Pages: 000922 to 000924.] Scott L. Astrin never provided Keitra Davis with the information required in the Order on Procedures. [EXHIBIT 3824.]
- 322. On 3/29/2021 at 3:44 p.m., Keitra Davis emailed the Order on Procedures for the Show Cause Hearing in response to my question about a court reporter. [APPENDIX 61.]
- 323. On 3/30/2021, the Clerk of the Court made a Docket entry: "Service Document Unable to be Issued. Subpoena Filed 03/25/2021 Not Issued Per Order Interim on Pro Se Filings filed on 03/25/2021 Documents did not contain a Certificate by a member of the Florida Bar to explained document was reviewed." [EXHIBIT 335-1.]
- 324. On 3/30/2021 at 3:08 a.m., I emailed Keitra Davis about getting the Flash Drive with my evidence to the courthouse for the Show Cause Hearing. [APPENDIX 73.]
- 325. On 3/30/2021 at 11:13 a.m., Keitra Davis emailed me regarding the Flash Drive. [APPENDIX 74.]
- 326. On 3/30/2021 at 7:29 p.m., I emailed Keitra Davis regarding the need to strike the pleadings of the Defendants. [APPENDIX 75.]

- 327. On 3/31/2021 at 12:40 p.m., I emailed Keitra Davis requesting an extension of time to get the Flash Drive to the courthouse. [APPENDIX 76.]
- 328. On 3/31/2021 at 6:57 p.m., Keitra Davis emailed me to acknowledge receipt of my request to strike the pleadings of the Defendants. [APPENDIX 77.]
- 329. On 4/1/2021 at 1:03 a.m., Keitra Davis emailed me responding to the extension request. [APPENDIX 78.]
- 330. On 4/1/2021 at 8:46 a.m., I emailed Keitra Davis requesting a link for the April 5, 2021 hearing. [APPENDIX 79.]
- 331. On 4/1/2021, David I. Wynne filed a Notice of Withdrawal. [APPENDIX 63 Pages: 000930 to 000932.]
- 332. On 4/1/2021 at 1:55 p.m., Keitra Davis emailed me a Microsoft Teams link. [APPENDIX 80.]
- 333. On 4/1/2021, I filed a Motion for Continuance of the April 5, 2021 Hearing. I did not expect it to be docketed because of Judge Jeffrey L. Ashton's void order on 3/25/2021, but it was docketed. [APPENDIX 64.] It was not set for a hearing.
- 334. On 4/1/2021, I filed a Supplement to my Motion to Strike Pleadings and for Sanctions. I did not expect it to be docketed, but it was. [APPENDIX 65.] It was not set for a hearing.
- 335. On 4/1/2021, I filed a Motion to Strike Order to Show Cause. I did not expect it to be docketed because of Judge Jeffrey L. Ashton's void order on 3/25/2021, but it was docketed as EXHIBIT 361. [APPENDIX 66.] It was not set for a hearing.

- 336. On 4/1/2021, I filed a Second Motion to Disqualify Judge Jeffrey L. Ashton. I did not expect it to be docketed, but it was. [APPENDIX 67.] The judge refused to address it. It was not set for a hearing.
- 337. On 4/1/2021, I filed a Motion to Strike Supplemental Pleadings and Award Sanctions. I did not expect it to be docketed, but it was. [DOCKET 4049.] It was not set for a hearing.
- 338. On 4/2/2021 at 3:04 a.m., Keitra Davis emailed to advise the courthouse would be closed until April 5, 2021. [APPENDIX 68.]
- 339. On 4/2/2021 at 3:04 a.m., I emailed Keitra Davis with a change of email. [APPENDIX 81.]
- 340. On 4/2/2021, I filed evidence for the Hearing on the Order to Show Cause Motion to Strike Defendants' Motion to Require Pro Se Plaintiff's Submissions and/or Pleadings to the Court be Reviewed, Approved, and Signed by a Member of the Florida Bar; EXHIBITS 1-230, 231-326, 330-340, 355-365, 783, 792, 862. [DOCKET 4049.]
- 341. On 4/3/2021, I filed evidence for the Hearing on the Order to Show Cause APPENDIX I; EXHIBITS 389, 2443, 366-388; Affidavit of William M. Windsor dated March 29, 2021; Plaintiff's Verified Memorandum of Law Regarding Pleadings Signed by a Member of the Florida Bar for the Order to Show Cause Hearing. [DOCKET 4049.]
- 342. EXHIBIT 2464 is the spreadsheet listing all 172. The first column numbers them. The second column shows the Case Style. The third column shows if the Plaintiff was a Prisoner. The fourth column provides a brief summary of the Issues. The fifth column indicates whether the Plaintiff had been ruled to be a Vexatious Litigant under Florida law. The sixth column indicates whether the case was further addressed in a Memorandum of Law.

- [APPENDIX 25.] The seventh column indicates whether the opinion indicated a Show Cause Order had been issued by the appellate court. The eighth and ninth columns provide the remainder of the citation (in addition to the first column).
- 343. Three of the 19 had been declared Vexatious Litigants pursuant to Florida statutes. I cannot be so declared. I have never lost a Florida case.
- 344. The 19 penalized people included a frivolous and flagrant attempt to circumvent the Court's previously entered sanction order. One plaintiff filed identical petitions in multiple cases in violation of a court order. I have not violated any court order, and I have never filed an identical petition.
- 345. The other penalized Plaintiffs had 17 cases filed with no relief and determined frivolous; 85 cases filed; multiple meritless petitions; 22 cases showing a profound lack of understanding of the court system in general and of the appellate system in particular; 45 cases dismissed; 26 baseless Florida pleadings; numerous pleadings devoid of merit and failure to properly pursue actions; numerous meritless filings; 25 appellate proceedings found to have no merit; relitigating matters decided earlier and 12 federal court actions against judges. I have never filed anything frivolous or baseless. I have an excellent understanding of the court system; I have never filed an appellate proceeding found to have no merit. I have taken multiple matters to the United States Supreme Court, and nothing was found to be improper. I used to have a genius IQ, but this ordeal has damaged my memory.
- 346. Not a single one of the 172 was restricted in Florida because of something that purportedly happened in another state.
  - 347. On 4/4/2021, I filed a Motion to Cancel the Hearing Set for April 5, 2021. [EXHIBIT 4049.] It was not set for a hearing.

- 348. On 4/4/2021, I filed an Objection to the Exhibits of the Defendants for the Hearing Set for April 5, 2021. [APPENDIX 69.] It was not set for a hearing.
- 349. On 4/4/2021, I filed evidence for the Hearing on the Order to Show Cause EXHIBITS 390-399. [EXHIBIT 4049 .]
- 350. On 4/5/2021, I filed evidence for the Hearing on the Order to Show Cause EXHIBIT 400. [APPENDIX 70.]
- 351. On 4/5/2021, a Hearing was held on the Order to Show Cause. [EXHIBIT 1286.] It ended at 11:27 a.m. I was sworn in so all of my statements were made under oath under penalty of perjury. [EXHIBIT 4060.]
- 352. At the hearing on 4/5/2021, Judge Jeffrey L. Ashton accused me of <u>threatening a</u> <u>member of the judiciary and said it was contemptuous</u>. This is what Judge Jeffrey L. Ashton said was a threat to a member of the judiciary (said under oath):

"MR. WINDSOR: "I'm going to make it my mission to expose you and Astrin.

THE COURT (JUDGE JEFFREY L. ASHTON): "All right. Mr. Windsor, that is a threat against this Court --

MR. ASTRIN: "And myself.

THE COURT (JUDGE JEFFREY L. ASHTON): "Mr. Windsor, there is a limit. I have let you go on at length, but you have just threatened a member of the judiciary and that is a matter which is contemptuous. Now, sir, would you like to withdraw that comment or would you like to leave it in the record and face contempt? Because that, sir, will not be tolerated. Threatening a member of the judiciary in a court hearing is not going to be permitted." [EXHIBIT A - Transcript of Hearing 4/5/2021 – P. 38: 18-25, P. 39:1-6.]

353. Exposing corruption is not a threat. It is a First Amendment right. It has been my vocation since 2007. I have websites, including LawlessAmerica.com, and YouTube.com/lawlessamerica. I have produced and directed a documentary film on government and judicial corruption that was presented to every member of Congress on 2/5/2003. I have

interviewed thousands of people in all 50 states who believe they are victims of corruption. I have been referred to as a leading authority on judicial corruption.

- 354. <u>Black's Law Dictionary</u> defines "threat" as "a menace or destruction or injury to the lives or property of those against whom it is made."
- 355. This was not a threat; it was a statement, under oath, of what I am doing. Falsely accusing me of making a threat in open court is a violation of the Code of Judicial Conduct.
- 356. The Florida Code of Judicial Conduct defines "Impartiality" or "impartial" to denote absence of bias or prejudice in favor of, or against, particular parties or classes of parties, as well as maintaining an open mind in considering issues that may come before the judge.

  Judge Jeffrey L. Ashton does not appear to have an impartial bone in his body when it comes to me and pro se plaintiffs.

## 357. At the hearing on 4/5/2021, Judge Jeffrey L. Ashton accused me of being a liar:

THE COURT (JUDGE JEFFREY L. ASHTON): "Well, sir, I want to reiterate what Mr. Astrin has said, that this case cannot go forward, but you've got to make a choice. You can either continue the way you have been, which -- well, I mean, you can't, if I grant the motion; you just can't do anything.

"You cannot get around it by sending e-mails to my judicial assistant. We're going to block you from communicating that way. But we are more than, more than happy to consider any motion that you file which is signed and approved by a member of the Florida Bar.

"So the motion is granted. The interim order that I filed will be extended to be a permanent order in this case. Mr. Astrin, if you would like to prepare a proposed order and send it to me, please send it in Word because I'm sure I will be making changes and additions to it.

"Send a copy of that to Mr. Windsor as well so that he will know what you submitted to me. I will submit the order. In the interim, I'm going to prepare a brief order extending my prior order until the new order is written and fully done.

"Mr. Windsor, I hope that you get an attorney involved in this case, because I think there's a case here that needs to be litigated. But the case needs to be litigated not on personalities.

"So that is the ruling of the Court. Thank you all very much. Mr. Astrin, I'm looking forward to seeing your proposed order.

"Mr. Windsor, I don't -- I mean, I don't -- if I ask you not to e-mail my JA anymore, will you do it?

MR. WINDSOR: "Your Honor, I have only e-mailed her when necessary. But she is listed as one of the contacts on the E-portal and I would be happy to remove her from that --

THE COURT (JUDGE JEFFREY L. ASHTON): "Mr. Windsor, you e-mailed my JA 214 times since Thursday. Since Thursday.

MR. WINDSOR: "Absolutely not, Your Honor.

THE COURT (JUDGE JEFFREY L. ASHTON): "Well, you're calling my secretary a liar and I know that she's telling me the truth about that, so that ain't going to happen. So I'll block you from e-mail, again. If you have a lawyer that wants to communicate with us on your behalf, we will be happy to speak with him." [EXHIBIT 4060 – P.36: 9-25; P.37: 1-25; P. 38: 1-4.]

- 358. I 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. Judge Jeffrey L. Ashton is a liar and calling me 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 an damn liar. This is perjury. This is fraud upon the court.
- 359. At the hearing on 4/5/2021, Judge Jeffrey L. Ashton established his bias against me as a senior citizen and a person with a disability after I mentioned difficulty finding something in my records:

MR. WINDSOR: "Sorry, Your Honor. I do suffer from a cognitive decline that makes it impossible for me to remember if I just took my pills.

THE COURT (JUDGE JEFFREY L. ASHTON): "Well, sir, since you've raised that, if you suffer from that cognitive decline so that you can -- as you said you can't remember - you have no short-term memory, how is it that you can represent yourself if you can't remember whether you took your pills a few minutes ago?" [EXHIBIT 4060 – P. 21: 4-12.]

- 360. Following the hearing on 4/5/2021 at 11:51 a.m., I printed the DOCKET in Case # 2018-010270-O. [EXHIBIT 4057.] It shows all of my evidence was on file at the time of the Hearing, but Judge Jeffrey L. Ashton refused to consider any of it.
- 361. On 4/5/2021 at 3:24 p.m., Judge Jeffrey L. Ashton entered an Order Striking all Pro Se Filings from 3/27/2021. [EXHIBIT 3834.]
- 362. On 4/5/2021, Judge Jeffrey L. Ashton entered an Interim Order on Pro Se Filings in Effect Until Further Order of the Court. [EXHIBIT 3779.]
- 363. On 4/5/2021, Judge Jeffrey L. Ashton entered an Interim Order on Pro Se Filings Extended Until Further Order of the Court. [EXHIBIT 3810.]
- 364. On 4/5/2021 at 3:30 p.m., Judge Jeffrey L. Ashton entered an Order Striking Pro Se Filings from 3/27/2021 to 4/5/2021. [EXHIBIT 3268.]
- 365. On 4/6/2021, Defendants filed a Notice of Designation of Email Addresses. [EXHIBIT 3539.] It is unsigned.
- 366. On 4/6/2021, Judge Jeffrey L. Ashton entered an Order on the Courts Rule to Show Cause Why the Court Should not Grant Defendants' Motion Requiring Pro Se Plaintiff Submissions / Pleadings of the Court be Reviewed Approved & Signed by A Member of the Florida Bar. [EXHIBIT 3825.]
- 367. On 4/6/2021, Judge Jeffrey L. Ashton entered an Amended Interim Order on Pro Se Filings. [EXHIBIT 3269.]
- 368. On 4/19/2021, I tried to file a Motion to Disqualify Judge Jeffrey L. Ashton, but I was denied any use of myflcourtaccess.com for Case # 2018-010270-O.
- 369. I mailed it to the judge and filed a motion with the 5DCA asking the Clerk of the Court to be ordered to file it.

- 370. Judge Jeffrey L. Ashton theoretically got away with making me ONE in 1,074,00. There are as many as 21,480,000 people in Florida who could be plaintiffs. Before me, only 19 of those people, who are neither prisoners nor attorneys under disbarment proceedings, have had an order entered denying them the right to represent themselves. APPENDIX 37, 40, and 50 show I do not meet the criteria of the 19 people previously denied the Constitutional right to represent themselves. Judge Jeffrey L. Ashton did not allow me to tender any of this into evidence at the 4/5/2021 Hearing because he is terminally biased and corrupt.
- 371. The documents in APPENDIX 37, 40, and 50 were all filed and docketed in Case #2018-CA-010270-O.
- 372. On October 18, 2022, Judge Jeffrey L. Ashton conducted a Case Management Conference.
  - 373. This is all he did in 2022.
  - 374. Judge Jeffrey L. Ashton is simply corrupt, evil, dishonest, and a liar.
- 375. It was clear to me that Judge Jeffrey L. Ashton was prejudiced and biased. Looking back after all that has happened since, I believe Judge Jeffrey L. Ashton appeared in the case solely for the purpose of damaging me and ensuring that I will lose. Jeff Ashton is corrupt. I wonder how many defendants he abused as a prosecutor. I plan to contact every law firm that was on the losing side when dealing with Jeffrey L. Ashton. I would be happy if Jeff Ashton spends the rest of his life in prison.
- 376. Judges are supposed to go by the law. Judge Jeffrey L. Ashton does not. Every action he has taken in this case is to grant unsigned and unverified requests of the attorneys for the Defendants and deny requests for relief that are signed, verified, and proven by me. Judge Jeffrey L. Ashton had never even granted me a hearing, and he said in the hearing on 4/5/2021

that he never would [EXHIBIT 4060 – P. 36: 9-14; P. 40: 12-25; P. 41: 1-3]. All that he has done has been unlawful and designed to procure a benefit for the Defendants contrary to his duty and my rights.

- 377. EXHIBITS 502, 503, 543 are my Motion for Partial Summary Judgment. It shows that the Defendants are liable. Judge Jeffrey L. Ashton has blocked it from being set for a hearing.
- 378. I am not and will not receive a fair trial in the Ninth Judicial Circuit Court in Orange County, Florida due to the bias of Judge Jeffrey L. Ashton of that court against me and prejudice in favor of the Defendants and their attorney.
- 379. EXHIBIT 3562 is an affidavit sworn under penalty of perjury before a notary that I filed 2/2/2021. It details my issues with Judge Jeffrey L. Ashton as to my medical emergency in February 2021. Judge Jeffrey L. Ashton refused to delay a relatively meaningless hearing in this case about the Defendants disabling me and using the court system to inflict emotional distress.
- 380. Judge Jeffrey L. Ashton OUTRAGEOUSLY refused to reschedule the 2/2/2021 hearing with no justification whatsoever. That he refused to reschedule the 2/2/2021 hearing when I had a medical emergency and was hospitalized is outrageous bias.
  - 381. Judge Jeffrey L. Ashton simply wants to hurt me any way he can.
- 382. In January 2023, a hearing was held on 1/11/2023, but Judge Jeffrey L. Ashton changed it to a hearing on a Defendants' Motion rather than the motion I had scheduled. On 1/24/2023, an Inspection of the Boise Cascade Truck was finally held. I obtained very damaging evidence against the Defendants. On 1/27/2023, Judge Jeffrey L. Ashton denied me access to damning evidence against the Defendants and their Hired Gun Goll. He also introduced his plan to bifurcate to try to screw me more. On 1/30/2023, I filed a Motion for

Partial Summary Judgment. It is a slam dunk if the judge was honest. Judge Jeffrey L. Ashton entered other orders to damage me.

- 383. The lowlight in February 2023 came on 2/21/2023 when Jeff Asshton purportedly entered an order on the docket sua sponte that took away my Constitutional rights. Fortunately, I was left with my shirt, pants, shoes, fingers, tongue, and member.
- 384. I believe Judge Jeffrey L. Ashton will say and do anything. I 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 I was polite and attempting to protect the dishonest witness by encouraging him to have legal counsel because I 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." I cannot afford the TRANSCRIPT of the 2/10/2023 Hearing, but I do have a tape recording of the hearing that I will use in my 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 the Dog.
- 385. Judge Jeffrey L. Ashton, not known for his honesty a la Ashley Madison, outrageously claimed I threatened to un-necessarily prolong the questioning of the witness at trial. What a liar. I said if Judge Jeffrey L. Ashton denied a deposition, I would just have to ask the questions at the trial. That was no threat. Judge Jeffrey L. Ashton will prolong the trial if I continue to be denied all forms of discovery, or he will simply disallow everything I need to prove my case.

- 386. On 2/21/2023, Judge Jeffrey L. Ashton entered a sua sponte order REVOKING my right of self-representation ("REVOCATION ORDER"). [EXHIBIT 4056.]
- 387. Windsor believes Judge Jeffrey L. Ashton may be a mentally ill man because he lies and then lies some more. The truth is the history of this case is replete with examples of the Defendants' abuses. The Answer, Interrogatories, and Requests for Admissions contain one falsehood after another. Defendants' Motions are usually false and never signed or sworn.
- 388. Judge Jeffrey L. Ashton has utterly failed... but as a purported judge and human being. Since Windsor was unlawfully forced to get an attorney to sign his pleadings on 1/10/2023, the Defendants have filed 1461 documents (none signed or verified) while Windsor has filed 511 (all certified for filing by a member in good standing of the Florida Bar). The truth is Windsor filed seven (7) motions totaling 511-pages, virtually all EVIDENCE. The evidence was necessitated by the Defendants' Motion to Strike Witnesses and Sanctions on 2/7/2023. [APPENDIX 91.] All of the evidence can be seen on the Docket from 2/16/2023 to 2/21/2023. [APPENDIX 94.]
- 389. APPENDIX 92 is printed from the DOCKET and shows the filings and indicates who filed. Both Windsor and the Defendants filed seven (7) motions. The Defendants are responsible for 137 Docket Entries while Windsor hit the Docket 38 times.
- 390. If these filings deny an American the right to represent himself in court, that sound you hear is our forefathers turning over in their graves.
- 391. Then Judge Jeffrey L. Ashton wrote on 2/21/2023 at 12:09:51 p.m.: "In response to the hearing set for this date Plaintiff has returned to his abusive filings. He has, in the last four days filed 1,504 documents. Plaintiff has previously been sanction for his abusive conduct in litigation. The right to self-presentation does not the right to threaten, harass and abuse."

- 392. Judge Jeffrey L. Ashton made all of this up. I have not threatened, harassed, or abused in legal proceedings. I am writing a book about this case, and it will be brutally honest. I will spread the word far and wide on social media. I plan protests at the Orange County Courthouse, and I will utilize every legal means possible to expose Jeffrey L. Ashton, Lisa T. Munyon, and others.
- 393. In the last FOUR days, I had filed four docket entries totaling 429 pages. If 2/17/2023 is added to the equation, it was1,062 pages. [EXHIBIT 4091.] There was one motion and one affidavit. All the rest was evidence to prove the malicious and false claims of the Defendants. I produced every document with his right hand and index finger from emails in his email program. This was done to provide incontrovertible proof that I did nothing but file evidence that proved the attorney for the Defendants files a false, malicious motion. Everything I filed was e-filed by me, all on pdfs, so it did not take any precious time from the Clerk' staff. Besides, when you have evidence that is needed, it is the Clerk's job to get it handled efficiently. If she doesn't know how, I am available at \$250 per hour to come and straighten out their systems.
- 394. Judge Jeffrey L. Ashton must be prohibited from doing what he is doing. I have no means of redress but this.
- 395. I have been denied the right to file a motion for recusal and disqualification of Judge Jeffrey L. Ashton because my bankruptcy attorney was unwilling to put his livelihood at risk. I had to fire him, and now Judge Jeffrey L. Ashton claims I am a party with no rights whatsoever.
- 396. Judge Jeffrey L. Ashton's authority comes from the Constitutions, and he has violated them.

- 397. On 2/24/2023, I filed a Complaint Against Judge Jeffrey L. Ashton with the State of Florida Judicial Qualifications Commission. There is no copy on the Flash Drive as the Commission requires confidentiality.
- 398. On 2/28/2023, I terminated my bankruptcy attorney, Jeffrey Badgley, because he refused to sign documents after he was threatened by the Defendants' attorney, Blake Mansker, and Mansker filed charges against him. [EXHIBIT 1287.] I had prepaid Jeffrey Badgley in 2018, and I cannot afford an attorney. I have to represent myself in bankruptcy court.
- 399. On many occasions, I informed Judge Jeffrey L. Ashton that I was in bankruptcy and could not afford an attorney. Judge Jeffrey L. Ashton was well aware of the bankruptcy filing, the stay, and my approval as Indigent by the Orange County Clerk of Court.
- 400. I have 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.
- 401. I have a well-grounded fear that I will not receive a fair trial. LOL. I know there is no such thing with Judge Jeffrey L. Ashton. Judge Jeffrey L. Ashton has ignored all of the prejudice and bias of Judge John Marshall Kest, and he refused without proper consideration my request to reconsider the corrupt orders of Judge John Marshall Kest.
- 402. This Affidavit of Prejudice clearly provides the facts and reasons for the belief that bias and prejudice exists. Dates, times, places, circumstances, and statements are itemized.
- 403. Judge Jeffrey L. Ashton established a clearly fixed view about substantive pending trial matters, so this must raise concerns about the "appearance of impropriety," a standard that I allegedly safeguarded under applicable recusal law.
  - 404. Judge Jeffrey L. Ashton has violated my civil and constitutional rights under color

of law.

- 405. Judge Jeffrey L. Ashton has effectively denied my rights of the equal protection under the law under Article VI of the Constitution.
- 406. Judge Jeffrey L. Ashton's actions prove that he has exercised his power in this civil action for his own personal purposes rather than the will of the law or the common decency of man.
- 407. I will not get a fair and impartial trial with Judge Jeffrey L. Ashton. He is prejudiced against me. He has already committed an unforgivable sin in this case by refusing to reconsider orders of Judge John Marshall Kest that were issued without the required hearings. Judge Jeffrey L. Ashton acts like he is simply another in a string of corrupt Orange County judges who dislike pro se parties and love insurance agencies with deep pockets.
- 408. All I want is to have someone fair and impartial with an open mind to listen to the facts and review as much of the evidence as is needed to prove each of my claims. It is established that Judge Jeffrey L. Ashton doesn't care about the facts and does not want to apply the law.
- 409. The United States Constitution allegedly guarantees an unbiased judge who will always provide litigants with full protection of ALL RIGHTS. Judge Jeffrey L. Ashton is biased against me. Judge Jeffrey L. Ashton has demonstrated this.
- 410. My motion, affidavit, certificate of good faith, and memorandum of authorities meet the requirements for a motion to disqualify.
- 411. This Affidavit of Prejudice states the facts and the reasons for the belief that bias and prejudice exist. The reasons for the belief are material and stated with particularity.
  - 412. I have not received a fair trial.

413. As shown above, I have previously attempted to disqualify Judge Jeffrey L. Ashton.

# FURTHER SAITH AFFIANT NOT.

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

Executed this 17th day of March, 2023,

Weiter he United

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. Windson

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.

nary Public

BETH COWLING
Notary Public - State of Florida
Commission # HH 211154
My Comm. Expires Dec 27, 2025

#### 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

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#### Judge Jeffrey L. Ashton

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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

William h. Weten