

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN

JEFFREY RYAN FENTON,

PLAINTIFF

v.

VIRGINIA LEE STORY ET AL.,

DEFENDANTS

CASE NO. 1:23-cv-01097

FILED - LN

July 12, 2024 12:53 PM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

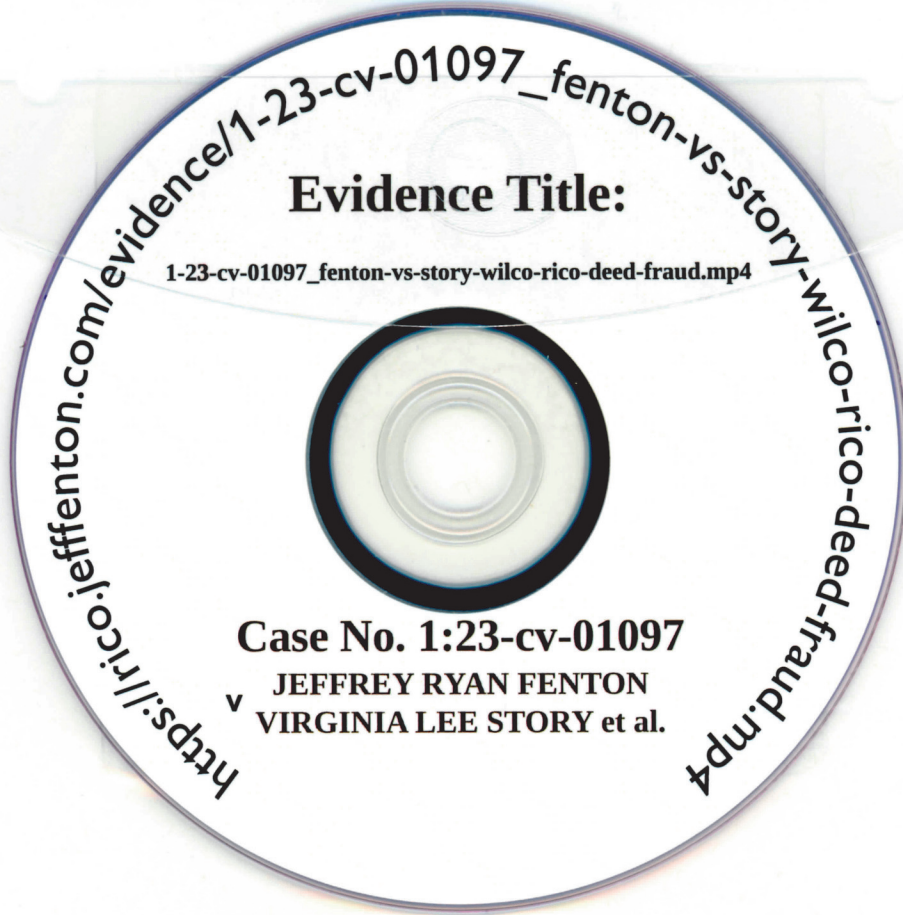
BY: DM / _____ SCANNED BY: JG 7/15/24

DECLARATION CERTIFYING TESTIMONY IN VIDEO IS ACCURATE AND TRUE

Plaintiff brings this testimony pursuant to 28 U.S. Code § 1746.

I, Jeffrey Ryan Fenton, declare under oath as follows:

1. My name is Jeffrey Ryan Fenton.
2. I am the Plaintiff in this federal lawsuit (CASE NO. 1:23-cv-01097).
3. I am a citizen of the United States of America.
4. I am domiciled in Genesee County, Michigan.
5. My mailing address is 17195 Silver Parkway, #150, Fenton, MI 48430-3426.
6. My phone number is (615) 837-1300. My email address is contact@jefffenton.com.
7. The “Evidence Title” and file name of the video which this declaration is in regard to is, “1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4” (hereinafter “the video”).
8. A DVD with the video burned on it is included with this declaration and is online at:
https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4.



UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN

JEFFREY RYAN FENTON,
 PLAINTIFF

v.

VIRGINIA LEE STORY ET AL.,
 DEFENDANTS

CASE NO. 1:23-cv-01097

Evidence Title:	1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4
Internet URL:	https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4
YouTube Redirect:	https://rico.jefffenton.com/youtube/1-23-cv-01097_fenton-vs-story-wilco-rico-deed-fraud-intro.mp4
Related Doc:	https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-wilco-rico-video-declaration.pdf

Description: This is a short 3-minute video introduction to this lawsuit, providing a high-level overview of the conspiracy between bad actors spanning both state and federal courts in Middle Tennessee. This video also shows Plaintiff's Brentwood (Williamson County) residence, located at 1986 Sunnyside Drive, Brentwood, TN 37027.

The .mp4 video file on this disc is an exhibit in this federal civil rights, conspiracy, fraud, and racketeering lawsuit.

CITATION ABBREVIATIONS

9. To reduce redundancy and clutter in this declaration, citations to the court record in this lawsuit will be abbreviated using only the **starting** ECF Number, followed by both the **beginning** and **ending** PageID. The case number for these citations is “Case 1:23-cv-01097-PLM-RSK” but will not be listed in the individual citations. For example, the citation for “Case 1:23-cv-01097-PLM-RSK, ECF No. 38, PageID.3445 through ECF No. 39, Page ID.3496”, will be abbreviated as: “**ECF 38, PID.3445-3496**”. If any case other than this one is being cited, then a case number or the names of the parties will be included in the citation.

PRO SE LITIGANT - MERITS RULE OVER TECHNICALITIES

10. I am acting in a *pro se*¹ capacity in this lawsuit, due to my poverty, entitled to a liberal reading and less stringent standards since it was prepared without assistance of counsel. See *Haines v. Kerner, et al.*, 404 U.S. 519, 92 S. Ct. 594 (1972).

QUALIFIED AMERICAN WITH DISABILITIES ACT LITIGANT

11. I am a qualified ADA party with disabilities affecting my communication and cognitive functions, which make researching and drafting legal pleadings exceptionally slow and challenging.

12. I request considerations from the court to allow me to participate in, be protected by, and benefit from the federal judiciary.

13. I suffer from several cognitive disabilities: Obsessive-Compulsive Personality Disorder (OCPD) DSM-5 301.4 (F60.5), Generalized Anxiety Disorder (GAD) DSM-5 300.02

¹ ECF 1-35, PID.1960

(F4L1), Attention-Deficit Hyperactivity Disorder (ADHD) DSM-5 314.01 (F90.2), Circadian Rhythm Sleep Disorder (CRSD) Non-24-Hour Sleep-Wake Disorder (Non-24) DSM-5 307.45 (G47.24).

14. Letters from my doctors², along with a declaration regarding my disabilities³, are on file in this federal lawsuit.

15. Medications that I take regularly can only control these afflictions, not cure them.

16. Due to my disabilities, it is extremely difficult for me to concisely write documents without losing focus and experiencing significant sprawl, causing repetition, countless rewrites, and bloated documents. For this reason, I am trying to file multiple short declarations to concisely address specific topics, to help communicate more effectively, for the benefit of all parties.

DECLARATIONS INCLUDED BY REFERENCE HEREIN AND THROUGHOUT

17. To increase efficiency while reducing redundancy in this lawsuit, this declaration and the facts herein are made a part of every other declaration written by me in this lawsuit, which is included, named, or referenced in my “Fenton Master Declaration and List of Declarations to Date.”⁴

18. Similarly, every declaration and the facts therein written by me and mentioned in my “Fenton Master Declaration and List of Declarations to Date” are incorporated herein by reference and made a part of this declaration.

² ECF 1-30, PID.1749-1752 | https://rico.jefffenton.com/evidence/2020-07-08_tnsc-coa-ada-request-for-modification.pdf

³ ECF 32, PID.3296-3309 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-declaration-of-disabilities.pdf

⁴ https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-master-list-of-declarations-to-date.pdf

19. My “Fenton Master Declaration and List of Declarations to Date” will be periodically updated both in court and online to have the most comprehensive and complete set of facts available in this case.

TRANSCRIPT OF THE VIDEO

20. Upon information and belief, “A big part of this lawsuit is the fact that my home⁵ was stolen⁶ under color of law by a conspiracy⁷ between bad actors working in both the Williamson County Chancery Court⁸ and the United States Bankruptcy Court for the Middle District of Tennessee⁹, where I wasn’t even provided notice¹⁰ that a single mortgage payment of ours had been missed¹¹, let alone the fact that my ex-wife and her counsel had secretly defaulted upon our mortgage payments and filed for bankruptcy¹², around the same time when we both knew a year in advance¹³, that her employer planned to retire¹⁴ and close their architectural firm, at the end of their office lease, when she needed to transition into working for another firm.”

⁵ ECF 19-1, PID.2629 | <https://rico.jefffenton.com/evidence/1986-sunnyside-brentwood-tn-2019-property-taxes.pdf>
ECF 42, PID.3665-3676 | <https://rico.jefffenton.com/evidence/1986-sunnyside-property-improvement-highlights.pdf>
ECF 52, PID.4211-4217 | https://rico.jefffenton.com/evidence/2023-05-31_1986-sunnyside-brentwood-tn-appreciation.pdf

⁶ ECF 48, PID.4019-4029 | https://rico.jefffenton.com/evidence/2019-10-29_1986-sunnyside-real-estate-deed-fraud.pdf

⁷ ECF 53, PID.4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf

⁸ ECF 1-17, PageID.641-1369

⁹ ECF No. 1-8, PageID.74-478

¹⁰ ECF 52, PID.4208-4210 | https://rico.jefffenton.com/evidence/2022-03-15_ustp-bk-fraud-referral-confirmed-no-notice.pdf

¹¹ ECF 43, PID.3717-3719 | https://rico.jefffenton.com/evidence/2018-04-23_wife-locked-plaintiff-out-of-financial-accounts.pdf

¹² ECF 45, PID.3835-3915 | https://rico.jefffenton.com/evidence/2019-04-26_wifes-ch13-petition-3-19-bk-02693.pdf

¹³ ECF 43, PID.3725 | https://rico.jefffenton.com/evidence/2018-08-30_wife-notifies-about-employers-retirement.pdf
ECF 27, PID.3260-3275 | https://rico.jefffenton.com/evidence/2018-07-12_arons-and-associates-divorce-planning.pdf

¹⁴ ECF 45, PID.3817-3819 | https://rico.jefffenton.com/evidence/2019-04-26_bankruptcy-planned-for-when-employer-retires.pdf

21. Upon information and belief, “To make matters even worse, my wife’s counsel coordinated their attacks while using the same fraudulent narrative¹⁵ in both courts, claiming that my wife was the actual owner of our Brentwood marital residence¹⁶, when in fact we both invested the whole of our premarital retirement savings¹⁷ in the purchase of our home, while it was equally deeded to us both¹⁸, as tenancy by the entirety¹⁹.”

22. Upon information and belief, “To still make matters even worse, my wife’s counsel motioned for the bankruptcy court to sell our marital residence²⁰, which I was lawfully in possession of at that time²¹, without even providing me notice, or an adversarial proceeding²² as was required by the Federal Rules of Bankruptcy Procedure and subsequent bankruptcy laws²³. Denying me both lawful notice and any opportunity to save my property, or at the very least to mitigate my losses in my property interests prior to the forced deprivation of my property, as is required in both the 5th and 14th Amendments of the United States Constitution, along with the State of Tennessee’s own Constitution.”

¹⁵ ECF 19-25, PID.2632-2646 | https://rico.jefffenton.com/evidence/2019-04-26_ausbrooks-story-fraudulent-bk-petition.pdf

¹⁶ ECF 52, PID.4202-4207 | https://rico.jefffenton.com/evidence/2022-01-03_1986-sunnyside-brentwood-tn-appreciation.pdf

¹⁷ ECF 42, PID.3631-3657 | https://rico.jefffenton.com/evidence/2011-04-29_1986-sunnyside-premarital-assets-invested.pdf

¹⁸ ECF 19-1, PID.2624-2628 | https://rico.jefffenton.com/evidence/2011-04-29_1986-sunnyside-brentwood-tn-deed.pdf

¹⁹ ECF 19-1, PID.2620-2623 | https://rico.jefffenton.com/evidence/2011-04-29_fenton-marital-residence-tenancy-by-entirety.pdf

²⁰ ECF 19-2, PID.2646 | Entered on April 26, 2019, in bankruptcy case 3:19-bk-02693, in Appendix D, Part 9, "Nonstandard Plan Provisions", the following request was included by defendant Ausbrooks: "Debtor moves for permission to sell real property located at 1986 Sunny Side Drive Brentwood, TN 37027 Williamson County, within 180 days of confirmation with no payments being made in the interim. The liens of Bank of America, NA and BanCorp South shall be satisfied in full and all remaining proceeds after Debtor's homestead exemption and costs of sale shall be paid to the Chapter 13 Trustee for the benefit of the estate."

ECF 19-2, PID.2632-2646 | https://rico.jefffenton.com/evidence/2019-04-26_ausbrooks-story-fraudulent-bk-petition.pdf

²¹ ECF 45, PID.3800-3807 | https://rico.jefffenton.com/evidence/2019-03-26_fenton-sunnyside-roommate-lease-merriman.pdf

ECF 45, PID.3808-3813 | https://rico.jefffenton.com/evidence/2019-04-09_fenton-sunnyside-roommate-lease-garcia.pdf

²² ECF 38, PID.3445-3496 | https://rico.jefffenton.com/evidence/2019-04-26_conspiracy-against-rights-under-color-of-law.pdf

²³ ECF 28, PID.3276-3288 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf

ECF 54-1, PID.4367 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3

23. Upon information and belief, “To ensure that I had absolutely no chance to save my property interests and thwart the forced auction of my home (with no minimums), the Chancery Court unlawfully restrained me²⁴, by ordering that I not directly or indirectly interfere in the sale by any means.”

24. Upon information and belief, “Everything done by the prestigious officers in both courts was a felony crime²⁵ against myself and my family. While they even leveraged the Williamson County Sheriff’s Office²⁶ as the muscle by which to wrongfully evict me from my home, ordered by a court without lawful jurisdiction²⁷, based upon fraudulent claims²⁸ which clearly constituted felony obstruction of justice²⁹ by both Attorney Virginia Lee Story in Chancery Court, and Judge Michael W. Binkley who signed the wrongful orders.”

25. Upon information and belief, “Unbeknownst to me at that time, Judge Michael W. Binkley has a sordid past of criminal misconduct³⁰ and involvement with members of organized crime³¹, while Attorney Story was an undisclosed close family friend, partying³² and vacationing³³ buddy of Judge Michael W. Binkley³⁴.”

²⁴ ECF 47, PID.3974-3977 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-court-order-with-counsel.pdf (See page 2.)

²⁵ ECF 1-12, PID.479-596 | https://rico.jefffenton.com/evidence/2019-10-29_tn-wilco-deed-fraud-ada-financial-exploitation.pdf

ECF 48, PID.4019-4029 | https://rico.jefffenton.com/evidence/2019-10-29_1986-sunnyside-real-estate-deed-fraud.pdf

ECF 38, PID.3445-3496 | https://rico.jefffenton.com/evidence/2019-04-26_conspiracy-against-rights-under-color-of-law.pdf

²⁶ ECF 47, PID.3986-3992 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-court-order-once-pro-se.pdf

ECF 52, PID.4225-4228 | https://rico.jefffenton.com/evidence/2023-12-13_wcso-racketeering-official-oppression.pdf

²⁷ ECF 21, PID.2781-2817 | https://rico.jefffenton.com/evidence/2024-01-18_binkley-disqualification-for-bias-coercion.pdf

²⁸ ECF 33, PID.3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf

²⁹ ECF 23-1, PID.2901-2905

ECF 1-35, PID.1925-2006

³⁰ ECF 42, PID.3696-3697 | https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.pdf

ECF 52, PID.4174-4179 | https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf

ECF 1-14, PID.597-640 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf

³¹ ECF 43, PID.3694-3695 | https://rico.jefffenton.com/evidence/2017-02-01_scene-ethics-complaint-against-two-judges.pdf

26. Upon information and belief, “I never had a chance at justice³⁵. I was only there for a divorce³⁶, but they took my whole life away³⁷.”

27. I certify herein that I have made these statements in good faith³⁸, in the honest pursuit of justice, and have not created this video or testified therein or hereunder “for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation³⁹.”

28. I Jeffrey Ryan Fenton further certify and swear that the same is entirely accurate and absolutely true to the best of my knowledge and ability⁴⁰.

29. I would like to bring to this court’s attention that I have taken care to ensure that this filing is made in full compliance with Rule 8(e)⁴¹ and Rule 11⁴² of the Federal Rules of Civil Procedure, to ensure that my testimony can be given the **full weight** due by the court, knowing that this was executed in good faith toward the honest **pursuit of justice**⁴³ and that it contains honest and **true facts** of which I possess and have shared with the court extensive (if not

ECF 54-1, PID.4358 | https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.mp4
³² ECF 1-14, PID.597-640 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf
³³ ECF 43, PID.3726-3729 | https://rico.jefffenton.com/evidence/2018-08-30_tennessean-story-hosts-vacations-with-judges.pdf
³⁴ ECF 44, PID.3740-3741 | https://rico.jefffenton.com/evidence/2018-09-24_tenn-binkley-defends-partying-with-lawyers.pdf
ECF 54-1, PID.4368 | https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4
³⁵ ECF 1-17, PID.692-702 | https://rico.jefffenton.com/evidence/2019-07-29_response-to-wifes-motion-to-sell-residence.pdf
ECF 51, PID.4088-4135 | https://rico.jefffenton.com/evidence/2020-10-28_motion-to-supplement-and-correct-the-record.pdf
³⁶ ECF 18-7, PID.2526-2589 | https://rico.jefffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf
³⁷ ECF 19, PID.2617-2716 | https://rico.jefffenton.com/evidence/2019_tn-court-motions-in-chronological-order.pdf
³⁸ In compliance with Fed. R. Civ. P. Rule 11(b) | https://www.law.cornell.edu/rules/frcp/rule_11
³⁹ In compliance with Fed. R. Civ. P. Rule 11(b)(1) | https://www.law.cornell.edu/rules/frcp/rule_11
⁴⁰ In compliance with Fed. R. Civ. P. Rule 11(b) | https://www.law.cornell.edu/rules/frcp/rule_11
⁴¹ https://www.law.cornell.edu/rules/frcp/rule_8 | “Construing Pleadings. Pleadings must be construed so as to do justice.”
⁴² https://www.law.cornell.edu/rules/frcp/rule_11
⁴³ In compliance with Fed. R. Civ. P. Rule 8(e) | https://www.law.cornell.edu/rules/frcp/rule_8

irrefutable) **evidence**⁴⁴. I have no doubt that I can prove the same to any reasonable and impartial jury of my peers if or when I have that opportunity.

30. The record in this case contains evidence⁴⁵ of significant wrongdoing and felony criminal misconduct by multiple attorneys, court clerks, judges, and even supervising bodies⁴⁶ over those individuals who chose to cover-up their misconduct rather than to help the unjustly injured party. These bodies rejected their duties knowing full well the consequences of their failure or refusal to intervene would both continue to endanger the public in Middle Tennessee, while dealing the death blow to my life and any chance for me to be able to reach a remedy by which I could become self-sufficient once again, as I was all my life before I was targeted, setup, and ambushed by these lawless and unethical rogue members of the courts in Tennessee.

31. My efforts—to learn the law, discover the truth, research the case and the parties, and pursue justice⁴⁷—has met or exceeded any threshold required for making an “inquiry reasonable under the circumstances⁴⁸.”

⁴⁴ In compliance with Fed. R. Civ. P. Rule 11(b)(3) | https://www.law.cornell.edu/rules/frcp/rule_11

⁴⁵ ECF 53, PID.4258-4339 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf
 ECF 38, PID.3445-3496 | https://rico.jefffenton.com/evidence/2019-04-26_conspiracy-against-rights-under-color-of-law.pdf
 ECF 19-2, PID.2632-2646 | https://rico.jefffenton.com/evidence/2019-04-26_ausbrooks-story-fraudulent-bk-petition.pdf

⁴⁶ https://rico.jefffenton.com/evidence/2019-12-08_tn-coa-issues-proposed-to-be-raised-in-appeal.pdf
 ECF 26-1, PID.3259 | https://rico.jefffenton.com/evidence/2020-02-13_tnsc-aoc-ada-gc-john-coke-phone-call.mp3
 ECF 26, PID.3227-3258 | https://rico.jefffenton.com/evidence/2020-02-13_tnsc-aoc-ada-gc-john-coke-transcript.pdf
 ECF 1-38, PID.2032-2045 | https://rico.jefffenton.com/evidence/2020-07-08_tnsc-coa-ada-request-for-modification.pdf
https://rico.jefffenton.com/evidence/2020-10-05_report-ada-abuse-misconduct-to-coke-hivner.pdf
 ECF 50, PID.4082-4086 | https://rico.jefffenton.com/evidence/2020-10-16_coa-emergency-motion-reporting-misconduct.pdf
 ECF 51, PID.4088-4135 | https://rico.jefffenton.com/evidence/2020-10-28_motion-to-supplement-and-correct-the-record.pdf
https://rico.jefffenton.com/evidence/2020-12-29_tnsc-bpr-complaint-against-story-binkley-etc.pdf
 ECF 1-29, PID.1665-1681 | https://rico.jefffenton.com/evidence/2021-01-19_reported-misconduct-sought-help-tnsc-aoc-bpr.pdf
 ECF 27, PID.1370-1873 | Motion to Escalate to the Tennessee Supreme Court

⁴⁷ https://rico.jefffenton.com/evidence/2019-08-30_emergency-attempt-to-correct-court-order.pdf

ECF 54-1, PID.4361 | https://rico.jefffenton.com/evidence/2019-08-30_judgment-wrong-emergency-call-to-court.mp3

32. My claims, defenses, and other legal contentions are clearly “warranted by existing law⁴⁹ or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law⁵⁰.”

33. My “factual contentions⁵¹ have [abundant] evidentiary support⁵²”, already filed on court record. While this is only a fraction of the evidence in my possession. I have much more which I have not yet had time or the manpower to process, itemize, draft or publish.

https://rico.jefffenton.com/evidence/2019-08-30_notified-story-beeler-false-claims-in-court-order.pdf

https://rico.jefffenton.com/evidence/2019-08-30_story-lied-when-notified-false-claims-in-order.pdf

https://rico.jefffenton.com/evidence/2019-09-20_halt-confronting-criminal-misconduct-by-story.pdf

https://rico.jefffenton.com/evidence/2019-09-21_notice-listing-agreement-coerced-null-and-void.pdf

https://rico.jefffenton.com/evidence/2019-09-21_auctioneer-refused-to-stop-illegal-auction.pdf

https://rico.jefffenton.com/evidence/2019-09-23_notified-binkley-false-claims-in-storys-order.pdf

https://rico.jefffenton.com/evidence/2019-09-23_seeking-ada-assistance-coa-referred-aoc.pdf

https://rico.jefffenton.com/evidence/2019-10-10_notice-to-court-and-title-co-auction-was-illegal.pdf

https://rico.jefffenton.com/evidence/2019-10-10_notified-bankers-title-sale-illegal-unauthorized.pdf

ECF 49, PID.4046-4067 | https://rico.jefffenton.com/evidence/2020-05-05_notified-story-about-her-fraudulent-affidavit.pdf

https://rico.jefffenton.com/evidence/2020-09-09_tn-aba-free-legal-answers-site-question-closed.pdf

https://rico.jefffenton.com/evidence/2020-10-05_report-ada-abuse-misconduct-to-coke-hivner.pdf

ECF 50, PID.4082-4086 | https://rico.jefffenton.com/evidence/2020-10-16_coa-emergency-motion-reporting-misconduct.pdf

ECF 51, PID.4088-4135 | https://rico.jefffenton.com/evidence/2020-10-28_motion-to-supplement-and-correct-the-record.pdf

https://rico.jefffenton.com/evidence/2020-12-29_tnsc-bpr-complaint-against-story-binkley-etc.pdf

ECF 1-27, PID.1370-1873 | Motion to Escalate to the Tennessee Supreme Court

ECF 1-29, PID.1665-1681 | https://rico.jefffenton.com/evidence/2021-01-19_reported-misconduct-sought-help-tnsc-aoc-bpr.pdf

ECF 51, PID.4169-4173 | https://rico.jefffenton.com/evidence/2021-01-27_notified-ausbrooks-fraud-misconduct-damages.pdf

⁴⁸ In compliance with Fed. R. Civ. P. Rule 11(b) | https://www.law.cornell.edu/rules/frcp/rule_11

⁴⁹ ECF 21, PID.2781-2817 | https://rico.jefffenton.com/evidence/2024-01-18_binkley-disqualification-for-bias-coercion.pdf

ECF 38, PID.3445-3496 | https://rico.jefffenton.com/evidence/2019-04-26_conspiracy-against-rights-under-color-of-law.pdf

⁵⁰ In compliance with Fed. R. Civ. P. Rule 11(b)(2) | https://www.law.cornell.edu/rules/frcp/rule_11

⁵¹ ECF 1-1, PID.34-47 | https://rico.jefffenton.com/evidence/2022-02-01_fenton-affidavit-of-story-binkley-fraud-on-court.pdf

ECF 23, PID.2863-2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf

ECF 27, PID.3260-3275 | https://rico.jefffenton.com/evidence/2018-07-12_arons-and-associates-divorce-planning.pdf

ECF 28, PID.3276-3288 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf

ECF 32, PID.3296-3309 | https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-declaration-of-disabilities.pdf

ECF 33, PID.3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf

ECF 37, PID.3398-3443 | <https://rico.jefffenton.com/evidence/fenton-family-finances-property-education-experience.pdf>

ECF 53, PID.4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf

⁵² In compliance with Fed. R. Civ. P. Rule 11(b)(3) | https://www.law.cornell.edu/rules/frcp/rule_11

ECF 1, PID.1-4377

ECF 53, PID.4258-4349 | https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf

ECF 54-1, PID.4367 | https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3

ECF 42, PID.3610-3614 | https://rico.jefffenton.com/evidence/2004-12-09_through_2021-07-25_tn-real-estate-license.pdf

ECF 42, PID.3665-3676 | <https://rico.jefffenton.com/evidence/1986-sunnyside-property-improvement-highlights.pdf>

ECF 19-1, PID.2629 | <https://rico.jefffenton.com/evidence/1986-sunnyside-brentwood-tn-2019-property-taxes.pdf>

ECF 19-1, PID.2624-2628 | https://rico.jefffenton.com/evidence/2011-04-29_1986-sunnyside-brentwood-tn-deed.pdf

ECF 42, PID.3631-3657 | https://rico.jefffenton.com/evidence/2011-04-29_1986-sunnyside-premarital-assets-invested.pdf

ECF 19-1, PID.2620-2623 | https://rico.jefffenton.com/evidence/2011-04-29_fenton-marital-residence-tenancy-by-entirety.pdf

ECF 43, PID.3717-3719 | https://rico.jefffenton.com/evidence/2018-04-23_wife-locked-plaintiff-out-of-financial-accounts.pdf

ECF 43, PID.3720-3721 | https://rico.jefffenton.com/evidence/2018-05-02_family-budget-living-apart.pdf

ECF 1-26, PID.1317-1318 | https://rico.jefffenton.com/evidence/2018-10-27_verbal-settlement-agreement.pdf

ECF 43, PID.3723-3724 | https://rico.jefffenton.com/evidence/2018-08-30_wifes-budget-for-husband-keeping-home.pdf

ECF 43, PID.3730-3739 | https://rico.jefffenton.com/evidence/2018-09-14_fair-settlement-offer-by-wife-with-tax-truth.pdf

ECF 44, PID.3769-3770 | https://rico.jefffenton.com/evidence/2018-12-22_projected-gross-taxes-alimony-net.pdf

ECF 44, PID.3771-3772 | https://rico.jefffenton.com/evidence/2018-12-31_divorce-deadline-for-trump-tax-reform.pdf

ECF 49, PID.4042 | https://rico.jefffenton.com/evidence/2019_tn-21st-district-court-rule-11-preparation-of-orders.pdf

ECF 44, PID.3773 | https://rico.jefffenton.com/evidence/2019-01-08_wifes-claims-about-alimony-and-lawyers.pdf

ECF 44, PID.3774-3778 | https://rico.jefffenton.com/evidence/2019-01-22_wifes-birthday-and-counseling-together.pdf

ECF 44, PID.3781 | https://rico.jefffenton.com/evidence/2019-01-28_verbal-agreement-needed-in-writing-for-closing.pdf

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ECF 45, PID.3796-3798 | https://rico.jefffenton.com/evidence/2019-02-21_request-for-clarification-on-finances.pdf

ECF 45, PID.3799 | https://rico.jefffenton.com/evidence/2019-02-25_wifes-monthly-budget-deficit_400-500.pdf

ECF 45, PID.3800-3807 | https://rico.jefffenton.com/evidence/2019-03-26_fenton-sunnyside-roommate-lease-merriman.pdf

ECF 45, PID.3808-3813 | https://rico.jefffenton.com/evidence/2019-04-09_fenton-sunnyside-roommate-lease-garcia.pdf

ECF 19-2, PID.2632-2646 | https://rico.jefffenton.com/evidence/2019-04-26_ausbrooks-story-fraudulent-bk-petition.pdf

ECF 46, PID.3916-3927 | https://rico.jefffenton.com/evidence/2019-05-16_support-email-wife-never-mentioned-bankruptcy.pdf

ECF 47, PID.3956-3959 | https://rico.jefffenton.com/evidence/2019-07-17_chancery-motion-to-sell-marital-residence.pdf

ECF 47, PID.3960-3962 | https://rico.jefffenton.com/evidence/2019-07-26_attorney-gates-failed-to-perform.pdf

ECF 1-17, PID.692-702 | https://rico.jefffenton.com/evidence/2019-07-29_response-to-wifes-motion-to-sell-residence.pdf

ECF 22, PID.2818-2862 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf

ECF 47, PID.3974-3977 | https://rico.jefffenton.com/evidence/2019-08-01_chancery-court-order-with-counsel.pdf

ECF 33, PID.3310-3391 | https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf

ECF 47, PID.3978-3980 | https://rico.jefffenton.com/evidence/2019-08-02_attorneys-miller-duke-retainer-exhausted.pdf

ECF 47, PID.3981 | https://rico.jefffenton.com/evidence/2019-08-05_attorney-agreement-extending-answer-deadline.pdf

ECF 23-4, PID.2920 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3

ECF 23, PID.2863-2918 | https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf

DECLARATION

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct, except as to matters herein stated to be on information and belief, and as to such matters, I certify as aforesaid that I verily believe the same to be true.

Executed on July 10, 2024



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AN INDEX OF DOCUMENTS FILED IN THIS LAWSUIT IS AVAILABLE ONLINE AT:

https://rico.jefffenton.com/evidence/1-23-cv-01097_fenton-vs-story-lawsuit-document-index.pdf

ECF 18-7, PID.2526-2589 | https://rico.jefffenton.com/evidence/2019-08-29_husbands-one-and-done-answer-to-all.pdf
ECF 54-1, PID.4369 | https://rico.jefffenton.com/evidence/2020-09-30_wilco-inquiry-about-extended-op-and-sales-records.mp3
ECF 48, PID.4004-4013 | https://rico.jefffenton.com/evidence/2019-10-21_fraudulent-final-affidavit-by-virginia-story.pdf
ECF 48, PID.4014-4018 | https://rico.jefffenton.com/evidence/2019-10-21_chancery-final-decree-of-divorce.pdf
ECF 1-31, PID.1794-1873 | https://rico.jefffenton.com/evidence/2019-10-21_order-of-protection-as-illegal-prior-restraint.pdf
ECF 48, PID.4019-4029 | https://rico.jefffenton.com/evidence/2019-10-29_1986-sunnyside-real-estate-deed-fraud.pdf
ECF 49, PID.4043 | https://rico.jefffenton.com/evidence/2020-02-18_notice-of-filing-transcripts-from-2019-08-01.pdf
ECF 49, PID.4044-4045 | https://rico.jefffenton.com/evidence/2020-03-31_chancery-certificate-of-appellate-record.pdf
ECF 54-1, PID.4363 | https://rico.jefffenton.com/evidence/2020-04-30_wilco-weems-8-29-19-transcript-buried-as-exhibit.mp3
ECF 54-1, PID.4365 | https://rico.jefffenton.com/evidence/2020-05-01_coa-hivner-8-29-19-hearing-transcript-recorded-call.mp3
ECF 54-1, PID.4373 | https://rico.jefffenton.com/evidence/2022-03-10_doj-ustp-megan-seliber-bk-fraud-referral.mp3
ECF 52, PID.4208-4210 | https://rico.jefffenton.com/evidence/2022-03-15_ustp-bk-fraud-referral-confirmed-no-notice.pdf
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From:

**Jeff Fenton
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