

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**JEFFREY RYAN FENTON,**

**PLAINTIFF**

**v.**

**VIRGINIA LEE STORY ET AL.,**

**DEFENDANTS**

**CASE NO. 3:24-cv-01282**

**RECEIVED**

**FEB 06 2025**

**US DISTRICT COURT  
MID DIST TENN**

**DECLARATION EXPLAINING MY PURSUIT OF JUSTICE<sup>1</sup>**

This testimony is being brought pursuant to 28 U.S. Code § 1746.

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

1. I am the plaintiff in this federal lawsuit (Case No. 3:24-cv-01282, which was previously 1:23-cv-1097 in the United States District Court for the Western District of Michigan.)
2. I am a citizen of the United States of America, born in Washington State.
3. I am domiciled in Genesee County, Michigan.
4. My mailing address is 17195 Silver Parkway, #150, Fenton, MI 48430-3426.
5. My phone number is (615) 837-1300. My email address is contact@jefffenton.com.

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<sup>1</sup> This lawsuit was originally filed on October 13, 2023, in the United States District Court for the Western District of Michigan (hereinafter "MIWD") as case no. 1:23-cv-01097. On October 25, 2024, MIWD transferred this lawsuit as ordered in ECF 127 to the United States District Court for the Middle District of Tennessee (hereinafter "TNMD") as case no. 3:24-cv-01282. The language used in the file stamps of each page filed is slightly different between the two courts. MIWD uses the term "ECF No." (which I abbreviate as "ECF"), while in place of that, TNMD uses the term "Document" (which I abbreviate as "DOC"). Both courts use the term "PageID" (which I abbreviate as "PID"). Citations to the court record in this lawsuit will be notated without the case name or number, using the starting DOC/ECF number, followed by both the beginning and ending PID. The Notice of Electronic Filing for this transfer is recorded in TNMD DOC 131, at which point the DOC/ECF number from MIWD was retained and continued, but the PID was reset after DOC 130, PID 5727, to restart at zero.

## COURT MISCONDUCT

6. Although this lawsuit must repeatedly address what I believe can only be reasonably interpreted as court misconduct, for the purpose of protecting my constitutional and lawful rights to equal protection and due process of law, by an impartial tribunal, through a fair court process, I do not do so with any joy, malice, or disrespect for the court whatsoever. I likewise do not seek to disparage the court or any member of the court in any way.

7. At the same time, I have been placed in a situation, through no fault of my own, where I must speak honestly about and confront the professional and judicial misconduct which I have experienced “under color of law.”

8. I am providing this declaration in an effort to clarify my posture, position, and beliefs regarding both attorney and judicial misconduct as well as the role of the courts and the “practice of law” currently in our nation, and specifically within the State of Tennessee.

9. It is my firm and steadfast belief that the institutions of justice are not inherently bad, corrupted, or used for unlawful purposes. Yet it would be naive and illogical for me to blindly accept that what members of the court say is **truth** and what the court orders is **lawful**.

10. I wish that life was that simple, transparent, and honest, but it quite simply is not, as the thousands of pages of sworn testimony and evidence in my case irrefutably proves.

## I AM FIGHTING FOR JUSTICE

11. I want to make sure that nobody twists or misrepresents the fact that **I am fighting for justice** in this lawsuit, on many levels, both for myself and my family, but also for the victory of justice over injustice, the truth over the lie, good over evil, right over wrong within our courts, combined with both our state and federal governments in this nation. I believe that what we feed grows. I’m doing everything within my power to feed JUSTICE!

## **THIS LAWSUIT IS NOT ABOUT MONEY**

12. If I never gain a penny from this suit and remain destroyed for my entire life, but the courts in Middle Tennessee are able to disbar, remove, or imprison some of the bad actors in my lawsuit thereby increasing the honest judicial integrity throughout Middle Tennessee—specifically impacting the Williamson County Chancery Court and the Tennessee Court of Appeals in Nashville for the honest lawful benefit of the people who used to be my neighbors and friends—then this lawsuit will have been a success no matter what is ever penned in this case or by whom.

## **REQUIRE TENNESSEE JUDGES TO OBEY THE COURT’S ETHICAL CANONS**

13. One of my greatest hopes is that rules and/or statutes will be created, whether state or federal, which will prohibit the incredibly foolish and incestuous practice of allowing judges to hear and decide matters argued in court by their friends and prior associates, especially without even disclosing their relationship to the litigants or allowing the litigants any opportunity or choice by which they might obtain an honestly impartial tribunal without such obvious conflicts of interest. The current incestuous workings of the Tennessee courts is unconscionable! Now, it simply needs to be outlawed or punished to the point where states around the nation prioritize acting in the honest interests of improving judicial integrity within their courts and disciplining powerful local bad actors to protect the honest interests and rights of the people.

14. The State of Tennessee has chosen to remain silent on this issue<sup>2</sup> despite the

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<sup>2</sup> DOC 43, PID 3726-3729 | [https://rico.jefffenton.com/evidence/2018-08-30\\_tennessean-story-hosts-vacations-with-judges.pdf](https://rico.jefffenton.com/evidence/2018-08-30_tennessean-story-hosts-vacations-with-judges.pdf)  
DOC 44, PID 3740-3741 | [https://rico.jefffenton.com/evidence/2018-09-24\\_tenn-binkley-defends-partying-with-lawyers.pdf](https://rico.jefffenton.com/evidence/2018-09-24_tenn-binkley-defends-partying-with-lawyers.pdf)

obvious dangers to the honest judicial integrity<sup>3</sup> throughout the entire state in addition to the health and safety<sup>4</sup> of the public at large. It has been my personal experience that the misconduct exhibited in Tennessee goes beyond professional negligence by the Tennessee Supreme Court’s supervisory boards and administrative offices as the facts and evidence in my lawsuit unquestionably proves.

**WHERE TRANSPARENCY IS LACKING – CORRUPTION INEVITABLY THRIVES**

15. In 2019 when I was involved in litigation in Middle Tennessee, the Williamson County Chancery Court did not record audio or video during civil court hearings, thus eschewing transparency and accountability. Everything was based on the “honor” system, trusting the

<sup>3</sup> DOC 54-1, PID 4355 | [https://rico.jefffenton.com/evidence/2010-10-05\\_reguli-tn-senate-judiciary-comm-retaliation-pt-1.mp4](https://rico.jefffenton.com/evidence/2010-10-05_reguli-tn-senate-judiciary-comm-retaliation-pt-1.mp4)  
DOC 54-1, PID 4356 | [https://rico.jefffenton.com/evidence/2010-10-05\\_reguli-tn-senate-judiciary-comm-retaliation-pt-2.mp4](https://rico.jefffenton.com/evidence/2010-10-05_reguli-tn-senate-judiciary-comm-retaliation-pt-2.mp4)  
DOC 43, PID 3694-3695 | [https://rico.jefffenton.com/evidence/2017-02-01\\_scene-ethics-complaint-against-two-judges.pdf](https://rico.jefffenton.com/evidence/2017-02-01_scene-ethics-complaint-against-two-judges.pdf)  
DOC 54-1, PID 4358 | [https://rico.jefffenton.com/evidence/2017-02-01\\_wsmv-binkley-arrest-expunged-by-moreland.mp4](https://rico.jefffenton.com/evidence/2017-02-01_wsmv-binkley-arrest-expunged-by-moreland.mp4)  
DOC 52, PID 4180-4201 | [https://rico.jefffenton.com/evidence/2018-02-28\\_tn-judge-cason-moreland-fbi-criminal-complaint.pdf](https://rico.jefffenton.com/evidence/2018-02-28_tn-judge-cason-moreland-fbi-criminal-complaint.pdf)  
DOC 40, PID 3497-3569 | [https://rico.jefffenton.com/evidence/2019-01-14\\_tn-petition-of-remonstrance-by-john-gentry.pdf](https://rico.jefffenton.com/evidence/2019-01-14_tn-petition-of-remonstrance-by-john-gentry.pdf)  
DOC 58-2, PID 4628-4630 | [https://rico.jefffenton.com/evidence/2019-07-01\\_tenn-bpr-targets-whistleblowers-not-corruption.pdf](https://rico.jefffenton.com/evidence/2019-07-01_tenn-bpr-targets-whistleblowers-not-corruption.pdf)  
DOC 54-1, PID 4367 | [https://rico.jefffenton.com/evidence/2020-07-02\\_bk-trustee-john-mclemore-recorded-call.mp3](https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3)  
DOC 28, PID 3276-3288 | [https://rico.jefffenton.com/evidence/2020-07-02\\_bk-trustee-john-mclemore-call-declaration.pdf](https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf)  
DOC 52, PID 4174-4179 | [https://rico.jefffenton.com/evidence/2021-03-21\\_knoxnews-coa-removes-judge-binkley-for-bias.pdf](https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf)  
DOC 58-4, PID 4712-4716 | [https://rico.jefffenton.com/evidence/2024-02-16\\_tnsc-manookian-disbarment-opinion-justice-lee.pdf](https://rico.jefffenton.com/evidence/2024-02-16_tnsc-manookian-disbarment-opinion-justice-lee.pdf)  
DOC 58-5, PID 4718-4722 | [https://rico.jefffenton.com/evidence/2024-05-02\\_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf](https://rico.jefffenton.com/evidence/2024-05-02_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf)  
<sup>4</sup> DOC 58-1, PID 4573-4626 | [https://rico.jefffenton.com/evidence/2014-09-18\\_tn-stop-false-allegations-for-protective-orders.pdf](https://rico.jefffenton.com/evidence/2014-09-18_tn-stop-false-allegations-for-protective-orders.pdf)  
DOC 1-31, PID 1794-1873 | [https://rico.jefffenton.com/evidence/2019-10-21\\_order-of-protection-as-illegal-prior-restraint.pdf](https://rico.jefffenton.com/evidence/2019-10-21_order-of-protection-as-illegal-prior-restraint.pdf)  
DOC 1-31, PID 1794-1873 | [https://rico.jefffenton.com/evidence/2020-09-24\\_5yr-op-ext-retaliation-no-notice-motion-hearing.pdf](https://rico.jefffenton.com/evidence/2020-09-24_5yr-op-ext-retaliation-no-notice-motion-hearing.pdf)  
DOC 54-1, PID 4368 | [https://rico.jefffenton.com/evidence/2021-03-21\\_knox-news-binkley-threatens-prior-restraints.mp4](https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.mp4)  
DOC 1-14, PID 597-640 | [https://rico.jefffenton.com/evidence/2021-03-21\\_knox-news-binkley-threatens-prior-restraints.pdf](https://rico.jefffenton.com/evidence/2021-03-21_knox-news-binkley-threatens-prior-restraints.pdf)  
DOC 54-1, PID 4360 | [https://rico.jefffenton.com/evidence/2017-04-03\\_wtvf-moreland-tried-to-plant-drugs-on-witness.mp4](https://rico.jefffenton.com/evidence/2017-04-03_wtvf-moreland-tried-to-plant-drugs-on-witness.mp4)  
DOC 54-1, PID 4362 | [https://rico.jefffenton.com/evidence/2017-04-03\\_wtvf-undercover-fbi-video-of-casey-moreland.mp4](https://rico.jefffenton.com/evidence/2017-04-03_wtvf-undercover-fbi-video-of-casey-moreland.mp4)  
DOC 43, PID 3689-3693 | [https://rico.jefffenton.com/evidence/2017-01-31\\_nashville-judicial-misconduct-leigh-terrys-death.pdf](https://rico.jefffenton.com/evidence/2017-01-31_nashville-judicial-misconduct-leigh-terrys-death.pdf)  
DOC 54-1, PID 4374 | [https://rico.jefffenton.com/evidence/2022-12-22\\_sgcs-franklin-tn-corruption-abuse-solomon-case.mp4](https://rico.jefffenton.com/evidence/2022-12-22_sgcs-franklin-tn-corruption-abuse-solomon-case.mp4)  
Reguli – Fake Felony Testimony | <https://www.youtube.com/watch?v=rC6CjUATTk>  
<https://tennesseeconservativenews.com/2022-tennessee-judicial-candidate-sues-public-officials-after-fake-felony-conviction-is-reversed/>



judge and the clerks of the court implicitly, without any meaningful mechanisms for transparency or accountability within the reach of the average litigant; otherwise, I would have never needed to bring this lawsuit.

**PROTECTING THE PRACTICE OF LAW WITH A MINIMUM OF  
GRADE SCHOOL LEVEL COMMON SENSE**

16. It never should have required the obscene losses which I have experienced and continue to experience and endure each day to convince the State of Tennessee and the Tennessee Supreme Court to proactively exercise grade-school-level common sense for the proactive protection of the people, but now I can definitively prove what should have been “a given” from the start.

17. I’m here to prove that the damage done to me is real, substantial, criminal, and unjustifiable, while much of it was and is preventable—at almost no cost to the state—by enacting simple common-sense policies in alignment with the ethical canons forcing the members of the court to in fact comply with the canons prior to the exercise of power over another person’s life, liberty, and property.

**COURTS MUST PROTECT LITIGANTS FROM LOSSES  
WHICH STATES CAN’T AFFORD TO REMEDY**

18. In any situation whereby a state cannot realistically afford to remedy the injustices caused under its policies and governance, such as a multi-billion-dollar class action lawsuit by the people against the State of Tennessee and the Tennessee Supreme Court for professional negligence for refusing to use grade-school-level common-sense for the proactive protection of the people, the courts must **stop** the state from causing damage which it cannot afford to honestly cure.

19. The only other lawful option to protect the natural and constitutional rights of the people is to penalize a state so **severely** once its judicial members are caught violating the natural and federal rights of an individual, such as in my Tennessee divorce and in my ex-wife's bankruptcy, that they decide to proactively "raise the bar" for the "practice of law" throughout the state and their courts therein.

**COURTS MUST INCENTIVIZE AND PROTECT WHISTLEBLOWERS  
CHALLENGING CORRUPTION**

20. When it costs a state more money to allow its residents to be treated unfairly "under the color of law" within their courts by powerful bad actors, the state will without doubt invest their resources to **protect the people** with the even-handed application of justice as is lawfully required to exercise power instead of protecting the powerful bad actors as they are currently in this lawsuit.

**ALL OR NOTHING—THE UNREASONABLE EXCUSE FOR PASSIVITY**

21. There are many people in our nation currently who believe that our courts are so corrupt and compromised that they are simply beyond saving, reforming, or being able to improve to honestly be trusted to serve the interests of "we the people" instead of being leveraged by powerful bad actors to prey upon the honest and hardworking people in our country.

22. I see and in fact have experienced what many of these people have. Without question, it is grotesque, horrific, and unjustifiable, yet I have come to a different conclusion.

23. I don't believe it is possible to abolish our courts without causing more harm than good to our nation. At the same time, I don't necessarily believe that our courts are currently providing more benefit than harm to our nation either. I am honestly not in a position, not privy

to enough data, nor have I the education or training necessary to make such a judgment. Personally, this issue is moot for me. I do not consider it a realistic option.

### **FORCING OUR COURTS TO OBEY THE LAW**

24. My belief is that “we the people” along with individuals with integrity and respect for the “the rule of law” within the “legal” industry throughout our nation must force our courts to **obey the law**, whether they want to or not, to whatever extent we are capable. We must simultaneously advocate for common-sense systems of robust transparency and meaningful accountability within the reach of most people, especially injured litigants.

### **PROSECUTE THE CRIMINALS AND REMOVE THEM FROM PRACTICE**

25. Then to whatever extent we are not capable of compelling the courts and bad actors therein to obey the law, we must call them out and prosecute them to the highest extent of the law, while challenging, limiting the constraints of, and ultimately abolishing counterproductive doctrines such as “judicial immunity” for anything intentionally nefarious. Nobody can have power without equally being responsible to exercise it lawfully, honorably, honestly, and fairly. Any precept to the contrary is frankly barbaric, anti-American, oppressive, and unconstitutional.

### **WHISTLEBLOWERS CHALLENGING GOVERNMENT/COURT MISCONDUCT/CORRUPTION MUST BE PROTECTED**

26. We also must ensure that the courts protect (if not encourage) a culture of challenging judicial and professional misconduct as well as all types of corruption.

**THE TENNESSEE BOARD OF PROFESSIONAL RESPONSIBILITY  
HAS BEEN CAPTURED AND WEAPONIZED BY BAD ACTORS**

27. When the State of Tennessee decided to weaponize the Board of Professional Responsibility of the Supreme Court of Tennessee, against some of the most honest, ethical, lawful, patriotic defenders of the people, such as *disbarred* former attorney whistleblower Brian Manookian<sup>5</sup> and currently *suspended* attorney whistleblower Connie Reguil<sup>6</sup>, it sent a message throughout that state **that anyone who reports or challenges judicial misconduct as every BAR member is ethically required to do, will be retaliated against, suspended, and ultimately driven out of the “practice of law” within the State of Tennessee.**

**THE TENNESSEE SUPREME COURT IS IN VIOLATION  
OF THE TENNESSEE STATE CONSTITUTION**

28. Allowing the Board of Professional Responsibility to become captured and weaponized toward the interests of lawless corruption was a grave violation of Article I, Section 2 of the Tennessee Constitution *ensuring* that the “practice of law” would remain absolutely *arbitrary* and *oppressive* within Tennessee until the state regulatory boards are taken back by people with ethical and moral fortitude who refuse to protect bad actors while retaliating against their enemies.

29. For any who question my claims, please do the due diligence and verify for yourself *who* the Board of Professional Responsibility for the Supreme Court of Tennessee is

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<sup>5</sup> DOC 58-2, PID 4628-4630 | [https://rico.jefffenton.com/evidence/2019-07-01\\_tenn-bpr-targets-whistleblowers-not-corruption.pdf](https://rico.jefffenton.com/evidence/2019-07-01_tenn-bpr-targets-whistleblowers-not-corruption.pdf)  
DOC 52, PID 4174-4179 | [https://rico.jefffenton.com/evidence/2021-03-21\\_knoxnews-coa-removes-judge-binkley-for-bias.pdf](https://rico.jefffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf)  
DOC 58-4, PID 4712-4716 | [https://rico.jefffenton.com/evidence/2024-02-16\\_tnsc-manookian-disbarment-opinion-justice-lee.pdf](https://rico.jefffenton.com/evidence/2024-02-16_tnsc-manookian-disbarment-opinion-justice-lee.pdf)  
<sup>6</sup> DOC 58-5, PID 4718-4722 | [https://rico.jefffenton.com/evidence/2024-05-02\\_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf](https://rico.jefffenton.com/evidence/2024-05-02_reguli-lawsuit-against-wilco-tn-gov-corruption.pdf)  
Reguli v. Woodruff et al (3:2024-cv-00694) | <https://dockets.justia.com/docket/tennessee/tmmdce/3:2024cv00694/99766>  
Reguli et al v. Hetzel et al (3:2024-cv-00541) | <https://dockets.justia.com/docket/tennessee/tmmdce/3:2024cv00541/99331>

honestly serving<sup>7</sup>, headed by Chief Disciplinary Counsel and Executive Director Sandra Jane Leach Garrett (BRP #013863).

30. I've provided links below for the disciplinary records<sup>8</sup> for every bad actor and defendant in this lawsuit (individual BAR members only). Please bear in mind that the State of Tennessee and the Board of Professional Responsibility—Sandy Garrett specifically—has been redundantly served<sup>9</sup> irrefutable evidence<sup>10</sup> of unconscionable misconduct<sup>11</sup> by many of the defendants herein, some for years, while their public records reflect absolutely none of that. Unfortunately, I do not expect that they soon will either since many of these bad actors are being protected by the current administration, of which this notice shall serve as evidence and public record while retaliating against some of their publicly known enemies<sup>12</sup>, as absolutely absurd as that actually is.

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<sup>7</sup> <https://rico.jeffenton.com/evidence/tnsc-board-of-professional-responsibility-weaponization.pdf>

<sup>8</sup> See attached Exhibits 'A' through 'R-2'.

<sup>9</sup> <https://jeffenton.com/digital-service-package-for-lawsuit/>

<sup>10</sup> <https://jeffenton.com/digital-service-package-for-lawsuit/2019-08-01-williamson-county-tn-chancery-court-hearing-package/>  
<https://jeffenton.com/digital-service-package-for-lawsuit/2019-08-29-williamson-county-tn-chancery-court-hearing-package/>  
DOC 53, PID 4258-4349 | [https://rico.jeffenton.com/evidence/2024-03-13\\_irrefutable-proof-of-criminal-conspiracy.pdf](https://rico.jeffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf)  
DOC 66, PID 4870-5007 | [https://rico.jeffenton.com/evidence/1-23-cv-01097\\_fenton-vs-story-first-amended-complaint.pdf](https://rico.jeffenton.com/evidence/1-23-cv-01097_fenton-vs-story-first-amended-complaint.pdf)  
DOC 18, PID 2417-2616 | [https://rico.jeffenton.com/evidence/2024-01-16\\_marsha-fenton-sons-tn-legal-proceedings.pdf](https://rico.jeffenton.com/evidence/2024-01-16_marsha-fenton-sons-tn-legal-proceedings.pdf)

<sup>11</sup> DOC 33, PID 3310-3391 | [https://rico.jeffenton.com/evidence/2019-08-01\\_hearing-professional-and-judicial-misconduct.pdf](https://rico.jeffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf)  
DOC 68, PID 5009-5029 | [https://rico.jeffenton.com/evidence/2024-08-22\\_memorandum-of-law-about-void-tn-court-orders.pdf](https://rico.jeffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf)

<sup>12</sup> DOC 52, PID 4174-4179 | [https://rico.jeffenton.com/evidence/2021-03-21\\_knoxnews-coa-removes-judge-binkley-for-bias.pdf](https://rico.jeffenton.com/evidence/2021-03-21_knoxnews-coa-removes-judge-binkley-for-bias.pdf)  
Brian Phillip Manookian (BPR #026455) <https://www.tbpr.org/attorneys/026455>  
Connie Lynn Reguli (BPR #016867) <https://www.tbpr.org/attorneys/016867>

**BAD ACTORS THE BOARD OF PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF TENNESSEE IS CURRENTLY PROTECTING**

Virginia Lee Story (BPR# 011700) <https://www.tbpr.org/attorneys/011700> (Exhibit ‘A’)<sup>13</sup>  
Michael Weimar Binkley (BPR# 005930) <https://www.tbpr.org/attorneys/005930> (Exhibit ‘B’)  
Kathryn Lynn Yarbrough (BPR# 032789) <https://www.tbpr.org/attorneys/032789> (Exhibit ‘C’)  
Elaine Beaty Beeler (BPR# 016583) <https://www.tbpr.org/attorneys/016583> (Exhibit ‘D’)  
Mary Elizabeth Maney Ausbrooks (BPR# 018097) <https://www.tbpr.org/attorneys/018097> (Exhibit ‘E’)  
Alexander Sergey Koval (BPR# 029541) <https://www.tbpr.org/attorneys/029541> (Exhibit ‘F’)  
Henry Edward Hildebrand III (BPR# 004630) <https://www.tbpr.org/attorneys/004630> (Exhibit ‘G’)  
Charles M. Walker (BPR# 019884) <https://www.tbpr.org/attorneys/019884> (Exhibit ‘H’)  
Samuel Forrest Anderson (BPR# 017022) <https://www.tbpr.org/attorneys/017022> (Exhibit ‘I’)

James Michael Hivner (BPR# 020405) <https://www.tbpr.org/attorneys/020405> (Exhibit ‘J’)  
John Brandon Coke (BPR# 029107) <https://www.tbpr.org/attorneys/029107> (Exhibit ‘K’)  
Sandra Jane Leach Garrett (BPR# 013863) <https://www.tbpr.org/attorneys/013863> (Exhibit ‘L’)

Frank Goad Clement Jr. (BPR# 006619) <https://www.tbpr.org/attorneys/006619> (Exhibit ‘M’)  
Andy Dwane Bennett (BPR# 009894) <https://www.tbpr.org/attorneys/009894> (Exhibit ‘N’)  
William Neal McBrayer (BPR# 013879) <https://www.tbpr.org/attorneys/013879> (Exhibit ‘O’)

**BEST-IN-CLASS ATTORNEY WHISTLEBLOWERS WHO CHALLENGED JUDICIAL MISCONDUCT AND CORRUPTION IN WILLIAMSON COUNTY—WHOM TENNESSEE RETALIATED AGAINST/SUSPENDED/DISBARRED**

31. Compare the aforementioned to two publicly known attorney whistleblowers who’ve had the courage to confront judicial misconduct and corruption in Williamson County Chancery Court, who were subsequently retaliated against by Board of Professional Responsibility for the Supreme Court of Tennessee and removed from the “practice of law”.

Brian Phillip Manookian (BPR #026455) <https://www.tbpr.org/attorneys/026455> (Exhibit ‘Q’)  
Connie Lynn Reguli (BPR #016867) <https://www.tbpr.org/attorneys/016867> (Exhibit ‘R’)

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<sup>13</sup> All exhibits are attached.

32. We cannot continue to leave predators in control of our courts and state oversight boards. It is obscene that it has reached this point, but the courts have an obligation to **obey the law**, and in any instance where they refuse, the law must **remove** those individuals from our courts along with every position of power entrusted with the honest administration of justice.

### **OFFICIALS CAN'T WAR AGAINST THE CONSTITUTION AND REMAIN IN POWER—THE COURT MUST REMOVE THEM**

33. Nobody can remain in a position of power while waring against the Constitution and violating the natural and constitutional rights of the people. Is that happening today? Absolutely, all over the place unfortunately. But the Court has a **responsibility** above and beyond all others to **remove** these “misfits of misconduct” and “perverts of power” to restore the even-handed administration of justice to the broader base **of the people**.

“No state legislator or executive or judicial officer can war against the Constitution without violating his solemn oath to support it.” *Cooper v. Aaron*, 358 U.S. 1, 3 (1958)

### **THE COURT'S REAL ENEMIES ARE MISCONDUCT AND CORRUPTION**

34. The only thing which can prevent the court from fulfilling this crucial and core responsibility is misconduct and corruption to whatever depth and breadth which the state and court have chosen to tolerate and allow this misconduct to exist. Regardless, the remedy remains the same and is **required**; those who participate in misconduct must be disciplined and/or removed, disbarred, or prosecuted.



“The exposure and punishment of public corruption is an honor to a nation, not a disgrace. The shame lies in toleration, not in correction.”

— *Theodore Roosevelt*

35. Corruption must be rooted out of our courts and government bodies at all levels with the same fastidiousness and ferocity as the Department of Justice once exercised to eradicate prohibition era gangsters. Today’s *organized crime* looks much different, but it is honestly no more civil or humane than in the days when Tommy guns ruled the streets in most major cities. At least then it was obvious who the criminals, mobsters, and bad guys actually were.

36. The defendants in this lawsuit *forced me* to learn the law, something in which I never had any interest, to have any chance of surviving their crimes against me. Now I will devote the rest of my life to doing everything within my power to *force them to obey the law* at any and every lawful and peaceful cost required regardless of what further harm they can and, I expect, will choose to cause me. Unfortunately, that’s the price of liberty in the United States of America today. I believe in freedom with every fiber of my being!

### **THE LEGENDARY FEARLESS ALAMO SCOUTS**

37. My grandfather<sup>14</sup> was one of the 138 courageous legendary Alamo Scouts during World War II who rescued prisoners of war from behind enemy lines in small six-man teams. (See attached Exhibit ‘S’.)

38. I am also serving my country albeit on a different battlefield—through justice

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<sup>14</sup> [https://rico.jeffenton.com/evidence/2017-03-24\\_wwii-alamo-scout-william-r-watson-grandpa.pdf](https://rico.jeffenton.com/evidence/2017-03-24_wwii-alamo-scout-william-r-watson-grandpa.pdf)  
[https://en.wikipedia.org/wiki/Alamo\\_Scouts](https://en.wikipedia.org/wiki/Alamo_Scouts)

advocacy both in the courtroom and through the media—but I believe it is every bit as essential for the freedom of our country and the generations who follow.

### EDUCATING THE PUBLIC ABOUT PREDATORY LITIGATION TACTICS

39. I will continue educating the public<sup>15</sup> about the dangers of predatory litigation by teaching people how to spot predatory practices by comparing what is said and done in court—preferably using the certified original transcripts of evidence—to the court’s codes of professional and judicial conduct. Part of this objective means teaching people how to recognize judicial bias by analyzing how strictly a judge requires attorneys to comply with the codes of professional conduct along with how the judge reacts to blatant misconduct. The façade flourishes only because people don’t know the codes of conduct. It’s time we reverse the burden of proof onto the courts and anyone seeking to leverage the “law” to **take** from others.

40. Judges must do their jobs by calling out, correcting, and disciplining attorney misconduct to maintain an impartial atmosphere in the court where the truth is welcome and can be equally heard without any prejudice improperly instilled by misconduct and predatory practices. Otherwise, the judge simply “plays along” with the misconduct as if the attorney’s actions and language are lawful and proper, which is nothing less than bias and judicial impropriety.

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<sup>15</sup> <https://tninjustice.org/predatory-litigation-101/>

<https://tninjustice.org/williamson-county-brentwood-tn-rico-lawsuit-interview-on-slam-the-gavel-podcast/>

<https://jefffenton.com/predatory-litigation-how-us-courts-were-designed-to-produce-justice-why-they-fail-how-to-restore-justice-again/>

## PROCESS OVER CONDUCT AND MERITS = “COLOR OF LAW” FELONIES

41. Courts need to recognize and the public needs to learn that whenever licensed attorneys try to defeat *pro se* litigants by the court’s rules, processes, and procedures (technicalities), without showing equal or greater care about good ethical conduct and the merits of the matters before the court, most of the time misconduct<sup>16</sup> is afoot. The question then is: how does the judge respond to this misconduct?

## MISCONDUCT CANNOT PRODUCE JUSTICE

42. The idea that bad conduct can produce justice is pure folly. Good conduct and judges who require and enforce it, placing merits and conduct over processes and technicalities, are the missing ingredient for everything I experienced throughout Tennessee courts. However, correcting misbehavior isn’t optional in the ethical canons, yet it continued to be lacking in the United States District Court for the Western District of Michigan also.

## CONDUCT PROVES INTENTIONS AND BIAS

43. From what I have experienced to date, I believe that conduct is the key to reasonably interpreting and proving the motives/intentions/bias of members of the court, both attorneys and judges alike. One benefit of learning to analyze court proceedings based upon conduct is that they can often be evaluated and weighed independently of knowing what is in fact true in the case. Truth can be hard to prove during a hearing, but many types of misconduct can be easily recognized and proved regardless of what anyone claims to be the truth in the matter.

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<sup>16</sup> Courts should be keen to “predatory litigation” in any case involving a *pro se* litigant, where counsel tries to elevate court processes and procedures (technicalities), above merits and conduct. That is a tell-tale sign that the council or court’s priorities are not in alignment with real justice.

### **TRUTH DOES NOT REQUIRE MISCONDUCT, ONLY LIES DO**

44. Truth does not require misconduct to be heard or proved. In fact, misconduct is more likely to produce a lie, which has been falsely presented as the truth.

45. The truth is absolutely important. I'm willing to die for it. Don't misunderstand what I am saying, but while facts can be argued and uncertain, conduct is often very clear. Even when missed in the moment, the exact language can be captured by the court reporter and plainly evaluated against the court's codes of conduct.

46. This evaluation of the language, claims, and conduct<sup>17</sup> between defendants Story and Binkley is all that is needed to prove that bias and misconduct ruled the docket in Tennessee.....over and over and over again.

### **TREATING FACTS AND MY PLEADINGS AS BEING ACTUALLY TRUE**

47. Upon information and belief, no defendant in this case to date has meaningfully challenged the facts in this lawsuit; the misconduct I prove was committed by defendants Story, Binkley, and the Chancery Court; the content of the prior court records as presented; or the supporting evidence while swearing under the penalty of perjury that their claims are lawful, filed without misconduct in the honest interests of justice, and are actually true. In stark contrast, almost all of my testimony in this lawsuit has been sworn, attested, and certified accurate.

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<sup>17</sup> DOC 22, PID 2818-2862 | [https://rico.jefffenton.com/evidence/2019-08-01\\_chancery-hearing-transcript.pdf](https://rico.jefffenton.com/evidence/2019-08-01_chancery-hearing-transcript.pdf)  
DOC 19-6, PID 2669-2672 | [https://rico.jefffenton.com/evidence/2019-08-01\\_chancery-court-order-with-counsel.pdf](https://rico.jefffenton.com/evidence/2019-08-01_chancery-court-order-with-counsel.pdf)  
DOC 33, PID 3310-3391 | [https://rico.jefffenton.com/evidence/2019-08-01\\_hearing-professional-and-judicial-misconduct.pdf](https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf)  
DOC 23-4, PID 2920 | [https://rico.jefffenton.com/evidence/2019-08-29\\_chancery-hearing-audio-recording.mp3](https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3)  
DOC 23, PID 2863-2920 | [https://rico.jefffenton.com/evidence/2019-08-29\\_chancery-hearing-transcript-audio-markers.pdf](https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf)  
DOC 19-7, PID 2674-2677 | [https://rico.jefffenton.com/evidence/2019-08-29\\_chancery-court-order-once-pro-se.pdf](https://rico.jefffenton.com/evidence/2019-08-29_chancery-court-order-once-pro-se.pdf)  
DOC 68, PID 5009-5029 | [https://rico.jefffenton.com/evidence/2024-08-22\\_memorandum-of-law-about-void-tn-court-orders.pdf](https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf)

48. Therefore, it would be inappropriate and biased for this court to treat my evidence and sworn testimony as anything less than the actual **truth**, thereby further violating my constitutional right to equal protection and due process by an impartial tribunal.

**IMPARTIALITY REQUIRES “THE BENEFIT OF THE DOUBT”  
TO FOLLOW THE EVIDENCE**

49. At this stage, it would be unreasonable for the court to deny me the “benefit of the doubt,” since my testimony is both sworn to and largely proven<sup>18</sup> to be true, already in the court record, and supported with evidence that is irrefutable<sup>19</sup>, all of which shows the court who the bad actors are regardless of their claims and filings.

50. Especially in the absence of any sworn testimony or evidence challenging my claims, it would be inappropriate for the court to treat my submissions as less than the actual truth.

**AN EVIDENTIARY HEARING (IF NEEDED) TO HEAR AND ESTABLISH THE  
MERITS OF THIS CASE ALONG WITH THE CRITICAL INTERESTS OF JUSTICE**

51. If the court still has any doubt about the truthfulness of my claims and evidence as filed in my complaint and declarations throughout this lawsuit, then I move for the court to stay all other

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<sup>18</sup> DOC 33, PID 3310-3391 | [https://rico.jefffenton.com/evidence/2019-08-01\\_hearing-professional-and-judicial-misconduct.pdf](https://rico.jefffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf)  
DOC 68, PID 5009-5029 | [https://rico.jefffenton.com/evidence/2024-08-22\\_memorandum-of-law-about-void-tn-court-orders.pdf](https://rico.jefffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf)  
<sup>19</sup> DOC 53, PID 4258-4349 | [https://rico.jefffenton.com/evidence/2024-03-13\\_irrefutable-proof-of-criminal-conspiracy.pdf](https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf)  
DOC 19-2, PID 2632-2646 | [https://rico.jefffenton.com/evidence/2019-04-26\\_ausbrooks-story-fraudulent-bk-petition.pdf](https://rico.jefffenton.com/evidence/2019-04-26_ausbrooks-story-fraudulent-bk-petition.pdf)  
DOC 48, PID 4019-4029 | [https://rico.jefffenton.com/evidence/2019-10-29\\_closing-for-illegal-auction-wilco-rico-deed-fraud.pdf](https://rico.jefffenton.com/evidence/2019-10-29_closing-for-illegal-auction-wilco-rico-deed-fraud.pdf)  
DOC 54-1, PID 4367 | [https://rico.jefffenton.com/evidence/2020-07-02\\_bk-trustee-john-mclemore-recorded-call.mp3](https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-recorded-call.mp3)  
DOC 28, PID 3276-3288 | [https://rico.jefffenton.com/evidence/2020-07-02\\_bk-trustee-john-mclemore-call-declaration.pdf](https://rico.jefffenton.com/evidence/2020-07-02_bk-trustee-john-mclemore-call-declaration.pdf)  
DOC 51, PID 4161-4168 | [https://rico.jefffenton.com/evidence/2021-01-26\\_trustees-final-account-and-distribution-report.pdf](https://rico.jefffenton.com/evidence/2021-01-26_trustees-final-account-and-distribution-report.pdf)  
DOC 52, PID 4208-4210 | [https://rico.jefffenton.com/evidence/2022-03-15\\_ustp-bk-fraud-referral-confirmed-no-notice.pdf](https://rico.jefffenton.com/evidence/2022-03-15_ustp-bk-fraud-referral-confirmed-no-notice.pdf)  
DOC 1-1, PID 34-47 | [https://rico.jefffenton.com/evidence/2022-02-01\\_fenton-affidavit-of-story-binkley-fraud-on-court.pdf](https://rico.jefffenton.com/evidence/2022-02-01_fenton-affidavit-of-story-binkley-fraud-on-court.pdf)

matters while having an evidentiary hearing to determine the critical constitutional merits of this lawsuit.

52. Justice will be impossible in this case if the court doesn't first establish that I'm telling the truth, operating in good faith, and the honest interests of justice require the court to make any accommodations necessary to help this matter proceed toward trial.

**SELF-REGULATION OF THE LEGAL PROFESSION REQUIRES THAT MEMBERS INITIATE DISCIPLINARY INVESTIGATIONS**

53. Upon information and belief, if members of the court obeyed their oaths of office and reported attorney and judicial misconduct as every BAR member is required<sup>20</sup> and the State of Tennessee acted lawfully and ethically taking responsibility for the criminal damages which I have been caused through its courts and local governance, they would either sanction those involved and require them to provide me a remedy (there are plenty of BAR members who have been deceptively involved that they could sanction), or the state, county, or court would take responsibility for forcing me to participate in and submit myself to what were in fact lawless courts and orders, while refusing me equal protection under the law because both the Williamson County Sheriff's Office (hereinafter "WCSO") and the Tennessee Bureau of Investigation (hereinafter "TBI") have refused to even allow me to press criminal charges against defendants Binkley and Story in this lawsuit.

54. More outrageously, the WCSO was leveraged as the "muscle" by which the felonies against me were both executed and enforced, as demanded in bad faith by defendant

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<sup>20</sup> Tenn. R. Sup. Ct. 2.15 (Rule 2.15) Responding to Judicial and Lawyer Misconduct  
Tenn. R. Sup. Ct. 2.3 (Rule 2.3) Bias, Prejudice, and Harassment  
Tenn. R. Sup. Ct. 8.3 (Rule 8.3) REPORTING PROFESSIONAL MISCONDUCT

Story<sup>21</sup> and ordered<sup>22</sup> in bad faith by defendant Binkley subsequent to my hearing in Chancery Court on September 29, 2019. Both the court<sup>23</sup> and defendant Story's office<sup>24</sup> refused to act lawfully or ethically despite me reaching out to them in desperate attempts to mitigate my damages before I was wrongfully evicted from my home thereby exponentially increasing my damages every day thereafter.

#### **FOURTH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES<sup>25</sup>**

“The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.”

#### **FIFTH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES**

“No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to

<sup>21</sup> DOC 23-4, PID 2920 | [https://rico.jefffenton.com/evidence/2019-08-29\\_chancery-hearing-audio-recording.mp3](https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-audio-recording.mp3)

DOC 23, PID 2863-2920 | [https://rico.jefffenton.com/evidence/2019-08-29\\_chancery-hearing-transcript-audio-markers.pdf](https://rico.jefffenton.com/evidence/2019-08-29_chancery-hearing-transcript-audio-markers.pdf)

<sup>22</sup> DOC 19-7, PID 2674-2677 | [https://rico.jefffenton.com/evidence/2019-08-29\\_chancery-court-order-once-pro-se.pdf](https://rico.jefffenton.com/evidence/2019-08-29_chancery-court-order-once-pro-se.pdf)

<sup>23</sup> DOC 54-1, PID 4361 | [https://rico.jefffenton.com/evidence/2019-08-30\\_judgment-wrong-emergency-call-to-court.mp3](https://rico.jefffenton.com/evidence/2019-08-30_judgment-wrong-emergency-call-to-court.mp3)

DOC 57-1, PID 4405-4413 | [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_notified-story-beeler-false-claims-in-court-order.pdf)

DOC 57-1, PID 4459 | [https://rico.jefffenton.com/evidence/2019-08-30\\_story-lied-when-notified-false-claims-in-order.pdf](https://rico.jefffenton.com/evidence/2019-08-30_story-lied-when-notified-false-claims-in-order.pdf)

<sup>24</sup> DOC 57-1, PID 4394-4404 | [https://rico.jefffenton.com/evidence/2019-08-30\\_emergency-attempt-to-correct-court-order.pdf](https://rico.jefffenton.com/evidence/2019-08-30_emergency-attempt-to-correct-court-order.pdf)

<sup>25</sup> <https://constitution.congress.gov/constitution/amendment-4/>



be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.”

55. In the preceding Tennessee matters, the Fourth and Fifth Amendments to the United States Constitution were trampled with a level of violent disregard that is unbecoming of any office of the state or public trust.

56. I was almost instantly deprived of my life, liberty, and property without remotely equal or due process of law. This happened via a court with no lawful jurisdiction<sup>26</sup> to hear or dispose of my property because the federal courts had both original and exclusive jurisdiction over my property at the commencement of my ex-wife’s bankruptcy<sup>27</sup>, which incidentally preceded any filings in state court, not the other way around as was improperly suggested by counsel for the defendants.

57. My property was forcefully taken against my will by government actors without just cause or compensation.

58. I was not secure in my person, house, papers, and effects against unreasonable searches and seizures. Despite having done everything in my power and to the best of my knowledge, to be secure in my home against all threats.

59. There was no probable cause nor lawful warrant for removing me from my home.

60. Yet it all happened with just a five-day notice over a holiday weekend when no help could be reached, despite my desperate attempts.

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<sup>26</sup> DOC 53, PID 4258-4349 | [https://rico.jefffenton.com/evidence/2024-03-13\\_irrefutable-proof-of-criminal-conspiracy.pdf](https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf)

<sup>27</sup> DOC 38, PID 3445-3496 | [https://rico.jefffenton.com/evidence/2019-04-26\\_bankruptcy-crimes-rules-and-laws-violated.pdf](https://rico.jefffenton.com/evidence/2019-04-26_bankruptcy-crimes-rules-and-laws-violated.pdf)

61. Until there are some mechanisms in place to protect the Fourth and Fifth Amendment rights of the people in Williamson County Tennessee to prevent this **exact same scam** from being executed again, there can be absolutely no discussion or consideration of dispositive motions or immunity. The court's first priority must be to **protect the public** from criminal interference and deprivation under the fraudulent color of law.

62. The State of Tennessee and Williamson County cannot allow armed deputies to be leveraged as the muscle for the execution and enforcement of felony crimes against the people without answering for those actions and taking steps to protect the people from it ever happening again.

### **FEDERALLY UNCONSTITUTIONAL ACTS — NO STATE OFFICER HAS IMMUNITY**

“When a state officer acts under a state law in a manner violative of the Federal Constitution, he comes into conflict with the superior authority of that Constitution, and he is in that case *stripped of his official or representative character* and is **subjected in his person to the consequences of his individual conduct**. The State has no power to impart to him any immunity from responsibility to the supreme authority of the United States” (emphasis added). *Scheuer v. Rhodes*, 416 U.S. 232, 94 S. Ct. 1683, 1687 (1974)

63. Upon information and belief, as long as the Williamson County Sheriff's Office can be leveraged by lawless judges and attorneys in the commission and enforcement of felonies against the people, but the people can't find any protection or relief through the WCSO from those same corrupt and compromised judges and attorneys (violating their rights), then the State

of Tennessee, Williamson County, and the WCSO are in violation of the Equal Protection Clause of the United States Constitution.

64. It might be appropriate for all federal funding to be withheld from the state and county until they bring their agencies into compliance with the United States Constitution to protect the people's property, lives, and liberty from being arbitrarily destroyed by the criminal interests of corruption.

65. The idea that bad actors can use public resources to harm the public without accountability is absolutely absurd. The same goes for the Board of Professional Responsibility.

66. The idea that the state and county can sit back and refuse to answer for the obviously unethical and unlawful actions of their officers without taking any steps to remedy the damage wrongfully caused to the injured party or to protect the public from the same crimes being committed again by rogue judges and attorneys while trying to claim any sort of immunity for acts which were clearly never performed honestly in good faith in the first place is not only obscenely absurd, but it is without doubt that conduct which has been described as "waring against the constitution of the United States".

*Note: Any judge who does not comply with his oath to the Constitution of the United States wars against that Constitution and engages in acts in violation of the supreme law of the land. The judge is engaged in acts of treason. The U.S. Supreme Court has stated that "no state legislator or executive or judicial officer can war against the Constitution without violating his undertaking to support it." Cooper v. Aaron, 358 U.S. 1, 78 S. Ct. 1401 (1958); See also In Re Sawyer, 124 U.S. 200 (188); U.S. v. Will, 449 U.S. 200, 216, 101 S. Ct. 471, 66 L. Ed. 2d 392, 406 (1980); Cohens v. Virginia, 19 U.S. (6 Wheat) 264, 404, 5 L. Ed 257 (1821).*

## INAUGURATION DAY, JANUARY 20, 2025

67. As I finish writing this declaration today, on January 20, 2025, shortly after President Trump was sworn into office, news headlines broadcast how former President Biden has disgustingly granted blanket pardons—preemptive in some instances—to his friends and family<sup>28</sup> for their substantial, and some even unspeakable, crimes against our country. These reprehensible pardons are compounded further by granting a blanket pardon to Dr. Anthony Fauci<sup>29</sup> for his involvement in gain-of-function research after it had been outlawed and improper handling was identified as the most probable cause for the global COVID-19 pandemic that followed.

68. Upon information and belief, on top of all of that, former President Biden granted blanket pardons to many of his treasonous allies in Congress, such as members of the “Select Committee to Investigate the January 6<sup>th</sup> Attack on the United States Capital<sup>30</sup>”, who misused government offices, resources, and assets to advance private and party interests, many of which were substantially opposed to the interests of the constitutional republic which governs this great nation and the constitutional liberties of our people.

69. Upon information and belief, time has proven this to have largely been a false flag initiative by leaders of the Democratic Party secretly staged and supported with untold numbers of federal agents, assets, offices, and actors leveraging materially misleading and dishonest narratives by which our nation has been terrorized and our freedoms have been unlawfully deprived and held hostage while government has allowed the “practice of law” to become

<sup>28</sup> <https://www.justice.gov/pardon/media/1385756/dl?inline>  
[https://www.justice.gov/d9/2024-12/biden\\_warrant.pdf](https://www.justice.gov/d9/2024-12/biden_warrant.pdf)

<sup>29</sup> <https://www.justice.gov/pardon/media/1385746/dl?inline>

<sup>30</sup> <https://www.justice.gov/pardon/media/1385751/dl?inline> (<https://january6th-benniethompson.house.gov/>)

weaponized against the people by the political parties and interests fighting for control throughout our nation.

70. The most horrific part about these pardons is that they reward **loyalty to a person** rather than loyalty to the law, oaths of office, or our nation. These individuals were absolved even if their actions and lies caused catastrophic loss of life, liberty, and property to innocent people—as long as they did not personally do anything violent to them.

71. The message is that it's OK if you give **false testimony** (perjure yourself) before Congress or the January 6<sup>th</sup> Committee or special courts prosecuting Biden and Pelosi's "political prisoners" no matter how much harm is caused to others and our nation as long as you **stick to the script** for the role you were assigned to **play** and remain **loyal to the leader** of the lies and misconduct.

72. Maybe that makes sense in the realm of politics, but it perverts, dishonors, and invalidates any correlating action, exercise, pretense, or practice of **law**.

73. **Law requires truth to rule**, not loyalty to politicians, political interests, or wealthy and powerful people.

### TENNESSEE'S JUDICIAL OATH OF OFFICE

*I, [Insert Name], do solemnly swear that I will support the Constitution of the United States of America and the Constitution of the State of Tennessee, that I will administer justice **without respect of persons**, and that I will faithfully and impartially discharge all the duties incumbent upon me as Judge of the [Insert Court & District], of the State of Tennessee, to the best of my skill and ability, so help me God. (emphasis added)*

74. Actions like these are ushering in a new breed of outlaws in our country whose words cannot reasonably be trusted or accepted as true. They do not speak the truth unless it is complimentary or convenient. They show no interest or respect for the rule of law, except for how they can leverage it to manipulate others and court proceedings to their advantage.

75. Upon information and belief, some, if not many, of the defendants in this matter operate in this polluted paradigm of power, not expecting to ever be justified by any lawfulness of their actions, but rather with full expectation that through a combination of influence and resources at their disposal, they will be pardoned or dismissed from this lawsuit without ever being required to honestly answer for their actions regarding their preceding crimes against me and my family.

76. Upon information and belief, it's obvious even when reading some of the defendants' pleadings—they don't expect their "expertly" crafted motions and briefs to win the day. Some barely put forth any effort at all.

77. Instead, upon information and belief, many expect the "powers that be" inside their regional courts to rule in their favor and in favor of the powerful defendants so as not to upset the balance of power throughout Middle Tennessee, especially due to the claims of an indigent *pro se* litigant whom they have all but silenced. That's one of the benefits of partnering with corrupt judges in the commission of crimes; it virtually eliminates ever being held accountable. Even better, the state pays for their defense while doing most of the heavy lifting.

78. Only the court can cause these people to ever honestly respect the rule of law again. No matter how much that creates a personal conflict of interest for whomever adjudicates this matter, that is what is required by a person's oath of office. Similarly, public confidence in

our judicial system, the “practice of law,” and the constitutional mandate of even-handed justice is destroyed more each time these defendants evade accountability for another crime they committed against the people, the State of Tennessee, and/or the United States of America.

**THE WILLIAMSON COUNTY SHERRIFF’S OFFICE WILL NOT INVESTIGATE “ELECTED OFFICIALS”**

79. During a recorded phone call with Captain David Beard<sup>31</sup> from the Williamson County Sheriff’s Office on December 15, 2023, he told me in part as follows:

4:45	“Since you're dealing with an elected official, I would recommend you contact the TBI, because they investigate elected officials.”
4:57	“I promise you this, the Williamson County Sherriff's Office is not going to open an investigation into this matter at all.”
7:44	“We can only do so much... what you are alleging is outside our purview.”
7:51	“When you're dealing with elected officials, you're dealing with court issue related matters, Those things are up to the Tennessee Bureau of Investigation and/or the FBI.”
8:01	“The Williamson County Sherriff's Office... [is] not going to go into that area, dealing with elected officials.”
11:25	“We don't investigate elected officials. That is entirely up to the TBI.”
11:33	“As far as allegations of official corruption, sometimes the TBI waits on a referral from the DA, but the TBI can investigate official corruption without a referral from the District Attorney’s Office.”

80. Upon information and belief, in Williamson County Tennessee, the Williamson County Sheriff’s Office will not intervene to protect the public or investigate the actions or orders by an “elected official” regardless of whether or not their actions and orders are legal or

<sup>31</sup> (615) 790-5554 Ext. 3227



an absolutely sinister criminal deprivation of one's life, liberty, or property.

81. Upon information and belief, the Williamson County Sheriff's Office will even participate in felonies committed against the public as they did in my case—provided it is pursuant to an order by an elected official even when that official is known to be involved in numerous public scandals and misconduct—without taking responsibility for the role played by its officers, ensuring the order is actually legal, or being certain the action is executed in a lawful manner.

82. Upon information and belief, even after having been told that the actions by the Williamson County Sheriff's Office constituted one or more felonies committed against an innocent member of the public, the WCSO refused to help the injured party, investigate the victim's claims in his complaint, or determine whether the orders and subsequent actions by the Sheriff's Office were ever lawful or even theoretically could have been given the circumstances and jurisdiction of the court at that time.

83. Upon information and belief, the Williamson County Sheriff's Office also refuses to provide any protection to victims of crimes committed by or in conjunction with "elected officials." This includes the continued overreach, abuse, intimidation, harassment, and oppression caused by the originally unlawful orders even when they cause years of illegal interference to the innocent party or victim's most basic natural and constitutional rights to life, liberty, and the pursuit of happiness—after having already stolen his property as they did to me.

84. Upon information and belief, in prior matters, the Williamson County Sheriff's Office was illegally leveraged by the defendants as the **muscle** by which they **executed** and

**enforced** my *unlawful eviction* from my beautiful Brentwood home<sup>32</sup>, thus allowing them to illegally liquidate my home for pennies on the dollar<sup>33</sup> and disburse those funds in their entirety<sup>34</sup> without one dollar to my benefit<sup>35</sup>. In fact, the Williamson County Chancery Court was prohibited by federal law<sup>36</sup> from even exercising jurisdiction<sup>37</sup> over my Williamson County real estate<sup>38</sup>, but nobody cared at that time, nor have they taken responsibility for their crimes against me and my family since.

85. Upon information and belief, in this case, the Williamson County Sheriff's Office was used as an instrument of unlawful intimidation, coercion, extortion, and retaliation by what was essentially **organized crime** in Williamson County Tennessee.

86. Upon information and belief, the Williamson County Sheriff's Office refuses to accept any responsibility for its role in these crimes against me and my family and further refuses to provide me with **any protection** from the defendants, despite being a **victim** of serious **felony crimes** including, but not limited to, racketeering, bankruptcy fraud, false oaths and claims, real estate deed theft, theft of property, financial exploitation, civil rights intimidation; ADA interference, coercion, extortion, and retaliation; coercion or persuasion of witness, aggravated criminal trespass, official misconduct and oppression; fabricating evidence, tampering with government records, and flagrant nonsupport.

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<sup>32</sup> DOC 19-1, PID 2624-2628 | [https://rico.jefffenton.com/evidence/2011-04-29\\_1986-sunnyside-brentwood-tn-deed.pdf](https://rico.jefffenton.com/evidence/2011-04-29_1986-sunnyside-brentwood-tn-deed.pdf)

DOC 19-1, PID 2620-2623 | [https://rico.jefffenton.com/evidence/2011-04-29\\_fenton-marital-residence-tenancy-by-entirety.pdf](https://rico.jefffenton.com/evidence/2011-04-29_fenton-marital-residence-tenancy-by-entirety.pdf)

DOC 52, PID 4211-4217 | [https://rico.jefffenton.com/evidence/2023-05-31\\_1986-sunnyside-brentwood-tn-appreciation.pdf](https://rico.jefffenton.com/evidence/2023-05-31_1986-sunnyside-brentwood-tn-appreciation.pdf)

<sup>33</sup> DOC 1-13, PID 553-556 | [https://rico.jefffenton.com/evidence/2019-09-28\\_illegal-coerced-auction-wilco-rico-deed-fraud.pdf](https://rico.jefffenton.com/evidence/2019-09-28_illegal-coerced-auction-wilco-rico-deed-fraud.pdf)

<sup>34</sup> DOC 48, PID 4019-4029 | [https://rico.jefffenton.com/evidence/2019-10-29\\_illegal-auction-closed-wilco-rico-deed-fraud.pdf](https://rico.jefffenton.com/evidence/2019-10-29_illegal-auction-closed-wilco-rico-deed-fraud.pdf)

<sup>35</sup> DOC 48, PID 4002-4003 | [https://rico.jefffenton.com/evidence/2019-10-10\\_chancery-no-proceeds-from-forced-auction.pdf](https://rico.jefffenton.com/evidence/2019-10-10_chancery-no-proceeds-from-forced-auction.pdf)

<sup>36</sup> DOC 38, PID 3445-3496 | [https://rico.jefffenton.com/evidence/2019-04-26\\_bankruptcy-crimes-rules-and-laws-violated.pdf](https://rico.jefffenton.com/evidence/2019-04-26_bankruptcy-crimes-rules-and-laws-violated.pdf)

<sup>37</sup> DOC 53, PID 4258-4349 | [https://rico.jefffenton.com/evidence/2024-03-13\\_irrefutable-proof-of-criminal-conspiracy.pdf](https://rico.jefffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf)

<sup>38</sup> DOC 1-12, PID 479-596 | [https://rico.jefffenton.com/evidence/2019-10-29\\_tn-wilco-deed-fraud-ada-financial-exploitation.pdf](https://rico.jefffenton.com/evidence/2019-10-29_tn-wilco-deed-fraud-ada-financial-exploitation.pdf)

87. Referring back to my phone call on December 15, 2023, with Captain David Beard from the Williamson County Sheriff's Office at the 11:25 timestamp, Captain Beard told me, **"We don't investigate elected officials. That is entirely up to the TBI."**

### **THE TENNESSEE BUREAU OF INVESTIGATION'S POSTURE TOWARD OFFICIAL CORRUPTION**

88. I have tried to contact the Tennessee Bureau of Investigation on multiple occasions and have never been able to get past the operator to speak with any officer, agent, detective, or supervisor. I've even asked to speak with department heads by name and been refused.

89. The TBI's website says in part, "Absent a District Attorney's request, the TBI may exercise its **original jurisdiction** on a number of issues, pursuant to TCA §38-6-102(b). Among the areas on which TBI may exercise its jurisdiction include: investigating fugitives from justice; **offenses involving corruption of or misconduct by a public official**<sup>39</sup>..." (emphasis added).

90. This supports what Captain David Beard told me from the Williamson County Sheriff's Office near the 11:33 timestamp above, "the TBI can investigate official corruption without a referral from the District Attorney's Office."

91. The TBI operator has told me the exact opposite repeatedly even while I read her the language directly off of the TBI's own website. (See attached Exhibit 'T' for this audio recording, filed as digital media on a DVD, also available on the Internet at the URL below<sup>40</sup>.)

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<sup>39</sup> <https://www.tn.gov/tbi/divisions/criminal-investigation-division.html>

<sup>40</sup> [https://rico.jefffenton.com/evidence/2024-02-26\\_tennessee-bureau-of-investigation-recorded-call.mp3](https://rico.jefffenton.com/evidence/2024-02-26_tennessee-bureau-of-investigation-recorded-call.mp3)

3:06	TBI Operator	"We only investigate matters if it is handed over to us by either law enforcement or a district attorney"
7:49	TBI Operator	"It's typically a DA's office that grants us jurisdiction, especially with civilian cases, such as your own."
13:01	TBI Operator	"If we sent civilian calls to the agents, they would be overwhelmed..."
17:31	Jeff Fenton	"So, you don't have any director or anything that's available to the public?"
17:36	TBI Operator	"That would be me, that's what I'm trying to tell you."
17:39	Jeff Fenton	"Ok, what's your name?"
17:41	TBI Operator	"I don't give out my name sir."
17:45	Jeff Fenton	"Can I talk to somebody that will give out their name and be accountable for what they say, and what they say will actually be legal and lawful please?"
17:54	TBI Operator	"Sir, I have tried to help you out. I want to give you our email. <b>We do not have jurisdiction.</b> "
18:04	Jeff Fenton	"No you have jurisdiction. It says right on your website you have <b>original jurisdiction</b> over public corruption, involving corruption, or misconduct of public officials. It's right there on your criminal-investigation-division.html."
18:32	TBI Operator	"That's what I'm trying to tell you. <b>We don't file charges here.</b> We don't do that. That does not go in our jurisdiction. We do human trafficking. We do missing children, silver alerts, amber alerts. <b>We do not do this private-public matter.</b> "
18:45	Jeff Fenton	"No, no, this says, offenses involving corruption or misconduct by public officials."
18:49	TBI Operator	" <b>You would report that to your local law enforcement or your DA. That is the only two options.</b> "
19:07	Jeff Fenton	"So, there's not a detective or officer I can speak with anywhere in the Tennessee Bureau of Investigation?"
19:14	TBI Operator	" <b>We do not do that here.</b> "

92. For the record, I called the Williamson County District Attorney’s Office a few times and found them equally disinterested, evasive, and unhelpful. I have never been allowed to speak directly with Williamson County District Attorney Stacey Edmonson, nor will she even sign for certified notices which I have mailed her.

93. Much of Williamson County Tennessee operates as I would expect for an evasive, shady, unaccountable, criminal enterprise to operate—not what I would expect from the administration of the wealthiest county in the State of Tennessee and one of the wealthiest per capita in our nation.

94. Upon information and belief, the bottom line is **there is no equal protection under the law** for residents of Williamson County Tennessee from **criminal actions** perpetrated by or in conjunction with **elected officials**. Despite having a history of absolutely putrid corruption by elected officials throughout Middle Tennessee, where the “don’t help but continue to injure the people” mantra holds true.

95. This is an egregious, unnecessary, preventable, deliberate, and unconstitutional **eminent danger** to and attack upon the **public health** and **safety** of the lives, liberty, and property of American Citizens living in Williamson County Tennessee and likely the public at large throughout the state.

96. This is a direct violation of the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution and an unconscionable betrayal of the public’s trust and resources by the State of Tennessee to benefit only a select few.

“**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**”<sup>41</sup> (emphasis added).

97. One cannot ethically use public funds and resources to force the public to submit to the arbitrary and lawless deprivation of what they cherish the most—without any lawful protection within their reach to ensure the actions by elected officials are in fact lawful—or to **prevent** the victims of predatory crimes committed by corrupt officials from surviving and recovering after they are unlawfully destroyed by this privileged class of criminals. Yet this is exactly what the State of Tennessee has done in prior matters which are the genesis to this case and continues to do right here and now.

98. Public tax dollars continue to be wasted to defend the criminals in this matter while the state has refused to investigate or hold any of the bad actors accountable based entirely upon their **names** and **relationships** (in stark violation Tenn. Const. art. I, § 30<sup>42</sup>) without any interest or regard for the crimes they have committed, the danger they continue to pose to public health and safety, or the overwhelming evidence of their misconduct.

99. Even more outrageously, there exists no division of law enforcement or police protection in Middle Tennessee, especially not within the public’s reach or available upon demand in an emergency, who can or will **protect the public** from the criminal actions of this

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<sup>41</sup> [https://en.wikipedia.org/wiki/Equal\\_Protection\\_Clause](https://en.wikipedia.org/wiki/Equal_Protection_Clause)

<sup>42</sup> Tenn. Const. art. I, § 30, “That no hereditary emoluments, privileges, or honors, shall ever be granted or conferred in this state.”

privileged class of criminals involving “elected officials.” Given their known history, this is not only unreasonable, but it is also irresponsible, unconstitutional, discriminatory, absurdly negligent, reprehensible, and frankly barbaric.

### AN ABOMINATION OF INJUSTICE

100. One of the most distressing facts I have learned as a result of this obscene injustice is the following. Even though I have now spent over five years of my life studying state and federal laws, the federal rules, the ethical canons, and the State of Tennessee’s Rules of Professional and Judicial Conduct along with a myriad of ways the system was designed to self-police itself and prevent anything like this case from ever happening, if I was in the same situation as I was on August 29, 2019, **I know of nobody within the reach of the public who could protect me from being wrongfully evicted from my home again.**

101. As long as the action was ordered by a sitting judge, the Williamson County Sheriff’s Office will execute and enforce the order as if it were law even when it is the furthest thing from the law, actually being comprised of multiple felony crimes being committed against the property owner under the fake and fraudulent “color of law” by influential, compromised, and corrupt officers of the court. Such is executed and enforced by the local sheriff’s office and defended thereafter by public tax dollars though being one of the most vile, repugnant, and egregious violations of an American Citizen, property owner, and a long-term, peaceful, hardworking member of the community. This issue demands immediate attention and rectification to **protect the public** health and safety of Williamson County Tennessee residents at the very least.

102. I know now close to fifty combined counts of crimes which were committed



against me, with the vast majority being felonies both at state and federal levels, yet I know of no division of government or law enforcement in Middle Tennessee that I could call, who would in fact protect me from being wrongfully evicted (again) from my own home without any lawful authority, jurisdiction, or grounds whatsoever.

103. I called the court<sup>43</sup> in a panic and tried to find out how to initiate emergency contact with former judge Binkley, which I was denied. I reached out to opposing counsel<sup>44</sup>, the court<sup>45</sup>, the clerk and master<sup>46</sup>, the judge<sup>47</sup> (via the clerk and master), the auctioneers<sup>48</sup>, and the closing company<sup>49</sup> and told them **all** that the auction was being **illegally** forced against my will, demanding they stop the auction and not go through with the sale. The officers of the court all reasonably had to have known that they were not proceeding legally<sup>50</sup>, in proper form, but they demonstrated no care and showed zero concern about consequences.

104. When a Tennessee sitting judge is involved in crimes against the public, especially against a small, isolated, and underfunded person, family, group, or entity, there is almost no chance of getting caught. The judge's wrongful orders cover for the illegal actions by other court officers while they outrageously leverage publicly funded resources such as the Sheriff's Office in the execution and enforcement of the crime.

105. I was destroyed almost instantly without due process by a group of bad actors who

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<sup>43</sup> DOC 54-1, PID 4361 | [https://rico.jeffenton.com/evidence/2019-08-30\\_judgment-wrong-emergency-call-to-court.mp3](https://rico.jeffenton.com/evidence/2019-08-30_judgment-wrong-emergency-call-to-court.mp3)

<sup>44</sup> DOC 57-1, PID 4394-4404 | [https://rico.jeffenton.com/evidence/2019-08-30\\_emergency-attempt-to-correct-court-order.pdf](https://rico.jeffenton.com/evidence/2019-08-30_emergency-attempt-to-correct-court-order.pdf)

<sup>45</sup> DOC 57-1, PID 4481-4483 | [https://rico.jeffenton.com/evidence/2019-10-10\\_notice-to-court-and-title-co-auction-was-illegal.pdf](https://rico.jeffenton.com/evidence/2019-10-10_notice-to-court-and-title-co-auction-was-illegal.pdf)

<sup>46</sup> DOC 57-1, PID 4405-4413 | [https://rico.jeffenton.com/evidence/2019-08-30\\_notified-story-beeler-false-claims-in-court-order.pdf](https://rico.jeffenton.com/evidence/2019-08-30_notified-story-beeler-false-claims-in-court-order.pdf)

<sup>47</sup> DOC 57-1, PID 4452-4459 | [https://rico.jeffenton.com/evidence/2019-09-23\\_notified-binkley-false-claims-in-storys-order.pdf](https://rico.jeffenton.com/evidence/2019-09-23_notified-binkley-false-claims-in-storys-order.pdf)

<sup>48</sup> DOC 57-1, PID 4442-4450 | [https://rico.jeffenton.com/evidence/2019-09-21\\_notice-listing-agreement-coerced-null-and-void.pdf](https://rico.jeffenton.com/evidence/2019-09-21_notice-listing-agreement-coerced-null-and-void.pdf)

<sup>49</sup> DOC 57-1, PID 4478-4480 | [https://rico.jeffenton.com/evidence/2019-10-10\\_notified-bankers-title-sale-illegal-unauthorized.pdf](https://rico.jeffenton.com/evidence/2019-10-10_notified-bankers-title-sale-illegal-unauthorized.pdf)

<sup>50</sup> DOC 53, PID 4258-4349 | [https://rico.jeffenton.com/evidence/2024-03-13\\_irrefutable-proof-of-criminal-conspiracy.pdf](https://rico.jeffenton.com/evidence/2024-03-13_irrefutable-proof-of-criminal-conspiracy.pdf)

should rightfully be disbarred and prosecuted. Some should even be in prison for the crimes they committed. The courts must de incentivize this type of organized, collaborative, lawless, unrestrained, misconduct to protect the public, judicial integrity, and the rule of law, yet so far, my family and I are the only ones who have suffered in this case, or likely ever will, short of an act of extraordinary justice.

106. I know the entire scam now, **but I still couldn't stop it from happening again** because there is no meaningful protection against this type of crime or criminals in Middle Tennessee. That's negligence by governance far beyond the threshold of social tolerance.

107. Upon information and belief, if the preceding courts and Middle Tennessee governance operated honestly, ethically, and lawfully, I wouldn't even need this lawsuit to receive a rightful remedy.

108. The State of Tennessee can't continue to maintain a police force used by corrupt politicians to illegally deprive the public of their property and rights **while refusing to protect the public from those same corrupt politicians**. That is an insanely unconstitutional, heavy-handed abuse of police powers, and that is exactly what is happening in Williamson County Tennessee right now. Remedying this to protect the public's health and safety throughout Williamson County Tennessee from the unlawful exercise of power by "elected officials" **must be one of the highest priorities of this court**.

109. Upon information and belief, instead of holding the bad actors accountable or taking responsibility for their actions and my damages, the State of Tennessee and Williamson County are misappropriating tax dollars to pay legal counsel to protect bad actors by covering-up crimes and corruption. They are fighting the honest interests of justice in more than just my

case. That is both unreasonable and unacceptable. I demand a remedy!

**18 U.S. CODE § 4 - MISPRISION OF FELONY**

“Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both.”

110. There isn't an attorney or law firm involved in this lawsuit amongst the primary defendants or their counsel who should not be cognizant of their responsibilities to report both felonies committed by the defendants along with attorney and judicial misconduct<sup>51</sup> to the proper authorities. Similarly, anyone working to conceal the multiple felonies committed by the defendants and counsel in this lawsuit will be called-out, exposed, and possibly added as joinders to this lawsuit and/or be subject to a subsequent lawsuit later. This cause of action will continue to “snowball” until the officers of the court quit committing crimes against me and my family and begin holding the bad actors accountable.

111. The only way to escape this action unscathed is to obey the law, the federal rules, the ethical canons, and the State of Tennessee's Rules of Professional and Judicial Conduct. I cordially invite all to please do so.

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<sup>51</sup> DOC 33, PID 3310-3391 | [https://rico.jeffenton.com/evidence/2019-08-01\\_hearing-professional-and-judicial-misconduct.pdf](https://rico.jeffenton.com/evidence/2019-08-01_hearing-professional-and-judicial-misconduct.pdf)  
DOC 68, PID 5009-5029 | [https://rico.jeffenton.com/evidence/2024-08-22\\_memorandum-of-law-about-void-tn-court-orders.pdf](https://rico.jeffenton.com/evidence/2024-08-22_memorandum-of-law-about-void-tn-court-orders.pdf)

**THIS LAWSUIT EXISTS TO FIGHT FOR JUSTICE**

112. I understand that the courts have taken an adversarial position against this lawsuit so far to date, which is unfortunate and contrary to the honest interests of justice in the matters before the court. It is important to me that any honest, lawful overseers of our courts and Tennessee’s governance along with advocates and administrators of justice know that I have brought this lawsuit for the express purpose of fighting **FOR JUSTICE**, not against it.

113. To that end I have committed my life. No matter how big of a battle is waged against me, no matter how violently the enemies of justice choose to dissect and continue destroying my life, no matter how cruel and lawless their tactics, no matter how much power and influence they wield, I will persist until justice is served or I am buried. That is my love and commitment to **freedom**, the United States of America, the great State of Tennessee, **and the justice necessary for anyone to be secure in their rights.**

**CERTIFICATION AND DECLARATION**

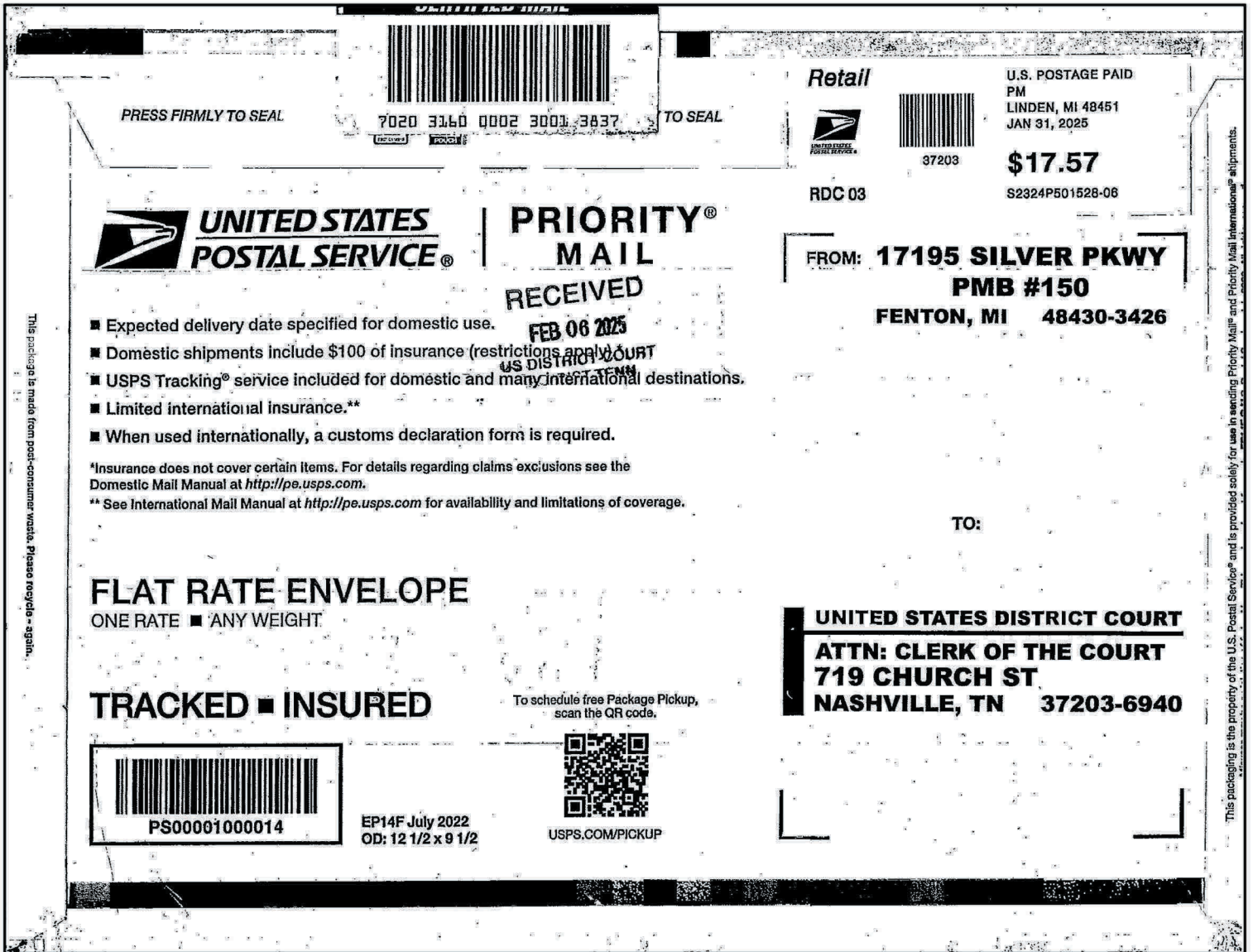
By signing below, I, Jeffrey Ryan Fenton, certify that this document has been executed in good faith, in the honest pursuit of justice, and in strict compliance with F.R.Civ.P. 11(b).

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 January 20, 2025



**JEFFREY RYAN FENTON, PRO SE**  
17195 SILVER PARKWAY, #150  
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## Attorney Details

**Name:**

Story, Virginia Lee

**Address:**

136 4th Ave S  
Franklin, TN 37064-2622

**BPR Number:**

011700

**Status:**

Active

**Office County:**

WILLIAMSON

**Licensed in TN Since:**

1985

**Law School:**

Nashville School of Law

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### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

Date	Title
07/20/1989	Release of Information RE: Virginia Lee Story

### Names Used:

**Name**

Virginia Lee Story

\* Information accurate as of Tuesday, December 03, 2024 11:00 AM UTC

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## Attorney Details

**Name:**

Binkley, Michael Weimar

**Address:**

135 4th Ave S Ste 286  
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**BPR Number:**

005930

**Status:**

Active

**Office County:**

Williamson

**Licensed in TN Since:**

1978

**Law School:**

Vanderbilt University - Vanderbilt Law School



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Michael Weimar Binkley

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## Attorney Details

**Name:**

Yarbrough, Kathryn Lynn

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223 Town Center Pkwy Unit 1897  
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**BPR Number:**

032789

**Status:**

Active

**Office County:**

Maury

**Licensed in TN Since:**

2014

**Law School:**

Nashville School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Kathryn Lynn Yarbrough

\* Information accurate as of Tuesday, December 03, 2024 11:00 AM UTC

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## Attorney Details

**Name:**

Beeler, Elaine Beaty

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016583

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Inactive (1/20/2023)

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**Licensed in TN Since:**

1994

**Law School:**

Nashville School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Elaine Beaty Beeler

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## Attorney Details

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018097

**Status:**

Active

**Office County:**

Davidson

**Licensed in TN Since:**

1996

**Law School:**

University of Memphis - Cecil C. Humphreys School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Mary Elizabeth Ausbrooks

Mary Elizabeth Maney

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## Attorney Details

**Name:**

Koval, Alexander Sergey

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1321 Murfreesboro Pike Ste 320  
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**BPR Number:**

029541

**Status:**

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**Office County:**

Davidson

**Licensed in TN Since:**

2010

**Law School:**

Nashville School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Alexander Sergey Koval

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## Attorney Details

**Name:**

Hildebrand, Henry Edward III

**Address:**

320 Seven Springs Way Ste 110  
Brentwood, TN 37027-4558

**BPR Number:**

004630

**Status:**

Active

**Office County:**

Davidson

**Licensed in TN Since:**

1976

**Law School:**

George Washington University - George Washington Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Henry Edward Hildebrand III

\* Information accurate as of Friday, December 06, 2024 8:00 AM UTC

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## Attorney Details

**Name:**

Walker, Charles M.

**Address:**

701 Broadway Ste 260  
Nashville, TN 37203-3983

**BPR Number:**

019884

**Status:**

Federal Exempt (3/6/2017)

**Office County:**

Davidson

**Licensed in TN Since:**

1999

**Law School:**

University of Illinois Chicago School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Charles M. Walker

\* Information accurate as of Tuesday, December 03, 2024 11:00 AM UTC

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## Attorney Details

**Name:**

Anderson, Samuel Forrest

**Address:**

5107 Maryland Way Ste 115  
Brentwood, TN 37027-7555

**BPR Number:**

017022

**Status:**

Active

**Office County:**

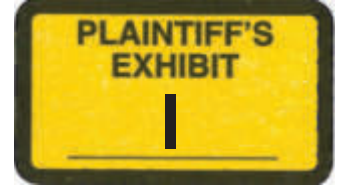
WILLIAMSON

**Licensed in TN Since:**

1995

**Law School:**

University of Memphis - Cecil C. Humphreys School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Samuel Forrest Anderson

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## Attorney Details

**Name:**

Hivner, James Michael

**Address:**

401 7th Ave N  
Nashville, TN 37219-1400

**BPR Number:**

020405

**Status:**

Active

**Office County:**

DAVIDSON

**Licensed in TN Since:**

2000

**Law School:**

University of Alabama - School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

James Michael Hivner

\* Information accurate as of Tuesday, December 03, 2024 11:00 AM UTC

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## Attorney Details

**Name:**

Coke, John Brandon

**Address:**

Nashville City Center  
511 Union St Ste 600  
Nashville, TN 37219-1768

**BPR Number:**

029107

**Status:**

Active

**Office County:**

Davidson

**Licensed in TN Since:**

2010

**Law School:**

Samford University - Cumberland School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

John Brandon Coke

\* Information accurate as of Tuesday, December 03, 2024 11:00 AM UTC

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## Attorney Details

**Name:**

Garrett, Sandra Jane Leach

**Address:**

10 Cadillac Dr Ste 220  
Brentwood, TN 37027-5078

**BPR Number:**

013863

**Status:**

Active

**Office County:**

Williamson

**Licensed in TN Since:**

1989

**Law School:**

Vanderbilt University - Vanderbilt Law School



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Sandra Jane Leach Garrett

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## Attorney Details

**Name:**

Clement, Frank G. Jr.

**Address:**

401 7th Ave N 215  
Nashville, TN 37219-1400

**BPR Number:**

006619

**Status:**

Active

**Office County:**

DAVIDSON

**Licensed in TN Since:**

1979

**Law School:**

Nashville School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Frank G. Clement Jr.

\* Information accurate as of Tuesday, December 03, 2024 11:00 AM UTC

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## Attorney Details

**Name:**

Bennett, Andy Dwane

**Address:**

401 7th Ave N  
Nashville, TN 37219-1400

**BPR Number:**

009894

**Status:**

Active

**Office County:**

DAVIDSON

**Licensed in TN Since:**

1982

**Law School:**

Vanderbilt University - Vanderbilt Law School



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Andy Dwane Bennett

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## Attorney Details

**Name:**

McBrayer, William Neal

**Address:**

401 7th Ave N Ste 203  
Nashville, TN 37219-1400

**BPR Number:**

013879

**Status:**

Active

**Office County:**

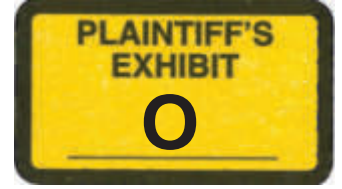
Davidson

**Licensed in TN Since:**

1989

**Law School:**

William and Mary - Marshall-Wythe School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

William Neal McBrayer

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## Attorney Details

**Name:**

Woodruff, Joseph Addison

**Address:**

135 4th Ave S Ste 286  
Franklin, TN 37064-2564

**BPR Number:**

012869

**Status:**

Active

**Office County:**

WILLIAMSON

**Licensed in TN Since:**

1987

**Law School:**

University of Alabama - School of Law



### Public Information:

No Public Information Available

### Informational Releases for Public Discipline:

No Public Discipline

### Names Used:

**Name**

Joseph Addison Woodruff

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ATTORNEY LOGIN

Board of Professional Responsibility of the Supreme Court of Tennessee

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Attorney Details

RETALIATED AGAINST BY BPR



Name:

Manookian, Brian Philip

Address:

PO Box 150229 Nashville, TN 37215-0229

BPR Number:

026455

Status:

Disbarred - Permanent (2/16/2024)

Office County:

Davidson

Licensed in TN Since:

2007

Law School:

Vanderbilt University - Vanderbilt Law School

Public Information:

Table with 2 columns: Date, Title. Row: 10/26/2021, Amendment to Hearing Panel Report and Recommendation - #2017-2805-5-WM -

Informational Releases for Public Discipline:

Table with 2 columns: Date, Title. Multiple rows listing dates and titles of disciplinary actions and court judgments.

Date	Title
11/21/2018	Davidson County Lawyer Remains on Temporary Suspension
11/21/2018	Order Denying Verified Petition for Dissolution or Amendment of Order of Temporary Suspension
09/21/2018	Davidson County Lawyer Temporarily Suspended
09/21/2018	Order of Temporary Suspension
03/22/2018	Supplemental Petition for Discipline filed - #2107-2805-5-WM
12/18/2017	Petition for Discipline filed - #2017-2805-5-WM

Names Used:

Name

Brian Philip Manookian

\* Information accurate as of Tuesday, December 03, 2024 11:00 AM UTC

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## Attorney Details

RETALIATED AGAINST BY BPR

**Name:**

Reguli, Connie Lynn

**Address:**1646 Westgate Cir Ste 101  
Brentwood, TN 37027-8560**BPR Number:**

016867

**Status:**

Suspended (4/22/2022)

**Office County:**

Williamson

**Licensed in TN Since:**

1994

**Law School:**

Nashville School of Law

## Public Information:

Date	Title
08/02/2021	Petition for Discipline filed - 2021-3191-6-AJ

## Informational Releases for Public Discipline:

Date	Title
11/20/2023	Order of Temporary Suspension
11/20/2023	Williamson County Lawyer Temporarily Suspended
04/22/2022	Suspended pending further orders of the Supreme Court - serious crime
04/22/2022	Williamson County Lawyer Suspended
04/22/2022	SC Order of Enforcement
04/11/2022	Supplemental Petition for Discipline filed - #2021-3191-6-AJ
04/29/2019	Supplemental Petition for Discipline filed - #2018-2958-6-AW
05/01/2018	Petition for Discipline filed - #2018-2858-6-AW
12/30/2015	Williamson County Attorney on Probation
12/28/2015	Supreme Court Judgment and Opinion - #2012-2139-6-SG
12/28/2015	Probation of 11 months and 29 days
12/10/2014	Circuit Court Decision - #2012-2139-6-SG



Date	Title
12/27/2013	Hearing Panel Judgment and Amended Judgment - #2012-2139-6-SG
07/16/2012	Petition for Discipline filed (SG)
04/19/2011	Williamson County Lawyer Censured
04/12/2011	Order of Enforcement - Public Censure
02/08/2011	Chancery Court Decision - #2009-1804-6-KH
02/12/2010	Hearing Panel Judgment - #2009-1804-6-KH
08/10/2009	Supplemental Petition for Discipline filed (KH)
02/11/2009	Petition for Discipline filed (KH).

### Names Used:

**Name**

Connie Lynn Reguli

\* Information accurate as of Tuesday, December 03, 2024 11:00 AM UTC

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2024-02





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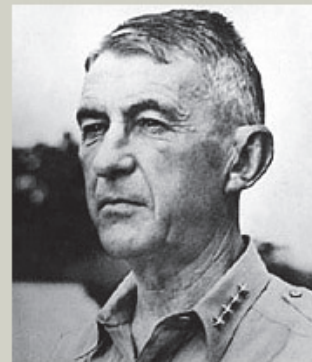
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# History ALAMO SCOUTS History

The Alamo Scouts were organized on Fergusson Island, New Guinea, on 28 November 1943 to conduct reconnaissance and raider work in the Southwest Pacific Theater under the personal command of then Lt. General Walter Krueger, Commanding General, Sixth U.S. Army.

Named for his beloved association with San Antonio, Texas, and the Alamo, Krueger envisioned that the Alamo Scouts, consisting of small teams of highly trained volunteers, would operate deep behind enemy lines to provide intelligence-gathering and tactical reconnaissance in advance of Sixth U.S. Army landing operations.



General Walter Krueger



Members of Rounsaville & Nellist Teams following the successful liberation of Cabanatuan POW camp. Luzon, PI. February 1945.

During these two years the Alamo Scouts liberated 197 Allied prisoners in New Guinea, and provided forward reconnaissance and tactical support of the Sixth Ranger Battalion in the liberation of the Cabanatuan Prisoner of War Camp on Luzon, in February 1945, freeing 511 Allied prisoners. In addition, the Alamo Scouts

captured 84 Japanese prisoners of war.



The Alamo Scouts evolved from a simple reconnaissance unit in New Guinea to a sophisticated intelligence collection group which supplied and coordinated large-scale guerrilla operations on Leyte and Luzon.



Alamo Scouts Training Center under construction Fergusson Island, New Guinea, December 1943.

In July 1945, the Alamo Scouts were training to conduct pre-invasion reconnaissance of Kyushu in preparation for OPERATION OLYMPIC, the first step in the proposed

Allied invasion of the Japanese homeland. Following the Japanese surrender, the Alamo Scouts landed in Wakayama and became part of the occupation army

They were unceremoniously disbanded at Kyoto, Japan, in November 1945, never to be reconstituted.



Back row. ASTC staff Mayo Stuntz (L) and Homer Williams (R) with natives near Kalo, Kalo, Fergusson Island, New Guinea.

The Alamo Scouts have the finest record of any elite unit of World War II and, arguably, one of the finest in the history of the United States military.

In 1988, the Alamo Scouts were individually awarded the SPECIAL FORCES SHOULDER TAB for their services in World War II and included in the lineage of today's U.S. Army Special Forces.



Alamo Scouts Historical Foundation, Inc.

THE U.S. SIXTH ARMY SPECIAL RECONNAISSANCE UNIT OF WORLD WAR II



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*Full Roster*

# ALAMO SCOUTS

*Full Roster*

Name / Rank / Class / ASTC Status

WALSH, Edward W. / PFC / 7th / GRADUATE / Assigned to Ouzts Team

WALTERS, Robert G. / PFC / 5th / GRADUATE / Assigned to Chanley Team

WANGRUD, Ray W. / SGT / 3rd / GRADUATE / Assigned to Reynolds Team

WATSON, Glendale / SSG / 5th / GRADUATE / Assigned to Chanley Team

WATSON, Lee F. / PFC / 9th / RETAINEE / Assigned to Williams Team

WATSON, Ray (Moose) / LT / AUSTRALIAN ARMY / Instructor-Junglecraft and Jungle Survival

WATSON, William R. / 1LT / 2nd / GRADUATE / Assigned to Reynolds Team (Later)

WEILAND, Harry D. / SSG / 3rd / GRADUATE / Assigned to Sumner Team

White, Horton V. / COL / G-2, Sixth Army

WHITE, Thomas / PVT / 1st / GRADUATE / Returned to Original Unit

WHITTINGTON, Charles B. / T/4 / 2nd / GRADUATE / Returned to Original Unit

Alamo Scouts Historical Foundation, Inc.

THE U.S. SIXTH ARMY SPECIAL RECONNAISSANCE UNIT OF WORLD WAR II





asgo\_460

William R. Watson, (shown as a T/5 with the 1st Cavalry Division prior to Alamo Scouts selection), was a graduate of the 2nd ASTC class and was retained on REYNOLD's Team. After the team broke up, Watson joined THOMPSON Team and performed numerous missions before receiving a team of his own in July 1945.

(Photo courtesy of Everett Fenton, grandson of William Watson)

 LARGER VIEW



asgo\_461

A photo of William R. Watson at home in Michigan while a member of the VIII Corps.

(Photo courtesy of Everett Fenton, grandson of William Watson)

 LARGER VIEW



asgo\_462

William R. Watson as a member of the 1st Infantry Division.

(Photo courtesy of Everett Fenton, grandson of William Watson)

 LARGER VIEW



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*Final Roll Call*

**ALAMO SCOUTS**

*Final Roll Call*

Oliver Roesler  
September 15, 2020

Terry Santos  
February 18, 2020

John J. Geiger, Jr  
March 19, 2018

William R. Watson  
March 24, 2017

Carl A. "Skip" Bertoch  
February 28, 2017  
[Obit](#)

Jay V. Russell  
May 22, 2016

Henry L. Adkins  
March 25, 2016  
[Obit](#)

Harry D. Weiland  
August 21, 2014

Alfred L. Jacobs  
April 17, 2014

Robert L. Shirkey  
February 14, 2014





# WILLIAM "BILL" R. WATSON

December 27, 1919 - March 24, 2017

WATSON, William "Bill" Robert – age 97, of Fenton joined his mother, father, sister, brother, and wife of 55 years with our heavenly father on Friday, March 24, 2017. A funeral service will be held at 1 PM on Thursday, March 30, 2017 at Brown Funeral Home – 1480 E. Hill Road, Grand Blanc, Michigan. Friends may visit with the family two hours prior the service. Burial will follow at Great Lakes National Cemetery – 4200 Belford Road, Holly, Michigan. Bill was born on December 27, 1919 in Pittsburg, Pennsylvania. Bill is survived by his children: Robert (Pat), Carol (LeRoy), Daniel (Miriam); 13 grandchildren; 19 great-grandchildren; 13 great-great-grandchildren; and several nieces and nephews. Bill was in WWII as part of an elite group called Alamo Scouts where he earned a silver star along with several other medals, a field commission and his own team before the end of the war. Bill retired from Pontiac Motors as a supervisor of the mechanics department after 30 years of service. In retirement, he loved golfing, traveling with his beloved Anna, and spending time with family. God has welcomed a one of a kind man, whom we will all miss dearly. In lieu of flowers, memorial contributions may be made to Heart to Heart Hospice care – 2029 S. Elms Road, Bldg B, Suite A, Swartz Creek, Michigan 48473. Please visit [www.brownfh.com](http://www.brownfh.com) to leave online condolences for the family. Arrangements under the direction of Brown Funeral Home, Grand Blanc, MI.

Dignity<sup>®</sup>  
MEMORIAL  
LIFE WELL CELEBRATED

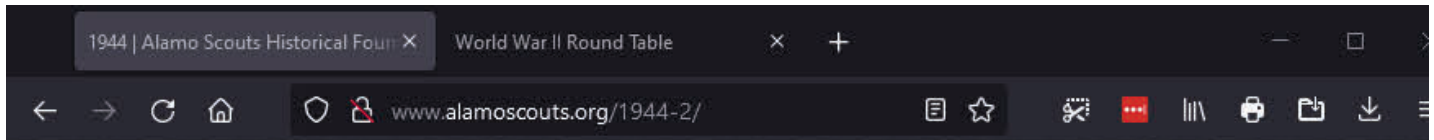
Brown Funeral Home

[www.brownfh.com](http://www.brownfh.com)  
(810) 606-1300



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Publication of the Alamo Scouts Historical Foundation

# RECON

Published July 9, 2021 by ExecDir

## 1944



The Alamo Scouts had been in existence for 34 days when the calendar rolled over to 1944. In that first full year, Alamo Scouts Training Centers (ASTC) were established on Ferguson Island, New Guinea and at Finschaven and Hollandia in Dutch Guinea. Another was erected after the successful landing on Leyte Island in the Philippines. ASTCs trained six classes, graduated approximately 225 trained Alamo Scouts, and retained 13 teams

consisting of various compositions of men. The 6-7 man teams conducted a known 43 missions from February-December 1944, and are credited for providing deep reconnaissance, intelligence collection, conducting civilian rescue and civil affairs operations, guerrilla coordination and resupply, pilot recovery, and more in the Bismarck Archipelago and New Guinea Campaigns and during the Leyte Operation without losing a man killed or captured. The tiny unit also earned 51 Silver Stars, 18 Bronze Stars, 4 Soldier's Medals, and 8 Purple Hearts. By any measure, the Alamo Scouts had proven themselves, but they were getting started.



# SILENT WARRIORS

OF WORLD WAR II



The Alamo Scouts  
Behind Japanese Lines

Lance Q. Zedric

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This is a preview. The total pages displayed will be limited.

## CHAPTER 5

### THE BISMARCK ARCHIPELAGO AND NEW GUINEA CAMPAIGNS

**O**n the morning of February 25, 1944 Lt. Col. Bradshaw faced a dilemma. He sat in his thatched-roof office on Fergusson Island contemplating which team of Alamo Scouts would be the first to go on a live mission. Sixth Army Headquarters had just sent a vague message requesting that the A.S.T.C. send over a team of Alamo Scouts ready to go. But for what? Four days earlier the Sixth Army had proposed that a team of Scouts be sent on a four-day reconnaissance of the Marakum area 15 miles east of Bogadjim on the northern coast of New Guinea, but it had been cancelled. Bradshaw was confident that any one of the four teams he had available could do the job whatever it was, but since this would be the Scouts' first and most important mission, he had to select the best. He narrowed it down to the MCGOWEN TEAM and BARNES TEAM.

Lt. John R.C. McGowen, a daring 25-year-old Texan from Amarillo, had been hand-picked by Bradshaw from the 158th Infantry Regiment and was considered the wis-

## Bismarck/New Guinea Campaigns

est Scout in camp. McGowen had graduated from Texas A&M in 1939 and earned his master's degree a year later. Although he was skinny by Alamo Scouts standards, he was admired for his toughness and "try-anything" attitude. Once during man-to-man combat training with Moyer, he attacked the much larger man diving at his feet and taking him down, much to the astonishment of Moyer and the rest of the camp.

McGowen's team, consisting of Tech. Sgt. Caesar J. Ramirez, Sgt. Walter A. McDonald, Sgt. John A. (Red) Roberts, and Pfc. John P. Legoud and Pvt. Paul V. Gomez, were ready to go. At twenty-nine, Legoud was the oldest member of the team. The rest were twenty-five; the perfect blend of youth and experience.

On the other hand, BARNES TEAM, led by 26-year-old Lt. William F. Barnes, was just as capable. Barnes had played on the University of Tennessee's 1938 and 1939 number two ranked football teams and was equally gifted in the classroom. He had come to the Scouts from the 32nd Division, where he had been on special assignment from the 127th Regiment to train Intelligence & Reconnaissance platoons. Barnes was a Scouts' Scout and excelled in everything he did.

Barnes' team also combined experience and youth. At twenty-three, Cpl. Aubrey L. Hall, was the next highest ranking member of the team. Then there were 32-year-old Warren J. Boes, a crack shot Pfc., and Pvts. Louis J. Belson, John O. Pitcairn, and Robert W. Teeples.

Bradshaw weighed the strengths and weaknesses of each team. A decision had to be made soon. Red Williams entered the hut and the two men discussed what should be done. Bradshaw took a coin out of his pocket and smiled at his executive officer. "If it's heads, McGowen's team goes. If it's tails, Barnes' team gets the job." Bradshaw tossed the coin into the air and caught it with his right hand. He then slapped it into the palm of his left hand.



## Chapter Five



*Lt. Col. Frederick Bradshaw outside his office on Fergusson Island, 1944. (Courtesy of Constance Bradshaw-Morrill.)*

“Heads!” exclaimed Bradshaw as he revealed the coin. “It looks like McGowen’s team!”

Barnes would serve as the contact officer. His job would be to help launch the team, maintain communications during the mission, and help recover the team after exfiltration. A contact team might be one officer and a couple of men, or a noncommissioned officer, but it was always a member or members of the Alamo Scouts.

Team leader William E. Nellist explained:

*When a team was sent out on a mission, a contact team went out with the PT boat people ahead of time to find out where, how, and when to land. The contact team would drop the operational team off, then return to the PT base or wherever and wait for the designated pick up time. On each mission a Scout team would have alternate plans for pickup. If pickup failed the first night they had a predetermined point to open contact for three more nights*

## Bismarck/New Guinea Campaigns

*at alternate points, which might be 10-15 miles down the coast. A team might then open radio contact there for three nights.*

### **INTO THE ADMIRALTIES**

The capture of the Admiralties was the final step in the isolation of Rabaul. The ring was tightening on the Japanese. By mid-February 1944, forces under MacArthur had seized major points along the northern coast of New Guinea and blocked the Vitiaz Strait between New Guinea and New Britain Island, which secured access to the Bismarck Sea. Meanwhile, forces under Halsey had advanced north through the Solomons and captured Nissan Island only 125 miles from Rabaul. According to MacArthur, capture of the Admiralties would “cork the bottle” on the Japanese in the New Guinea area and open the way for the return to the Philippines.<sup>1</sup>

The Admiralties, consisting of two main islands and several smaller islands, lie approximately 200 miles north and east of New Guinea and 260 miles west of New Ireland. The principle Allied objectives on Manus, the largest island, were Seeadler Harbor and an auxiliary landing field near Lorengau, a small settlement. Seeadler Harbor was one of the finest deep-water anchorages in the Southwest Pacific. More than six miles wide and twenty miles long, it was large enough to accommodate a large amphibious strike force. Los Negros, the second-largest island, was also strategically important. It contained Hyane Harbor and Momote airfield, with its large 5,000-foot runway. Control of the harbors and airfields on the two major islands would provide bases from which to stop the Japanese from reinforcing their garrisons at Rabaul and control communication from the city north to the Caroline and Marianas Islands. It would also consolidate and defend Allied-occupied areas in New Guinea and provide a springboard for future offensives.<sup>2</sup>



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The Admiralties offensive, code name “Brewer Operation,” was planned for April 1, 1944. MacArthur had outlined it in May 1943, but he did not issue the final order until November 23 of that year. MacArthur assigned the operation to Krueger, who was ordered to seize the Seeadler Harbor area and to “establish airfields and light naval facilities.” On February 13, 1944, Krueger received additional orders instructing him to gain control of the Bismarck Archipelago by seizing and consolidating the Admiralties and Kavieng, a strategic point on the north-west tip of New Ireland.

But on February 23, MacArthur received some early good news. Low-flying air observers reported that they had met no resistance over the islands and that they believed the Japanese had abandoned the Admiralties altogether. But Sixth Army intelligence had doubts. Their staff estimated that 4500 Japanese troops still occupied the islands. The next day MacArthur directed Krueger and Admiral Thomas Kinkaid to conduct a reconnaissance-in-force by February 29, near the Hyane Harbor area on eastern Los Negros. The force would consist of 800 men from the 1st Cavalry Division and supporting units. If they found that the area was lightly defended, the reconnaissance force would become an invasion force and move inland to capture Momote airfield. But prior to committing any troops to the islands, Krueger wanted to get a closer look. Besides, he had the perfect men for the job.<sup>3</sup>

On the afternoon of February 25, Bradshaw, arrived by PT boat at Sixth Army Headquarters, now located near Finschafen. McGowen and Barnes Teams were already there. Bradshaw entered the G-2 tent where he found a letter waiting for him. It was from Lt. Col. S.P. Smith of the G-2 section. He had the mission all lined out:

*Your boys will depart here by Catalina about 2:30, morning 26 February and will land at first light in the above (southeast tip of Los Negros) area. They*

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*propose to work in teams of two and pass through the swampy area to northeast of their landing point, cross the river and attempt to take up points for observation in the Momote Plantation area. The Catalina will return at dusk 26 February to pick them up in case they are in difficulty; however, if the going is okay they will not be at the beach but will be picked up at dusk 27 February. McGowen is taking the party in and Barnes is going in the Catalina on all three trips. As the party lands, General Whitehead has agreed to have B-25's over the area strafing the strip and the same procedure will be followed as they are picked up.<sup>4</sup>*

That night, Krueger called both teams into his quarters and wished them luck. He shook each man's hand and stressed the importance of their mission, not only to the operation but to the future of the Alamo Scouts. Later that night the Scouts received word that the mission had been changed. Instead of reconnoitering Momote airfield as planned, they were to now concentrate on the Hyane Harbor area. McGowen and his team worked through the night making preparations.

At 3:30 the next morning both teams nervously boarded a Catalina flying boat at Langemak Bay, north of Finschafen. After two hours in the air, the plane flew into a heavy thunderstorm. It circled over the drop off point, trying to land, but the seas were too rough and the plane was forced to return to Langemak Bay, where the men were ushered aboard the seaplane tender *U.S.S. Halfmoon* for some much-needed sleep. The mission was rescheduled for 3:00 a.m. the next day.

At 6:45 a.m. on February 27, the Alamo Scouts tried again, this time without the cover of darkness. Again, the plane encountered thunderstorms along the way, but the drop off area was clear enough to attempt a landing. The edgy pilot, having detected an approaching plane on his



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radar screen, didn't want to be exposed on the open water for long. The pilot guided the seaplane in one-half mile off the southeastern tip of Los Negros, barely slowing down. The touch-and-go landing made it almost impossible for the Scouts to get their rubber boat into the water. After a few choice words for the pilot, McGowen, with the help of BARNES TEAM, got his men into the boat and headed for shore. Thirty minutes later the Scouts neared a beach northwest of Chapotut Point. Gomez, who was sitting at the bow of the boat, leaped out and waded ashore, making him the first American to step foot on the island. But unknown to McGowen, the enemy had been watching. Fortunately for the Scouts, Col. Yoshio Ezaki, the Japanese Commander of the Admiralty Islands Garrison, believed that the team was reconnoitering for a landing on a nearby beach and moved one battalion away from the Hyane Harbor area to the other side of the island. This gave the Scouts time to deflate and conceal their boat and slip into the jungle.

Two hours into the mission the Scouts were startled by machine gun fire. Allied planes roared over the island and pelted enemy positions with .50 caliber fire and small bombs. Meanwhile, the Scouts sat down and waited for the raid to end. They resumed the march and soon came across tell-tale signs of the enemy. The air reports had been wrong. McGowen and his men discovered three machine gun positions and 200 yards of camouflaged trenches. They also heard screaming, which meant that someone had probably been wounded in the air raid. A few yards further into the jungle McGowen stopped cold in his tracks. He stood motionless as one-by-one he watched fifteen Japanese troops pass ten yards in front of him. Some were carrying weapons and others shovels. There was now no doubt. The enemy was definitely there and they were digging in. To make matters worse, McGowen noticed that some of the Japanese were not



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ordinary troops. They were larger than normal, in excellent shape, and were dressed in neat, well-tailored khaki uniforms. He later learned that they were elite Japanese marines.

After observing a large bivouac area southwest of the Momote airstrip for most of the afternoon, McGowen and his team arrived at a small, little-used trail thirty yards from the beach. There they set up security and remained for the night. Meanwhile, McGowen radioed Barnes who was flying overhead in a Catalina PBY. "The area is lousy with Japs!" exclaimed McGowen. Barnes took down the information and immediately radioed it to Sixth Army Headquarters. Shortly before seven the next morning, McGowen contacted Barnes and requested to be picked up by the PBY flying boat. The team paddled out and waited. But the pick up was a near disaster. The scheduled air cover had not arrived and both the Scouts and the plane were vulnerable to enemy fire. Not wanting to stay in one place too long, the pilot skimmed in fast and was still moving as the Scouts tried to board the aircraft. As McGowen tried to board the PBY, one of the propellers struck his cap, narrowly missing his head and tossing him backwards into the water. As Roberts was attempting to pull him into the boat, the other Scouts struggled aboard. Just as the plane accelerated, Gomez and the others pulled Roberts in the door. Fortunately, Roberts also had hold of McGowen.

The team arrived at Langemak Bay at 9:30 that morning and was met on the *Halfmoon* by Major Franklin Rawolle of Sixth Army Intelligence. Rawolle quickly ushered McGowen aboard a PT boat and rushed to him to meet Brig. Gen. William B. Chase aboard a destroyer. Upon hearing McGowen's report that the aerial reports were inaccurate, Chase, the reconnaissance force commander, requested that the Navy double the number of destroyers it had in the area and to direct more specific

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naval and air bombardment in the areas in which the Scouts had reconnoitered. Based on information obtained from the Scouts, the force also opted to change the invasion to the area which Ezaki had abandoned. This action resulted in a successful landing with light casualties. Meanwhile, elements of the 1st Cavalry Division cancelled a proposed reconnaissance-in-force of Manus Island and later conducted a major landing there. By March 25, organized Japanese resistance on the Admiralty Islands was broken, and the proposed landings at Kavieng and at Hansa Bay on the northern coast of New Guinea were cancelled in favor of an invasion at Hollandia, in Dutch New Guinea. Rabaul was effectively cut off and no longer posed a threat to the Allies.

The first Alamo Scouts mission was an outstanding success. Not only did it supply the Allies with vital pre-invasion intelligence which accelerated the capture of the Admiralty Islands and saved countless lives, it also validated Krueger's use of the Alamo Scouts and insured their continuation. But it wasn't perfect. The Scouts learned that flying boats were not the most practical way to insert a team, especially in broad daylight in full view of the enemy. During the takeoff and landing, the plane and the Scout team were exposed to the enemy. From then on Scouts were dropped off by submarine or PT boat. Communication was also a problem. Outfitted with only a "walkie-talkie," the team had difficulty contacting Barnes flying overhead. For future missions McGowen recommended that the Scouts carry a more powerful radio, if not two. Despite the glitches, the mission was everything that Krueger and Bradshaw had hoped for. To show his appreciation, Krueger presented each member of the MCGOWEN TEAM with the Silver Star. Although MacArthur had awarded the Distinguished Service Cross to Lt. Marvin J. Henshaw of the 5th Cavalry Regiment on February 29, for being the first American to land on Los

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*Lt. John R. C. McGowen*



*Alamo Scout in Mission Attire*



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Negros, the Scouts didn't mind. Everyone knew that they had been there forty-nine hours before anyone else.

### ON TO NEW GUINEA

Just a few days after landing in the Admiralties the Alamo Scouts were at it again. This time the BARNES TEAM was called. This would be the Scouts' first mission of the New Guinea campaign. On the mainland, elements of the U.S. 32nd Division had driven the Japanese west from Saidor on the northeast coast of New Guinea towards Madang, where Australian forces were waiting. Sixth Army needed to know if the trapped Japanese were trying to escape by boat or if they were planning to fight it out.

Once the order was issued, Barnes prepared his team. Sixth Army had arranged for him to fly over the proposed landing area for a closer look. He recalled:

*They put me in the nose of a B-25 and gave me a repeating camera. They took me down to the area I wanted to look at. It was pretty dense, but I wanted to look at the trail going down to the beach and the approximate vicinity where we were going to land. I took a bunch of photos. We took a real low sweep, just as low as you could get without being in the trees.*

This time Lt. Michael J. (Iron Mike) Sombar, a muscular 25-year-old team leader, and three of his Scouts would go along as the contact team. They would take BARNES TEAM in by rubber boat and drop them off at the mouth of the Male River, which was midway between Saidor and Madang. At 10 p.m. on March 2, the Scouts departed by PT boat from Dregor Harbor and arrived at their offshore disembarkation point at 4:30 the next morning. Teeples of Barnes team recalled the event:

*Our team rode in the hold of a PT boat to the disembarking point. The PT boat stopped about a*

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*hundred yards from shore and we all climbed into the rubber boat. As we got close to shore the surf caught us and spilled us out on the beach. It was dark when we landed and we lay on the beach until morning.*

After making their way to shore at 5 a.m., Sombar and his men set up a defensive perimeter and waited to insure that the landing party had not been spotted. Sombar and his men wished BARNES TEAM luck and returned to the PT boat. Barnes quickly led his team into the jungle some fifty yards west of the river. There the Scouts began a four-hour trek inland to the coastal track, which they suspected was being used by the Japanese as an escape route to the west. Their suspicions were confirmed. Several tracks indicated that a large Japanese force had recently used the trail. After observing the track for fifteen minutes, the Scouts moved further inland into the hills behind Kumisanger, a nearby village.

Up to this time, the Scouts had not seen one enemy soldier, but that soon changed. As the team continued westward through a patch of kunai grass, lead Scout Warren Boes came face to face with a Japanese patrol. The Japanese men, dressed in green camouflaged uniforms, carried only two rifles and were laughing heartily. With only fifteen yards between him and patrol, Boes dropped to one knee and coolly opened fire killing three men. The rest escaped into the jungle. During the skirmish, Barnes and Boes, who were well ahead of the other Scouts, lost contact with the main body of the team. Fearing that a larger enemy force had heard the shooting, Barnes and Boes decided to continue with the mission and try to link up with the others later. They proceeded into the area behind Kumisanger and then on to Bibi, another small village, where they observed several small bivouac areas and three large ones.

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Meanwhile, the remaining Scouts, led by Pfc. Hall, raced west towards Bau Plantation. After a gruelling sprint through the jungle, the group stopped to eat and rest. Teeples added :

*All our team had to eat on this mission was a mixture of raisins and peanuts. That was our typical ration on short missions, a blend of trail mix, figs, powdered milk, whatever we wanted to put into a little pouch that we had rigged up.*

The next morning Hall's group was awakened by the roar of Australian planes. Bombs exploded around them and bullets ripped into the ground. The Scouts dove for cover and narrowly missed being hit. The Australians also thought that area would be a good place for enemy troops to rest. Not wanting to stay there for long, the Scouts waited for the planes to leave and resumed their recon of the plantation, only to find no trace of the enemy. From there they turned around and headed east towards the Male River, their predetermined rendezvous point.

That same morning, March 6, Barnes and Boes were met with a similar wake up call. "All hell broke loose," Barnes recalled. "Our own planes attacked us! One dropped a bomb less than fifty yards from me! Meanwhile, the rest of my team, which was further inland, was getting bombed and strafed as well." After the attack they headed east towards the rendezvous point. En route, the two-man party met up with elements of G Company, of the 126th Regimental Combat Team who were driving westward in pursuit of the retreating Japanese. After relaying what information they had, Barnes and Boes made their way to the Male River, where that afternoon they were again bombed and strafed by Allied planes. At 7:30 that evening, Hall and the others arrived at the mouth of the river. Ten hours later the haggard Scouts were on a PT boat headed for home.



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**“We left our clothes on night and day,” said Teeples. “We were wet at night and hot and sweaty during the day. We must not have smelled too good at the end because the sailors held their noses when they picked us up.”**

**Barnes and Boes were taken to the Alamo Force Headquarters at Saidor, where they reported their findings to G-2 of the 32nd Division. The next day they were flown back to the Alamo Scouts Training Center for a well-earned rest.**

**On March 31, six days after the close of the Bismarck Archipelago campaign, the Alamo Scouts Training Center graduated its second class of Alamo Scouts. From this class, two more teams were formed bringing the total number of available teams to six. Two weeks earlier Sixth Army told Bradshaw to establish a new training center south of Finschafen on the northern coast of New Guinea, and to assign three teams of Scouts to General Robert Eichelberger’s I Corps based on Goodenough Island. Lieutenant Thompson, Sombar, and Reynold’s teams were selected to go and placed under the control of Lt. McGowen, who would act as the control officer.**



*Mayo S. Stuntz with the Duigi Family at Kalo Kalo, Fergusson Island, New Guinea. March 1944.*

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Eichelberger planned to use the Scouts in the upcoming operation at Hollandia. While Bradshaw and Stuntz went to look at the new site, the rest of the camp personnel remained on Fergusson Island and began packing.

Once it was learned that the Scouts were leaving, the natives of Kalo Kalo threw them a memorable farewell party. Lewis Hochstrasser, a recent graduate of the training center and the newly-appointed adjutant, wrote of the incident:

*A touching scene occurred the night before our departure. Out in the darkness along the track which led to numerous native villages we heard the thumping of native drums for an hour or more. We had heard them before, but never like this. It was as if some message were being signaled. Then there were torches, as natives began to assemble . . . a dozen boys ranging in age from six to twelve years, huddled in a conclave of low-voiced chattering and gesturing . . . The act was a combination of song and dance . . . After the boys had done their bit, Priscilla, wife of the native missionary . . . appeared with her two daughters. Side by side they sat cross-legged and sang in harmony . . . 'The Old Rugged Cross' and 'God Bless America' . . . There was a sadness in her voice when she said 'Good luck and God bless you — brave soldiers.'*<sup>5</sup>

On April 8, the last of the equipment was loaded on ships headed for the new campsite at Mange Point, ten miles southwest of Sixth Army Headquarters at Camp Cretin and some twenty miles southwest of Finschafen on the Lae-Finschafen trail. Two days later on April 10, the second Alamo Scouts Training Center was established. But there was a lot of work to do before it was ready. Tents had to be put up, water and electricity installed, a mess hall built, and tons of equipment organized. The site was in such a remote location that a road didn't even exist when



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the Scouts arrived. But putting up a new camp wasn't foremost in Bradshaw's mind. By now he had five teams of Alamo Scouts in the field and the invasion of Hollandia was fast approaching.

### **HOLLANDIA-AITAPE**

Following the rapid Allied victory in the Admiralties, MacArthur turned his attention to Hollandia, the principal Japanese trans-shipment and rear supply base in New Guinea. The invasion was planned for April 22, and involved a 985-mile leap from Goodenough Island, the principal Allied staging area in the Southwest Pacific. The Allies also planned a simultaneous invasion of Aitape to trap the Eighteenth Japanese Army between the Aitape force and the advancing Australians.

MacArthur again called on Krueger to plan and coordinate the invasion. Krueger ordered the 24th Infantry Division, under Major General Frederick A. Irving, to land in Tanahmerah Bay, some twenty miles west of Hollandia, and seize all air bases and adjacent areas. Likewise, Krueger ordered the 41st Infantry Division (less the 163d RCT), under Major General Horace H. Fuller, to assault Hollandia from the east. Upon landing, the two task forces would converge in a pincer movement and trap the Japanese in the rugged Cyclops Mountains separating Tanahmerah and Humboldt Bays. At the same time, elements of the 163rd Infantry (reinforced), under Brigadier General Jens A. Doe, were directed to land at Aitape, far to the east, and to seize the Tadjai air bases.

Given their recent success on the Los Negros and Male River missions, the Alamo Scouts were called upon to reconnoiter the projected landing areas. Working from I Corps Headquarters at Pim Jetty, REYNOLDS, THOMPSON, and SOMBAR TEAMS were anxious to go on a mission. The teams had been attached to I Corps

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intelligence since late March and were champing at the bit. They finally got their chance at Hollandia.

At dawn on April 22, two teams of Alamo Scouts landed with the 158th "Bushmaster" Regiment at Hollandia. REYNOLDS TEAM, led by Lt. Gean H. Reynolds, landed near Demta, a small village west of Hollandia near Humboldt Bay, while THOMPSON TEAM, headed by Lt. George S. Thompson, landed at Tablasoefa, east of Tanahmerah Bay.

As REYNOLDS TEAM, consisting of Cpl. Winfred E. McAdoo, Pvt. William C. Gerstenberger, Staff Sgt. Leonard J. Scott, Cpl. William R. Watson, and Pvt. Lucian A. Jamison, would discover rubber boat landings were often more dangerous than the enemy. On their way to shore high surf dashed them into a thirty-foot cliff sinking the craft. Fortunately, the Scouts clung to the rocks and climbed up to a ridge where they spent the night. The next morning the team traveled to Moeris Besar, a small, Dutch coastal village approximately one mile south of Demta, where they discovered signs of Japanese atrocities. In one native hut they found three men lying dead on the floor. Two were Dutch officers and one was a civilian. The officers had been shot in the head and stomach, while the civilian had been brutally beaten in the face with a club. Under the hut, the Scouts discovered a nude male body which had been severely violated. Although wild dogs had eaten parts of the corpse, the Scouts noticed that the man had been castrated and his left hand cut off at the wrist.

From there the Scouts traveled to Demta, where they saw no signs of the enemy. After returning to a point midway between Demta and Moeris Besar, the team set up an observation post. Several hours of watching brought no results and the Scouts headed back to Moeris Besar, where they contacted a PT boat for pick up. Meanwhile, Thompson and his team, composed of Sgt. Theodore T. (Tiny) Largo, Pfc. Joshua Sunn, Pvt. Joseph A. Johnson,



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**Pfc. Anthony Ortiz, and Sgt. Jack E. Benson, had been patrolling the area around Tablasoefa. But it was a dry run. After four days of looking for Japanese activity, they had seen only Americans.**

**Two days after the invasion three more teams of Scouts were on the move. SOMBAR TEAM and HOBBS TEAM both landed on White Beach with the invasion force, but had to wait until the 24th before taking off on a mission. The teams joined forces and went to Hollekang beach, where they expected to scout the trail leading from Hollekang to Tami Drome. After spending the first night bivouacked some 100 yards from their landing point, the teams moved out the following morning.**

**Once at Hollekang, the Scouts received a nondescript radio message cancelling the mission. But Lt. Woodrow Hobbs wasn't the type of man to sit still. Hobbs was named the top graduate of the American-Australian Commando School at Canungra, and was personally selected for Alamo Scouts training by General Innes P. Swift, commander of the 1st Cavalry Division.**

**Hobbs took his team and two members of Sombar's team back along the beach and into a swamp some fifty yards inland. Hobbs' team was a well-seasoned group. Staff Sgt. Vern H. Miller, Sgts. Herman S. Chanley, Edgar G. Hatcher, John E. Phillips, and Private Joe (Pete) Moon were all graduates of the second training class. With them were Sgt. Virgil P. Howell and Pfc. Ora M. Davis, both of whom had a taste of scouting when they acted as the contact team during Barnes first mission near the Male River.**

**Meanwhile, Sombar and his team remained in the area for the day. The next morning they crossed the Laho River and followed the coast to Cape Kassoe, where they came upon two native shacks. One was abandoned, but the other had a saddled horse standing outside. Sombar knew that none of the natives would have a saddled horse, so he**

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investigated. A quick look in the window said it all. Sombar pulled the pin on his grenade and tossed it through the window at a Japanese soldier who was sitting on a bed changing his clothes. The grenade exploded and Sombar rushed in only to find that the man was unharmed. Sombar delivered a crushing right to the man's jaw, dropping him to the floor. As the soldier attempted to get up, Sombar raised his carbine and fired.

From there Sombar led the team back to Hollekang, where he learned from the 2nd Battalion of the 34th Infantry of the plight of over 100 missionaries who had been held by the Japanese at Goya, some six miles inland. After three miles of slogging through knee-high mud, the team discovered an exhausted missionary who had been sent to find help. Sombar told Milda to take the missionary back to Hollekang, while the rest of the team continued to Goya. Three more gruelling miles brought the Scouts to the edge of the village. "Oh, it is so good to see a real man again!" exclaimed an elated nun as she threw her arms around the red-faced team leader.<sup>6</sup>

The remainder of the team fanned out and conducted a quick search of the village. Behind one of the huts the Scouts found a Japanese Naval officer sleeping soundly. He was now their prisoner. Weeks later, Sombar learned that the prisoner, Antonio Yenomi, had proudly beheaded an American Fifth Air Force officer at Wewak. Following a good night's rest, the team gathered its prisoner and three Polish missionaries to return with them to Hollekang. The party arrived at noon on April 27, and was greeted by HOBBS TEAM and soldiers of the 34th Division, who immediately sent men to Goya to evacuate the rest of the missionaries.

Back at the Alamo Scouts Training Center Lt. Henry L. Chalko was bored. A graduate of Harvard University, Chalko had joined the Naval Amphibious Scouts in July 1943 looking for action. When the Amphibious Scouts



# SILENT WARRIORS

The Alamo Scouts, Sixth Army's Special Reconnaissance Unit of World War II, provided intelligence-gathering and tactical reconnaissance in the Pacific Theater. During the war, they performed over 106 successful missions in the Admiralty Islands, New Guinea and the Philippines, most deep behind enemy lines. The Scouts took part in liberating two P.O.W. camps.

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# Alamo Scouts Training Center



To whom \_\_\_\_\_ Date June 22, 1944

40th Infantry \_\_\_\_\_ CONNELL Sgt. 38087930

of instruction \_\_\_\_\_ completed the prescribed course

from 15 \_\_\_\_\_ **TRAINING CENTER**

of his proficiency \_\_\_\_\_ is awarded in recognition

Remarks \_\_\_\_\_ included in the course.



McGowen Team after the 1st Alamo Scout mission, the reconnaissance of Los Negros Island, New Guinea, 27-28 Feb 1944.

*General Krueger.*  
*W. Bradshaw*  
 W. BRADSHAW  
 Colonel, G.S.C.  
 Director of Training

## Alamo Scouts Diary

By Kenneth Finlayson



*Inserted* at 7:00 p.m. by Navy PT boat onto the deserted beach, the small team moved stealthily along the trail until it reached its objective at 2:00 a.m. Two local guides were sent into the tiny village to obtain the latest information on the enemy disposition and ascertain the status of the personnel held hostage there. On the guide's return, the team leader modified his original plan based on their information and the men dispersed to take up their positions.

The leader with six team members, the interpreter, and three local guides moved to the vicinity of a large building where eighteen enemy soldiers slept inside. Two team members and one native guide took up a position near a small building occupied by two enemy intelligence officers and a captured local official. The assistant team leader, four men, and two guides were to neutralize an enemy outpost located more than two miles away on the main road to the village. The outpost was manned by four soldiers with two machine guns. This team would attack when they heard the main element initiate their assault in the village.

The team leader opened fire on the main building at 4:10 a.m. and within three minutes his team killed or wounded all the enemy combatants. The two enemy officers in the small hut were killed and their hostage released. In the village, the interpreter and the native guides went from hut to hut gathering the sixty-six civilian hostages. As soon as everyone was accounted for, the group began moving to the pickup point on the beach. The assistant team leader and his men were unable to hear the brief gun

battle in the village and waited until 5:30 before attacking the guard post from two sides, killing the four enemy soldiers. After neutralizing the guard post, the team moved to the pick-up point, secured the area, and made radio contact to bring in the boats for the evacuation. The main body with the newly-freed hostages soon arrived. By 7:00 a.m., everyone was safely inside friendly lines.<sup>1</sup>

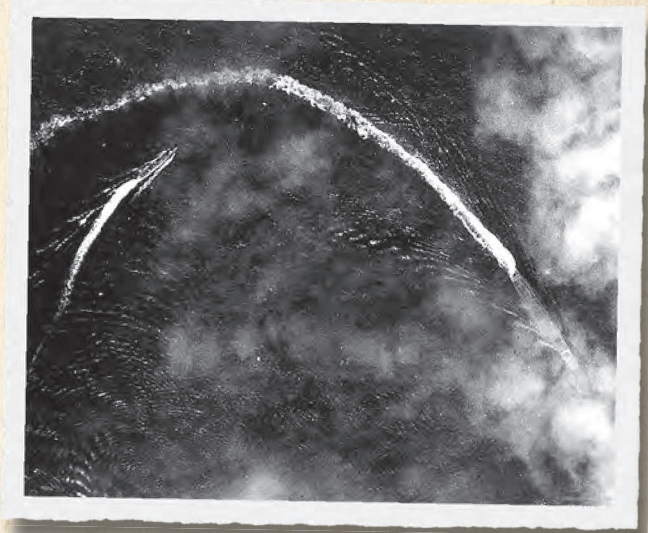
This well-planned, flawlessly executed hostage rescue could easily have come from today's war on terrorism. In reality, it took place on 4 October 1944 at Cape Oransbari, New Guinea. The team that rescued sixty-six Dutch and Javanese hostages from the Japanese were part of the Sixth U.S. Army's Special Reconnaissance Unit, called the Alamo Scouts. This article will look at the formation, training, and missions of that unique special operations unit.

## *The Japanese Advance*

Following the 7 December 1941 attack on Pearl Harbor, the Japanese military was on the march. The Imperial Army had been fighting in Manchuria since 1931 and was a veteran, battle-tested force. The Japanese grand strategy was to drive the European nations from their colonial holdings in Asia and implement the Greater East Asia Co-Prosperity Sphere, an involuntary assembly of Asian nations under Japanese domination. In December 1941, Nazi Germany occupied the Netherlands and France,



*Nellist Team after the Oransbari Rescue mission. Pictured L to R, back row, Andy E. Smith, Galen C. Kittleson, William E. Nellist, kneeling, front row, Wilbert C. Wismer, Sabas A. Asis and Thomas A. Siason. Taken New Years Day, 1945 on Leyte, Philippine Islands.*

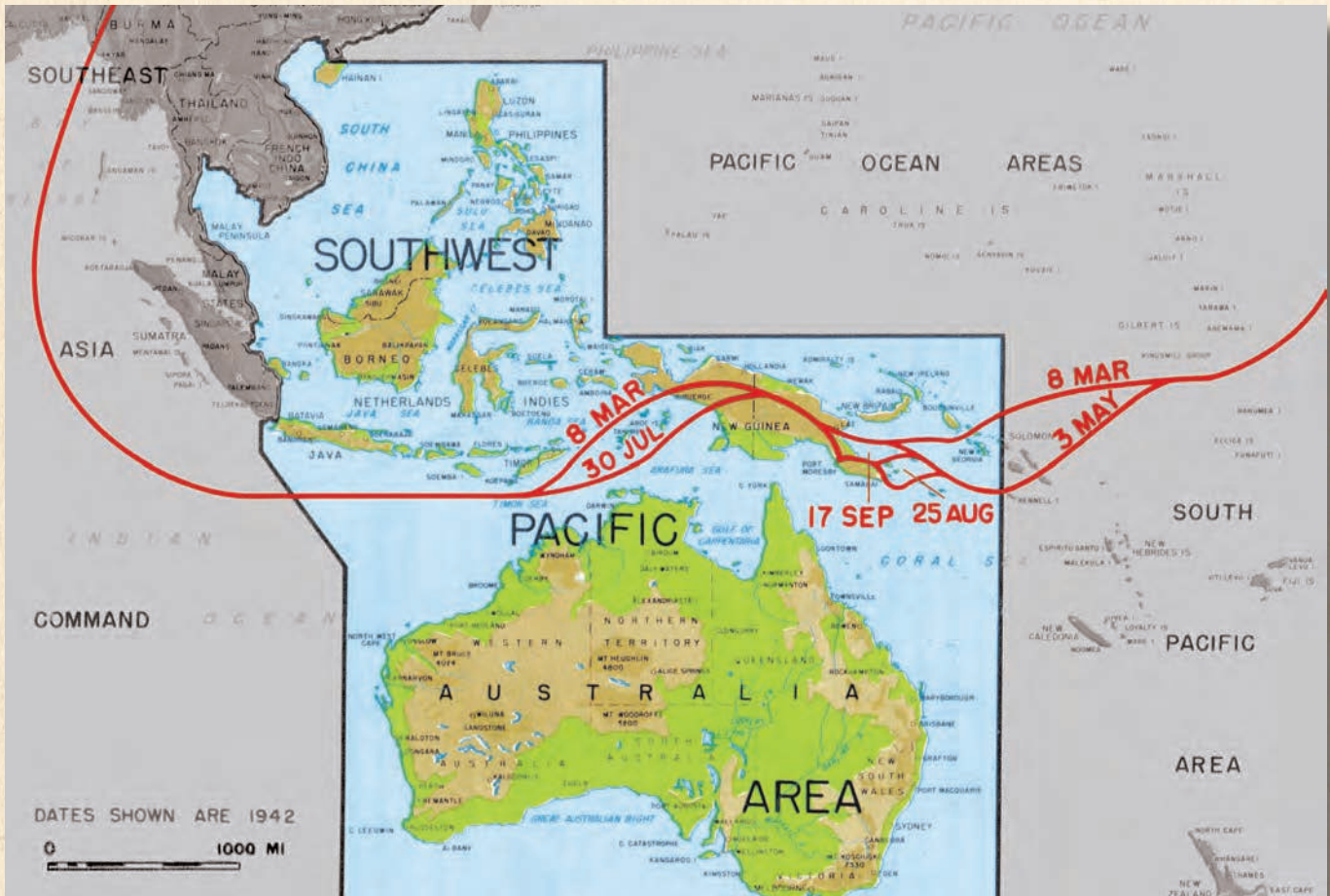


*The Japanese aircraft carrier Akagi was sunk by aerial attack at the Battle of Midway. To the left a Japanese destroyer maneuvers to avoid the American aircraft. The defeat at Midway spelled the end of the Japanese expansion.*

and the British Commonwealth was locked in a struggle with the Axis. The United States was preoccupied with building up its own military forces and providing war materials to the embattled British. Japan chose this time to launch their attack on Pearl Harbor, and begin offensive operations throughout East Asia. The initial months of the war were a string of unbroken Japanese victories.

August 1942 was the high-water mark for the Japanese military. The Imperial Army captured Malaya and





—General Douglas A. MacArthur's Southwest Pacific Area. The red line shows the limit of advance of the Japanese military in 1942. MacArthur's campaign strategy was to retake New Guinea and move north and recapture the Philippines prior to the assault on the Japanese home islands.

Singapore, occupied Borneo, Sumatra, and Java in the Dutch East Indies, and marched into Thailand. They pushed the British out of Burma, and dealt the United States a major defeat in the Philippines. Japanese forces swept south and east into New Guinea, where they established major bases at Rabaul on New Britain Island, and Tulagi in the Solomon Group and occupied the Marshall and Gilbert Islands in eastern Micronesia. They pushed north to seize Attu and Kiska in the Aleutians. Their forces were threatening Australia when the U.S. Navy decisively defeated the Japanese Navy at the Battle of Midway in June 1942. On 7 August 1942, the United States and her allies attacked Guadalcanal, Tulagi, and Tanambogo, effectively checking further Japanese expansion.<sup>2</sup> From this point on, the Japanese were forced to adopt a defensive posture to consolidate their holdings and prepare to fight off the growing strength of the Allies.

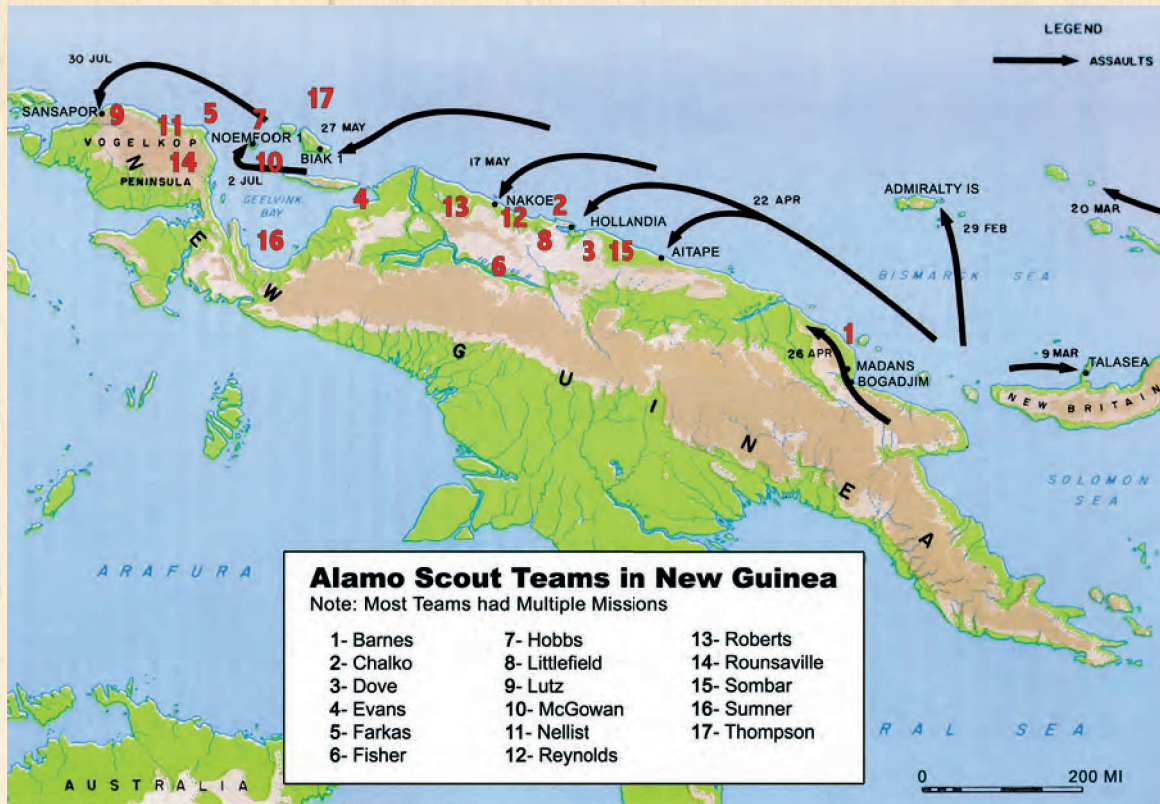
Maritime operations against the Japanese took place in two theaters. The Southeast Asia Command was under British control and led by Admiral Lord Louis Mountbatten. The Pacific Theater was divided into two areas. The largest was the vast Pacific Ocean Areas (POA) commanded by Admiral (ADM) Chester W. Nimitz, the Commander in Chief, Pacific Fleet, The POA extended from the continental United States westward across the ocean to Japan and included most of the Pacific

islands. The South Pacific area was commanded by Rear Admiral Robert L. Ghormley. The second subdivision, the Southwest Pacific Area (SWPA), encompassed Australia, New Guinea, the Dutch East Indies, and the Philippines and was under the command of General (GEN) Douglas A. MacArthur.<sup>3</sup> It was in the SWPA that the Alamo Scouts were created and operated.

### The SWPA and Sixth Army

After his evacuation from the Philippines to Australia in March 1942, GEN MacArthur, was installed as the Commander in Chief of the SWPA, a joint command composed of United States, Australian, and Dutch forces. Of the major theaters of World War II, only the China-Burma-India Theater (CBI) was more poorly resourced than the SWPA. MacArthur's General Headquarters (GHQ) directed three subordinate sections, the Allied Air Forces (Lieutenant General George C. Kenney, U.S. Army Air Forces), Allied Land Forces (General Sir Thomas A. Blamey, Australian Army) and the Allied Naval Forces, (Rear Admiral Arthur S. Carpender, U.S. Navy).<sup>4</sup> In January 1943, MacArthur specifically requested that his long-standing friend Lieutenant General (LTG) Walter Krueger be assigned to command the newly constituted Sixth Army.<sup>5</sup> In a move designed to keep the bulk of the American ground troops separate from the Allied Land





The campaign in New Guinea. LTG Krueger's Alamo Force executed a series of amphibious landings along the northern coast of New Guinea. The Alamo Scouts conducted 40 reconnaissance missions on the landing beaches and the off-shore islands in support of Alamo Force.

Forces, MacArthur established a new command, the New Britain Force, around the Sixth U.S. Army, reporting directly to SWPA GHQ.<sup>6</sup> The name was soon changed to the Alamo Force, because Sixth Army originally stood up in San Antonio, Texas, the home of the Alamo. LTG Krueger noted:

*The reason for creating Alamo Force and having it, rather than Sixth Army, conducting operations was not divulged to me. But it was plain that this arrangement would obviate placing Sixth Army under the operational control of the CG, Allied Land Forces, although that Army formed a part of these forces. Since the CG, Allied Land Forces, likewise could not exercise administrative control of Sixth Army, it never came under his command at all.<sup>7</sup>*

General MacArthur's strategy in the SWPA was to conduct a series of amphibious landings along the northern coast of New Guinea, capture the Japanese-held islands of the New Britain archipelago and destroy the major Japanese naval base at Rabaul. This would eliminate the Japanese threat to Australia and begin the process of recapturing the Philippines prior to assaulting the Japanese home islands. From July through September, 1942, Australian troops on New Guinea fought the Japanese between Port Moresby and the northern coast. The attack followed the treacherous Kokoda Trail across the towering Owen Stanley Mountains. The enemy's final attempt to consolidate his holdings on New Guinea's northern coast was repulsed at Milne Bay.<sup>9</sup> Fierce fighting led to Allied victories at Buna, Gona, and Sanananda. The Japanese penetration along the New Guinea coast and the occupation of Solomon Islands were disrupted. The Allies began to roll them back when the Sixth Army commenced operations.

The Japanese still occupied the majority of northeastern New Guinea, with strongholds at Lae and Salamaua. LTG Krueger's Alamo Force launched an offensive in June 1943, landing on Woodlark and Kiriwina islands on 30 June.<sup>10</sup> Airfields were rapidly built on these islands. The Allies began to move methodically up the northeastern coast of New Guinea, capturing Lae and Salamaua and executing amphibious landings further westward. For the Army,



L to R: LTG Walter Krueger, MG Franklin C. Sibert, RADM William M. Fechetler, BG Charles E. Hardis, New Guinea. General MacArthur said of General Krueger, "He was swift and sure in attack; tenacious and determined in defense; modest and restrained in victory-I don't know what he would have been in defeat because he was never defeated."



When LTG Krueger arrived in Australia in February, 1943, Sixth Army contained I Corps, the 32<sup>nd</sup> and 41<sup>st</sup> Infantry Divisions, the 1<sup>st</sup> Marine Division (under Army operational control), the 158<sup>th</sup> Infantry Regiment, the 503<sup>rd</sup> Parachute Infantry Regiment, the 40<sup>th</sup> and 41<sup>st</sup> Antiaircraft Brigades, the 98<sup>th</sup> Field Artillery Battalion, (Pack) and the 2<sup>nd</sup> Engineer Special Brigade. The 24<sup>th</sup> Infantry and 1<sup>st</sup> Cavalry Divisions joined Sixth Army in May and July, 1943 respectively. By November 1944, prior to the invasion of the Philippines, the Alamo Force (Sixth Army) had grown considerably. It now included the X Corps composed of the 1<sup>st</sup> Cavalry Division, the 24<sup>th</sup> Infantry Division and the 6<sup>th</sup> Cavalry Regiment and the XXIV<sup>th</sup> Corps, made up of the 7<sup>th</sup> and 96<sup>th</sup> Infantry Divisions, the 11<sup>th</sup> Airborne Division, the 20<sup>th</sup> Armored Group, and the 503<sup>rd</sup> Parachute Infantry Regiment. Included in the Sixth Army troop lists were the 32<sup>nd</sup> and 77<sup>th</sup> Infantry Divisions, the 2<sup>nd</sup> Engineer Special Brigade, the 21<sup>st</sup> and 381<sup>st</sup> Infantry Regiments and the 6<sup>th</sup> Ranger Battalion.<sup>8</sup>



amphibious operations on this large scale were a new experience, and there were many lessons to be learned. It was during the conduct of these early battles that LTG Krueger saw the need for more accurate timely intelligence, and ground reconnaissance of the landing areas.

### The Birth of the Alamo Scouts

Intelligence about the enemy disposition and the conditions on the ground on the New Guinea mainland were hard to come by. Aerial overflights were not effective in piercing the thick jungle that began at the edge of the beaches, and there was no human intelligence network in place in the Japanese-occupied areas. In the other theaters of World War II, the Office of Strategic Services (OSS) provided much of this tactical intelligence. Douglas A. MacArthur specifically prohibited the OSS from conducting operations in the SWPA. He would not allow any organizations in his theater that did not report directly to him.<sup>11</sup> In July 1942, in an attempt to address the intelligence shortfalls, GEN MacArthur established an organization to collect information through clandestine operations behind enemy lines. The Allied Intelligence Bureau (AIB) incorporated several loosely-knit organizations, including the Australian "Coast Watchers" and made an effort to insert agents with radios by submarine.<sup>12</sup> The Navy also established a short-lived organization, the Amphibious Scouts, on Fergusson Island in July 1943 to conduct reconnaissance of the landing beaches. The Amphibious Scouts included several Army personnel. The unit was disbanded in December 1943. The innovative Krueger, conscious of the intelligence failures that occurred before the battles on Kiska Island in the Aleutians and at Guadalcanal, took steps to acquire his own intelligence gathering capability.<sup>13</sup>

LTG Krueger said, "The trouble that we had met in getting information of the enemy and our objective area



Troops of the 32<sup>nd</sup> Infantry Division cross a bridge in the jungle during the battle of Buna in New Guinea, November 1942. The 32<sup>nd</sup> was a Sixth Army unit in the Alamo Force.



Australian "Coast Watchers" in late 1943. The civilian Coast Watchers were later incorporated into the Australian Navy and were a vital part of MacArthur's Allied Intelligence Bureau. One of the few American Coast Watchers, Frank Nash, is seated on the right, bottom row.



LTC Frederick Bradshaw (r) with LTC Sylvester Smith of Sixth Army G-2 on the boat dock at the Alamo Scout Training Center (ASTC), Fergusson Island, New Guinea. Bradshaw, a lawyer from Mississippi, formed the ASTC and served as the first director.



The Sixth Army orders establishing the ASTC required Bradshaw to have the school set-up and training its first class by 1 January 1944 at a location in the vicinity of Sixth Army Headquarters, then on Goodenough Island off the east coast of New Guinea. The mosquito-infested swamps and rough surf around Goodenough Island offered no suitable locations for the school. On 30 November, Bradshaw dispatched two former Amphibious Scouts, Lieutenants Daily P. Gambill and Milton Beckworth, and two enlisted men to follow up a rumor that the Navy reconnaissance unit was being disbanded. They had a camp on Fergusson Island.<sup>16</sup> The rumor proved true, and on 3 December 1943, Bradshaw and his staff moved to what would be the first of five homes of the ASTC. The school would run until after the end of the war, closing in September 1945.

prompted me to issue orders on 28 November 1943 establishing a training center near Headquarters, Alamo Force for training selected individuals in reconnaissance and raider work.<sup>14</sup> Sixth Army General Order 353-B established the Alamo Scout Training Center (ASTC) to provide trained reconnaissance troops to Sixth Army units. Krueger shrewdly used his prerogative as an Army commander to establish a training center instead of trying to create a new unit, an option that required approval by the Army General Staff. Krueger also converted the 98<sup>th</sup> Field Artillery Battalion (Pack) into the 6<sup>th</sup> Ranger Battalion when the need for a raiding capability was identified.

LTC Frederick W. Bradshaw, the Sixth Army Assistant G-2 was selected to command the ASTC. The self-effacing former lawyer from Mississippi was initially assisted by Major (MAJ) John F. Polk from the 1<sup>st</sup> Cavalry Division. Polk soon moved into the role of liaison with Sixth Army Headquarters and Bradshaw picked Captain (CPT) Homer A. Williams to be his executive officer. A gruff personality and a strict disciplinarian, Williams was the perfect counter-weight to the quiet, good-humored Bradshaw. Bradshaw made equally good choices with his other staff officers.

A critical position in establishing and maintaining the school was the supply officer. Bradshaw recruited First Lieutenant (1LT) Mayo S. Stuntz who had served in the Amphibious Scouts. An inveterate "scrounger", Stuntz was able to work wonders in the logistically constrained environment of the SWPA, provided, "no questions were asked."<sup>15</sup> In addition to building his staff, Bradshaw was on the look-out for a location for the school. It was likely to be a "bare-bones" operation.

The native village of Kalo Kalo sits on a quiet bay on the northwest coast of Fergusson Island. Only a 30-minute boat ride from Sixth Army Headquarters, the spot was ideal. It provided good areas for training in the jungle surrounding the village and easy access to the ocean for amphibious training in rubber boats. LTG Krueger sent construction engineers to build classrooms, a supply room, boat docks and a 50-man dining hall, all properly screened with cement floors. 1LT Stuntz "found" a kerosene-powered refrigerator, generators, and electric lights for the camp, a radio and movie projector for the dayroom, and a host of other amenities. 1LT William Barnes, who graduated in the first class recalled, "We had a wonderful setup on Fergusson Island. It was the nicest of all the camps. Stuntz rigged up a latrine and even managed to find a couple of toilet seats. That's probably the reason the men called the camp the 'Hotel Alamo'."<sup>17</sup>

As the construction of the camp continued, LTC Bradshaw began to fill out his instructor corps. The demise of the Amphibious Scouts provided him with several soldiers who had served in the Navy recon unit.

*"the men called the camp the 'Hotel Alamo'."*

*—1LT William Barnes*

On 27 December 1943, a month after the order establishing the ASTC, the first class of Alamo Scouts began training at Fergusson Island.

### Alamo Scout Training and Selection

Candidates for the Alamo Scouts came from units within the Sixth Army, initially from the 32<sup>nd</sup> Infantry



Amphibious Scouts SSI



98th Field Artillery Battalion Patch



6th Ranger Battalion Scroll



Division (32<sup>nd</sup> ID) and 158<sup>th</sup> Regimental Combat Team (the Bushmasters). The Scouts were all volunteers, and units were tasked to screen candidates for suitability prior to sending their names forward. LTG Krueger's influence was felt down to the lowest level. 1LT Robert Sumner volunteered for the Scouts in April 1944. "The Army Commander, General Krueger, insisted on quality people to begin with, and took a personal interest that quality people were made available. This is very clearly stated in his original order. So the commanders knew that the old man would look askance on this thing if a bunch of turkeys kept turning up all the time. So, you got a pretty good guy," said Sumner.<sup>18</sup>

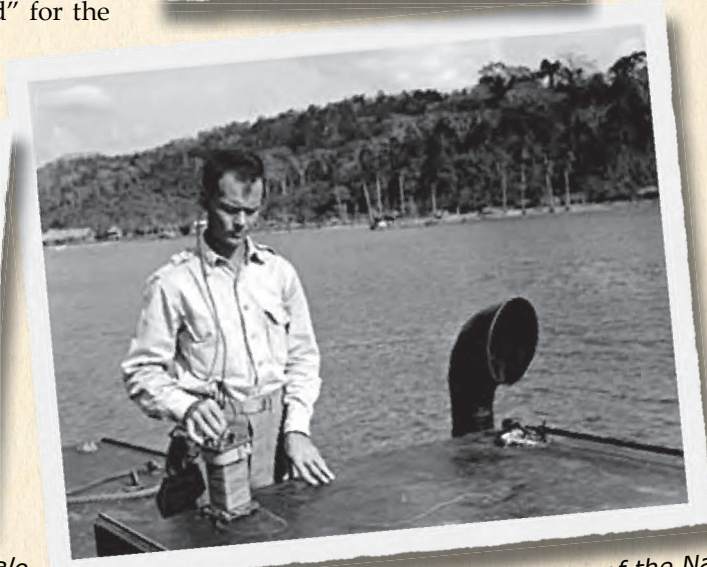
Nineteen year-old Private First Class (PFC) Galen C. Kittleson won a Silver Star on Noemfoor Island with the 503<sup>rd</sup> Parachute Infantry. He "volunteered" for the Alamo Scouts with little knowledge of



1LT Mayo Stuntz with 1LT Rafael Ileta at the last ASTC on Luzon, Philippine Islands. Stuntz was the ASTC Supply Officer renowned for his ability to "scrounge necessities." Rafael Ileta was a West Point graduate who later rose to be Chief of Staff of the Philippine Army and Secretary of National Defense.



The first Alamo Scout Training Center at Kalo Kalo was nicknamed the "Hotel Alamo." The industrious 1LT Mayo Stuntz had provided the camp with refrigeration, electricity, and other amenities not seen in the SWPA Theater. The sign travelled to subsequent camps.



1LT Myron Beckwith was an Army veteran of the Navy's Amphibious Scouts. As an instructor at the ASTC, he demonstrates the operation of a special waterproof radio to be used by the reconnaissance teams.



Major Homer "Red" Williams was the executive officer for LTC Bradshaw before becoming the ASTC director. A no-nonsense disciplinarian, Williams was an effective counter-part to the soft-spoken Bradshaw.



Trainees at the first Alamo Scout Training Center on Fergusson Island, New Guinea. The training center would be established in five separate locations in New Guinea and the Philippines as the Southwest Pacific Campaign unfolded. A total of eight classes were completed, and a ninth was cut short in September 1945, after the Japanese surrender.





*The Alamo Scout Training Center at Cape Kassoe, Hollandia, New Guinea. Classes #4 and 5 were run from this facility between August and November 1944. Later training centers were not as plush as the original "Hotel Alamo."*

There were five separate Alamo Scout Training Centers established between December 1943 and September 1945.

Camp 1 - Kalo Kalo on Fergusson Island, New Guinea.

27 Dec 43 – 31 Mar 44, Classes 1 and 2.

Camp 2 - Mange Point, Finschafen, New Guinea.

15 May 44 – 22 Jun 44, Class 3.

Camp 3 - Cape Kassoe, Hollandia, New Guinea.

31 Jul 44 – 28 Oct 44, Classes 4 and 5.

Camp 4 - Abuyog, Leyte, Philippines.

26 Dec 44 – 1 Jun 45, Class 6.

Camp 5 - Mabayo (Subic Bay), Luzon, Philippines.

23 Apr 45 – 2 Sep 45, Classes 7 and 8.

the unit. "I and a Lieutenant Cole from the 503<sup>rd</sup> were told, 'We are going to send you to a recon school because you are a scout.' I didn't really know what the hell the Alamo Scouts were. I thought, well I suppose the more I can learn, the better off I'll be. They really didn't say it was voluntary, either."<sup>19</sup> SGT Zeke (Chief Thunderbird) McConnell, a Native American Cherokee with the 40<sup>th</sup> Infantry Division on New Britain recalls "My Colonel came up and said, 'You're an Indian. How would you like to go to Scout training? Then you can come back and show us how to do it.'"<sup>20</sup> Unfortunately for the Colonel, McConnell remained with the Alamo Scouts when he completed the course. Volunteer or not, everyone went through a rigorous six-week training program.

The Alamo Scout course was designed to maximize the soldier's ability to penetrate behind enemy lines and gather accurate, timely intelligence. Heavy emphasis was placed on the skills necessary for a successful recon patrol. 1LT Robert Sumner went through the ASTC after attending a company commander's course at Fort

Benning, GA. "The training program [at the ASTC] was an advanced sort of proposition. We had all the basic training, of course, in map reading, area photography, individual weapons. However, at the Scout Training Center, your training was detail work on reading maps and reading aerial photography."<sup>21</sup> The nature of the Scout mission, amphibious insertion onto the landing beaches, dictated that a major portion of the training be devoted to the use of rubber boats.

The Alamo Scouts depended on small inflatable rubber boats (RB-7's) for their entry into enemy territory. "I think the rubber boat training was the easiest part, but we practiced it a lot," said Galen Kittleson. "We went out into the ocean and worked with those waves coming in. Because if you don't know a little bit about it, you turn sideways and you're automatically capsized."<sup>22</sup>

Scouts were also expected to be proficient open water swimmers. Corporal (CPL) Andrew E. Smith remembers an unusual training exercise. "There were two taped off areas in the bay. You went under water at one end and they [the cadre] told us, 'Now don't come up until you get to the other one because there are going to be bullets hitting the water.' It was ninety or a hundred yards."<sup>23</sup>

Every aspect of patrolling, including conducting operations in the tropical jungle, was addressed in the training. Sumner said "There was an Australian officer, a Lieutenant Ray Watson who was attached to the Scouts as one of the training cadre. He had his own native police boys with him. In their pidgin English, they gave us instruction in jungle survival."<sup>24</sup> 1LT Tom Rounsaville described the training "as nothing really new. It was just concentrated, a hell of a lot of physical stuff, a lot of work in the water because we were going to be working in the water a lot. And stuff like map reading and patrolling, [for] the first ten days or two weeks."<sup>25</sup> "The physical training aspect was called Ju-Jitsu, and we had a young fellow who was one of the very, very few American brown-belters. We're



talking the 1940's, and he was very good," said Robert Sumner.<sup>26</sup> Not everyone had a positive experience with the physical training. "They paired me with big Gib [Gilbert] Cox," said Andrew Smith. "He was a football player from Oregon State and he threw me around like a pretzel. Then he'd say, did I hurt you, Smitty?"<sup>27</sup>

The six week training program of the Alamo Scouts involved an initial period devoted to classroom and hands-on instruction. "The classroom portion was very detailed and went on until 2200 [hours] each night. [It was] four weeks of this training, from 0800 to 2200 at night. Classroom [work] with practical training on the ground. Then we went into a series of exercises," said

Robert Sumner.<sup>28</sup> Each class of students was divided into teams of one officer with five or six enlisted men and the members were rotated throughout the training. This was by design and supported one of the unique selection aspects of the Alamo Scouts.

1LT Robert Sumner went through the fourth class at the ASTC. "Everybody trained with everybody else during this entire period, so that you would get to know other men and they would get to know you. There was a logical reason for this, which we were unable to see to begin with."<sup>29</sup> The reason became clear when it was time to execute the culminating exercise of each class.



A member of Littlefield Team, Native American SSG Zeke McConnell participated in over a dozen missions in New Guinea and the Philippines. Shown here after the war, Staff Sergeant McConnell wears the Alamo Scout patch on his right shoulder.



Alamo Scout training was arduous and intensive, concentrating on reconnaissance techniques and honing the men's ability to move through the jungle. Here trainees at the ASTC at Kalo Kalo conduct a forced march on Fergusson Island, New Guinea, February 1944.



LTG Walter Krueger congratulates SGT Gilbert Cox after awarding him the Silver Star. PFC Galen C. Kittleson, also a Silver Star recipient is in the background. Leyte, Philippines, 1944.



32nd Infantry Division SSI



158th Regimental Combat Team Patch



503rd Parachute Infantry Patch



40th Infantry Division SSI



Trainees of ASTC Class #4 at Hollandia, New Guinea were instructed in Ju-Jitsu as part of the physical training program. The training was taught by one of the few Americans qualified in this form of martial arts.



Alamo Scout trainees had to swim an under-water course under fire. Here 1LT Preston Richard fires at the surface from the boat with a Thompson sub-machinegun. LTC Frederick Bradshaw, ASTC Director (hands on hips), and MG Innis P. Swift, commander of I Corps (in helmet) observe the training, ASTC Fergusson Island, January 1944.

In a rare example of a unit conducting training in enemy-occupied terrain, the Scouts ran their final exercise in disputed areas. "At the end of the class, they would break us out into teams and send us on a mission, usually into some of the areas that were recently taken over by us. I mean there were still some Japanese in them, but they were kind of a virgin area," said 1LT Tom Rounsaville.<sup>30</sup> Sergeant (SGT) Gilbert Cox remembers his team going onto the New Guinea mainland. "We ran a mission back to the Tami-Avery Trail that the Japanese were using



A Scout team at the 1st ASTC prepares to conduct a night reconnaissance. Front L-R, PFC Joseph Johnson, 1LT Michael Sombar and CPL David Milda. Back L-R, SGT Byron Tsingine, SSG Alvin Vilcan, CPL John A. Roberts, CPL Walter A. MacDonald and SSG Caesar Ramirez, 8 January 1944.

# Alamo Scouts Training Center



Southwest Pacific Area

Date June 22, 1944

To whom it may concern:

This is to certify that ZEKE McCONNELL Sgt. 38087930  
40th Infantry Division has successfully completed the proscribed course of instruction at the ALAMO SCOUTS TRAINING CENTER from 15 May to 22 June. This certificate is awarded in recognition of his proficiency in all subjects included in the course.  
Remarks Excellent - ALAMO SCOUT

By command of Lieutenant General Frederick W. Bradshaw

F. W. BRADSHAW  
Colonel, G.S.C.

Director of Training

The graduation certificate of SGT Zeke McConnell of Littlefield Team. The certificate reads "Excellent-Alamo Scout." If the rating Excellent or Superior appeared on the certificate, the individual was retained on a Scout team. If not, he returned to his unit.





*An Alamo Scout Team, (most likely Dove Team) lands from a Landing Craft-Vehicle on the rocky coast near Tanahmerah Bay, New Guinea. The team was scouting the area prior to the amphibious landings to seize Hollandia, June 1944.*

selected out of the first five classes conducted operations supporting Sixth Army as it moved up the northern coast of New Guinea.

### The New Guinea Missions

The first Alamo Scout mission was conducted on 27 and 28 February, 1944 by 1LT John R. C. McGowen's team. Alamo Scout teams were generally identified by the team leader's name. McGowen Team was to conduct a pre-invasion reconnaissance of Los Negros Island in the Admiralty Island chain. Transported by Catalina PBY Flying Boat, the team encountered bad weather that delayed the insertion until dawn was breaking. The Scouts identified the Japanese positions and pinpointed their areas of concentration, information that proved invaluable for selecting the bombing targets for the invasion. On the exfiltration, the nervous pilot refused to slow the aircraft sufficiently to allow the team, barely able to clamber aboard the moving PBY, to recover their rubber boat. The mission of McGowan Team validated

to cross the Owen Stanley Mountains. We saw a few dead guys that didn't make it."<sup>31</sup> At the conclusion of these exercises, each man was given an opportunity to evaluate his fellow classmates.

Using a secret ballot, each enlisted man was asked to rank in order of preference, the officer he would most like to serve under, and the five other enlisted men he wanted on his team. Officers were asked to provide the names of five enlisted men they would like to have on their team, in rank order. CPL Andrew Smith said, "I was to put on a piece of paper, the person I would most like to associate with on missions. Of course, there wasn't a man who graduated that I wouldn't gladly go with."<sup>32</sup> These peer evaluations were combined with a cadre assessment of each man. The projected mission requirements of Sixth Army determined who and how many Alamo Scouts would come from each class.<sup>33</sup> Who was selected was not revealed until the graduation ceremony.

"On graduation day, we formed up in platoons, about an eight or nine-man squad with the lieutenant standing at the end. All the cadre officers were there, all lined up neatly. The director of training would make a few remarks, you know, the usual hype, and then the graduation exercise would start. The young officer was called forward. He marches up, salutes the director, and receives his diploma. And this was the first time you would know if you had been selected," said Robert Sumner.<sup>34</sup> If the words "Superior or Excellent - Alamo Scout" appeared on the diploma, the man was retained at the ASTC. If his diploma read "Alamo Scout", he was a successful course graduate, but returned to his unit. On average, between 20 and 25 Scouts were selected from each class, enough for three complete teams. The teams



*LTG Walter Krueger inspecting trainees at the Alamo Scout Training Center. Corporal Robert Beattie is in the foreground.*



*A Consolidated PBY Catalina Flying Boat was used to insert and extract the McGowen Team on Los Negros Island. Difficulty in launching and recovering the team ended the use of the PBY as a means to insert Alamo Scout teams.*



the Alamo Scout program and led to, among other lessons learned, the abandonment of the "Flying Boat" as a means of delivering teams. Subsequent missions went in by submarine or Navy Patrol Torpedo (PT) boat.<sup>35</sup>

Nearly forty Alamo Scout missions on the mainland of New Guinea and nearby islands were run by seventeen teams from the first five graduating classes of the ASTC.<sup>36</sup> With the exception of the rescue of the civilian detainees at Cape Oransbari, reconnaissance was the primary mission of these teams. LTG Krueger took a close personal interest in the Scout operations. PFC Gil Cox said, "When we were planning for a mission, LTG Krueger often briefed the teams himself."<sup>37</sup> Dove, Nellist, and Rounsaville Teams were combined for one of the final missions in New Guinea, the Cape Oransbari rescue described at the beginning of this article.<sup>38</sup> When the tide of battle shifted from New Guinea to the Philippines, the mission of the Alamo Scouts changed.

Unlike New Guinea and the adjacent off-shore islands, the Philippines had well-developed resistance movements of Filipinos and Americans. Men such as LT Donald Blackburn, LTC Wendell Fertig, and MAJ Russell Volkman stayed behind following the surrender of the U.S. forces in May 1942. They fled to the interior regions and waged guerrilla warfare against the Japanese Army. When the United States began landing on the different Philippine islands, the guerrillas increased their activity against the Japanese, necessitating the need for communication between the guerrillas and the U.S. Army. While still continuing their reconnaissance missions, the new mission for the Alamo Scouts was to be the liaison between these resistance groups and the Sixth Army.

## The Philippines

The U.S. strategy for liberating the Philippines involved initial landings on the island of Leyte in October 1944, followed by landings on Mindanao and Samar before finally capturing Luzon and the capitol city of Manila.<sup>39</sup> The capture of Leyte, located in the center of the Philippine Archipelago, allowed the U.S. to build airfields and achieve air superiority over the entire region. On 17 October 1944, the first U.S. forces, the 6<sup>th</sup> Ranger Battalion, landed on Homonhan and Suluan Islands which guarded the approaches to Leyte Gulf and the island's capitol of Tacloban.<sup>40</sup> Alamo Scout teams were actively involved in the landings, providing reconnaissance of the beaches and intelligence on the enemy disposition.

Following the initial landings, Alamo Scout teams were inserted to reconnoiter future landing beaches. Littlefield Team and McGowen Team were inserted at Palo, on Leyte. Nellist Team landed on Mindanao and Sumner Team on Samar at the same time.<sup>41</sup> These missions were all of two to three days in length. Later liaison missions were of much greater duration.

The team of 1LT Woodrow E. Hobbs was inserted at Cananga on Leyte on 12 November 1944 and remained on the island until 5 December. 1LT Robert



*Alamo Scout Team Leaders following an awards ceremony at Leyte, Philippines in December 1944. L-R, 1LT William Nellist, 1LT Thomas Rounsaville, 1LT Robert Sumner, and 1LT John Dove.*



*The Navy's Patrol Torpedo (PT) boats were the primary vessel used to insert Alamo Scout teams. Swift and maneuverable, the 80-foot craft were ideal for the mission of dropping off and recovering the teams.*

Sumner's team returned from Samar and went into the strategically critical Ormoc Valley on Leyte on 6 November, remaining until withdrawn on 22 December, when major combat operations ceased and the mopping up phase on Leyte began.<sup>42</sup> When the Sixth Army began the invasion of the main island of Luzon, the primary Scout missions were liaison.

The invasion of Luzon commenced on 9 January 1945 in Lingayen Gulf northwest of Manila, and set off the most intense period of Alamo Scout activity. 1LT Robert Sumner was part of the Luzon operations. "We did not put anyone ashore prior to the landings in Luzon. Obviously the G2 [intelligence officer] didn't feel it was necessary; and I think they were absolutely right. The guerrilla forces furnished all of the responses to the





The campaign to retake the Philippines was divided between the Eighth Army and the Sixth Army. Seventeen Alamo Scout teams conducted more than 70 missions in support of the two Armies. In the Philippines, the Scouts added liaison with the guerrilla units to their reconnaissance mission.



EI [essential elements of information],” said Sumner.<sup>43</sup> Instead, the Alamo Scout teams were ferried in Landing Craft Infantry (LCIs) to Lingayen after the initial assault to link up at the Sixth Army forward command post (CP). “We assembled at the Sixth Army jump CP in the morning after the landings. From then on we were fully employed. We were off and running. A couple of the teams worked their way on up into the northern part of Luzon and were up there three and four months at a time,” Sumner said.<sup>44</sup>

William Nellist’s team was sent southeast to the Legaspi-Sorsogon Peninsula on 9 February to establish contact with guerrilla groups in the vicinity and reconnoiter the landing areas for the insertion of the 158<sup>th</sup> Regimental Combat Team (158<sup>th</sup> RCT). CPL Andrew Smith relates that the team was divided up to cover multiple locations. “They split our team up in Tagay and Bulan one time. And they left me in the middle. [SGT Galen] Kittleston, [Staff Sergeant Thomas] Siason, and [1LT William] Nellist went over the mountain to the Pacific side and the rest went out to Bulan. I accused Nellist of leaving me by myself and he said, ‘Well, hell, you were only there for thirty days.’ Thirty days is a long time to not have someone that speaks your language or [provide you with] something to eat.”<sup>45</sup> 1LT Nellist experienced difficulties with rival guerrilla groups and, on order from Sixth Army, took over control of all guerrilla operations on the peninsula.<sup>46</sup> He remained in charge of the guerrillas until 1 April. With the arrival of the 158<sup>th</sup> RCT, Nellist Team turned over the liaison mission to the 158<sup>th</sup> and returned to the Army headquarters. It was the Nellist Team along with the Rounsaville and Dove Teams that took part in the most famous Alamo Scout mission, the rescue of the prisoners from the Cabanatuan Prison Camp.

The two Alamo Scout teams worked with the 6<sup>th</sup> Ranger Battalion and a Filipino guerrilla force under Captain Eduardo Josen to rescue 513 American and British prisoners from their camp at Cabanatuan, then thirty miles inside Japanese lines.<sup>47</sup> The rapid advance of Sixth Army imperiled the POWs in Japanese hands. The mission was planned and executed on very short notice between 27 January and 1 February 1945. The Rounsaville and Nellist Teams with guerrilla guides negotiated the 30 miles to the vicinity of the POW camp and linked-up with the main Philippine guerrilla unit. The Scouts placed the camp under surveillance on the 29<sup>th</sup> and 30<sup>th</sup> as the guerrillas moved into blocking positions near the camp. Dove Team accompanied C Company of the 6<sup>th</sup> Ranger Battalion and arrived at the Camp on the 29<sup>th</sup>. Based on the intelligence gathered by the Nellist and Rounsaville teams, LTC Henry Mucci, the 6<sup>th</sup> Ranger Battalion commander, agreed to wait one day for Japanese units traversing the area to move on before attempting the rescue. On the 30<sup>th</sup>, the forces hit the camp at 7:45 p.m., killing the 200 Japanese guards and rescuing the prisoners. In thirty minutes, the prisoners, escorted by the Rangers, were on their way back to friendly lines,

while the Alamo Scouts provided security to cover the withdrawal.<sup>48</sup> The success of this mission generated such publicity that SGT Harold Hard and SGT Gilbert Cox were sent back to the United States with twelve of the Rangers to meet President Roosevelt and take part in a War Bond drive.<sup>49</sup> The campaign for the capture of Luzon would last until nearly the end of the war and involve the Alamo Scouts in increasingly complex missions.



*6th Rangers move through the grass to take up positions prior to the raid on the Cabanatuan Prison compound. The Nellist and Rounsaville Teams with Filipino guides led the Rangers into position and covered the retreat of the 513 POWs after the successful rescue.*



*Following the successful Cabanatuan Prison Rescue, a select group of Rangers and Alamo Scouts were brought back to the United States to participate in a War Bond drive. Here the men meet with President Franklin Delano Roosevelt in the White House. Alamo Scouts SGT Harold Hard, Rounsaville Team (5th from left) and SGT Gilbert Cox, Nellist Team (far right) were part of the publicity campaign surrounding the successful rescue, March 1945.*





LTG Krueger took Alamo Scout Teams with him from the Philippines to Japan after the surrender in August 1945. Adkins Team performed a reconnaissance of the Wakayama landing beach and Derr Team provided personal security for Krueger.

Until July 1945, when Sixth Army turned over control of operations in Luzon to Eighth Army to begin preparations for the invasion of the Japanese home islands, the Alamo Scouts were continually employed. The teams gathered intelligence on Japanese strengths and locations, set up communications sites and advised and supplied guerrilla units in central and northern Luzon. When not engaged in operations behind the Japanese lines, Alamo Scout teams acted as the personal security detachment for LTG Krueger on his forays away from Sixth Army headquarters.

### On to Japan

General Walter Krueger held the Alamo Scouts in high esteem, and from the inception of the unit, employed a team as his security detachment. The final Alamo Scout mission involved the teams of 1LT George A. Derr, 1LT Henry A. Adkins and 1LT Martin Grimes who had taken over the Shirkey Team. They sailed from Manila with Krueger on 14 September 1945 bound for Japan. About twenty Alamo Scouts were part of the Sixth Army GHQ. The Derr Team accompanied Krueger when he took control of the Sasebo Naval Air Base on 20 September. Later Grimes Team toured Nagasaki with LTG Krueger. SGT Gilbert Cox recalled, "We were just in and out of Nagasaki. The people were still staggering around. It was a mess. Ground Zero was nothing but red dirt, and maybe a chimney standing here or there."<sup>50</sup> When the Sixth Army convoy landed at the port city of Wakayama on 25 September 1945, members of the

### The 6th Ranger Battalion

The 6<sup>th</sup> Ranger Battalion was created in December 1943 at the direction of General Douglas A. MacArthur, who saw the need for a Ranger force to replicate the Marine Raider battalions in the Pacific Theater.<sup>1</sup> LTG Walter Krueger, the Sixth Army commander, converted the 98<sup>th</sup> Field Artillery Battalion (75mm Pack Howitzers) into a provisional Ranger Battalion. The mission of the new unit would be for "employment on amphibious raids and diversionary attacks of limited duration."<sup>2</sup> Commanded by Lieutenant Colonel Henry A. Mucci and using volunteers from Sixth Army units, the 6<sup>th</sup> Ranger Battalion grew to six rifle companies and a headquarters company. Ironically, it was the decimation of the 1<sup>st</sup>, 3<sup>rd</sup> and 4<sup>th</sup> Ranger Battalions at Cisterna, Italy that provided the TO&E personnel spaces to expand the 6<sup>th</sup> Rangers.<sup>3</sup>

Following a rigorous training program, the Rangers quickly achieved a high level of fitness and proficiency. They proved their mettle by seizing the islands guarding the harbor entrance during the landing at Leyte Gulf in the Philippines. Later, a reinforced C Company under LTC Mucci's direction joined two Alamo Scout Teams and a Filipino guerrilla force to rescue 513 prisoners held at Cabanatuan.

1 David W. Hogan, Jr., *Raiders or Elite Infantry: The Changing Role of the U.S. Army Rangers from Dieppe to Grenada* (Westport, CT: Greenwood Press, 1992), 83.  
 2 Hogan, *Raiders or Elite Infantry*, 83-84.  
 3 Hogan, *Raiders or Elite Infantry*, 85.



Adkins and Grimes teams performed an advanced reconnaissance. This proved unnecessary as the Japanese had evacuated the city.<sup>51</sup>

LTG Krueger and the Sixth Army were scheduled to establish their headquarters in the ancient Japanese capital city of Kyoto. A select group of Alamo Scouts accompanied Krueger as his Honor Guard when he arrived on 28 September. From this point forward, the Scouts were detailed to the 6th Ranger Battalion for administration but had no real duties. As time passed, the men gradually rotated back to the United States. The Alamo Scout Training Center, then located on Luzon at Subic Bay, closed on 10 October 1945. The Alamo Scout teams were never officially disbanded, but simply melted away with the drawdown of American forces.

The Alamo Scouts were established to meet the specific needs of Sixth Army. Their missions grew from straight-forward reconnaissance to increasingly sophisticated operations supporting the Philippine guerrillas and establishing intelligence networks. The product of a stringent selection process and an exceptional training program, the Alamo Scouts are part of the legacy of Army Special Operations Forces. In March 1988, they were awarded the Special Forces Tab in recognition of their role as one of the predecessors of Army Special Forces. ♣

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## Endnotes

- Gibson Niles, "The Operations of the Alamo Scouts (Sixth U.S. Army Special Reconnaissance Unit), on the Following Missions: 1. Advanced Reconnaissance of Los Negros Island, 27-28 February 44, Prior to Landing by the First Cavalry Division in the Admiralty Islands (Bismarck Archipelago Campaign); 2. Rescue of Sixty-six Dutch and Javanese from the Japanese at Cape Oransbari, Dutch New Guinea, 4-5 October 1944 (New Guinea Campaign); 3. Reconnaissance of Enemy Dispositions and Contact with Guerrilla Elements, Degaspi-Sorsogon Peninsula, 19 February - 26 April 1945, (Luzon Campaign)," Advanced Infantry Officer Class II, 1947-1948, Fort Benning, Georgia, monograph in the Donovan Research Library Digitized Monograph Collection, <https://www.infantry.army.mil/monographs/content/wwii/STUP2/NilesGibson%20LTC.pdf>.
- Louis Morton, *The U.S. Army in World War II. The War in the Pacific: Strategy and Command, The First Two Years* (Washington DC: Office of the Chief of Military History, 1962); John C. Boleyn, "The Japanese Expansion in the Pacific, 7 December 1941-12 September 1942," Advanced Infantry Officer Course, 1948-1949, Fort Benning, Georgia, monograph in the Donovan Research Library Digitized Monograph Collection, <https://www.infantry.army.mil/monographs/content/wwii/STUP2/Boleyn.%20John%20C.%20ILT.pdf>.
- Samuel Milner, *The U.S. Army in World War II. The War in the Pacific: Victory in Papua* (Washington DC: Office of the Chief of Military History, 1971), 49.
- Morton, *The War in the Pacific*, 407-408.



*U.S. troops landing at Wakayama, Japan, 25 September 1945. The Alamo Scout Adkins and Grimes Teams conducted advance reconnaissance of the landing beaches. Derr Team accompanied LTG Krueger from the Philippines and served as his personal security team when Krueger took control of the city.*

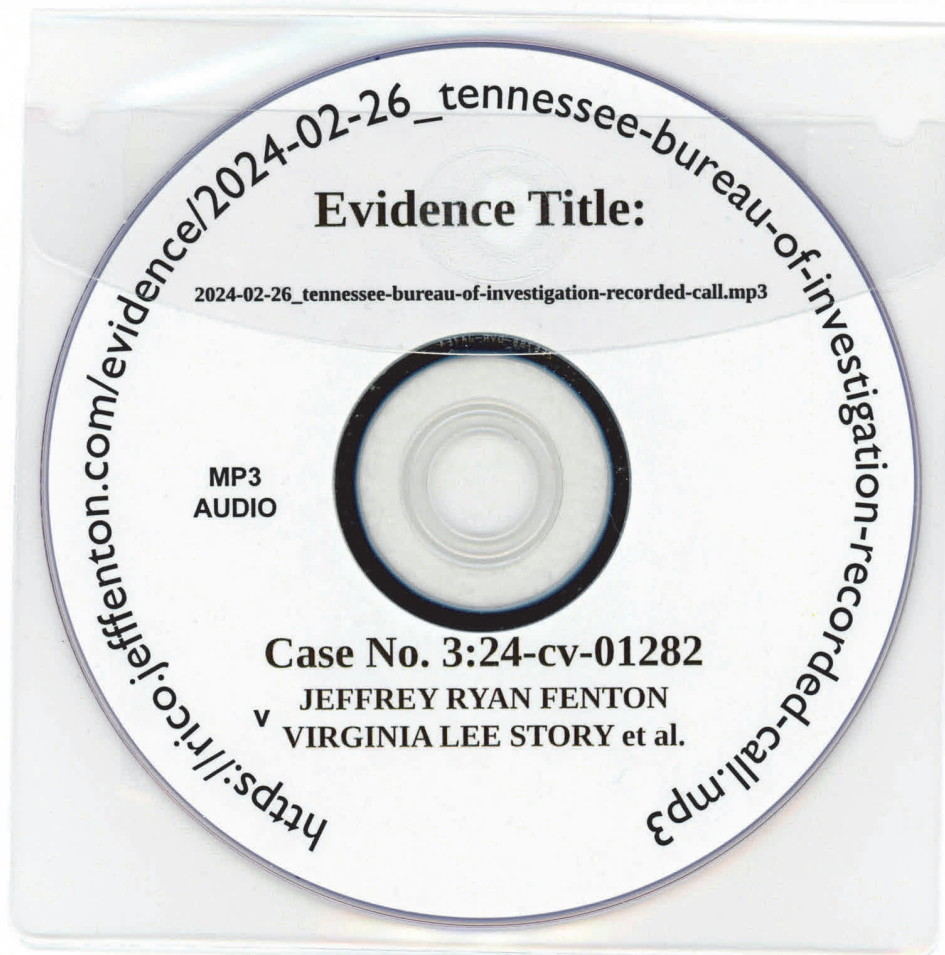
- General Headquarters, Southwest Pacific Area, *The Reports of General MacArthur: The Campaigns of MacArthur in the Pacific*, Vol I (Washington DC: Center of Military History Publication 13-3, reprint 1994), 107-109.
- Morton, *The War in the Pacific*, 408.
- Walter Krueger, *From Down Under to Nippon: The Story of Sixth Army in World War II*, (Washington DC, Combat Forces Press, 1953) 10.
- Morton, *The War in the Pacific*, 407; GHQ SWPA, *The Reports of General MacArthur*, 183.
- GHQ, SWPA: *The Reports of General MacArthur*, 67.
- GHQ, SWPA: *The Reports of General MacArthur*, 117.
- Kermit Roosevelt, *War Reports of the OSS: The Overseas Targets Vol II* (New York: Walker and Company, 1976), 358.
- GHQ, SWPA: *The Reports of General MacArthur*, 54. For a more complete story of the Allied Intelligence Bureau, see William B. Breuer, *MacArthur's Undercover War: Spies, Saboteurs, Guerrillas, and Secret Missions* (Edison, NJ, Castle Books, 2005) and Allison Ind, *Allied Intelligence Bureau: Our Secret Weapon in the War Against Japan* (New York: David McKay Co) 1958.
- The Japanese evacuated the island of Kiska undetected by the Allies in July 1943. Three weeks later, the Allies landed a major invasion force on the island. The enemy executed a similar evacuation from Guadalcanal. Kenneth Finlayson, "Operation Cottage: The First Special Service Force in the Kiska Campaign," *Veritas*, Vol 4, No. 2, 2008.
- Krueger, *From Down Under to Nippon*, 29.
- Lance Q. Zedric, *Silent Warriors: The Alamo Scouts Behind Japanese Lines* (Ventura, CA: Pathfinder Publishing Co., 1995), 45-50.
- Zedric, *Silent Warriors*, 52.
- Zedric, *Silent Warriors*, 54.
- Colonel Robert Sumner, Alamo Scouts, interview by Dr. John W. Partin and Dr. Richard Stewart, 10 December 1991, Tampa FL, transcript, USASOC History Office Classified Files, Fort Bragg, NC.
- Command Sergeant Major Galen C. Kittleson, Alamo Scouts, interview by Dr. Richard Stewart and Dr. Stanley Sandler, 10 October 1993, Fort Bragg, NC, transcript, USASOC History Office Classified Files, Fort Bragg, NC.
- Staff Sergeant Zeke McConnell, Alamo Scouts, interview by Dr. Charles H. Briscoe, 7 April 2006, Seattle, WA, digital recording, USASOC History Office Classified Files, Fort Bragg, NC.
- Sumner interview.
- Command Sergeant Major Galen C. Kittleson, Alamo Scouts, interview by Ms Cynthia Hayden, 10 March 2000, Fort Bragg, NC, transcript, USASOC History Office Classified Files, Fort Bragg, NC.
- Corporal Andrew E. Smith, Alamo Scouts, interview by Dr. Richard Stewart and Dr. Stanley Sandler, 10 October 1993, Fort Bragg, NC, transcript, USASOC History Office Classified Files, Fort Bragg, NC.



- 24 Sumner interview.
- 25 First Lieutenant Thomas J. Rounsaville, Alamo Scouts, interview by Dr. Stanley Sandler, 1 October 1993, Fort Bragg, NC, transcript, USASOC History Office Classified Files, Fort Bragg, NC.
- 26 Sumner interview.
- 27 Smith interview.
- 28 Sumner interview.
- 29 Sumner interview.
- 30 Rounsaville interview.
- 31 Sergeant First Class Gilbert J. Cox, Alamo Scouts, interview by Dr. Charles H. Briscoe, 14 December 2005, Des Moines, WA, digital recording, USASOC History Office Classified Files, Fort Bragg, NC.
- 32 Smith interview.
- 33 Zedric, *Silent Warriors*, 86-87.
- 34 Sumner interview.
- 35 Niles, "The Operations of the Alamo Scouts", 5.
- 36 Zedric, *Silent Warriors*, 276-279.
- 37 Cox interview.
- 38 Cox interview.
- 39 M. Hamlin Cannon, *The U.S. Army in World War II, Leyte: The Return to the Philippines* (Washington DC, Office of the Chief of Military History, 1954), 21-39.
- 40 Cannon, 54-57. **The 6th Ranger Battalion was another special operations unit created by LTC Krueger. The battalion was not affiliated with the Ranger battalions created by COL William O. Darby that fought in the European Theater. Lieutenant Colonel Henry Mucci, the battalion commander, led C Company of the 6th Ranger Battalion, the main element in the Cabanatuan Prison Camp liberation in February 1945. Two Alamo Scout teams, Nellist and Rounsaville, acted as the advanced reconnaissance and guides on this operation.**
- 41 Zedric, *Silent Warriors*, 276-279.
- 42 Sumner interview; Cannon, 329-346.
- 43 Sumner interview.
- 44 Sumner interview.
- 45 Smith interview.
- 46 Niles, "The Operations of the Alamo Scouts", 20.
- 47 **The Cabanatuan rescue mission is one of the most famous POW rescues in history. SGT Galen Kittleson of Nellist Team had the distinction of being on both the Oransbari and Cabanatuan rescue missions in World War II as well as the Son Tay POW rescue attempt in the Vietnam War. The Cabanatuan rescue is well documented. See Hampton Sides, *Ghost Soldiers: The Forgotten Epic Story of World War II's Most Dramatic Mission*, (New York; Doubleday, 2001); Zedric, 187-198; Forest Bryant Johnson, *Hour of Redemption: The Heroic WW II Saga of Americas Most Daring POW Rescue* (New York: Warner Books, Inc. 1978); Charles W. Sasser, *Raider* (New York: St. Martin's Press, 2002).**
- 48 Sides, *Ghost Soldiers: The Forgotten Epic Story of World War II's Most Dramatic Mission*, 309-312.
- 49 Zedric, *Silent Warriors*, 199-200.
- 50 Zedric, *Silent Warriors*, 245.
- 51 Zedric, *Silent Warriors*, 246.







**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**JEFFREY RYAN FENTON,**  
PLAINTIFF  
  
**VIRGINIA LEE STORY ET AL.,**  
DEFENDANTS

v.

**CASE NO. 3:24-cv-01282**

<b>EVIDENCE TITLE:</b>	<b>2024-02-26_tennessee-bureau-of-investigation-recorded-call.mp3</b>
<b>Internet URL:</b>	<a href="https://rico.jeffenton.com/evidence/2024-02-26_tennessee-bureau-of-investigation-recorded-call.mp3">https://rico.jeffenton.com/evidence/2024-02-26_tennessee-bureau-of-investigation-recorded-call.mp3</a>
<b>RELATED DOC:</b>	<a href="https://rico.jeffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf">https://rico.jeffenton.com/evidence/2025-01-20_declaration-explaining-my-pursuit-of-justice.pdf</a>
<b>ECF LOCATION:</b>	

**Description:** Plaintiff called the Tennessee Bureau of Investigation in an effort to press criminal RICO charges against the defendants, specifically seeking to file official corruption and official misconduct charges against former Williamson County judge Michael W. Binkley, but he was told by the TBI, “We do not do that here.”

The .mp3 audio file on this disc is evidence in this federal civil rights, conspiracy, fraud, and racketeering lawsuit.