IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

William Keisling Plaintiff	)	CIVIL ACTION LAW
v.	)	No. 1:09-CV-2181
Richard Renn Ronald Castille John S. Kennedy Sheryl Ann Dorney Maria Musti Cook J. Robert Chuk Pamela S. Lee Rick Lee MediaNews Group York Daily Record Russell Wantz Schaad Detective Agency L.C. "Larry" Heim Katherman, Heim and Perry Supreme Court of Pennsylvania County of York, Pennsylvania York County Judicial District Court National City Mortgage Company Doreen Wentz PNC Bank Freddie Mac Federal Home Loan Mortgage Corp. Udren Law Firm Mark J. Udren Louis A. Simoni Alan M. Minato John Doe(s)	)	JURY TRIAL DEMANDED

AMENDED COMPLAINT

INTRODUCTORY STATEMENT

1. This is a civil rights complaint which alleges that the defendants Russell Wantz, Schaad Detective Agency, L.C. "Larry" Heim, Katherman, Heim and Perry, National City Mortgage Co, Doreen Wentz, PNC Bank, Freddie Mac, Mark

Udren, Louis A. Simoni, Alan M. Minato, and Federal Home Loan Mortgage, Pennsylvania newspaper reporter Rick Lee and his employers, MediaNews Group and the York Daily Record, unlawfully conspired by, with, and through the public official defendants, namely York County Pennsylvania Court of Common Pleas Judges Richard Renn, Sheryl Ann Dorney, John S. Kennedy and Maria Musti Cook, and District Court Administrator J. Robert Chuk, Pennsylvania Chief Justice Ronald Castille, Prothonotary Pamela S. Lee, the Judicial District Court of York County, and the County of York, and the Pennsylvania Supreme Court.

2. Defendant judges in this case are not being sued for their judicial actions on the bench, but for *personal conflicts of interest* involving Plaintiff Keisling and his work, and for their *administrative actions, and non-actions,* which harmed Keisling.

3. For example, a business associate of Defendant Judge Richard Renn informed Keisling of a personal conflict of interest and influence peddling scheme involving Richard Renn, *dating from Renn's days in private practice.* Keisling reported these allegations involving Richard Renn to the Defendant Pennsylvania Supreme Court, which repeatedly ignored its *administrative responsibilitie*s and took no action to investigate Renn's *personal and private* conflicts of interest and misbehavior. Keisling also wrote about Renn's personal conflicts and unlawful activites in a book, and is actively writing another book about Renn. Defendant Richard Renn knowingly misused his administrative powers as president judge to interject himself in a case involving the same book(s), which ironically involved Renn's personal conflicts and misbehaviors, in an ongoing *personal* conflict of interest with Keisling's work, as more fully discussed below.

4. Defendant judges had *personal* and *adminstrative* interests in the Plaintiff being harmed as much as possible.

JURISDICTION

5. The Federal Courts of the Middle District have the power to hear lawsuits brought by American citizens pro se where their constitutional rights have been violated. 28 U.S.C. Section 1331 confers this power. This suit is brought under 42 U.S. Code Section 1983, which also confers this power. The defendants violated the Plaintiff's rights under the First Amendment, namely his rights to petition for a redress of grievances, and his rights to free and protected speech. These Defendants also violated William Keisling's Fourteenth Amendment rights to substantive and procedural due process. The Defendants' unlawful efforts to take Plaintiff's real property is a substantive due process right. The Defendant banks National City Mortgage Co., PNC Bank, Freddie Mac and Federal Home Loan Mortgage Corp., and Defendants Heim; Katherman, Heim and Perry; and Wantz knowingly used the unlawful actions of the Defendant judges to take Plaintiff's property, and to otherwise harm Plaintiff. The Defendant judges violated Plaintiff's due process rights by denying hearings; by denying impartial hearings; discovery; proper notices; the answering of interrogatories; stay of proceedings while in federal Chapter 13 bankruptcy; due process of law; equal protection of law; denying Plaintiff an open day in court and a right to an impartial judge(s); and his right to free and protected speech.

6. In the course of this matter, Petitioner Keisling was repeatedly denied discovery in violation of the Pennsylvania Rules of Civil Procedure (Pa.R.C.P.); was denied his right to an impartial judge; was not informed of hearings or the assignment of cases to judges; was at all times subjected to Court behavior well beyond prejudicial; Keisling was openly ridiculed by the Court; the safety of his minor daughter was repeatedly threatened; Keisling himself was beaten and unlawfully jailed; Keisling was repeatedly told he would be denied due process and his day in court; Keisling was denied a single hearing on issues of triable fact; was denied reasonable access to an attorney; deprived of basic civil rights and forced to witness the safety and due process of those close to him likewise threatened by officers of the York County Court and other employees of the York County Courthouse, as more fully discussed below.

JURY TRIAL

7. The Plaintiff demands a jury trial in accordance with federal law.

PUNITIVE DAMAGES

8. Plaintiff demands punitive damages because the actions of these Defendants was particularly outrageous.

DAMAGES

9. The Plaintiff claims that these defendants deprived him of his federally guaranteed rights for which he claims compensatory and punitive damages. Plaintiff also claims damages under state law for fraud, which this court has the power to hear.

BASIS OF LIABILITY

10. Under federal law a private party who participates by, through, with, or takes advantage of the abuses of American citizens by a public official is liable to the citizen under the law of Section 1983, even if the official has immunity.

ALLEGATIONS OF FACT

11. Plaintiff is William Keisling, a professional writer of books, and citizen of the United States. Many of Keisling's books involve vital issues of public interest, including matters of government corruption and other topics of compelling public concern. From the years 1989 to 1998 he was also a stay-at-home dad, the primary caregiver for his minor daughter Ariel Elizabeth Keisling.

12. For more than a decade Plaintiff Keisling has been engaged in researching and documenting unaddressed allegations of systemic corruption in and around York County and its courthouse, and the methods by which this unchecked systemic corruption has grown to threaten the safety of the children, and citizens, of York County. The subject matter researched by Keisling include, but are not limited to, long-standing yet uninvestigated allegations of child abuse; neglect leading to endangerment and serious injury to children; rampant prostitution activities by courthouse personnel, officers of the court, and contractors; sex with minor children by court officials; case fixing and influence peddling by court officials; murder and unlawful beatings by public officials; and related allegations including personal conflicts of interest involving officers of the court and others working in and around the York County, Pennsylvania, Courthouse.

13. Most sadly of all, making money off children and the destruction of their families, and ignoring medical and psychiatric standards of care, has become a money making enterprise in York County, Pennsylvania.

14. At all times the Defendants have used the district court system as a political machine for their own nefarious and unlawful ends.

15. As a professional writer, Petitioner Keisling has extensively studied and written about the role played by York County judges in protecting those responsible for these criminalities; the alleged perpetrators of these heinous crimes often are personal, professional or political associates of the judges. Simply put, the York County judiciary protects those with ties to courthouse personnel while, conversely, retaliates against and punishes those who question such judicial and political protection and favoritism. As such, this system represents a wholesale violation of the 1st and 14th Amendment rights of the victimized citizens who, like Keissling, have been willfully and unlawfully deprived of their free speech, due process and equal protection rights before the courts.

16. Ultimately this is a case of York, Pennsylvania, going bad and descending into a self-perpetuating cauldron of blatant unlawful behavior and systemic

corruption. Corrupt court and public officials, and a government-approved monopoly newspaper, conspire to conceal their culpability to shameful, unlawful, and unending public misdeeds, including murder; injury of children; courthouse prostitution; sex between children and court officials; conflicts of interest; and to further conspire in a wholesale manner to deny and injure the civil rights of any who, like Keisling, resists and speaks out against them and their unlawful political insiders' judicial machine.

17. The above-named defendants, who are members of the judiciary of the York County Common Pleas Court, unlawfully retaliated against Plaintiff Keisling after Keisling rightly rejected, complained about, and sought an investigation of what Keisling perceived to be extortion, kick-back, and/or influence peddling demands involving attorney Richard Renn and a longtime business associate of Richard Renn's from Renn's days in private law practice. The circumstances are as follows:

18. In February 1996, while residing at 601 Kennedy Road in Airville, PA, Lauren McHenry, PhD, the working mother of Plaintiff William Keisling's 10-year-old daughter, Ariel Keisling, began exhibiting strange and alarming behavior.

19. On February 15, 1996, Lauren McHenry threatened to kill by strangulation the couple's six-year-old daughter, Ariel Keisling, while Ariel lay sleeping in bed. Lauren McHenry also expressed the desire to kill herself.

20. That night, Lauren McHenry received emergency hospitalization in the Psychiatric Unit of the Hershey Medical Center, in Dauphin County, PA, where she was admitted for homicidal and suicidal ideations.

21. The safety of the minor child, Ariel Keisling, was further grievously undermined and threatened by Lauren McHenry's mother, Marilyn McHenry, a caseworker at Dauphin County's Children and Youth Services, who was also the victim child's maternal grandmother. Children and Youth caseworker McHenry repeatedly refused to report to proper authorities her daughter's threats to kill her own granddaughter Ariel, as required by Pennsylvania state law, in an unlawful

attempt to protect the reputation of her mentally ill daughter Lauren.

22. Lauren McHenry was subsequently diagnosed at the Johns Hopkins Affected Mood Disorder Clinic in Baltimore, MD, with bipolar disorder, and was instructed by doctors there to take appropriate medication, in keeping with psychiatric and medical standard of care for this life-long, debilitating disorder.

23. Lauren McHenry refused to take the prescribed mood-stabilizing medication for her disorder.

24. On March 25, 1998, due to this ongoing, untreated, severe and long-term mental illness, McHenry was admitted for an involuntary observation at the Emergency Department of York Hospital, a traumatic event for Keisling and his minor daughter that triggered a custody case in York County Common Pleas Court.

25. At that time, the Emergency Department Physician's Report of York Hospital noted that McHenry suffers from bipolar disorder. The report relates the events leading to Keisling's having sought an involuntary observation of McHenry on March 25, 1998, stating that Keisling reported McHenry, "lay (sic) down with some knives and wrote a suicide note that he claims she incinerated in a fire." The report relates McHenry explained to emergency room doctors that:

26. "The patient's recollection of this is that she is a poet and writes on scraps of paper. She was very drunk that night and was looking for a knife to cut an apple. She fell asleep on the floor with the knife. The next day she burned the scraps of paper in the fireplace which he thought were suicide notes when, in fact, she claims they were rough drafts of poems."

27. Keisling later testified at trial about events that led to the March 25, 1998, involuntary observation of McHenry in the Emergency Department of York Hospital, and the devastating, adverse impact to the best interest of the child, and Keisling, caused by McHenry's ongoing and unmedicated illness:

28. "It was a Wednesday night. Ariel was upstairs. And Lauren had for several months had been talking about killing herself outright or in a veiled way. If I were to leave or things didn't work out, did I realize what would happen. It just goes on in the background like a squelch.... And I came home to see Ariel was upstairs and Lauren was intoxicated on the floor. There were knives all around her. She was out cold. I thought she was dead then. I went to the table right by the door and there was a note that said life is no longer worth living, and I thought she was dead right there. And right away I tried to pat her in the face, and she began to come around. And, again, she shouldn't be taking alcohol.... I went to the bathroom to get some water for her, and she got up, staggered up and grabbed the note, because I think by this time she was concerned about all the documentation. She grabbed the note and threw it in the fireplace. And I gave her some water, and I was truly at wit's end."

29. At the time, Lauren McHenry's mother, Marilyn McHenry, was still a case worker at Dauphin County Children and Youth Services. As in the first incident involving the Hershey Medical Center Psychiatric Unit, Marilyn McHenry did not report this March 25, 1998, incident endangering the welfare of Ariel Keisling to the proper authorities, as required by state law. In fact, caseworker Marilyn McHenry was enraged at Keisling that he sought help. Marilyn McHenry herself personally drove to Keisling's home and snatched Ariel Keisling away from the care of her father.

30. Upon her release from the March 25, 1998 psychiatric observation, Lauren McHenry began a custody proceeding in York County Common Pleas Court, against Keisling, seeking custody of the victimized child, Ariel Keisling.

31. This custody case was assigned to Defendant Judge Richard Renn. The political nature of Defendant Judge Renn, and his personal political climb, are underscored by political monetary contributions Defendant Renn tendered to the political campaign of District Attorney Stanley Rebert. The principals as such protect and advance each other's political agendas, and unlawful means and ends.

32. During the course of the custody proceedings, Lauren McHenry continued to exhibit erratic behavior, as can be expected from an unmedicated bipolar who has rejected sound medical treatment. For example, Dr. McHenry refused to send daughter Ariel to school, forcing Keisling to drive a 120-mile a day round trip from Harrisburg to Airville to take his daughter to school on those days when Judge Renn carelessly placed the child in McHenry's custody. At all times, Judge Renn did not seem at all concerned or interested in the welfare and plight of the victimized child.

33. On February 18, 1999, Defendant Judge Richard Renn granted Keisling a psychiatric expert in the case, under Pennsylvania Court Rule 1915.8. Under Pennsylvania law, such an expert is required to present to the court the bountiful psychiatric records already in Keisling's possession.

34. Despite great ongoing difficulties involving Lauren McHenry's untreated mental illness and her continued erratic mistreatment of the minor child, Keisling set about with due diligence to locate and retain a qualified expert who would be lawfully recognized by the court. A midstate attorney referred Keisling to a Dr. Neil Blumberg of Timonium, Maryland. On April 23, 1999, Keisling retained Dr. Neil Blumberg with a payment of $2,500, for Dr. Blumberg's professional services.

35. On May 12, 1999, on Keisling's behalf, Dr. Blumberg wrote Lauren McHenry's attorney to schedule the psychiatric examination of Lauren McHenry, and evaluation of her psychiatric records, as approved by Order of Judge Renn on February 18, 1999.

36. Lauren McHenry repeatedly refused to submit to Dr. Blumberg's psychiatric examination, or comply with Defendant Judge Renn's February 18, 1999 order.
00
37. Strangely, Defendant Judge Renn mysteriously and dangerously took no action to ensure the child's safety by compelling the mentally ill mother to undergo

the evaluation, which, after all, Defendant Judge Renn himself had ordered and which had caused Keisling to retain Dr. Blumberg at an expense of $2,500.

38. On May 16, 1999, Keisling again petitioned Defendant Judge Renn for special relief and finding of contempt, citing McHenry's refusal to submit to Keisling's expert for examination.

39. Defendant Judge Renn held a hearing on May 25, 1999, at which time Judge Renn allowed he would consider the matter, and continued the hearing for a later date.

40. Yet throughout this time Defendant Judge Renn continued to strangely deny Keisling his lawful right to proper discovery. This refusal to allow Keisling his procedural rights was noticed and taken advantage of by opposing counsel.

41. Defendant Judge Renn all the while continued his strange detachment from the victimized child's plight.

42. Defendant Renn scheduled another hearing on the matter on June 30, 1999, which was continued to July 7, 1999.

43. On or about June 29, 1999, Dr. Blumberg and Keisling had a telephone conversation. In this conversation, Dr. Blumberg offered an explanation of Defendant Renn's odd behavior.

44. Dr. Blumberg claimed an ongoing, personal, and business relationship with Defendant Judge Renn. Dr. Blumberg furthermore claimed to hold special sway with and understanding of Defendant Judge Renn's business practices, informing Keisling, in a highly inappropriate, disturbing and shocking manner, of his past and ongoing private and personal business dealings with Defendant Richard Renn.

45. The expert then offered to contact Judge Renn secretly and ex parte, to unlawfully and unethically advance Keisling's case with Judge Renn. Explicit in

these statements made by Dr. Blumberg was a threat against the safety of the minor child, Ariel Keisling, if Plaintiff Keisling did not cooperate with what Keisling perceived to be Dr. Blumberg's alleged criminal conspiracy with Defendant Judge Renn. Dr. Blumberg told Keisling that Keisling had to be concerned about the safety of his daughter.

46. At all times, in fact, Keisling was foremost concerned about the safety of his victimized daughter.

47. It was Keisling's understanding and belief that that Dr. Blumberg was demanding unlawful and secret payments to be made to Judge Richard Renn, or other unlawful considerations. Keisling, appalled, and deeply concerned for the safety of his minor daughter, told the expert he would do nothing illegal, to which the expert replied that "no one cares about a judge's conduct in Pennsylvania; you should be concerned about the safety of your daughter."

48. Keisling understood this statement to be an explicit threat made against the safety of his already victimized daughter by Dr. Blumberg, and Defendant Judge Renn, and an attempt at extortion of Keisling.

49. Dr. Blumberg further stated that influence peddling, ex parte and secretive dealings with financial and political supporters was a time-honored, common, and accepted practice with the elected judges of the York County Common Pleas Court.

50. Keisling refused to enter into any unlawful activity with the psychiatric expert and his secret business associate, Defendant Judge Renn, or to allow any unlawful ex parte contact between Dr. Blumberg and Defendant Judge Renn.

51. Throughout this ordeal, Keisling was shocked, deeply troubled and greatly frightened for the safety of his daughter.

52. Keisling at that time told Dr. Blumberg that Dr. Blumberg had been retained to lawfully ensure the safety of the minor child, whose life and well-being and safety

had been repeatedly threatened by the unmedicated bipolar mother, and a grandmother employed at Children and Youth Services. Keisling out of hand refused to have the psychiatric expert contact Judge Renn ex parte, and instead directed the expert to write an open letter to Judge Richard Renn about the seriousness of Lauren McHenry's unmedicated bipolar condition, and the necessity of having McHenry submit to an examination by Dr. Blumberg, as originally approved by Richard Renn.

53. Keisling further directed Dr. Blumberg to send a copy of this letter to Lauren McHenry's attorney.

54. After this telephone conversation with Dr. Blumberg, Keisling telephoned the Pennsylvania attorney who had referred Keisling to Dr. Blumberg. This attorney informed Keisling that Dr. Blumberg had been, in turn, recommended to him by Defendant Judge Renn, in a public seminar concerning mental illness cases before the Pennsylvania courts.

55. From his extensive professional experience writing about judicial corruption matters, Keisling knew that Defendant Judge Renn, if such a close personal association existed as claimed by Dr. Blumberg, would be obligated by Pennsylvania Judicial Canon to *immediately* disclose his close personal and/or business interests with Dr. Blumberg, and immediately recuse himself, and certainly not allow Dr. Blumberg to peddle influence with Defendant Judge Renn, or otherwise threaten Keisling with harm to his already victimized daughter.

56. Canon 2. of the Pennsylvania Code of Judicial Conduct states, in part, for example,

57. "A Judge should avoid impropriety and the appearance of impropriety in all his activities. A. A judge should respect and comply with the law and should conduct himself at all times in a manner that promotes public confidence in the integrity and impartiality of judiciary. B. A judge should not allow his family, social, or other relationships to influence his judicial conduct or judgment. He should not

lend the prestige of his office to advance the private interests of others; nor should he convey or knowingly permit others to convey the impression that they are in a special position to influence him...."

58. Canon 3. of the Pennsylvania Code of Judicial Conduct states, in part,

59. "A Judge should perform the duties of his office impartially and diligently."

60. As directed by Keisling, Dr. Blumberg, on June 29, 1999, wrote Defendant Judge Renn an open letter on Keisling's behalf, with a copy sent to opposing counsel, as instructed by Keisling.

61. The dishonest tone of the letter mailed by Dr. Blumberg to Richard Renn, however, was such that Dr. Blumberg falsely pretended that he did not know, or have previous association with, Defendant Judge Renn; nor in the letter did Dr. Blumberg indicate any personal history between Defendant Judge Renn and Dr. Blumberg whatsoever.

62. Renn and his business associate from private practice in reality violated several federal and state criminal statutes, including the use of wires or mail to deprive Keisling, his daughter, and others, honest services by concealing conflicts of interest (see *United States v. Joseph L. Bruno),* and other laws regarding ongoing criminal conspiracies.

63. Nevertheless, in open court, Richard Renn, while acknowledging the receipt of the letter from the psychiatric expert, did not immediately disclose the conflict with his private business associate, as required by Pennsylvania Judicial Canon, and federal criminal statutes.

64. It was Keisling's understanding and belief that Defendant Renn and his secret business associate, Dr. Blumberg, were attempting to gain a secret and unlawful payment for Judge Renn, in return for advantage involving Defendant Richard Renn.

65. In open court, instead, Defendant Judge Renn appeared to be greatly infuriated with Keisling for rejecting and exposing Defendant Renn's ongoing, shameful and dangerous influence peddling scheme(s), involving as they did the safety of a child whose safety had already been comprised by a mentally ill mother and a grandmother who enjoyed an insider's advantage as a caseworker with Children and Youth Services.

66. Keisling nevertheless refused the expert's demand to participate in any unlawful activities involving Defendant Judge Renn, even while Judge Renn had a contempt complaint before him demanding the Mother be compelled to submit to Father's expert.

67. At a July 7, 1999, contempt hearing brought about by Keisling's motion for special relief and contempt, Judge Renn instead mysteriously ruled that too much time had elapsed for Keisling to now have an expert, even though Defendant Judge Renn had sanctioned the expert and Defendant Judge Renn had obviously stalled the proceedings by failing to compel Lauren McHenry to attend a psychiatric examination with Defendant Judge Renn's secret business associate, Dr. Blumberg, who was unsuccessfully engaged in peddling influence with Defendant Judge Renn.

68. Defendant Judge Renn's Order reads, in part:

69. "Father has requested that we directed that mother undergo a psychiatric evaluation by Dr. Neil Blumberg of Maryland. The father's request comes extremely late in the proceedings, as we have noted by previous court order; and while we have addressed to some extent father's request the mother undergo a psychiatric evaluation in previous order of this date, we would point out at this point that father's request for this additional psychiatric evaluation is certainly untimely and at this point the Court cannot see justification for delaying the proceedings further to have still another evaluation."

70. Defendant Judge Renn's untruthfully here suggested that this was a new

matter that Keisling had only initiated at a pre-trial conference. In fact, the July 7, 1999, hearing was brought about by Keisling's own petition for special relief to compel McHenry to submit to an evaluation by an "expert" who Judge Renn had allowed Keisling to retain in February, at a cost to Keisling of $2,500 tendered to Defendant Judge Renn's business associate.

71. In fact, Defendant Judge Renn's business associate, Dr. Blumberg, performed little or no work in return for Keisling's $2,500 retainer payment.

72. Defendant Renn at all times was deceitful, dishonest, duplicitous, self serving; shifty and shady; lacking integrity and honesty; crude and unstudied; erratic; lacking common sense; approaching all court business involving Keisling with subterfuge and chicanery unbecoming a judge or the lowest of public officials. Renn is a man who threatens the safety of a helpless young girl to conceal his unlawful private business interests and private schemes.

73. Realizing that Defendant Judge Renn was refusing to allow Keisling lawful discovery in this case, in violation of Keisling's right to a fair trial and an impartial justice system, Lauren McHenry's counsel took advantage of and profited from this, much to the endangerment of the minor child.

74. This pattern would be repeated in a succession of cases involving Keisling before the York County Common Pleas Court in general, and Defendant Judge Renn in particular.

75. In the custody case, Judge Renn ruled that the case was now ready to go to trial, without giving Keisling the benefit of a psychiatric expert. Keisling was forced to go to trial on August 20, 1999, without benefit of an expert.

76. Judge Renn as such not only rode roughshod over Keisling's rights before the court, he blatantly ignored the recommendations for bi-polar medications prescribed by the Johns Hopkins Affective Mood Disorder Clinic, and ignored the prevailing medical and psychiatric standards of care involving a patient such as Dr.

McHenry.

77. On the first day of bench trial, on August 20, 1999, Defendant Judge Renn awarded majority custody of the minor child to the unmedicated mentally ill mother, and further attempted to limit communication between the victimized child and Keisling, who after all previously had been the minor child's primary caregiver, causing great and untold emotional damage to Keisling and the minor child.

78. Keisling's attorney then made a motion to use the psychiatric expert Dr. Blumberg merely as a rebuttal witness at bench trial, without benefit of evaluating Dr. McHenry, to rebut testimony from McHenry's *two* expert witnesses.

79. Defendant Judge Richard Renn, on August 20, 1999, taking up the motion to use Keisling's retained expert merely as a rebuttal witness, finally informed the litigants, "This Court has had a number of professional dealings with Dr. Blumberg when we were in private practice. In fact, I've retained him to assist on a number of cases I'd say for probably the past 15 years."

80. Keisling, aware that Judge Renn previously had disregarded ethical requirements to divulge his *secret and private business relationships* with the expert, and aware of an ongoing and criminal conspiracy involving the expert and Richard Renn, was at all times fearful for the safety of his daughter before the bench of a blatantly corrupt and unethical judge, Richard Renn.

81. This untimely "offer" to recuse himself made by Defendant Richard Renn occurred some four (4) months after Keisling had retained Dr. Blumberg, and after Defendant Judge Renn had already awarded custody of the child to the unmedicated, mentally ill mother.

82. Keisling's understanding and belief was that Defendant Richard Renn was actually explicitly threatening the safety of Keisling's young daughter and offering to get off the case only so that another judge might be held responsible should a catastrophic injury occur to the minor child. Keisling's attorney furthermore

threatened to resign from the case should Keisling accept Defendant Renn's belated offer to recuse. It was also apparent that Renn was unlawfully retaliating against Keisling because Keisling had resisted and exposed Renn's unlawful conspiratorial conduct with Renn's private business partner.

83. Following the bench trial, in appeal before the Pennsylvania State Supreme Court, Keisling reported Defendant Judge Renn's and Defendant Judge Renn's business associate's influence peddling attempts to the state Supreme Court.

84. At the time, the Pennsylvania Supreme Court was headed by Chief Justice Stephen Zappala, who himself was a recent subject of one of Keisling's books on judicial corruption, *We All Fall Down*. Chief Justice Zappala's son, Gregory, would shortly thereafter become involved in the co-ownership of a juvenile detention facility that would unlawfully incarcerate children from Luzerne Couty, Pennsylvania, in return for payments to two county judges.

85. No investigation whatsoever ensued from Keisling's complaint concerning Judge Renn to the Pennsylvania Supreme Court; Keisling was never contacted by court officials, nor was anyone interviewed. Nothing happened. These influence peddling practices, and endangerments of children, are common among York County, Pennsylvania judges, and are in fact accepted practices by Pennsylvania courts and the Supreme Court of Pennsylvania. For this reason the judicial corruption in York County, Pennsylvania, particularly as it relates to its unlawful and dangerous handling of cases involving children, is directly related to criminal activities in Luzerne County, Pennsylvania, and are accepted practices throughout the Pennsylvania court system.

86. Keisling's understanding and belief moreover is that influence peddling, and demands of payments or political "contributions" to judges, is a common and accepted practice by judges of the York County Common Pleas Court, and Pennsylvania courts, such as in Luzerne County. These practices are by their nature intended to benefit the contributors of the judges by giving them an advantage before the court, while at the same time placing those, such as Plaintiff Keisling,

who do not contribute to the judges, at an unlawful disadvantage before the court, in violation of the 14 Amendment's rights of due process and equal protection before our courts.

87. As a concerned father, citizen, and a writer, Keisling soon learned from other concerned citizens of many other alleged ongoing criminal activities involving employees at the York County Courthouse, including, but not limited to, influence peddling, case fixing, kickbacks, murder, reckless endangerment of children, prostitution, human trafficking, sex with juvenile minors, unlawful electioneering in the courthouse and other public property, and the use of public employees and/or equipment to perform personal chores for elected Republican officials, including Defendant Judge Sheryl Ann Dorney.

88. The judges who are defendants in this instant action play an active roll not only in participating in and concealing these criminal activities, the Defendant Judges will retaliate against and punish any whistleblower, including Keisling, who would seek to report or resist these unlawful criminal activities, as more fully stated below.

89. Keisling would accordingly be unlawfully punished and retaliated against by the Defendant Judges and their criminal co-conspirators. These unlawful actions and retaliations by these public officials continue to this day. The other defendants in this instant case actively engaged in, and took advantage of, this unlawful depravation of Keisling's rights to a fair trial and impartial judges for the unlawful betterment of the other Defendants in this instant case.

90. As stated, following Keisling's ignored complaint to the Pennsylvania State Supreme Court concerning what Keisling perceived to be Judge Renn and his associate's failed extortion attempt, and of Renn's ongoing threats against an already victimized and grievously unprotected young girl, writer Keisling began hearing complaints from other concerned York County community members of ongoing and uninvestigated criminal activities involving other judges and staff members of the York County courthouse.

91. Community members complain that influence peddling and case fixings among judges, and the York County, PA District Attorney's staff, lawyers, contributors, and court experts, is an ingrained way of life in York County, and elsewhere in Pennsylvania. To not acquiesce, or "play ball" with this unlawful and criminal system is to invite overt and covert retaliation from other judges and public employees in the Pennsylvania court system.

92. These forms of retaliation include, but are not limited too, subverting and ignoring the constitutional rights of those, including Keisling, who oppose this ingrained system of "insider justice," and physical intimidation, adverse judgments, loss of property, unlawful jailings, beatings, threats of physical abuse, and other retaliations.

93. Defendants Udren; Heim; Katherman, Heim and Perry; Wantz, National City Mortgage; Freddie Mac; and Federal Home Loan Mortgage Corp. actively engaged in and took advantage of these unlawful retaliations by judges against Keisling to gain advantage and to further subvert Keisling's rights to impartial justice in the York County Common Pleas Court, and to unlawfully take Keisling's property from him.

94. As stated, as a professional writer, Petitioner Keisling has extensively studied, documented and written about the role played by York County judges in protecting those responsible for these atrocities; the alleged perpetrators often are the professional or political associates of the judges. Simply put, the York County judiciary protects those with ties to courthouse personnel while, conversely, punishing those who question such judicial protection and favoritism.

95. For instance, in 2000 through 2002, Keisling investigated the police-aided 1969 murder of a minister's daughter named Lillie Belle Allen. Implicated in the murder were current employees of the York County Courthouse and the York Sheriff's Department. Keisling wrote of the murder, subsequent cover-up and eventual criminal trial in his book *The Wrong Car*.

96. At the time Keisling was researching the book, in February 2001, he was carried from a hospital sick bed, unlawfully arrested, physically assaulted and beaten, and illegally jailed on a fraudulently obtained bench warrant issued from the York County Courthouse.

97. Following his unlawful jailing and beating, Keisling filed a federal civil rights lawsuit against the responsible parties (Keisling v. Helwig et al, 1:03-CV-0117). In depositions for that case York County Sheriff William Hose revealed that his Chief Deputy, James Vangreen, had fraudulently and intentionally changed Keisling's address on a notice for a court hearing, prompting an unlawful and fraudulent bench warrant to be issued and Keisling's beating and unlawful arrest.

98. Sheriff Hose's deputy, James Vangreen, in fact, was himself a defendant in a federal civil lawsuit involving the murder of Ms. Allen.

99. In this federal civil case Keisling was awarded an out-of-court settlement from one of the responsible parties, but the presiding federal judge, Judge Christopher Connor granted immunity to courthouse personnel involved in the attack on the writer, further greatly endangering Keisling.

100. After Keisling's beating, in a series of criminal and civil actions in state and federal court addressing Ms. Allen's murder, Sheriff William Hose and his chief deputy James Vangreen were alleged to have *personally* participated in events leading to the civil rights murder of Lillie Belle Allen.

101. It is therefore Keisling's personal experience, and the experience and wide-spread complaints of those whom he writes about, that this blatant system of unlawful behavior is countenanced and protected by some in the federal court system, leaving no means of redress to the victims of this systemic corruption in York County, Pennsylvania, and no meaningful remedies before the law.

102. For example, a public Internet website, http://www.impeachjudgeconnor.com, simply states: "Judge Connor seems to get all of the suits coming out of York. What is the reason for this? Is York using Connor exclusively because they know he will rule in their favor?"

103. Victimized citizens further complain to Keisling, for example, that federal Judge Connor has a personal conflict involving Judge Connor's wife and the political machinery of south central Pennsylvania. Likewise, citizens complain that these civil rights cases, when they are not mishandled by Judge Connor, receive short-shift treatment by Federal Judge Yvette Kane, further endangering the lives and welfare of the victimized public.

104. While the example cited above, involving Keisling's unlawful jailing and beating, was a case of retaliation where Keisling was the victim, those who are most hurt by these unlawful practices are the citizens of York County; most notably and horrifically in recent years its most unprotected -- its children.

105. Keisling's refusal to "play ball" with this corrupt system, and his ongoing whistleblowing and writing activites, further created a cascade of courthouse retaliations against Keisling that continue to this day, in what can only be described as a blatant and ongoing criminal conspiracy.

106. Despite performing little or no work, as explained in the preceding averments, "court expert" Dr. Blumberg refused to return the $2,500 Keisling paid Dr. Blumberg to retain him in the aforementioned custody case.

107. As a result, in November 1999, Keisling fell $300 behind on his mortgage payments, and Defendant Doreen Wentz, an agent for Defendants National City Mortgage and Freddie Mac, and "John Doe" others working for Defendant bank(s), agreed to a repayment plan with Keisling, and received tendered payment(s) from Keisling, per their agreement.

108. In March 2000, Defendants National City Mortgage and Freddie Mac, represented by Defendant Mark Udren, violated their repayment agreements with Keisling, and began a mortgage foreclosure action of Keisling's home at 601 Kennedy Road, Airville, PA, claiming that Keisling had not paid his mortgage since November 1999. National City Mortgage was subsequently purchased or assumed by Defendant PNC Bank.

109. Keisling in fact made his payments from November 1999 to March 2000, and has cancelled checks proving that Defendants National City and Freddie Mac received and accepted these payments.

110. In the ensuing mortgage foreclosure case, following Petitioner Keisling's Answer and Counterclaim filed on February 5, 2002, Keisling served upon National City Mortgage his First Set of Interrogatories on March 7, 2002. Defendants National City, Freddie Mac, and Udren refused to comply with Keisling's discovery requests concerning Defendant Doreen Wentz and Defendant National City's so-called "loan-modification" procedures.

111. On August 8, 2002, the foreclosure case was assigned by the Court Administrator, Defendant Robert Chuk, to Defendant York County Common Pleas Judge Sheryl Ann Dorney.

112. In other litigation relating to Dr. McHenry's unmedicated bipolar disorder, Defendant Dorney repeatedly told Keisling in chambers and in open court that she was actively consulting with Defendant Judge Renn, and stated that she would not rule in favor of Keisling on any motion or court proceding, giving unlawful advantage to Defendants Udren, National City and Freddie Mac, and any others.

113. Defendant Judge Dorney herself had several personal and professional conflicts with Keisling, including Dorney's former employment as an assistant York County District Attorney. The York County District Attorney's Office by this time had become a focus of Keisling's work, involving widespread public complaints of prostitution, case-fixing, and other unlawful activities in that public office.

114. Defendant Dorney's statements and actions were in reality coercion and retaliation against Keisling for Keisling's journalistic and whistle blowing activities as well as Keisling's refusal to "play ball" with Defendant Judge Renn and his business associate, Dr. Blumberg, in the custody case, and in retaliation for Keisling's complaints in filings with the Supreme Court of Pennsylvania outlining Judge Renn's alleged unlawful criminal behavior.

115. It is Keisling's understanding and belief that Defendant Judge Dorney also profits personally from her ongoing unlawful activities.

116. Helpless citizens complain that Defendant Judge Dorney herself uses public employees working at the courthouse to care for her personal home and pets, in violation of Pennsylvania law.

117. Defendant Judge Dorney herself is further alleged to have sought personal companionship from her subordinates in the secretarial pool of the York County courthouse, a situation that would not be tolerated would they be perpetrated by a male judge or public official.

118. Defendant Dorney's *personal* peccadilloes regarding her *personal* companions, and her unlawful use of public employees to care for her *personal* home, effects and pets, is *personal* in nature and is not protected by any judicial immunity.

119. Yet, Defendant Judge Dorney's past personal employment with the York County District Attorney's Office protects her from any and all investigations or prosecutions, citizens complain.

120. The mortgage foreclosure proceedings having been assigned to Defendant Judge Dorney by Defendant Chuk, Defendants National City Mortgage, Freddie Mac and Defendant Udren steadfastly refused to answer the First Set of Interrogatories supplied by Keisling.

121. Instead, Defedants Udren, National City, and Freddie Mac, among other fraudulent practices, resorted to a ruse whereby Keisling was contacted on January 23, 2003, by a Denise Berry of Loan Servicing, an agent for Defendants National City, Freddie Mac and Udren. Keisling was informed by Ms. Berry that the Defendant bank(s) would immediately agree to end the foreclosure case and reinstate the mortgage with yet another "mortgage modification."

122. This however was merely a bad-faith ruse to gain further fraudulent advantage over Keisling in the York County Courts.

123. On the *very same day* that Keisling was contacted by Ms. Berry supposedly to resolve this matter, on January 23, 2003, Defendants National City, Freddie Mac and Udren motioned Judge Dorney for Summary Judgment in the same mortgage foreclosure case.

124. This Motion for Summary Judgment was made despite outstanding fundamental and significant discovery issues. Defendants National City, Freddie Mac and Udren *never produced, as requested, the mortgage note and contracts,* and so *never even proved the debt.* Without having to prove the debt and provide the note, the forclosure action itself was *void ab initio.*

125. Other outstanding issues of triable fact remaining before the court, such as Keisling's cancelled and accepted mortgage payments to Defendant's National City and Freddie Mac.

126. On February 13, 2003, Judge Dorney was again assigned to one-judge assignment on Defendants' Motion for Summary Judgment.

127. Contemporaneous to National City and Defendant Udren's Motion for Summary Judgment, Keisling wrote Judge Dorney a letter of journalistic inquiry dated February 19, 2003, advising Judge Dorney that she was a subject in Keisling's forthcoming book.

128. To that end, Keisling questioned Judge Dorney about research indicating that she had mishandled and/or covered-up what amounted to a county negligence case involving the catastrophic injury of children and a schoolteacher. In that case, several county offices, including the York County Children and Youth Services, the county Domestic Relations Office, and a United States congressmen, were shown to have failed to pass along repeated warnings of threats of an impending attack by a known mentally ill man of what turned out to be school children and their school staff at the N. Hopewell-Winterstown Elementary School in York County, PA. In that ensuing criminal case, Defendant York County retained the services of Dr. Neil Blumberg to cover-up the negligence of county, county commissioners, and court officers, and to hold the mentally ill man criminally responsible for York County's blatant negligence. In fact, York County Children and Youth Services was already under probation from the Commonwealth of Pennsylvania for grievous past mismanagement(s) and injuries to children, and so York County commissioners, as well as county and court officials, feared public political repercussions should the county Children and Youth Services be held responsible for the attack on the school children, and/or lose its license to operate. Defendant York County and its commissioners also employ Defendants Wantz and Schaad for public security contracts, and have done nothing to investigate or curtail Wantz's involvement in the paid sex trade, even after Wantz's arrest for same, or to investigate complaints that Wantz's legal counsel boasts of employing minors for sexual activities.

129. In open court in the mis-applied N. Hopewell-Winterstown Elementary School student injury criminal case, Judge Dorney stated, "We are familiar with Dr. Blumberg and his qualifications. He had testified previously not only before this judge, but I am sure before other judges n York County as well." In Judge Dorney's courtroom in this case, as in others, the negligent county insiders and political allies of Judges Dorney were protected; left shamefully and dangerously unprotected by Judge Sheryl Ann Dorney were the children of York County.

130. In his February 19, 2003, letter to Judge Dorney, Keisling related that members of the courthouse staff, in retaliation, had likewise repeatedly threatened

his own daughter's safety for Keisling's whistle blowing and/or writing activities. Judge Dorney, so advised and informed of the perceived influence peddling scheme involving a supposed court expert and York area attorney Richard Renn, took no action, in violation of diverse laws and judicial canon, further endangering the welfare of threatened children. In this letter, Judge Dorney was also questioned by writer Keisling about outstanding allegations that various members of the courthouse staff had allegedly participated in the 1969 murder of Lillie Belle Allen, the subject of Keisling's 2002 book *The Wrong Car*.

131. In this letter, Keisling also questioned Defendant Sheryl Ann Dorney about long-standing allegations of human trafficking and prostitution activities involving district attorney's office and courthouse staff, associates, and contractors, and other matters of systemic corruption at the courthouse affecting the safety of York Countians. "Do you have any comments on the fear of retaliation and retribution many York Countians have expressed to me, which they say prevents them from coming forward to fight or report crimes such as these?" Keisling wrote Judge Dorney. This letter exchange with Dorney was extensively discussed in Keisling's book *The Midnight Ride of Jonathan Luna*.

132. On the same day Keisling wrote Judge Dorney, on February 19, 2003, Keisling filed a Motion for Recusal with Judge Dorney, citing the obvious professional and personal conflicts between Judge Dorney and Keisling.

133. Judge Dorney took no action on these pressing issues of public safety, involving the safety of children and the human trafficking of young women, and refused to recuse herself, for unlawful reasons of her own protection and that of her political allies in the courthouse, and to unlawfully retaliate against and coerce Keisling, to the benefit of Defendants National City, Freddie Mac, and Udren.

134. As stated above, Defendant Judge Dorney was furthermore specifically informed in Keisling's letter of February 19, 2003, of human trafficking and prostitution allegations involving a York County courthouse security contractor and Defendant Russell Wantz, owner of the Defendant Schaad Detective Agency.

Judge Dorney took no action to uphold the law and public safety involving Mr. Wantz, in violation of diverse laws and judicial canon.

135. State and county security contractor Defendant Russell Wantz, mentioned in Keisling's February 19, 2003, letter to Defendant Judge Dorney, was subsequently arrested in December 2007 on human trafficking and prostitution charges in Dauphin County, Pennsylvania. Nevertheless, security contractor Wantz *remains* protected by York County Courts and officers of the court, including Defendants Renn, Dorney and Kennedy. Wantz's activities have been, and continue to be, as well protected from investigation and prosecution by corrupt individuals in the York County District Attorney's Office, which is a client of Defendant Wantz's, and an office where Dorney once worked. Dorney was and is obviously more interested in protecting her political allies and friends and practices in the DA's office than in upholding the law.

136. On February 21, 2003 Defendant Keisling served upon Defendants National City and Freddie Mac, through Defendant Udren, his Response in Opposition to Plaintiff's Motion for Summary Judgment, citing obvious issues of triable fact before the court, such as canceled checks showing that Keisling had in fact met his contractual obligations. Pa.R.C.P. states that a moving parties is only entitled to summary judgment when "there is no genuine issue of any material fact as to a necessary element of the cause of action or defense which could be established by discovery or expert report," Pa.R.C.P. 1035.2(1).

137. Defendants Udren, National City and Freddie Mac, advised by repeated Motions for Recusal involving these issues, at no time, as required by law and professional responsibility, reported the allegations of unlawful or unethical behavior by these judges, and instead took every advantage of these judges' stated vows to harm and retaliate against Keisling.

138. On April 1, 2003, Keisling motioned for sanctions against Plaintiff National City Mortgage for Plaintiff's failure to answer the First Set of Interrogatories. Throughout this period of time, as reflected in the docket, Keisling repeatedly

demanded discovery in this case, but was every time denied discovery by Judge Dorney and, in business court, by Defendant Judge John Kennedy, both who consistently voiced their intent to forgo discovery in order to immediately grant Plaintiff National City and Freddie Mac its Motion for Summary Judgment and to irreparably harm and retaliate against Keisling. Defendants Udren, National City and Freddie Mac knew Keisling was entitled to discovery, and unlawfully took advantage of the Defendant Dorney and Kennedy's unlawful actions against Keisling. Moreover, Defendants Udren, National City, Freddie Mac and Federal Home Loan Mortgage Corp. were aware that Keisling was a whistleblower and that they were seeking to gain unlawful and shameful advantage from the court's unlawful retaliations against Keisling.

139. In business court on May 19, 2003, hearing the motion for sanctions filed by Keisling against Defendants National City and Freddie Mac for failing to comply with discovery requests, Defendant Judge John Kennedy announced that he was actively consulting and communicating with Defendant Judge Dorney about Keisling.

140. At this May 19, 2003, hearing, Keisling was openly and repeatedly ridiculed by Judge Kennedy. Judge Kennedy at this hearing stated his resolve to disallow both Keisling's right to discovery and Keisling's right to a fair trial in this case, in violation of Keisling's right to due process and equal protection of law.

141. Judge Kennedy entered an Order denying Defendant's Motion for Sanctions. Keisling as such was stripped of his right to discovery. The court ruled that Defendants Udren, National City and Freddie Mac need not to produce discovery materials; nor would Defendants Udren, National City and Freddie Mac need to provide the mortgage note, or even prove the debt.

142. It is Keisling's belief and understanding that Defendant Judge Kennedy's statements and actions were further retaliation against Keisling for Keisling's writings about corruption in the York County Courthouse, and the York County District Attorney's Office. Defendant Judge Kennedy, like Defendant Judge Dorney,

is a former Assistant District Attorney with the York County District Attorney's Office.

143. Defendants Udren, National City, and Freddie Mac, informed by these statements and rulings by Defendant Judges Dorney and Kennedy, and duly served with Keisling Motions raising the aforementioned issues of blatant public corruption in the courthouse, not only were aware of these unfolding allegations, but ignored the law in failing to address them in a lawful, appropriate manner.

144. For example, in the Rules of Professional Conduct governing attorneys at practice in Pennsylvania, Rule 8.3 (b) states, "A lawyer who knows that a judge has committed a violation of applicable rules of judicial conduct that raises a substantial question as to the judge's fitness for office shall inform the appropriate authorities."

145. Not only did Defendants Udren, National City, Freddie Mac and National Home Loan Mortgage ignore the law and allow these corrupt practices to continue, Defendants Udren, National City, Freddie Mac and National Home Loan Mortgage elected to unlawfully take advantage of the Defendant Judges' actions and words to deprive Keisling of his Constitutional Rights of due process and impartial tribunal in the mortgage foreclosure action, and his free speech rights.

146. As stated *inter alia,* a motion for summary judgment is only warranted where "there is no genuine issue of any material fact as to a necessary element of the cause of action or defense which could be established by discovery or expert report." Pa.R.C.P. 1035.2(1). "If, after completion of discovery relevant to the motion, including the production of expert reports, an adverse party who will bear the burden of the proof at trial failed to produce sufficient evidence of facts essential to the cause of action or defense" to submit the question to the jury. Pa.R.C.P. 1035.2(2)

147. A motion for summary judgment may only be granted when the pleadings, depositions, answers to interrogatories, admission and affidavits, and expert

witness reports demonstrate that there is "no issue of any material fact as to a necessary element of the cause of action or defense" Schroeder v. Commonwealth Dept. of Transportation 710 A.2d 23, 25 (1998), and Pa.R.C.P. 1035.1 et seq.

148. In order to successfully bring a motion of summary judgment, the moving party must demonstrate that there are no genuine issues of material fact for which the Court is to decide. First Wisconsin Trust Company v. Strausser, 439 Pa.Super. 192, 653 A.2d 688, (1994). Once the moving party has met this burden, the non-moving party must produce sufficient evidence on an issue essential to the case on which he bears the burden of proof such that a jury could return a verdict in his favor. Ertel v. Patriot News Co., 544 Pa. 93,674 A.2d 1038, (Pa. 1996) Pa.R.C.P. 1035.3.

149. Additionally, the record should be examined in the light most favorable to the non-moving party and summary judgment should only be granted where the entitlement to judgment as a matter of law is free and clear of doubt. Electronic Laboratory Supply Co. v. Cullen, 712 A.2d 304 (Pa. Super. 1998). Further, the court must give the non-moving party the benefit of all reasonable inferences which may be drawn from the facts. Spain v. Vicente, 315 Pa. Super. 135, 461 A2d 833 (1983).

150. Keisling, having specifically denied the allegations in the foreclosure Complaint, having produced canceled checks proving that he in fact paid his mortgage, having filed a counter-claim, and having repeatedly attempted to gain discovery, having been promised a mutually agreeable resolution to this case, more than produced "reasonable inferences" that Respondent National City Mortgage was *not* entitled to Summary Judgment.

151. The case against Keisling was not "free and clear of doubt" as stipulated by Pa.R.C.P. and Pennsylvania case law. Yet, Judge Dorney and Judge Kennedy repeatedly made it clear to Keisling that they had no intention of fulfilling their obligations to the law by granting Keisling due process or a fair trial in this case.

152. Having no recourse in state court to save his house from foreclosure, and to ensure a safe haven and home for his victimized daughter, Keisling was thereby forced to file for federal Chapter 13 bankruptcy procedure on July 1, 2003.

153. *Two days later,* on July 3, 2003, in violation of the federal bankruptcy stay then in place, Defendant Judge Dorney unlawfully entered an order granting Summary Judgment to National City Mortgage. The order was later found void due to the stay in the federal proceedings about which Judge Dorney, and Defendant banks, knew or should have known.

154. Petitioner Keisling emerged from Chapter 13 in 2005, whereupon Keisling was notified that the foreclosure case was reassigned to Judge John S. Kennedy.

155. Keisling motioned for recusal of Judge Kennedy, noting that Judge Kennedy had a personal and professional conflict with Keisling in that Judge Kennedy was an ongoing subject of Keisling's writings. In the normal course of his work, Keisling had been writing about Judge Kennedy in connection with allegations contained in a federal civil court suit, filed by former chief York county Detective Rebecca Downing on February 18, 2005. In her wrongful dismissal lawsuit, which was filed against the York County district attorney, whistleblower Det. Downing alleged deep-rooted corruption in the York County courthouse and DA's Office, including theft of items by the DA from courthouse evidence holding areas, electioneering in the courthouse, blatant cronyism and public endangerment. Detective Downing alleged that Judge John Kennedy administered the oath of office to lawfully unqualified county job seekers, in effect "rubber-stamping" unqualified political cronies for courthouse jobs, thus endangering public safety and further damaging the integrity of the courthouse staff. In 2006, Det. Downing's lawsuit was settled out of court by the county district attorney. A cash settlement was paid to Det. Downing to, in effect, buy her silence, though the underlying allegations have never been properly investigated and remain open.

156. The underlying allegation brought by Chief Detective Downing, and others, is that Defendant Judge Kennedy and other jurists in York County are

uninterested and resistant in gathering facts of law, sometimes with catastrophic public results; these catastrophic results and the underlying negligence themselves are then covered up, while the whistleblowers, such as Chief Detective Downing and writer Keisling, are unlawfully punished, and retaliated against.

157. As part of his investigative journalism work, Keisling wrote a letter to Judge Kennedy on June 6, 2005, which was docketed with a contemporaneous recusal motion, and duly served onto Defendant banks and Udren, questioning Judge Kennedy about Det. Downing's allegations and other courthouse matters, including uninvestigated allegations that members of the courthouse staff were regularly involved in theft, prostitution and influence peddling activities.

158. Keisling wrote to Defendant Judge Kennedy, "In her complaint in the United States District Court for the Middle District of Pennsylvania, Downing writes, 'On May 7, 2003, Defendant (Stanley) Rebert hired (John) Daryman as a detective. On May 20, 2003, Daryman took the oath of office before Judge Kennedy. Daryman, however, had not yet taken a polygraph examination as required by the established rules and regulations.' Following the oath which Downing reports that you carelessly and unlawfully administered to Daryman, Detective Daryman was arrested for driving while under the influence of alcohol. An official with the Pennsylvania Chapter of Mothers Against Drunk Driving expressed the obvious concern to me that me that Detective Daryman endangered the lives of innocent people by driving under the influence, and that you, by your failure to ensure that Daryman was of lawful standing, good character and lawful conduct before you swore him, share blame, and responsibility. I require your comment. I would like to know what corrective action, if any, you have taken to see that Detective Daryman is in full compliance with the law."

159. Defendant Kennedy's hiring and swearing in of a county deputy is *administrative* in nature and is not protected by any judicial immunity.

160. Keisling in this letter furthermore queried Judge Kennedy regarding reports of alleged paid sex and assorted prostitution activities involving courthouse

employees, their associates, and/or contractors, including courthouse security provider Russell Wantz, and further allegations that at least two York County judges regularly attend a sex club events involving bizarre sex practices, in which, *inter alia,* a naked young woman or women were tied to a carnival wheel.

161. Despite his having heard these legitimate concerns, Judge Kennedy took no action to uphold public safety or the law as required by Judicial Canon. On December 10, 2007, courthouse and state security provider Russell Wantz was arrested on alleged prostitution charges in Harrisburg, Dauphin County, Pennsylvania.

162. On June 8, 2006 Petitioner Keisling filed a Motion for Recusal with Judge John S. Kennedy. The Motion for Recusal cited the following Pennsylvania case law:

a. A Judge is required to disqualify himself when his impartiality can reasonably be questioned, see *Commonwealth v. Bryant, 476 A.2d 422* (Pa. Super 1984). "While rare, judicial bias does exist in Pennsylvania, and it cannot be tolerated where manifest." Bryant, supra.

b. Next to the tribunal being in fact impartial is the importance of it appearing so, *Shraaer v. Basil Dighton Ltd.,* (1924), 1 Kings Bench 274, 284 as quoted in *Glendenning v. Sprowls,* 405 Pa. 222 (1961). See also Argo v. Goodstein, 228 A.2d 195 (Pa. 1967).

c. Judgment ceases to be judicial if there is condemnation in advance of trial, *Escoe v. Zerbst,* 295 U.S. 490 *(Cardozo, J. 1935).*

d. Even in the absence of actual bias, a Judge must disqualify himself from any proceeding in which his impartiality might reasonably be questioned. *In the Interest of McFall,* 556 A.2d 1370 (Pa. Super 1989), affirmed with opinion, 617 A.2d 707 (Pa. 1992). Litigants ought not face a judge where there is a reasonable question of partiality. *Alexander v. Primerica Holdings. Inc.,* 10 F3d 155 (C.A. 3 1993), see also *In Re Antar,* 71 F3d 97 (C.A. 3 1995); and *Blanche Road Corp. v. Bensalem Township* 57 F3d 253 (C.A. 3 1995). Impartiality and even the appearance of impartiality in a judicial officer are the sine qua non of the

American judicial system, *Lewis v. Curtis,* 671 F2d 779 (C.A. 3 1982). Even judges who would personally do their best to try and balance the scales of justice may sometimes find it necessary to recuse themselves to protect appearances of impartiality. *Aetna Life Insurance Company v. Lavoie,* 475 U.S. 813 (1986). Public confidence in the judicial system mandate, at a minimum, the appearance of neutrality and impartiality in the administration of justice. When a judge is the actual trier of fact the need to preserve the appearance of impartiality is especially pronounced. *La Salle National Bank v. First Connecticut Holding,* 287 F3d 280 (C.A. 3 2002).

163. Defendant Judge Kennedy refused to recuse himself from the case and instead misused his public office and trust by attempting to intimidate and silence Petitioner and writer Keisling. Keisling was made to understand in court before Judge Kennedy that Keisling would be deprived of due process and other of his rights by Judge Kennedy in retaliation for Keisling's journalistic and whistle blowing responsibilities.

164. In business court and in his writings, Judge Kennedy was consistently discourteous and demeaning to Keisling, was openly partial and prejudicial, given to fits of ridicule, and repeatedly expressed his pre-conceived intent to unlawfully deny Keisling due process of law. For instance, on May 19, 2003, Judge Kennedy rebuked and berated Keisling at length for mispronouncing or misspelling a complicated legal term, and ridiculed Keisling for his insistence of his rights to discovery and a day in court where the facts of the case could be publicly and fairly heard, and weighed.

165. Defendant Judge Kennedy also disallowed Keisling's chosen attorney reasonable time to enter an appearance in this case, effectively disallowing Keisling the right to counsel. Thereafter Keisling felt intimidated and fearful in Judge Kennedy's presence and courtroom. At all times Defendants Judge Kennedy and Judge Dorney acted the role of adversary attorneys before Keisling, not as impartial jurists as required by law.

166. This conspiracy to deprive Keisling of his basic rights of due process and an impartial judge continues to this day in York County Common Pleas Court. Keisling for example is routinely not notified of assignment of Judges by Defendant Court Administrator Chuk.

167. Keisling is also not notified of hearings, and his due process is otherwise flagrantly violated.

168. Said retaliation by the Defendants is not limited to Keisling personally. Due to their profound personal dislike of Keisling for his whistle blowing and journalistic activities, an attorney who is a direct family member of Keisling's appeared before Defendant Judge Kennedy representing a client at a hearing. Judge Kennedy told the family member, before the hearing had even begun, and before opposing counsel had even appeared, that Defendant Judge Kennedy would summarily rule against Keisling's family member.

169. On November 2, 2005, as previously noted, Judge Kennedy granted, in a blatantly capricious and arbitrary manner, Respondent National City Mortgage's Motion for Summary Judgment, ruling that Defendant Keisling has "failed to make a legal defense."

170. On January 17, 2006, Judge Kennedy entered judgment against Defendant Keisling.

171. On February 16, 2006, Defendant Keisling filed a Notice of Appeal to the Superior Court of Pennsylvania.

172. On March 31, 2006, Defendant Keisling filed his Concise Statement of Matters Complained of on Appeal with Superior Court, citing, as discussed above:

a. Issues of triable fact were ignored;
b. Appellant was deprived of proper discovery;

c. Judges Dorney and Kennedy, having concealed issues of personal and professional conflict with Appellant, failed to properly recuse themselves from this case, and unfairly deprived Appellant of his day in court.

173. On June 1, 2006, to once again save his home from a pending unlawful Sheriff's Sale, Defendant Keisling had no choice but to again invoke the federal Chapter 13 bankruptcy statutes, thus automatically staying all state proceedings.

174. Previous to this, in December 2004, Keisling wrote extensively in his book *The Midnight Ride of Jonathan Luna* of Defendant Judge Dorney's unlawful negligence and complicity in the harming of children in York County, and Defendant Judge Dorney's failure to report an active prostitution and human trafficking network associated with York County courthouse personnel to appropriate law enforcement agencies. As well, in *The Midnight Ride of Jonathan Luna,* Keisling wrote of Defendant Judge Renn's close and undisclosed associations with a court expert who claimed an influence peddling scheme with Judge Renn.

175. As stated above, Defendant Judge Dorney was specifically informed in Appellant Keisling's letter of February 19, 2003, of human trafficking and prostitution allegations involving a York County courthouse security contractor named Russell Wantz. Yet Dorney took no action to uphold the law and public safety, in violation of diverse laws and judicial canon.

176. In *The Midnight Ride of Jonathan Luna,* Keisling wrote that corruption in York County had deteriorated to such a point that York Police Commissioner Herbert Grofcsik and York City Controller James Sneddon felt so concerned about the dangerous systemic corruption in the York County courthouse that Grofcsik and Sneddon were compelled to ask federal investigators outside of the York area to investigate county, state and federal security contractor Russell Wantz, of the Schaad Detective Agency, and others associated with the York County courthouse and DA's Office.

177. Police Commissioner Grofcsik and City Controller Sneddon explained to

writer Keisling that Defendant Wantz was not only a participant in human trafficking and prostitution activities, but that Defendant Wantz, to their belief and understanding, was protected from investigation and prosecution by law enforcement and judicial officers in the York County courthouse, and specifically in the York County DA's Office.

178. At the time of his investigation of Defendant Wantz, City Controller Sneddon served as editor and publisher of daily newspaper The York Dispatch, published by the Defendant MediaNews Group. Under Sneddon's editorship, the newspaper hired a private detective who worked under Sneddon and the newspaper company's attorney Niles Benn. The private investigator hired by the Defendant MediaNews Group unearthed and compiled much information concerning alleged unlawful paid sex activities involving Defendant Wantz, and others connected to the York County Courthouse.

179. Sneddon furthermore explained to Keisling that Attorney Benn had warned Sneddon that Sneddon could be fired from the York Dispatch for investigating this courthouse corruption.

180. Editor and Publisher Sneddon subsequently was threatened with criminal arrest by York County District Attorney Stanley Rebert, and was soon thereafter fired from his job with the York Dispatch, and Defendant MediaNews Group.

181. The acquired information concerning Defendant Wantz's alleged unlawful activities were thereafter secreted away by the York Dispatch and its attorney Niles Benn.

182. Both the York Dispatch and a second daily newspaper, Defendant York Daily Record, are published under a "Joint Operating Agreement" with the U.S. Justice Department, as a waiver from the Clayton and Sherman Antitrust Acts. As such, these newspapers no longer publish independently of the government and its political subdivisions in York County, PA. The MediaNews Group subsequently sold its interest in the York Dispatch and purchased the York Daily Record. In

compensation for its government and political waivers, MediaNews Group, must, and does, metaphorically speaking, pay the devil, and actively covers up misdeeds at the courthouse.

183. MediaNews Group relies on the whim of government officials to continue in profitable business. In this civil rights case involving Keisling, the MediaNews Group acted as an arm of the government, in league with Defendant public and court officials, to punish and silence whistleblowers, and to make an example of Keisling.

184. In this matter involving York courthouse corruption, the York Dispatch, while owned by MediaNews Group, relented to pressure from public officials and ended its corruption investigation(s), and suppressed the information it had acquired from Editor and Publisher Sneddon and its hired private detective.

185. Also in his book *The Midnight Ride of Jonathan Luna,* Keisling wrote of Defendant Richard Renn's aforementioned extensive *personal* involvement, *private associations,* and *private conflicts of interest* involving court expert and business associate Blumberg, dating from Renn's days in *private law practice.*

186. Following the December 2004 publication of Keisling's book *The Midnight Ride of Jonathan Luna,* Defendants Wantz and the Schaad Detective Agency, through their attorney, Defendant Larry Heim, of the Defendant law firm Katherman, Heim and Perry, on March 11, 2005, filed a retaliatory and frivolous defamation lawsuit in York County Common Pleas Court against Keisling.

187. Specifically, and central to his Complaint, Wantz alleged that journalist Keisling "wickedly and illegally" wrote and published a book, *The Midnight Ride of Jonathan Luna,* in December 2004.

188. Yet the book accurately reports that York, Pennsylvania, public and law enforcement officials had asked the U.S. Justice Department to investigate allegations that Defendant Wantz, a public security contractor, was engaged in paid

sex acts, prostitution, and human trafficking activities. Wantz at all times used his Complaint, and continues to use his lawsuit, in a malicious attempt to prevent Keisling from publishing and speaking, in violation of Keisling's First Amendment rights, Pennsylvania Constitutional rights, and the protections afforded to him as a working journalist by PA Shield Law Protections 42 Pa. C.S.A. § 5942 (Shield Law).

189. Defendants Wantz and Heim's other purpose in this defamation action was to take advantage of the York County Judiciary's unlawful retaliatory actions against Keisling for their own personal benefit, and to unlawfully cause Keisling to lose possession of his home, in conspiracy with Defendant Judges and Court Administrator, in retaliation for Keisling's whistle blowing and writing activities involving Defendant Wantz, and others, and in violation of Keisling's 14th Amendment Rights to Due Process and Equal Protection before the courts.

190. As well, Wantz and his attorneys at Katherman and Heim have conspired to violate Keisling 14th Amendment Rights to Due Process and Equal Protection before the courts by taking advantage of insider association they have with courthouse judges and other personnel, in an unlawful attempt to subjugate Keisling's Constitutional Rights to equal protection and due process before the courts, and his 1st Amendment Rights.

191. Indeed, Attorney Heim boasted that he and Defendant Wantz would take advantage of the York County Court's intense dislike of Keisling, and the denial of Keisling's constitutional rights, to unlawfully prevail against Keisling and to unlawfully take Keisling's home and house from him.

192. On June 19, 2006, meanwhile, a Suggestion of Bankruptcy was duly entered into the docket, presumably then under supervision of Pennsylvania Superior Court.

193. Whereupon, in July 2006, Defendant Wantz filed a Complaint for Injunction with the federal bankruptcy court asking, unsuccessfully, that the court

outright ban Keisling "from selling or otherwise circulating (Keisling's book) *The Midnight Ride of Jonathan Luna,*" underscoring the Defendants' outrageous use of the courts to blatantly trample and dispose of Keisling's most fundamental rights of free speech and civil liberties.

194. On July 25, 2006, meanwhile, in the foreclosure matter, Superior Court of Pennsylvania unlawfully ignored the federal stay and entered an order dismissing Keisling's Appeal for Failure to File a Brief, even though no brief was lawfully required as this matter *at all times remained under the jurisdiction of the federal court and subject to the ongoing federal stay.*

195. On August 15, 2006, while the matter was still under federal stay, Superior Court denied Appellant's application to reinstate the appeal pending the lifting of the federal court stay. On August 29, 2006, Superior Court again unlawfully violated the federal stay by entering an order dismissing Petitioner Keisling's appeal. This again was despite the fact that Defendants National City, Freddie Mac and Udren never produced the mortgage note, never proved the debt, and that the foreclosure action itself was *void ab initio.*

196. Defendants Udren, National City and Freddie Mac, knew that Keisling had a right to appeal in this matter, but again took advantage of Keisling's inability to gain a fair hearing in Pennsylvania courts.

197. Keisling was left with no means to seek a remedy at law in the foreclosure matter but to file, on April 18, 2008, an Application for King's Bench Jurisdiction and/or Extraordinary Relief with the Supreme Court of Pennsylvania, in which Keisling cited much of the foregoing, *inter alia.*

198. On April 28, 2008, while this King's Bench application was pending, Keisling again filed a Motion for Recusal with Defendant Judge Richard Renn. The Motion read, in part, "As Judge Richard Renn is well aware, Judge Renn is a primary subject of a forthcoming, long-researched book and other media on the endangerment of children in the York County Common Pleas Court, particularly

Judge Renn's mishandling of cases involving threats against a child by family members of Children and Youth Services employees, and related subjects, including long-term consequences to the child and family, and related ongoing demands for investigations of Judge Renn and his business associates." Again, Defendant Renn refused to recuse himself.

199. Keisling briefed the State Supreme Court, "this case is a matter of public importance in that its handling heretofore reflects retaliation for, and attempted suppression of, Petitioner and writer Keisling's investigation of deep-rooted negligence in the care of children in the York County Court system, and other matters. Officers of the court and others in York County at various times have contributed to, or concealed, catastrophic injury to children and others. It is of vital importance to the public for one to be able to investigate or criticize wrongdoing by those holding the public trust, without fear of retaliation. Officers of the court have used this and other cases to punish writer Keisling for his work.... The out-of-control environment in the York County Common Pleas Court is, at least in part, due to the systemic failure of *proper oversight of our judicial branch and other agencies.* The Pennsylvania Supreme Court should exercise plenary jurisdiction over this matter to not only establish principles of impartial justice in this particular case, but also to demonstrate its willingness to recognize, address and understand the deeper underlying problems in our court system, and to rectify these deficiencies."

200. The Pennsylvania Supreme Court denied the request; it should be noted that Keisling has written several books, most notably *We All Fall Down,* concerning deep-rooted political and judicial corruption in Pennsylvania's Supreme Court. The Pennsylvania Supreme Court, it should also be added, contemporaneously was embroiled in a controversy as to whether the court was covering-up widespread abuses in Luzerne County, Pennsylvania, in which more than 6,500 juveniles were unlawfully imprisoned at a juvenile detention facility co- owned by one Gregory Zappala, son of the former chief justice of the Pennsylvania Supreme Court.

201. In all these foregoing blatant examples by the Defendant Judges Dorney and

Kennedy to unlawfully retaliate against whistleblower and writer Keisling and to ignore Keisling's right to a fair discovery, trial and appeal processes, and Keisling's right to an impartial judge, Defendants Udren, National City and Freddie Mac took advantage of the Defendant Judges unlawful activities and retaliation against Keisling to take Keisling's house from him *without any lawful due process whatsoever.*

202. On April 28, 2008, in blatant violation to Keisling's rights to due process and equal protection, Defendants National City, Federal Home Loan Mortgage and the Udren Law firm unlawfully colluded with defendant judges to sell Keisling's home at Sheriff's Sale, on behalf of Defendant Federal Home Loan Mortgage, depite the fact that the foreclosure action, for the reasons previously stated, was *void ad initio.*

203. Meanwhile, through 2007 and into the present, Defendants Wantz, Heim, and Katherman Heim and Perry at all times continued to conspire with court officials to gain unlawful advantage over Keisling in the courthouse against Keisling. Now their efforts to have court officials "fix" their case against Keisling took another outrageous turn.

204. In *Caperton v. A.T. Massey Coal Co*., the U.S. Supreme Court has held that "a serious risk of actual bias" occurs when a party in the litigation "had a significant and disproportionate influence" in electing a judge, as in the case involving Wantz and Keisling, where a principal in Wantz's law firm was the campaign chairman for, and major financial contributor to, the judge, Defendant Musti Cook.

205. In this time period, Defendant Heim's law partner, J. Robert Katherman, also of the Defendant law firm Katherman, Heim and Perry, served as chairperson for the election committee of Defendant Judge Maria Musti Cook. The intent of the Katherman Heim law firm's political involvement with Musti Cook was to further the interests of the Katherman Heim law firm, and its clients, before the courts of York County, Pennsylvania, and so to unlawfully trample the interests and rights

of opposing litigants and others before the York County, PA, courts.

206. Defendant Heim's law firm, Katherman, Heim and Perry, was a nexus and focal point for Defendant Judge Musti Cook's fundraising and political activities in her successful quest to gain election to the York County Common Pleas Court as Judge.

207. Political fundraisers and other activities were held on behalf of Defendant Musti Cook at Defendant Heim's law firm of Katherman, Heim and Perry, while Defendant Musti Cook was in *private* law practice, *before* her election as judge. Defendant Musti Cook, while in private law practice, also received private legal work and/or referrals for legal work from the partners of defendant law firm Katherman, Heim and Perry. These associations involving Defendants Musti Cook, Katherman, Heim, and Perry, Wantz and Schaad, are *personal* in nature, and are not subject to any judicial immunity.

208. On February 28, 2005, Defendant Judge Musti Cook's Committee to Elect Maria Musti Cook received and accepted a $1,800 contribution from J. Robert Katherman, chairman of her election committee, and a partner of the Defendant firm Katherman, Heim and Perry, and a business partner of Defendant Heim.

209. On February 28, 2005, Defendant Judge Musti Cook's Committee to Elect Maria Musti Cook received and accepted another $500 contribution from J. Robert Katherman, chairman of her election committee, and a partner the firm Katherman, Heim and Perry, and a business partner of Defendant Heim. As well, on April 25, 2003, Defendant Judge Musti Cook's Committee to Elect Maria Musti Cook received and accepted a $100 contribution from former York County Assistant District Attorney Ronald Perry, a partner of the firm Katherman, Heim and Perry, and a business partner of Defendant Heim.

210. On September 27, 2007, unbeknownst to Keisling, Defendant York County Court Administrator Robert Chuk reassigned Defendant Wantz's and Heim's defamation action against Keisling to Defendant Judge Musti Cook. The case had

previously been assigned to Judge Michael Brillhart.

211. Defendant Court Administrator Chuk did not notify Keisling or his attorney of this reassignment.

212. At the time, Defendant Judge Renn was preparing to assume his new position as President Judge of York County Common Pleas Court.

213. Defendant Court Administrator Chuk would now be under the direct supervision of Defendant Judge Renn.

214. The webpage for York County Common Pleas Court explains, in fact, that the "District Court Administrator (i.e. Defendant Chuk) ... assists the President Judge (who is today Defendant Judge Renn) with *all* of the administrative responsibilities on the County level." Emphasis and parenthesis added.

215. Moreover, the web site explains, "All civil and criminal matters, other than matters that by statute are heard in the Orphan's Court Division, are heard in the civil or criminal divisions of the Court of Common Pleas. The same judges hear matters in each of these divisions, and the President Judge is responsible for the assignment of the work and the general administration of the work of the Court."

216. On October 1, 2007, Wantz served Interrogatories and Requests for Production to Mr. Keisling. Several of these Interrogatories requested the identity of Mr. Keisling's sources for the statements alleged to be defamatory. On October 24, 2007, Mr. Keisling submitted Answers to Wantz, objecting to the Interrogatories requesting the identity of sources on the grounds that they were protected from disclosure under federal and state law involving Keisling's First Amendment rights to free and protected speech.

217. On November 1, 2007, Wantz filed a Motion to Compel Answers to Interrogatories. Instead of filing the Motion with the motions judge as required by the York County Local Rule of Civil Procedure 208.3(a), counsel for Wantz filed

the Motion directly and surreptitiously with the new trial judge, Defendant Maria Musti Cook, the judge for whom Defendant Heim's law and business partner had served as political campaign chairman.

218. Keisling and his attorney were not notified by Defendant Court Administrator Chuk, or Defendant Prothonotary Pamela S. Lee, of this unlawful filing before Judge Musti Cook; nor was Keisling or his attorney given an opportunity to brief the judge.

219. Having so received the assignment of *Wantz v. Keisling et al* from Court Administrator Chuk, and not having notified Keisling of this assignment, Defendant Judge Musti Cook entertained, and granted, *ex parte,* several unlawful motions from Defendants Heim and Wantz regarding the removal of Keisling's lawful journalist's state shield law protections, his First Amendment rights, and proposed sanctions against Keisling. All this was also in violation of Keisling's 14th Amendment rights to equal protection and due process before the courts.

220. On November 8, 2007, without allowing Mr. Keisling the required opportunity to argue in opposition, or without Keisling even being notified of the hearing, Defendant Judge Musti Cook granted Wantz's Motion to Compel.

221. Defendant Judge Musti Cook's unlawful and blatant intent was to irreparably harm Keisling and to abrogate his 1st and 14th Amendment Rights to free speech, due process and equal protection before the courts, in favor of a client of her campaign chairman's law firm. Defendants Heim, Katherman, and Wantz took full advantage of these goals to further harm Keisling, to further their own malicious lawsuit against Keisling, and to cover-up their own involvements in unlawful activities.

222. Keisling's right to due process, an impartial judge, and his shield law protections unlawfully violated, Keisling was forced to undertake the expense of appealing the matter to Pennsylvania Superior Court on November 21, 2007.

223. On November 27, 2007, notice was filed that Defendant Judge Musti Cook's Order was appealed to the Superior Court of Pennsylvania.

224. On December 4, 2007, Wantz asked Pennsylvania Superior Court to quash Keisling's vital appeal.

225. On December 10, 2007, as this Appeal was pending before Superior Court of Pennsylvania, and while journalist Keisling was bearing the great and serious burden of defending his 1st Amendment and Shield law rights, Mr. Wantz was *arrested by police in Dauphin County, PA, on charges of soliciting a prostitute,* a paid sex act and a human trafficking activity, which bore out the truth and accuracy of Keisling's journalism that Wantz participates in prostitution, paid sex and human trafficking activities.

226. Even after his arrest, Defendant Wantz continued with his meritless, malicious, retaliatory and suppressive defamation lawsuit.

227. On January 11, 2008, Defendant Judge Musti Cook filed her Statement of Lower Court Pursuant to PA. R.A.P. 1925(s), in which the trial judge repeated Wantz's assertions that Keisling "'wickedly and illegally' authored and published a book."

228. Yet, on appeal, Pennsylvania Superior Court agreed with Keisling's position that, "Without affording Mr. Keisling an opportunity to make an argument, the trial court granted the Motion."

229. In its ruling entered January 12, 2009, Superior Court of Pennsylvania found that trial court Judge Musti Cook, who had held no hearing including Keisling, "did not, indeed could not, rule substantively on whether the First Amendment, the Shield Law, or any other State or Federal law would be violated by requiring Keisling to answer the interrogatories because the trial court had no way of knowing which laws Keisling thought would be violated."

230. The case was returned to York County Common Pleas Court for proper adjudication.

231. In the discovery process for this case, meanwhile, Keisling learned that a group of York County lawyers and court officials regularly made trips to Costa Rica, for the purpose of attaining sex from prostitutes, and sex from juveniles. Some of the participating attorneys involved in these sex junkets returned to York County, PA with unlawful Cuban Havana cigars, and other secret presents, some of which were given to York County judges to buy their favors and acquiescence, cooperation and silence.

232. Also in discovery for this case it was learned that Defendant Heim allegedly participated in these sex junkets to Costa Rica and, upon returning home, displayed to several of his legal clients photographs of an underage Costa Rican juvenile female which Defendant Heim boasted to his legal clients were paid by Heim for the purpose of illicit sex.

233. Attorney Heim, through his law firm's donations to, and backing of, Defendant Maria Musti Cook, and associations with Defendant Judge Richard Renn, and other York County judges, expects, and receives, legal protection from prosecution for these sex acts with juveniles.

234. As well, Attorney Heim enjoyed the long-term use of a bank-controlled vehicle or vehicles which Defendant Heim attained through fraudulent practices involving Defendant Wantz's car dealership, and involve the misappropriation of federal and state drug task force resources connected with the York County District Attorney's Office.

235. The unauthorized use of said vehicle(s) were not declared within Heim's, and other's, tax statements, his clients report.

236. These blatant attempts to strip Keisling of his Constitutional Rights continue to this day, as do conspiratorial efforts to cover-up unlawful activities by

York County officers of the court. York County judges and public officials continue to ignore Keisling's civil rights, while Defendants Wantz, Heim, National City, Federal Home Loan Mortgage and the Udren Law Firm continue to take advantage of these officials' unlawful actions against Keisling.

237. On March 2, 2009, Plaintiff Wantz filed in York County District Court a Motion to Dismiss Defendant's Objections to Plaintiff's Interrogatories. A hearing was scheduled before Defendant Judge Richard Renn on April 2, 2009.

238. On April 1, 2009, Keisling filed a Motion for Recusal with Judge Renn, citing Renn as a subject of Keisling's book involved in this suit, and ongoing investigative reporting and other personal and professional conflicts with Keisling, including Keisling's efforts to seek a criminal investigation of Richard Renn; Renn's hidden business association with court expert Dr. Neil Blumberg; and Keisling's belief and understanding that Defendant Renn threatened the safety of Keisling's 11-year-old daughter in an attempted to extort Keisling, and buy his silence.

239. As well, in this Motion, Keisling cited outstanding allegations against Defendant Heim that Heim has boasted to his clients, and others, of his traveling to Costa Rica to purchase sex acts from underage females.

240. On April 2, 2009, erring in discretion and in violation of case law and Pennsylvania Judicial Canon, Defendant Renn set about to further harm Keisling by refusing to immediately recuse himself from this proceeding, bearing as they did on Defendant Renn's personal, business, political and social associations and *personal affiliations while in private practice before he was a judge,* and the writings about Renn in the subject book, *The Midnight Ride of Jonathan Luna,* and Keisling's ongoing editorial projects.

241. Defendant Renn instead threatened to personally preside over a hearing involving the outstanding *personal* allegations concerning *private citizen* Defendant Renn, and to hold Keisling in contempt of Defendant Judge Renn's court.

242. As such, Defendant Renn's self-involvement in a case concerning Keisling's book and writings about Richard Renn, wherein Keisling discusses Renn's *personal* affairs and conflicts of interest from Renn's days in private law practice, is overtly *personal* in nature, and is not protected by any claim of judicial immunity whatsoever.

243. By interjecting himself in a case involving his own personal interests, Defendant Renn further personally abused his public position as a judge, and as administrator of county and court business as president judge, and blatantly acted to protect his secret personal associate Dr. Blumberg, and the resulting heinous endangerment and injury of children by court and county personal; and to conceal allegations made by Defendant Heim's clients that Heim boasts of having sex with underage females, and other outstanding allegations.

244. Defendant Renn, *himself a subject of the very book before the court at this hearing,* refused to recuse himself, and instead threatened Keisling and his counsel with sanctions. Judge Renn at this hearing announced that he was predisposed to rule against Keisling and planned to strip Keisling of his First Amendment and Shield Law and rights and protections. Only after he learned, from Keisling's counsel, that Keisling was an active employee of CBS News and was also engaged with several other news gathering organizations, did Renn agree to schedule an evidentiary hearing into the matter.

245. On April 3, 2009, at an evidentiary hearing presided by Defendant Judge Renn, evidence was heard that Keisling is a long-time journalist under contract with CBS News, and has lifelong news gathering associations with many television stations, television networks, general circulation magazines and newspapers. Evidence was also heard that Judge Renn was a primary subject of Keisling's ongoing journalistic work, *inter alia.* Evidence was heard and presented into the records that Plaintiff Wantz, his counsel L.C. "Larry" Heim, and Judge Richard Renn were subjects of Keisling's journalistic news gathering activities with CBS News dating at least to 1999, years before the writing and publishing of *The Midnight Ride of Jonathan Luna* in late December 2004.

246. Defendant Judge Renn went so far as to placed himself in a position to review a letter written by Keisling to CBS News and other news organizations, in which Judge Renn and his business associations with Dr. Blumberg were questioned. Defendant Renn's obvious motivations were to protect himself and his personal interests, as well as to suppress Keisling's writings and research of Judge Renn, and to outrageously and blatantly harm Keisling's right to free speech, equal protection and due process before the courts.

247. Defendant Judge Renn, personally seeking retaliation against Keisling, entered an Order dated April 3, 2009, granting Plaintiff Wantz's Motion to Dismiss Objections, ordering Keisling to reveal his journalistic sources for the book, including those sources who would provide information on, or lawfully express their opinions of, Defendant Richard Renn, in violation of Keisling's First Amendment Rights and PA Shield Law Protections, and Keisling's 14th Amendment rights to equal protection and due process before the courts.

248. Following this hearing, and fearing further retaliation from Judge Renn, Keisling's counsel withdrew from this case. Judge Renn effectively stripped Keisling of his counsel, even as Judge Renn refused to get off the case, involving as they did his personal and political interests.

249. Defendant Renn is attempting to hide behind immunity offered to a judge for which Defendant Renn is not eligible, insofar as the allegations against Defendant Renn are both criminal and personal in nature. As well, Defendant Renn administers county business on behalf of the publicly funded County of York: Defendant Renn's *administrative* refusal to revoke the private detective's license for Defendant Wantz for his admitted paid sex crimes is but one example. Another example is Defendant Renn's misuse of is powers to protect Defendant Heim from scrutiny from charges of sex with underage minors, allegations that were suppressed by Judge Renn at the April 2 and April 3 hearings.

250. In *Haybarger v. Lawrence County Adult Probation and Parole, et al,* moreover, the court has found that 11th Amendment immunity is waived when federal money is received from political subdivisions such as the York County Judicial District Court, its administrators, and the County of York, responsible for its district court.

251. At the time of the aforementioned April 3, 2009, hearing, Defendant York Daily Record and its owner, MediaNews Group, assigned its reporter Rick Lee to cover these hearings. Defendant Rick Lee, acting in concert with these corrupt government officials and administrators, refused to allow Keisling to comment in the prejudicial newspaper articles he filed with the MediaNews Group's York Daily Record for publication.

252. Newspaper reporter Rick Lee is married to Defendant Pamela S. Lee, the elected Prothonotary of York County district court. Defendant Pamela Lee is also the sister of the U.S. Congressman from York's 19th Congressional District.

253. This April 3, 2009 hearing concerned Keisling's ongoing *editorial projects in which Defendant Richard Renn himself is a subject.* At these hearings, as mentioned *inter alia,* Defendant Richard Renn blatantly ignored Keisling's Motion to Recuse, and instead stripped Keisling of his 1st and 14th Amendment rights and protections.

254. Following this blatantly unfair hearing, Keisling approached Defendant reporter Rick Lee with a simple and pithy written comment for publication in the Defendant York Daily Record: "I called the kettle black."

255. Defendant newspaper reporter Rick Lee informed Keisling that Keisling would not be allowed any comment whatsoever in the newspaper. Keisling would not be allowed to comment in the newspaper on Judge Renn's actions, misdeeds or conflicts of interest; nor would Keisling be allowed public comment on Defendant Wantz's subsequent arrest by police on paid sex charges, and Keisling's successful exposé of Wantz.

256. Reporter Rick Lee in fact expressed the cold reality to Keisling that Keisling would not be allowed to make any comment in his newspaper whatsoever, presumably because Keisling had stood up against wholesale unlawful public misbehavior and systemic corruption in the York County courthouse, where Reporter Rick Lee's wife works as an elected public court official.

257. Defendant reporter Rick Lee further expressed his opinion as to why Keisling was before the court. Wantz's Complaint in fact describes Keisling as "wicked." In these Defendants' minds, attitudes, and actions, protected and free speech is a "wicked" exercise which must be unconstitutionally suppressed, less these self-perpetuating insiders' wholesale corrupt practices in the York County courthouse be exposed and ended.

258. The newspaper and its reporter were actively conspiring with these public officials to gag Keisling's protected speech, and to further deprive Keisling of his civil rights to equal protection before the courts. A series of articles were published by MediaNews Groups's monopoly newspaper, Defendant York Daily Record, bearing Reporter Rick Lee's by-line, in which Keisling was not offered the opportunity to even comment on the court proceedings.

259. Defendant York Daily Record furthermore falsely and with malice berated Keisling for not revealing sources and information, much of which after all was attained by Keisling from former Editor and Publisher Sneddon under his employ with Defendant MediaNews Group, and which the MediaNews Group and its attorney Niles Been *themselves* have suppressed from public review.

260. As mentioned *inter alia,* Defendant newspaper reporter Rick Lee is the husband of Defendant Pamela Lee, the duly sworn elected prothonotary of the York County Common Pleas Court.

261. On May 28, 2009, Defendant Musti Cook was assigned a Complaint in Ejectment filed by Defendants Federal Home Loan Mortgage and the Udren Law firm, and its counsel Defendant Louis A. Simoni.

262. On July 21, 2009, Defendants Federal Home Loan Mortgage, the Udren Law Firm, Udren, Minato and Simoni filed a fraudulent and untimely Default Notice and Writ of Possession with Defendant Prothonotary Pamela Lee, which Defendant Pamela Lee granted.

263. Federal Home Loan Mortgage subsequently failed to file an answer to Keisling's Counterclaim, and admitted, among other things, to 14th Amendment violations against Keisling, losing by default. As part of its loss in this case, the judgment against Federal Home Loan Mortgage states that the court recognizes "Keisling's lawful title to said premises (at 601 Kennedy Road in Airville, PA), and to assess damages and other remedies as deemed necessary to make Keisling whole in this matter."

264. Federal Home Loan Mortgage subsequently filed a Motion, through its aforementioned attorneys at the Defendant Udren law firm, to Open and Strike Judgment, briefing the court that Keisling has no 14th Amendment Rights to due process and equal protection in this or, presumably, any other actions in the courtrooms of the United States of America.

265. Defendant Supreme Court of Pennsylvania further harmed Keisling, and continues to harm him, by failing to conduct its *administrative responsibilities* to lawfully, equally, and/or competently administer justice in the Commonwealth of Pennsylvania, and to properly and impartially investigate claims of unlawful activity, conflicts of interest, and misbehavior in the judicial branch of government.

266. Defendant Supreme Court of Pennsylvania willfully or incompetently ignored and/or refused to investigate complaints made by Keisling concerning Cash for Kids in York County, Pennsylvania involving Judge Richard Renn and his private associate(s), just as Defendant Supreme Court of Pennsylvania failed to

investigate long-standing complaints of Cash for Kids demands in Luzerne County involving Judges Nichael Conahan and Mark Ciavarella, and their associates.

267. In a similar fashion, Defendant Supreme Court of Pennsylvania ignored and failed to investigate reports that officers of the court such as Defendant L.C. "Larry" Heim in York County boast to clients of having sex with underage minor children.

268. The causes of Defendant Supreme Court of Pennsylvania's failure to lawfully, equally and competently administer justice are rooted in systemic public corruption, nepotism and political and personal cronyism in the Pennsylvania Supreme court, and in Pennsylvania as a whole.

269. In order to control its corrupt practices, protect insiders, and punish those who would speak out against unlawful behavior in Pennsylvania's courts, close relatives and friends of state Supreme Court Justices are placed on the court's so-called Disciplinary Board.

270. As such, the Pennsylvania Supreme Court's internal disciplinary administrative process, or lack thereof, protects political and personal cronies of the judges of the state courts, and other insiders, while punishing any who would speak out against this blatant corruption.

271. Any attorney in Pennsylvania who dares speak out against court corruption is threatened with "discipline" or disbarment, making it impossible for Pennsylvania citizens like Keisling to retain an attorney in cases such as this, involving as they do blatant administrative court corruption and personal conflicts of interest.

272. Underscoring this sad and shameful reality to harm the rights of Keisling and other Pennsylvanians, Defendant State Supreme Court Chief Justice Ronald Castille, acting in his role as chief court administrator of the state, publicly warned the League of Women Voters, and others, in May 2008, following that

organization's filing of a lawsuit alleging insider political shenanigans on the Pennsylvania Supreme Court, that the League's lawsuit, "slanders the entire Supreme Court of Pennsylvania with baseless and irresponsible charges.... The parties may have subjected themselves to sanctions, and the attorney may have subjected himself to disciplinary action."

273. The message clearly sent by Defendant Castille to all Pennsylvanians is that not only are Pennsylvania courts not administered lawfully and competently, but that any Pennsylvanian who complains about this dismal and unlawful state of affairs will face "sanctions," and their attorneys "subjected ... to disciplinary action."

274. This reckless and irresponsible statement by Defendant Castille chilled all court criticisms in Pennsylvania, and made it impossible for citizens like Keisling to find a attorney to bring their cases to court, in blatant violation of 1st and 14th Amendment Rights.

275. It would be one thing if corruption had been eradicated in Pennsylvania courts: the shameful truth is that the court system and its administration in reality has degraded to such a point in Pennsylvania that children are literally being sold down the river for cash, and their parents can do nothing about it. The lack of proper, lawful, equal and competent administration of justice in Pennsylvania, like that described in this case, is a direct cause of one of the most shameful instances of judicial corruption in American history.

276. The administrative duties of the court, it should go without saying, are necessary to the administration not only of the court, but are required for the administration of justice.

277. If one is deprived, as is Keisling, of competent, proper and lawful administration of justice, one is also, as a consequence, deprived of justice. If judicial canon is not enforced, as a matter of court administration, and judges such as Richard Renn and Maria Musti-Cook are allowed to sit on cases involving their

own private and personal interests and affairs, and injustice and unequal law is applied, as is the case with Keisling and these court officials, *lawful and meaningful justice is not, and cannot be delivered*.

Wherefore, Plaintiff demands judgment of the Defendants jointly and severally for the deprivation of his federally guaranteed rights, for losses to plaintiff's property, demands punitive damages in the case of the individual defendants, damages for pain and suffering and emotional distress, together with fees, costs, attorneys' fees and other such relief as the Court may deem appropriate.

Respectfully submitted,

_____

William Keisling IV, *pro se*
601 Kennedy Road
Airville, PA 17302
717-927-6377

December 22, 2009