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

WILLIAM WINDSOR, Plaintiff,

CASE NO. 2018-CA-010270-O

VS.

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

## WILLIAM M. WINDSOR'S AFFIDAVIT OF PREJUDICE OF JUDGE JEFFREY L. ASHTON DATED FEBRUARY 23, 2023

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

- 1. My name is William M. Windsor ("Windsor"). I am 74-years-old, am absolutely competent to testify and represent myself, and have personal knowledge of the matters stated herein.
- 2. This Affidavit of Prejudice of Judge Jeffrey L. Ashton ("Affidavit of Prejudice") is offered in support of a Judicial Misconduct Complaint against Judge Jeffrey L. Ashton ("MISCONDUCT COMPLAINT").
- 3. I am the Plaintiff in this personal injury action that has been pending since 2018, and I am representing myself pro se. After over six years since I was disabled in a horrible crash when an 18-wheeler came into my lane and crushed me, the case was finally set for trial on May 22, 2023.
- 4. On 2/21/2023, there were supposed to be two hearings in this case. I happened to notice a standard efiling notice hit my in-box. I opened it, and I was surprised to see the hearings canceled. I was SHOCKED to see that Judge Jeffrey L. Ashton entered an order revoking my right to self-representation. [EXHIBIT A.] This had never been discussed, and there was no notice or opportunity to be heard. The judge had no jurisdiction to do what he did. It is a void

order. The cases cited as "authority" by Judge Jeffrey L. Ashton both indicate it's a denial of due process to do what he did without notice and an opportunity to be heard. So he takes an action that is a violation of my Constitutional rights, and he does it in an order citing cases that establish he can't do what he had just done. Judge Jeffrey L. Ashton could be mentally ill. Or he is simply a corrupt narcissist. Or he has been bribed to do whatever it takes.

- 5. I'm not an attorney. However, I have studied law, and I know improper actions by attorneys and judges when I see them. I have seen them again and again in this case! Judge Jeffrey L. Ashton is maliciously biased against me. As I testified previously on 4/5/2021, the extent of his bias against me is truly overwhelming. [EXHIBIT B Transcript of Hearing 4/5/2021 P.6: 12-16.]
  - 6. Judge Jeffrey L. Ashton is corrupt.
- 7. <u>Black's Law Dictionary Free Online Legal Dictionary</u> defines "corruption" as "illegality; a vicious and fraudulent intention to evade the prohibition of the law. The act of an official or fiduciary person who unlawfully and wrongfully uses his station or character to procure some benefit for himself or for another person, contrary to duty and the rights of others."
- 8. Judges are supposed to go by the law. Judge Jeffrey L. Ashton does not. Every action he has taken in this case is to grant unsigned and unverified requests of the attorneys for the Defendants (Boise Cascade with defense paid by AIG) and deny requests for relief that are signed, verified, and proven by me. Judge Jeffrey L. Ashton had never even granted me a hearing, and he said in the hearing on 4/5/2021 that he never would [EXHIBIT B Transcript of Hearing 4/5/2021 P. 36: 9-14; P. 40: 12-25; P. 41: 1-3]. All that he has done has been unlawful and designed to procure a benefit for the Defendants contrary to his duty and my rights.

- 9. EXHIBIT C hereto is my Motion for Partial Summary Judgment. It shows that the Defendants are liable. Judge Jeffrey L. Ashton has blocked the motion from being set for a hearing.
- 10. Judge Jeffrey L. Ashton got away with making me ONE in 1,074,00. There are as many as 21,480,000 people in Florida who could be plaintiffs. Before me, only 19 of those people, who are neither prisoners nor attorneys under disbarment proceedings, have had an order entered denying them the right to represent themselves. APPENDIX 37, 40, and 50 <sup>1</sup> show I do not meet the criteria of the 19 people previously denied the Constitutional right to represent themselves without an attorney to approve their filings. Judge Jeffrey L. Ashton did not allow me to tender any of this into evidence at the 4/5/2021 Hearing because he is terminally biased and corrupt. The documents in APPENDIX 37, 40, and 50 were all filed and docketed in Case #2018-CA-010270-O. <sup>2</sup>
- 11. At the hearing on 4/5/2021, Judge Jeffrey L. Ashton accused me of threatening a member of the judiciary and said it was contemptuous. This is what Judge Jeffrey L. Ashton said was a threat to a member of the judiciary (said under oath):

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

THE COURT: "All right. Mr. Windsor, that is a threat against this Court --

MR. ASTRIN: "And myself.

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

<sup>2</sup> All references to APPENDIX are to the Appendix in 5D21-0492.

<sup>&</sup>lt;sup>1</sup> I am only enclosing a few exhibits. If you want more, I'm happy to provide them.

- 12. Exposing corruption is not a threat. It's a First Amendment right. It has been my vocation since 2007. I do it for free. I have websites, including LawlessAmerica.com, and YouTube.com/lawlessamerica. I have produced and directed a documentary film on government and judicial corruption. I have interviewed face-to-face thousands of people in all 50 states who believe they are victims of corruption. I have been referred to as a leading authority on judicial corruption.
- Black's Law Dictionary defines "threat" as "a menace or destruction or injury to the lives or property of those against whom it is made." This was not a threat; it was a statement, under oath, of what I am doing. Falsely accusing me of making a threat in open court is a violation of the Code of Judicial Conduct.
- 14. I will begin setting up JeffreyLAshton.com, and I have arranged for a lady to drive me to the Orange County Courthouse where we hope to get a copy of the docket for every case Judge Jeffrey L. Ashton has handled. We will be looking for evidence of other bad acts. I had no idea Judge Jeffrey L. Ashton lost the infamous Casey Anthony trial, that he couldn't even successfully defend his son from criminal charges, and that this married man was caught red-handed in the Ashley Madison sex website scandal.
- 15. The Florida Code of Judicial Conduct defines "Impartiality" or "impartial" to denote absence of bias or prejudice in favor of, or against, particular parties or classes of parties, as well as maintaining an open mind in considering issues that may come before the judge.

  Judge Jeffrey L. Ashton does not appear to have an impartial bone in his body when it comes to me and pro se plaintiffs.
  - 16. At the hearing on 4/5/2021, Judge Jeffrey L. Ashton accused me of being a liar:

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

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

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

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

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

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

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

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

THE COURT: "Mr. Windsor, you e-mailed my JA 214 times since Thursday. Since Thursday.

MR. WINDSOR: "Absolutely not, Your Honor.

THE COURT: "Well, you're calling my secretary a liar and I know that she's telling me the truth about that, so that ain't going to happen. So I'll block you from e-mail, again. If you have a lawyer that wants to communicate with us on your behalf, we will be happy to speak with him." [EXHIBIT A - Transcript of Hearing 4/5/2021 – P.36: 9-25; P.37: 1-25; P. 38: 1-4.]

- 17. I sent three emails to Judge Jeffrey L. Ashton's Judicial Assistant from Thursday April 1, 2021 to Monday April 5, 2021, and I have the records to prove it. THREE (3) not 214. Judge Jeffrey L. Ashton is a liar, and calling me a liar in open court is a violation of the Code of Judicial Conduct.
- 18. I am not and will not receive a fair trial in the Ninth Judicial Circuit Court in Orange County, Florida due to the bias of Judge Jeffrey L. Ashton of that court against me, prejudice in favor of the Defendants and their attorney, and apparent mental illness.
- 19. EXHIBIT D is an affidavit sworn under penalty of perjury before a notary that I filed 2/2/2021. It is referenced and incorporated herein. It details my issues with Judge Jeffrey L. Ashton as to my medical emergency in February 2021. Judge Jeffrey L. Ashton refused to delay a relatively meaningless hearing in this case about the Defendants disabling me and using the court system to inflict emotional distress.
- 20. Judge Jeffrey L. Ashton OUTRAGEOUSLY refused to reschedule the 2/2/2021 hearing with no justification whatsoever. That he refused to reschedule the 2/2/2021 hearing when I had a medical emergency and was hospitalized is bias at its worst.
- 21. Judge Jeffrey L. Ashton simply wants to hurt me any way he can. He's clearly a Judicial Sadist.
- 22. Judge Jeffrey L. Ashton had entered 20 orders in this case, and all 20 had been against me. All 20 should have been in my favor. [EXHIBIT D DOCKET.]
- 23. I have not been treated fairly by Judge Jeffrey L. Ashton. Judge Jeffrey L. Ashton has not demonstrated the impartiality required of a judge. He is demonstrating that he is a heartless person who has no business sitting in judgment on people.

- I have a well-grounded fear that I will not receive a fair trial. That's what you are supposed to say in a motion to recuse. The truth is I haven't received anything fair, and I won't unless I can somehow get this sad excuse for a man removed as judge. Judge Jeffrey L. Ashton has ignored all of the prejudice and bias of Judge John Marshall Kest, and he refused without proper consideration my request to reconsider the corrupt orders of Judge John Marshall Kest.
- Judge Lisa T. Munyon granted a protective order to stop discovery when there 25. was no legal authority to do so. Judge John Marshall Kest allowed that to continue. Judge John Marshall Kest allowed hearings on frivolous motions by the Defendants while ignoring violations of his own rules and orders. Judge John Marshall Kest outrageously stated in an order that two motions were not being set for hearings because they were motions for reconsideration when clearly they were no such thing. Judge John Marshall Kest claimed I made a false statement to the Court denying that the case had been stayed. The case was never stayed, and saying I made a false statement to the Court was both improper and erroneous. Judge John Marshall Kest ignored the fact that there was no legal basis given by the Defendants for either of the motions that Judge John Marshall Kest ordered to be set for hearing. Judge John Marshall Kest extended the trial date for another year when he would not even be a judge, with no consideration given to my medical condition. Judge John Marshall Kest announced at the Case Management Conference that he treats pro se parties the same as attorneys, but this is neither true, fair, nor the law. Judge John Marshall Kest indicated at the Case Management Conference that he had independently researched cases that I had been involved in, and he threatened me with sanctions for frivolous motions under Florida Statute 57.105. I have never filed anything frivolous. Judge John Marshall Kest argued with me over whether there had been the required "meet and confer" with the Defendants' attorneys. Judge John Marshall Kest claimed that a

telephone bullying by Attorney Scott L. Astrin amounted to a "confer." I tried to explain that confer means an actual discussion. Judge John Marshall Kest rejected that, yet he knew the specifics of the law while I as a pro se party did not. I was absolutely right about the requirements to confer, and Judge John Marshall Kest lied and claimed I was wrong. Judge John Marshall Kest is a past president and Governor of the Bar Association, so he has been a very active member of a club that the Defense attorneys belong to that I will never belong to. Judge John Marshall Kest had been an attorney for 48 years and a judge for 17 years. He had seemingly developed disdain for pro se parties over the past 48 years. I developed these feelings because after studying the developments in this case, I saw Judge John Marshall Kest acting with bias again and again. Judge Jeffrey L. Ashton dismissed without any consideration my motion to have him reconsider Judge John Marshall Kest's orders. No honest judge could do that. In the hearing on 4/5/2021, I learned that Judge Jeffrey L. Ashton had not even read my motion.

Ashton became the judge, I asked him to reconsider the order denying the order claiming my motions were motions for reconsideration. Judge Jeffrey L. Ashton dismissed without any consideration my motion to have him reconsider Judge John Marshall Kest's orders. No honest judge could do that. My motions identified 298 violations by the Defendants and their attorneys including perjury, contempt, attempted fraud, fraud on the court, concealing evidence, unsigned and unsworn answers and objections to interrogatories, false sworn answers, false admissions, over 30 violations of the Florida Rules of Professional Conduct, a variety of violations of the Florida Rules of Civil Procedure, and more. [EXHIBITS D and E.] In the hearing on 4/5/2021, I discovered that Judge Jeffrey L. Ashton had not even read Judge John Marshall Kest's orders much less my motion.

- On 7/20 2020, Scott L. Astrin filed an Emergency Motion Requesting the Court to Determine if I was Mentally Competent to Represent myself, a frivolous motion with no legal basis whatsoever. It was unsigned and unverified, and Scott L. Astrin had not made an appearance in the case. Judge John Marshall Kest and Judge Jeffrey L. Ashton did not take action against Scott L. Astrin or the Defendants. There is absolutely no legal authority for this, and there has never been an appellate decision in the history of Florida over such a frivolous motion. Judge Jeffrey L. Ashton's endorsement of this outrageous frivolous motion puts him in a class with the most corrupt of judges.
- 28. Scott L. Astrin seems to be a pathological liar. Upon information and belief, he may have the mental disorders mythomania or pseudologia fantastica.
- 29. On 7/27/2020, Scott L. Astrin filed a frivolous motion to dismiss and for contempt of a purported federal court order that had no legal basis whatsoever. It was unsigned and unverified, and Scott L. Astrin had not made an appearance in the case. Judge John Marshall Kest and Judge Jeffrey L. Ashton did not take action against Scott L. Astrin or the Defendants. Again, there is absolutely no legal authority for this, and there has never been an appellate decision in the history of Florida over such a frivolous motion. Once again, Judge Jeffrey L. Ashton's endorsement of this outrageous frivolous motion puts him in a class with the most corrupt of judges.
- 30. The Notice of Appearance of Scott L. Astrin was filed 8/19/2020. [APPENDIX 17 Pages: 000103 to 000105.] It is unsigned. It and all of the filings by the attorneys for the Defendants used a fake address as confirmed to me by a Hillsborough County Deputy Sheriff. [APPENDIX 67 Pages 002018 to 002025.]

- 31. Judge Jeffrey L. Ashton had at that time allowed the attorneys for the Defendants to file 75 unsigned pleadings. There are far more now, but I have not yet had time to list and count them. Pleadings must be signed, and unsigned pleadings must be stricken. I filed a Verified Motion to Strike Pleadings and Award Sanctions. The Motion sought to strike 75 unsigned pleadings. [APPENDIX 52 Pages: 000846 to 000858.] It will never be heard.
- 32. Judge John Marshall Kest issued an "Order Requiring Compliance by Attorneys and *PRO SE* Litigants with Procedures and Administrative Orders on 9/1/2020. [APPENDIX 18 Pages: 000106 to 000108.] This Order states:

"Administrative Order 2012-03 requires that a mandatory meet and confer be undertaken before a hearing or motion is scheduled. It is the responsibility of the party scheduling the hearing to arrange the conference. Failure to 'meet and confer' on each motion will result in a hearing being cancelled if it was scheduled and/or sanctions may be imposed." [emphasis added.]

- 33. The attorneys for the Defendants have repeatedly violated Administrative Order 2012-03. The judges did nothing. Judge Jeffrey L. Ashton has granted such unsigned orders.
- 34. I filed a Motion to Disqualify Judge Jeffrey L. Ashton on 2/2/2021. [APPENDIX 21 Pages: 000140 to 000153.] It included my Affidavit of Prejudice of Judge Jeffrey L. Ashton [APPENDIX 20 Pages: 000114 to 000139] and a Certificate of Good Faith [APPENDIX 19 Pages: 000109 to 000113].
- 35. Judge Jeffrey L. Ashton denied my Motion to Disqualify him on 2/2/2021. [APPENDIX 22 Pages: 000154 to 000156.] Judge Jeffrey L. Ashton lied in refusing to be disqualified.
- 36. On 1/27/2021, I filed an Emergency Motion for Stay and/or Continuance until the Fifth District Court of Appeal ruled on my Petition for Writ of Prohibition. [APPENDIX 23 Pages: 000157 to 000225.]

- 37. On 1/28/2021, Judge Jeffrey L. Ashton denied my Emergency Motion for Stay and/or Continuance claiming it was moot, which it was not. [APPENDIX 24 Pages: 000226 to 000228.]
- 38. On 1/27/2021, Judge Jeffrey L. Ashton's Judicial Assistant, Keitra Davis, emailed me for the first time to introduce herself. She stated that "Hearing Notebooks, memorandums, and case law must be provided at least five (5) business days prior to the hearing." [APPENDIX 25 Pages 000233.] The hearing was only four (4) business days away, so I requested that the 2/2/2021 hearing be reset for another date as the documentation could not be timely submitted. This was indicated as the necessary procedure in the email from Keitra Davis. There was no response to this Request or my emails. I filed a Request for Cancellation of Hearing. [APPENDIX 25 Pages: 000229 to 000237.] Judge Jeffrey L. Ashton violated his own orders.
- 39. On 1/30/2021, I filed an Emergency Motion for Stay and/or Continuance due to a medical emergency and inability to comply with the 1/27/2021 instructions of Keitra Davis.

  [APPENDIX 88.]
- 40. On 2/1/2021, Judge Jeffrey L. Ashton denied my Emergency Motion for Stay and/or Continuance. [APPENDIX 26 Pages: 000238 to 000239.] Judge Jeffrey L. Ashton does not comply with his own Rules, much less the Constitutions.
- 41. On 2/1/2021, Judge Jeffrey L. Ashton entered an Order denying my Emergency Motion for Reconsideration of orders of Judge John Marshall Kest. [APPENDIX 27 Pages: 000240 to 00241.] At the 4/5/2021 Hearing, Judge Jeffrey L. Ashton indicated he hadn't even read the orders. [APPENDIX 82 Page 002202: Lines 5-14.]

- 42. On 2/2/2021, Judge Jeffrey L. Ashton held a hearing. [APPENDIX 28 Pages: 000242 to 000244.] I was in the hospital and was unable to participate. I was denied due process denied the opportunity to be heard.
- 43. On 2/2/2021, I filed a Motion to Disqualify Judge Jeffrey L. Ashton. [APPENDIX 29 Pages: 000245 to 000258.] [APPENDIX 30 Pages: 000259 to 000284.] [APPENDIX 31 Pages: 000285 to 000289.]
- 44. On 2/2/2021, Judge Jeffrey L. Ashton entered an Order denying the Motion to Disqualify. [APPENDIX 32 Pages: 000290 to 000292.] He lied again. He said he "can be fair and impartial in this matter. All opinions expressed or rulings made have been based upon review of the files of the case and are not based upon any personal bias against the Petitioner. THEREFORE, the Court rules that it does stand fair and impartial between the parties...."
- 45. What a crock! He didn't review the file, and he has nothing but a raging personal bias against me. Here's what Judge Jeffrey L. Ashton ruled:

"The Court finds that the Motion is legally insufficient as to following issues: 1) Adverse rulings do not support a reasonable fear of personal bias. *Rivera v. State*, 717 So. 2d 477 (Fla. 1998)." [APPENDIX 32 - Pages: 000290 to 000292.]

46. True to form, Judge Jeffrey L. Ashton claimed the Florida Supreme Court opinion said something it did not. And he cited a case where there was no Motion to Disqualify; he cited an appeal of a death penalty case. Here's the actual opinion [EXHIBIT F]:

"We have repeatedly held that a motion to disqualify a judge 'must be well-founded and contain facts germane to the judge's undue bias, prejudice, or sympathy."

Jackson v. State, 599 So.2d 103, 107 (Fla.1992); Gilliam v. State, 582 So.2d 610, 611 (Fla.1991); Dragovich v. State, 492 So.2d 350, 352 (Fla.1986). The motion will be found legally insufficient 'if it fails to establish a well-grounded fear on the part of the movant that he will not receive a fair hearing.' Correll v. State, 698 So.2d 522, 524 (Fla.1997). The fact that the judge has made adverse rulings in the past against the defendant, or that the judge has previously heard the evidence, or 'allegations that the trial judge had formed a fixed opinion of the defendant's guilt, even where it is alleged that the judge

discussed his opinion with others,' are generally considered legally insufficient reasons to warrant the judge's disqualification. Jackson, 599 So.2d at 107." [emphasis added.]

- 47. My Motion to Disqualify contained well-founded facts germane to the undue bias of Judge Jeffrey L. Ashton.
  - 48. Judge Jeffrey L. Ashton also ruled:
  - "2) Claims that the Court has formed fixed opinions on an issue before it do not support a reasonable fear of personal bias *Rivera v. State*, 717 So. 2d 477 (Fla. 1998)."
  - 49. This is not expressed in the opinion AT ALL.
- 50. Judge Jeffrey L. Ashton failed to address the legal sufficiency of my motion and lied about irrelevant case law.
- 51. On 2/5/2021, Judge Jeffrey L. Ashton entered an Order granting Defendants' Motion for Attorney's Fees. [APPENDIX 33 Pages: 000293 to 000295.] There was no evidence, and I darn sure never did anything to justify any such thing. I was denied my right to be heard.
- 52. On 2/14/2021, I filed a Motion for Reconsideration of the 2/4/2021 Order of Judge Jeffrey L. Ashton. [APPENDIX 34 Pages: 000296 to 000347.]
- 53. On 2/15/2021, I filed a Petition for Writ of Prohibition with the 5DCA. [APPENDIX 35 Pages: 000348 to 000491.]
- 54. On 2/17/2021, Scott L. Astrin filed Defendants' Emergency Motion to Require Pro Se Plaintiff, William Windsor's Submissions and/or Pleadings to the Court Be Reviewed, Approved and Signed by a Member of the Florida Bar ("BAR MOTION"). [APPENDIX 36 Pages: 000402 to 000444.] It was unsigned, unverified, and did not comply with Administrative Order 2012-03 or the Florida Rules of Civil Procedure.

- 55. On 2/18/2021, I filed a Motion to Strike the BAR MOTION. [APPENDIX 37 Pages: 000445 to 000488.]
- 56. On 2/19/2021, Judge Jeffrey L. Ashton entered an Order denying my Motion for Reconsideration of the 2/4/2021 Order. [APPENDIX 38 Pages: 000489 to 00490.]
- 57. On 2/23/2021, Judge Jeffrey L. Ashton entered an Order denying my Motion to Strike the unsigned, unverified, unlawful BAR MOTION. [APPENDIX 1 Pages: 000013 to 000015.] Corrupt judges like Judge Jeffrey L. Ashton ignore the law and violate the law whenever it pleases them.
- 58. On 2/26/2021, I filed a Memorandum of Law regarding Pleadings Signed by a Member of the Florida Bar. [APPENDIX 39 Pages: 000491 to 000584.]
- 59. 2/26/2021, I filed a Motion for Reconsideration of the Order denying my Motion to Strike the BAR MOTION. [APPENDIX 40 Pages: 000585 to 000618.]
- 60. On 3/2/2021, Judge Jeffrey L. Ashton entered an Order to Show Cause.

  [APPENDIX 2 Pages: 000016 to 000018.] It was never served on me. The ORDER TO SHOW CAUSE claims "Defendants request the issuance of an Order to Show Cause," but the Defendants' Motion makes no such request. [APPENDIX 36 Pages: 000402 to 000444.] I emailed the attorneys for the Defendants and Judge Jeffrey L. Ashton's judicial assistant, Keitra Davis, requesting any such request. The Docket does not show any such request. [APPENDIX 14.] Neither Keitra Davis nor the attorneys responded. The ORDER TO SHOW CAUSE is legally deficient. [APPENDIX 2.]
- 61. The Defendants did not request an ORDER TO SHOW CAUSE. There is no such "Motion." See the Docket APPENDIX 14. Judge Jeffrey L. Ashton's Order is false.

Upon information and belief, this was Judge Jeffrey L. Ashton coaching the attorneys for the Defendants on what to do.

- 62. There was nothing attached to the ORDER TO SHOW CAUSE, which is a requirement. [APPENDIX 14.]
- 63. The only Motion by the Defendants is unsigned, unverified, and without an affidavit. [APPENDIX 36 Pages: 000402 to 000444.]
- 64. When an ORDER TO SHOW CAUSE does not state the essential facts constituting the reason for the ORDER TO SHOW CAUSE, and the Motion filed was not attached to the Order to Show Cause, it must be declared legally insufficient. (*Mayo v. Mayo*, 2D17-3140 (Fla.App. Dist.2 12/07/2018).) See also Mix v. State, 827 So.2d 397, 399 (Fla. 2d DCA 2002); Flanagan v. State, 840 So.2d 379, 380 (Fla. 1st DCA 2003); Brown v. State, 595 So.2d 259, 260 (Fla. 2d DCA 1992). See Eubanks v. Agner, 636 So.2d 596, 598 (Fla. 1st DCA 1994; Lindman v. Ellis, 658 So.2d 632, 634 (Fla. 2d DCA 1995); Levine v. State, 4D20-118 (Fla.App. Dist.4 02/03/2021); Hagerman v. Hagerman, 751 So.2d 152 (Fla. 2d DCA 2000).)
- 65. In this case, there is an unsworn motion, and there are no sworn affidavits whatsoever.
- 66. On 3/3/2021, Judge Jeffrey L. Ashton entered an Order denying my Motion for Reconsideration of Order denying my Motion to Strike the BAR MOTION. [APPENDIX 3 Pages: 000019 to 000021.] It was never served on me.
- 67. On 3/10/2021, I requested 16 hours for the Hearing on the Order to Show Cause.

  Judge Jeffrey L. Ashton was allowing only 15 or 20 minutes. [APPENDIX 41 Pages: 000619 to 000622.]

- 68. On 3/11/2021, I filed a Notice of Taking Deposition of David I. Wynne. [APPENDIX 42 Pages: 000623 to 000631.]
- 69. On 3/11/2021, I filed a Notice of Taking Deposition of Scott L. Astrin. [APPENDIX 43 Pages: 000632 to 000640.]
- 70. On 3/11/2021, I requested Subpoenas Duces Tecum for David I. Wynne and Scott L. Astrin. [APPENDIX 44 Pages: 000641 to 000652.] I was denied to have them as witnesses at the 4/5/2021 hearing where these attorneys made a cornucopia of claims against me that were not signed or verified.
- 71. On 3/12/2021, I filed a Motion to Strike Strange Hidden Docket Entry.

  [APPENDIX 45 Pages: 000653 to 000656.] This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 72. On 3/12/2021, I filed a Verified Motion to Strike Answer and Amended Answer; Enter a Decree Pro Confesso; Enter Judgment in Favor of the Plaintiff; and Schedule the Jury Trial for Damages. [APPENDIX 46 Pages: 000657 to 000683 and 000698 to 000756 and 000771 to 000789.] The Answer and Amended Answer were unsigned. This is a dispositive motion that should have been heard. This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 73. On 3/15/2021, the Defendants filed a Motion for Protective Order. [APPENDIX 47 Pages: 000790 to 000792.] It was unsigned and unverified.
- 74. On 3/16/2021 and 3/17/2021, I filed the Verified Affidavit of William M. Windsor dated March 12, 2021 with 1,645 pages of Exhibits. This is very important as it debunks all of the frivolous claims of Astrin. [APPENDIX 50 is the Affidavit Pages: 000817 to

- 000839.] [APPENDIX 85 contains the exhibits to the Affidavit Pages: 002261 to 004227.] This was ignored.
- 75. On 3/17/2021, I filed a Verified Affidavit Regarding Prior Sworn Statements. [APPENDIX 51 Pages: 000840 to 000845.] This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 76. On 3/17/2021, I filed a Verified Motion to Strike Pleadings and Award Sanctions. The Motion seeks to strike 75 unsigned pleadings. [APPENDIX 52 Pages: 000846 to 000858.] This dispositive motion has not been set for a hearing and won't be by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 77. On 3/18/2021, the Defendants filed Additional Exhibits in Support of Defendants' First Amended BAR MOTION. It is unsigned and unverified. [APPENDIX 53 Pages: 000859 to 000888.]
- 78. On 3/18/2021, I filed a Motion for Accommodations for Senior Citizen with Disabilities. [APPENDIX 54 Pages: 000889 to 000898.] This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 79. On 3/18/2021, I filed a Motion to Declare that All Statements by Attorneys that Purport to be Facts in Pleadings or in Hearings Must Be Stricken Unless the Attorney Filed an Affidavit Sworn Under Penalty of Perjury or is at an Evidentiary Hearing when Sworn to Tell the Truth Under Penalty of Perjury. [APPENDIX 55 Pages: 000899 to 000904.] This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 80. On 3/18/2021, I filed a Motion to Compel Defendant and All Non-Parties to

  Produce Each Separate Item Requested for Production in a File Folder Marked to show the Date

Requested and the Item Number of the Request. [APPENDIX 56 - Pages: 000905 to 000908.]

This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 - Pages: 002211 to 002212.]

- 81. On 3/18/2021, I filed a Motion Regarding Pro Se Verifications. [APPENDIX 57 Pages: 000909 to 000912.] This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 82. On 3/18/2021, I filed a Motion to Compel Defendant and All Non-Parties to Comply with Rule 1.280(b)(6). [APPENDIX 58 Pages: 000913 to 000916.] This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 83. On 3/18/2021, I filed a Motion to Declare I am Not Obligated to Comply with The Florida Handbook on Civil Discovery or the Florida Rules of Professional Conduct.

  [APPENDIX 59 Pages: 000917 to 000921.] This hasn't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.]
- 84. On 3/24/2021, Judge Jeffrey L. Ashton entered an Order granting the Motion for Protective Order. [APPENDIX 4 Pages: 000022 to 000023.] It was never served on me.
- 85. On 3/24/2021, Judge Jeffrey L. Ashton entered an Order on My Motion to Strike Answer and Amended Answer and my Emergency Motion to Strike Strange Hidden Docket Entry and Memorandum of Law. [APPENDIX 5 Pages: 000024 to 000026.] These haven't been heard, and won't be set for a hearing by Judge Jeffrey L. Ashton. [APPENDIX 82 Pages: 002211 to 002212.] It was never served on me.
  - 86. On 3/25/2021, I was preparing to file a Motion to Strike the Order to Show Cause.

- 87. On 3/25/2021, Judge Jeffrey L. Ashton entered an "Interim Order" order without notice or an opportunity to be heard directing the Clerk of the Court to refuse to process my filings. [APPENDIX 6 Pages: 000027 to 000029.] There was no legal authority for such an order and no factual basis for it.
- 88. On 3/25/2021, I requested subpoenas from the Clerk of Court for testimony at the April 5, 2021 hearing on Order to Show Cause. The requests were ignored. [APPENDIX 62 Pages: 000928 to 000929.]
- 89. On 3/26/2021, Judge Jeffrey L. Ashton entered an Order on Procedures for the Show Cause Hearing. [APPENDIX 7 Pages: 000030 to 000032.]
- 90. From 2/23/2021 to 3/26/2021, I was not served with any orders entered by Judge Jeffrey L. Ashton.
- On 3/27/2021, I provided Keitra Davis with the information required in the Order on Procedures. [APPENDIX 60 Pages: 000922 to 000924.] Scott L. Astrin never provided Keitra Davis with the information required in the Order on Procedures. [APPENDIX 7 Pages: 000030 to 000032.]
- 92. On 4/1/2021, I filed a Motion for Continuance of the April 5, 2021 Hearing. I did not expect it to be docketed because of Judge Jeffrey L. Ashton's void order on 3/25/2021, but it was docketed. [APPENDIX 64 Pages: 000933 to 000936 Pages: 000937 to 000973.] It was not set for a hearing.
- 93. On 4/1/2021, I filed a Supplement to my Motion to Strike Pleadings and for Sanctions. I did not expect it to be docketed, but it was. [APPENDIX 65 Pages: 000937 to 000973.] It was not set for a hearing.

- 94. On 4/1/2021, I filed a Motion to Strike Order to Show Cause. I did not expect it to be docketed because of Judge Jeffrey L. Ashton's void order on 3/25/2021, but it was docketed as EXHIBIT 361. [APPENDIX 66 Pages: to 00974 to 001264 and 001279 to 001971.] It was not set for a hearing.
- 95. On 4/1/2021, I filed a Motion to Disqualify Judge Jeffrey L. Ashton. I did not expect it to be docketed, but it was. [APPENDIX 67 Pages: 001972 to 002053.] The judge refused to address it. It was not set for a hearing.
- 96. On 4/1/2021, I filed a Motion to Strike Supplemental Pleadings and Award Sanctions. I did not expect it to be docketed, but it was. [APPENDIX 14 Pages: 000051 to 000073.] <sup>3</sup> It was not set for a hearing.
- 97. On 4/2/2021, I filed evidence for the Hearing on the Order to Show Cause Motion to Strike Defendants' Motion to Require Pro Se Plaintiff's Submissions and/or Pleadings to the Court be Reviewed, Approved, and Signed by a Member of the Florida Bar; EXHIBITS 1-230, 231-326, 330-340, 355-365, 783, 792, 862. [APPENDIX 14 Pages: 000051 to 000073.]
- 98. On 4/3/2021, I filed evidence for the Hearing on the Order to Show Cause APPENDIX I; EXHIBITS 389, 2443, 366-388; Affidavit of William M. Windsor dated March 29, 2021; Plaintiff's Verified Memorandum of Law Regarding Pleadings Signed by a Member of the Florida Bar for the Order to Show Cause Hearing. [APPENDIX 14 Pages: 000051 to 000073.]
- 99. On 4/4/2021, I filed a Motion to Cancel the Hearing Set for April 5, 2021. [APPENDIX 14 Pages: 000051 to 000073.] It was not set for a hearing.

<sup>&</sup>lt;sup>3</sup> I am referencing only the DOCKET – APPENDIX 14 -- and am not adding each filing that was ignored to keep the APPENDIX from being gargantuan in size. All is available.

- 100. On 4/4/2021, I filed an Objection to the Exhibits of the Defendants for the Hearing Set for April 5, 2021. [APPENDIX 69 Pages: 002056 to 002066.] It was not set for a hearing.
- 101. On 4/4/2021, I filed evidence for the Hearing on the Order to Show Cause EXHIBITS 390-399. [APPENDIX 14 Pages: 000051 to 000073.]
- 102. On 4/5/2021, I filed evidence for the Hearing on the Order to Show Cause EXHIBIT 400. [APPENDIX 70 Pages: 002067 to 002140.]
- 103. On 4/5/2021, a Hearing was held on the Order to Show Cause. [APPENDIX 71 Pages: 002141 to 002143.] It ended at 11:27 a.m. I was sworn in so all of my statements were made under oath under penalty of perjury. [APPENDIX 82 Pages: 002171 to 002213.] The Transcript is not filed as I was not allowed to file anything.
- 104. Following the hearing on 4/5/2021 at 11:51 a.m., I printed the DOCKET in Case # 2018-010270-O. [APPENDIX 14 Pages: 000051 to 000073.] It shows all of my evidence was on file at the time of the Hearing, but Judge Jeffrey L. Ashton refused to consider any of it.
- 105. On 4/5/2021 at 3:24 p.m., Judge Jeffrey L. Ashton entered an Order Striking all Pro Se Filings from 3/27/2021. [APPENDIX 8 Pages: 000033 to 000035.]
- 106. On 4/5/2021, Judge Jeffrey L. Ashton entered an Interim Order on Pro Se Filings in Effect Until Further Order of the Court. [APPENDIX 9 Pages: 000039 to 000041.]
- 107. On 4/5/2021, Judge Jeffrey L. Ashton entered an Interim Order on Pro Se Filings Extended Until Further Order of the Court. [APPENDIX 10 Pages: 000036 to 000038.]
- 108. On 4/5/2021 at 3:30 p.m., Judge Jeffrey L. Ashton entered an Order Striking Pro Se Filings from 3/27/2021 to 4/5/2021. [APPENDIX 11 Pages: 000042 to 000044.]

- 109. On 4/6/2021, Judge Jeffrey L. Ashton entered an Order on the Courts Rule to Show Cause Why the Court Should not Grant Defendants' Motion Requiring Pro Se Plaintiff Submissions / Pleadings of the Court be Reviewed Approved & Signed by A Member of the Florida Bar. [APPENDIX 12 Pages: 000045 to 000047.]
- 110. On 4/6/2021, Judge Jeffrey L. Ashton entered an Amended Interim Order on Pro Se Filings. [APPENDIX 13 Pages: 000048 to 000050.]
- 111. On 4/19/2021, I tried to file a Motion to Disqualify Judge Jeffrey L. Ashton, but I was denied any use of myflcourtaccess.com for Case # 2018-010270-O. [APPENDIX 86.] I mailed it to the judge and filed a motion with the 5DCA asking the Clerk of the Court to be ordered to file it.
- 112. Judge Jeffrey L. Ashton has not handled the proceedings in a regular way and according to the law. 73 of the pleadings by the attorneys for the Defendants had not been signed, but Judge Jeffrey L. Ashton accepted them and denied my motions to strike.
- 113. For example, APPENDIX 36 (Pages 000402 to 000444) is the Defendants' Emergency Motion to Require my Submissions and/or Pleadings to the Court Be Reviewed, Approved and Signed by a Member of the Florida Bar ("BAR MOTION"). If was filed 2/17/2021. It is unsigned. It should have been stricken.
- 114. APPENDIX 37 Page 000454 is Page 11 of the BAR MOTION marked to show where the signature is supposed to be. There is the required signature on the Certificate of Service, but NOT on the BAR MOTION. APPENDIX 37 Pages 000459 to 000460 is a recent filing by Assistant State Attorney David Asti to show the proper signature. EVERY filing by me shows I always properly signed.

- 115. APPENDIX 66 Part 2: Pages 001642 to 001661 is the Docket in Orange County Case # 2018-010270-O as of 3/25/2021. Pages 000853 to 000856 of APPENDIX 52 is my analysis of the DOCKET to show which filings are unsigned (fifth column). Please take judicial notice of the DOCKET and the unsigned filings.
- 116. Rule 2.515 of the Florida Rules of Judicial Administration dictates the requirement:

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

- (1) the attorney has read the document;
- (2) to the best of the attorney's knowledge, information, and belief, there is good ground to support the document;
- (3) the document is not interposed for delay; and
- (4) the document contains no confidential or sensitive information, or that any such confidential or sensitive information has been properly protected by complying with the provisions of rules 2.420 and 2.425. If a document is not signed or is signed with intent to defeat the purpose of this rule, it may be stricken and the action may proceed as though the document had not been served." [emphasis added.]
- 117. EXHIBIT C to the March 12, 2021 Affidavit of William M. Windsor [APPENDIX 85 Pages: 003874 to 003894] is a spreadsheet listing each document filed in Orange County Case #2018-010270-O in the 903 days the case had been pending. Column A is my Docket Number since the Clerk of the Court does not number the Docket entries; Column B is the Party who filed; Column C is the Category of the filings; Column D is whether the document was sworn as true and correct under penalty of perjury; Column E shows whether or

not the document was signed; Column F is the title of the filing; Column G is the date of the filing; Column H is the number of pages; and Column I shows the Legal Authority specified in the opening paragraph of the Filing.

- 118. This shows there had been only one filing signed by an attorney for the Defendants; it is an agreed motion that was prepared by my attorney on 1/17/2020.
- 119. It shows 46 filings were filed by me and sworn as true and correct under penalty of perjury. Not one filing by the Defendants or their attorneys in 903 days was sworn as true and correct, much less under penalty of perjury. My 46 filings add 655 pages of sworn testimony plus exhibits. This gave me a grand total of 813 pages of sworn testimony in Case # 2018-010270-O.
- 120. There was no proof that Scott L. Astrin or anyone read the motions and other filings, and there was no certification that, to the best of his knowledge, information, and belief, there was good ground to support these filings.
- 121. Judge Jeffrey L. Ashton is not handling the proceedings in a regular way and according to the law because he accepts the unverified claims of the attorneys for the Defendants as fact.
- 122. Judge Jeffrey L. Ashton accepted the BAR MOTION filed by Attorney Scott L. Astrin. It was unverified, and there was no affidavit. Based on the unverified factual claims in the BAR MOTION, Judge Jeffrey L. Ashton instructed the Defendants' attorney to issue an Order to Show Cause. Then he granted a motion when there was absolutely no evidence but mine.
- 123. Many of the false statements in the BAR MOTION are identified under oath under penalty of perjury in my sworn affidavit that is APPENDIX 50 Pages 000817 to 000837.

- 124. At the hearing on the Order to Show Cause, Judge Jeffrey L. Ashton used information provided by Attorney Scott L. Astrin that was not verified or provided under oath. [APPENDIX 82 Pages 002190 to 002194 (Transcript P.19: 24-25, P. 20, 21, 22, 23).] It was not entered into evidence at the Hearing, and Scott L. Astrin failed to comply with the Procedures established for the Hearing. [APPENDIX 7 Pages: 000030 to 000032.] But Judge Jeffrey L. Ashton had no other factual basis to issue his orders.
- 125. APPENDIX 85 Pages: 003874 to 003894 lists all the pleadings. The second column identifies the Party. The fourth column shows No if the pleading was neither sworn nor accompanied by an affidavit.
- 126. 82 of the Defendants' motions and filings were not verified. There were no affidavits, and claims of facts should have been stricken.
- 127. Attorneys may not present facts, only legal arguments. This legal requirement must be made clear to the attorneys as they had violated this requirement in every pleading and at every hearing in Case # 2018-010270-O.
  - 128. An attorney's unsworn statements do not establish a fact.
  - 129. Argument of counsel is not evidence.
- 130. This is clearly established by the Eleventh Circuit and every federal appellate court. I have cited extensive case law on this.
- 131. The 5DCA should have stopped the Circuit Court from allowing unverified claims of the attorneys for the Defendants to be accepted as facts. All of the judges in Case # 2018-010270-O have done this.
- 132. The actions of the trial court are a material departure from the essential requirements of law. Evidence of facts must be presented under oath. Verification of documents

is required by Florida Statute 92.525, but the attorneys for the Defendants have never verified any document.

- 133. Arguments of the Defendants' attorneys violate Florida Statute 90.604 due to lack of personal knowledge; violate Florida Statute 90.605 as there has been no oath or affirmation of the attorney as a witness; violate Florida Statute 90.802 as hearsay rule; violate Florida Statute 90.901 due to failure to provide authentication or identification of evidence; violate Florida Statute 90.957 as there is not testimony or written admissions; and violate Florida Case Law that the unsworn statements of fact by attorneys do not establish facts.
- 134. These violations resulted in a real miscarriage of justice, AND IT HAS JUST GOTTEN WORSE.
- 135. The errors cause me irreparable harm during the remaining proceedings. This violated my Constitutional rights that cannot be fixed by an appeal at the end of the case. I will lose the case, and I will be unable to appeal. I felt I would probably be forced into bankruptcy, and I was.
- 136. Judge Jeffrey L. Ashton did not handle the proceedings in a regular way and according to the law when he ordered filing restrictions against me without notice or an opportunity to be heard.
- 137. Judge Jeffrey L. Ashton denied due process to me, and he did it to make it impossible for me to properly respond to his totally biased and unlawful Order to Show Cause [APPENDIX 6, 8, 9, 10, 11, 12, 13].
- 138. This is Judge Jeffrey L. Ashton's Order Denying me the right to file anything in this case unless signed by a member of the Florida Bar entered 3/25/2021 without notice or an opportunity to be heard: [APPENDIX 6.]

- "WHEREAS, the Court, on March 2, 2021 set for hearing an Order to Show Cause to Plaintiff as to why the Court should not grant Defendant's Emergency Motion to Require Pro Se Plaintiff William Windsor's Submissions to the Court be Reviewed and Signed by a Member of the Florida Bar on April 5, 2021. WHEREAS, since the issuance of the Order to Show Cause, Plaintiff has filed twenty six items with the Clerk of the Court in this matter. Among the motions, was a request for sixteen hours of hearing time on the Order to Show Cause. Among the matters filed, are item described as affidavits of exhibits totaling one thousand six hundred and seventy pages. The Clerk is hereby directed to decline to file any further documents by the pro se Plaintiff unless they contain a certificate by a member of the Florida Bar that have reviewed the matter and that the filing is appropriate. This Order shall remain in effect until close of business April 5, 2021."
- 139. The truth is I filed motions totaling 23-pages and 15½-pages of sworn affidavits. The rest was EVIDENCE. The evidence was necessitated by the BAR MOTION. The following is what was filed and why:
- 140. APPENDIX 41 Motion requesting the amount of time I estimated to be necessary to respond to the BAR MOTION and Order to Show Cause. Judge Jeffrey L. Ashton asked for a letter from me in this regard, but I wanted this issue in the record of the court. 1½-pages. Truth verified under penalty of perjury.
- 141. APPENDIX 45 Motion to strike strange, hidden docket entry. I suspect foul play over this. 1½-pages. Truth verified under penalty of perjury.
- 142. APPENDIX 46 My Verified Motion to Strike Answer and Amended Answer; Enter a Decree Pro Confesso; enter Judgment in Favor of the Plaintiff; and Schedule the Jury Trial for Damages. This should have ended the case in my favor. 4-pages. Truth verified before a notary and sworn under penalty of perjury.
- 143. APPENDIX 50 -- Verified Affidavit of William M. Windsor dated March 12, 2021. This is my response to the BAR MOTION [APPENDIX 36.] This Affidavit is sworn under penalty of perjury before a notary. It dissects the unsigned, unsworn, unverified BAR MOTION and attaches over 1,000 pages of evidence that prove the motion is frivolous and that

- Scott L. Astrin lied to the Court. The purpose of Judge Jeffrey L. Ashton's 3/25/2021 Order was to stop me from filing my evidence to defeated the BAR MOTION and gut the Order to Show Cause. This was a truly outrageous act by a hopelessly biased "judge." 14½-pages.
- 144. APPENDIX 51 -- Verified Affidavit of William M. Windsor regarding Prior Sworn Statements. One page of testimony sworn under penalty of perjury before a notary.
- 145. APPENDIX 83 -- Motion to find Defendants in Contempt. 3-page Motion and 23 pages of evidence. Verified as true and correct under penalty of perjury.
- 146. APPENDIX 54 -- Motion for Accommodations for a Senior Citizen with Disabilities. I am disabled. 4-pages. Verified as true and correct under penalty of perjury.
- 147. APPENDIX 55 Motion to Declare that All Statements by Attorneys that Purport to be Facts in Pleadings or in Hearings Must be Stricken Unless the Attorney filed an Affidavit Sworn Under Penalty of Perjury or is at an Evidentiary Hearing when Sworn to tell the Truth Under Penalty of Perjury. This was filed because Judge Jeffrey L. Ashton violates this fundamental legal requirement. 3½-pages. Verified as true and correct under penalty of perjury.
- 148. APPENDIX 56 Motion to Compel Defendants and All Non-Parties to Produce Each Separate Item Requested for Production in a File Folder Marked to show the Date Requested and the Item Number of the Request. 1½-pages. Verified as true and correct under penalty of perjury.
- 149. APPENDIX 57 Motion Regarding Pro Se Verifications. This addressed the issue that I cannot always obtain a notary. 1-page. Verified as true and correct under penalty of perjury. The rules have now changed.

- 150. APPENDIX 58 Motion to Compel Defendant and all Non-Parties to Comply with Florida Rules of Civil Procedure Rule 1.280 (B) (6) when producing documents. 1½-pages. Verified as true and correct under penalty of perjury.
- 151. APPENDIX 59 -- Motion to Declare I am Not Obligated to Comply with the Florida Handbook on Civil Discovery or the Florida Rules of Professional Conduct. This addresses problems encountered by me in this and other cases. 2-pages. Verified as true and correct under penalty of perjury.
- 152. If these filings deny an American the right to represent himself in court, that sound you hear is our forefathers turning over in their graves.
- 153. What Judge Jeffrey L. Ashton should have written is what I believe he was thinking "OH \_\_\_\_\_. That damn Windsor has evidence, case law, and a motion that will blow Wynne and Astrin out of the water. I've got to stop him."
- 154. Judge Jeffrey L. Ashton must be stopped from doing what he is doing. I have no means of redress but this.
- 155. As a Pro Se party, I have limited knowledge regarding jurisdiction, but it seemed that Judge Jeffrey L. Ashton was without jurisdiction to enter filing restrictions without any manner of due process. Judge Jeffrey L. Ashton's authority comes from the Constitutions, and he violated Article I Section 2, Section 9, and Section 21 of the Florida Constitution.
- 156. The actions of Judge Jeffrey L. Ashton are a material departure from the essential requirements of law. Departure from the essential requirements of law means there is a violation of a clearly established principle of law. This violation resulted in a real miscarriage of justice and a denial of due process.

- 157. Judge Jeffrey L. Ashton is not handling the proceedings in a regular way and according to the law by granting the BAR MOTION.
  - 158. There is no legal authority for the BAR MOTION.
- 159. My research indicates there have been 172 appellate court decisions in the history of Florida containing the phrase "signed by a member of the Florida Bar" or "signed by a member in good standing of The Florida Bar." I have reviewed all the cases that could be relevant to the instant case.
- 160. APPENDIX 39 Pages: 000572 to 000584 is a spreadsheet listing all 172. 148 of those required to have pleadings signed a member of the Florida Bar were prisoners. 5 of the 177 were attorneys limited by The Florida Bar while disbarred. So, 19 were not prisoners or attorneys.
- 161. Nineteen (19) Florida citizens in the entire history of the state! I have summarized the opinions in each of the 19 cases. [APPENDIX 39 Pages: 000568 to 000570.]
- 162. Attorney Scott L. Astrin and Judge Jeffrey L. Ashton wanted to make me the 20th. Scott Astrin is dishonest, and Judge Jeffrey L. Ashton is maliciously biased, dishonest, corrupt, a bully, and so much more.
- 163. The cases reviewed show there is no way in the world for any court to require me to have my pleadings signed by a member of the Florida Bar.
- 164. The first column on these spreadsheets numbers them. The second column shows the Case Style. The third column shows if the Plaintiff was a Prisoner. The fourth column provides a brief summary of the Issues. The fifth column indicates whether the Plaintiff had been ruled to be a Vexatious Litigant under Florida law. The sixth column indicates whether the case was further addressed in a Memorandum of Law. [APPENDIX 39 Pages: 000568 to

- 000584.] The seventh column indicates whether the opinion indicated a Show Cause Order had been issued by the appellate court. The eighth and ninth columns provide the remainder of the citation (in addition to the first column).
- 165. Three of the 19 had been declared Vexatious Litigants pursuant to Florida statutes. I could not be so declared. I'd never lost a Florida case.
- 166. The 19 penalized people included a frivolous and flagrant attempt to circumvent the Court's previously entered sanction order. One plaintiff filed identical petitions in multiple cases in violation of a court order. I had not violated any court order, and I have never filed an identical petition.
- 167. The other penalized plaintiffs had 17 cases filed with no relief and determined frivolous; 85 cases filed; multiple meritless petitions; 22 cases showing a profound lack of understanding of the court system in general and of the appellate system in particular; 45 cases dismissed; 26 baseless Florida pleadings; numerous pleadings devoid of merit and failure to properly pursue actions; numerous meritless filings; 25 appellate proceedings found to have no merit; relitigating matters decided earlier and 12 federal court actions against judges. I had never had anything declared frivolous or baseless; I had never been found to have filed a meritless petition. I have had cases wrongfully dismissed, and they were appealed. I have an excellent understanding of the court system; I have never filed an appellate proceeding found to have no merit.
- 168. Not a single one of the 172 was restricted in Florida because of something that purportedly happened in another state. Not a single one of the 172 was restricted for filing evidence and valid motions as I have done.

- 169. The BAR MOTION fails to meet the requirements for the entry of an injunction. The Relief requested by Scott L. Astrin is an injunction. The Defendants do not have standing to seek an injunction, and these attorneys failed to state the essential elements. This was argued in APPENDIX 40 Pages 000609 to 000614. Judge Jeffrey L. Ashton completely ignored this.
- 170. The actions of the trial court are a material departure from the essential requirements of law. There is a violation of a clearly established principle of law. Citizens are allowed to represent themselves pro se and file evidence in support of their pleadings. Denying me these rights has resulted in a total miscarriage of justice and denial of due process.
- 171. The Sixth Amendment provides the Constitutional right to self-representation. That right should be enjoyed without fear of harassment or judicial prejudice. Furthermore, no law, regulation, or policy should exist to abridge or surreptitiously extinguish that right. Theoretically, *Pro Se* Litigants have no less of a right to effective due process as those who utilize an attorney. This is what my children used to call a Fig Newton of imagination. I encourage review the cases of Judge Jeffrey L. Ashton to see how many Pro Se Plaintiffs have won their cases in his court. I will not be shocked if there are none. I am currently working on gathering his cases for review.
- 172. Judge Jeffrey L. Ashton has expressed his disdain for pro se parties. He has harassed me and demonstrated extreme judicial prejudice. Consider these statements by Judge Jeffrey L. Ashton at the Hearing on the Order to Show Cause on April 5, 2021:

THE COURT: "... this matter has been about a year since Counsel was withdrawn from the case and this case has not proceeded at all towards trial or resolution. [APPENDIX 82 – Page 002175 (Transcript-P.4:8-11).]

THE COURT: "So that's one of the issues I'm having with you is if you were a lawyer you wouldn't say that because you would know that that's not how it works. And, see, that's why I'm concerned about the progress of your litigation is because you appear to have become so wrapped up in a personal argument with Counsel or with me that you've lost sight of the actual lawsuit itself. Because all the stuff that you're doing is not advancing your lawsuit. It's not getting you to a favorable resolution. And a lawyer would know that. And that's my concern is that you have become so obsessed with a battle with the lawyer or with the judge that you completely lose sight of the endgame, which is getting your case prepared, ready and presented to a jury." [APPENDIX 82 --Page 002200 (Transcript-P.29:3-18.)]

THE COURT: "They have no basis in law. I've looked at them. If you were a lawyer you would know that. But I understand that you've done some research and you're obviously a very bright man, but that's the difficulty here, is that right now I'm presented with a choice, either allow this thing to continue to spiral out of control or require you to have a lawyer help you get this case to move forward." [APPENDIX 82 -- Page 002200 – 002201 (Transcript-P.29:25, P.30:1-8.)]

THE COURT: "Well, sir, this is another area that you fail to understand the subtlety of. But if you were going to be held in contempt you'd be correct. But the order to show cause was simply to show cause why I shouldn't grant a motion. That has a different legal implication. So this is just another example of how what you interpret something a certain way that isn't accurate and if you were an attorney you would understand more how those things happen." [APPENDIX 82 -- Page 002204 (Transcript-P.33:1-10.)]

- 173. Judge Jeffrey L. Ashton then granted the BAR MOTION and ordered that I may not file anything unless approved and signed by a member of the Florida BAR.
- 174. I could not afford an attorney as Judge Jeffrey L. Ashton was well aware. [APPENDIX Pages 000891, 001194, 001211, 001249, 001910, 002179.] I testified to this under oath at the April 5, 2021 Hearing. [APPENDIX Page 002179.]
- 175. At the April 5, 2021 Hearing on the Order to Show Cause, I asked Judge Jeffrey L. Ashton to recuse himself five times:

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

THE COURT: "It will not be considered. Sir, the purpose of the rule to show cause is to address the allegations in the motion. So go ahead." [APPENDIX 82 --Transcript-P.5:14-25, P. 6: 1-2.]

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

THE COURT: "It will not be accepted."

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

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

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

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

MR. WINDSOR: "I'm asking you to recuse yourself and you have refused." [APPENDIX 82 -- Transcript-P.6:12-25, P. 7: 1-7.]

- 176. EXHIBIT 400 is APPENDIX 70 (Pages: 002067 to 002140.) It asks Judge

  Jeffrey L. Ashton to disqualify himself. The DOCKET shows it was filed at the time of the

  Hearing. [APPENDIX 14 Page 000052.] Judge Jeffrey L. Ashton said "It will not be

  considered. [APPENDIX 82 -- Page 002176.] APPENDIX 67 (Pages: 001972 to 002053) is

  "Plaintiff William M. Windsor's Motion to Disqualify Judge Jeffrey L. Ashton due to Denial of

  Due Process."
  - 177. The Motion to Disqualify was docketed. [APPENDIX 14 Page 000059.]
- 178. The Due Process Clause entitles a person to an impartial and disinterested tribunal in both civil and criminal cases. I have briefed this.
- 179. Canon 3E, Fla. Code Jud. Conduct, and Rule 2.160, Fla. R. Jud. Admin., mandate that a judge disqualify himself in a proceeding "in which the judge's impartiality might

reasonably be questioned." The disqualification rules require judges to avoid even the appearance of impropriety: It is the established law of this State that every litigant is entitled to nothing less than the cold neutrality of an impartial judge. It is the duty of the court to scrupulously guard this right of the litigant and to refrain from attempting to exercise jurisdiction in any manner where his qualification to do so is seriously brought into question. The exercise of any other policy tends to discredit and place the judiciary in a compromising attitude which is bad for the administration of justice. For due process and to secure Constitutional rights judges may not take the law into their own hands. But this is precisely what Judge Jeffrey L. Ashton has done. He has ignored the law, ignored the facts, and claimed laws and rules provide something they do not provide, while abusing and disadvantaging me.

- 180. Judge Jeffrey L. Ashton has a legal duty to disqualify himself.
- subject the individual to the arbitrary exercise of governmental power. Judge Jeffrey L. Ashton has violated my rights by using his power to inflict his bias and hatred, and in his role as a key participant in colnspiring to damage me. Judge Jeffrey L. Ashton hates me because I am pro se, because I have spent 14 years of my life helping other pro se plaintiffs while investigating judicial corruption, and because, unlike attorneys, I am not afraid of him, and I will identify his corrupt acts for the world to see. Today, I registered JeffreyLAshton.com, and I will be filling it with sworn facts for the world to see.
- 182. For due process, I theoretically have the right to protections expressly created in statute and case law. Due process allegedly ensures the government will respect all of a person's legal rights and guarantee fundamental fairness. Judge Jeffrey L. Ashton violated my rights by using his power to ignore facts and the law.

- 183. Due process requires an established course for judicial proceedings designed to safeguard the legal rights of the individual. Action denying the process that is "due" is unconstitutional. Inherent in the expectation of due process is that the judge will abide by the rules. Judge Jeffrey L. Ashton has interfered with the process and violated rules for the purpose of damaging me.
- 184. An inherent Constitutional right is the honesty of the judge. Judge Jeffrey L. Ashton has not been honest. He has violated Canon 2 and all of the other Canons of the Code of Judicial Conduct.
- 185. Due process guarantees basic fairness and to make people feel that they have been treated fairly. I have not been treated fairly. I have been treated corruptly.
- 186. Judge Jeffrey L. Ashton has denied my rights of equal protection under the law, and his mission seems to be to bury me any way he can.
- 187. Following the so-called Hearing on Order to Show Cause, Judge Jeffrey L. Ashton entered six (6) orders against me. The volume and content of the orders seem schizophrenic. APPENDIX 8 (Pages: 000033 to 000035); APPENDIX 9 (Pages: 000039 to 000041); APPENDIX 10 (Pages: 000036 to 000038); APPENDIX 11 (Pages: 000042 to 000044); APPENDIX 12 (Pages: 000045 to 000047); AND APPENDIX 13 (Pages: 000048 to 000050).
- 188. Judge Jeffrey L. Ashton did not handle the proceedings in a regular way and according to the law regarding orders to show cause.
- 189. There is no legal authority in the Florida Rules of Civil Procedure or the Florida Rules of Judicial Administration for a Circuit Court judge to issue an order to show cause in a case of auto negligence that is not criminal.

- 190. Orange County Case # 2018-010270-O is about auto negligence. It is not a criminal case.
- 191. I have searched Google, Yahoo, and every appellate court case in Florida history, and I can find no rule or statute to provide a legal basis for an order to show cause in this case.
- 192. The 5DCA should have ordered Judge Jeffrey L. Ashton to vacate the Orders in APPENDIX 8, 9, 10, 11, 12, and 13. But I have found them to be just as corrupt.
- 193. The BAR MOTION fails to meet the requirements for the entry of an injunction. This was argued in APPENDIX 40 Pages 000609 to 000614. Judge Jeffrey L. Ashton completely ignored this.
- 194. The actions of the Judge Jeffrey L. Ashton court are a material departure from the essential requirements of law. The law on injunctions is clear. The law on a citizen's right to represent himself is clear. Denying my rights results is a real miscarriage of justice and a denial of due process.
- 195. The errors have caused irreparable harm to me during the proceedings. The orders violated my Constitutional rights in a way that cannot be fixed by an appeal at the end of the case. I cannot afford an attorney, so I will lose my case. I will be unable to appeal. I will likely die.
- 196. Judge Jeffrey L. Ashton did not handle the proceedings in a regular way and according to the law by issuing a legally deficient order to show cause.
  - 197. This is the entire content of the Order to Show Cause:

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

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

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

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

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

"(Signed) JEFFREY L. ASHTON, CIRCUIT COURT JUDGE" [APPENDIX 2 - Pages: 000016 to 000018.]

- 198. The Defendants did not request an Order to Show Cause. There is no such "Motion." See the Docket APPENDIX 14 Pages: 000051 to 000073. Judge Jeffrey L. Ashton's Order is false. Upon information and belief, this was Judge Jeffrey L. Ashton coaching the attorneys for the Defendants on what to do.
- 199. There was nothing attached to the Order to Show Cause, which is a requirement. [APPENDIX 2 Pages: 000016 to 000018.]
- 200. The only Motion by the Defendants is unsigned, unverified, and without an affidavit. [APPENDIX 36 Pages: 000402 to 000444.]
- 201. There are no facts stated in the Order to Show Cause constituting the reasons for the Order to Show Cause. The existence of an unsigned, unverified, unsupported Motion does not qualify.

- 202. When an Order to Show Cause does not state the essential facts constituting the reason for the Order to Show Cause, and the Motion filed was not attached to the Order to Show Cause, it must be declared legally insufficient. I have provided the case law on this.
- 203. In the instant case, there was an unsworn motion, and there were no sworn affidavits whatsoever.
  - 204. This cannot be fixed by an appeal at the end of the case.
- 205. Prior to taking away Constitutional rights, a judge has an obligation to provide notice and an opportunity to be heard.
  - 206. I was never served with the Order to Show Cause.
- 207. When I discovered it existed, I requested 16 hours to present my defense to the wide range of claims made by Attorney Scott L. Astrin. Judge Jeffrey L. Ashton denied the request by email from Keitra Davis and then ignored my Motion [APPENDIX 41].
- 208. Then he refused to consider my evidence filed and docketed. APPENDIX 14 shows the evidence was docketed. APPENDIX 82 shows Judge Jeffrey L. Ashton repeatedly refused to allow it to be admitted or considered. After the Hearing, he had the Clerk of Court remove the evidence from the DOCKET. Please take judicial notice of the DOCKET to see this. [DOCKET in 2018-CA-010270-O.]
  - 209. I have motions that have been ignored, including case dispositive motions.
- 210. Judge Jeffrey L. Ashton has demonstrated that there isn't an unbiased bone in his large body.
- 211. This Affidavit of Prejudice clearly provides the facts and reasons for the belief that bias and prejudice exists. Dates, times, places, circumstances, and statements are itemized.

- 212. Judge Jeffrey L. Ashton established a clearly fixed view about substantive pending trial matters, so this must raise concerns about the "appearance of impropriety," a standard that I allegedly safeguarded under applicable recusal law.
- 213. Judge Jeffrey L. Ashton has violated my civil and Constitutional rights under color of law.
- 214. Judge Jeffrey L. Ashton has effectively denied my rights of the equal protection under the law under Article VI of the Constitution.
- 215. Judge Jeffrey L. Ashton's actions prove that he has exercised his power in this civil action for his own personal purposes rather than the will of the law or the common decency of man.
- 216. I am being legally raped by Judge Jeffrey L. Ashton. He is prejudiced against me. He has already committed an unforgivable sin in this case by refusing to reconsider orders of Judge Kest that were issued without the required hearings. Judge Jeffrey L. Ashton acts like he dislikes pro se parties and loves insurance agencies with deep pockets.
- 217. Canon 1 of the Florida Code of Judicial Conduct: A JUDGE SHALL UPHOLD THE INTEGRITY AND INDEPENDENCE OF THE JUDICIARY: An independent and honorable judiciary is indispensable to justice in our society. A judge should participate in establishing, maintaining, and enforcing high standards of conduct, and shall personally observe those standards so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.
- 218. The Commentary says: "Deference to the judgments and rulings of courts depends upon public confidence in the integrity and independence of judges. The integrity and independence of judges depend in turn upon their acting without fear or favor. Although judges

should be independent, they must comply with the law, including the provisions of this Code.

Public confidence in the impartiality of the judiciary is maintained by the adherence of each judge to this responsibility. Conversely, violation of this Code diminishes public confidence in the judiciary and thereby does injury to the system of government under law.

- 219. Judge Jeffrey L. Ashton is not honorable. He maintains the lowest possible standards. He does not comply with the law or the Code of Judicial Conduct. My only confidence is that Judge Jeffrey L. Ashton should be removed as a judge and disbarred. He is a menace to the citizens of the State of Florida.
- 220. Canon 2 A JUDGE SHALL AVOID IMPROPRIETY AND THE APPEARANCE OF IMPROPRIETY IN ALL OF THE JUDGE'S ACTIVITIES: A. A judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.
- judges erodes public confidence in the judiciary. A judge must avoid all impropriety and appearance of impropriety. A judge must expect to be the subject of constant public scrutiny. A judge must therefore accept restrictions on the judge's conduct that might be viewed as burdensome by the ordinary citizen and should do so freely and willingly. Examples are the restrictions on judicial speech imposed by Sections 3B(9) and (10) that are indispensable to the maintenance of the integrity, impartiality, and independence of the judiciary. The prohibition against behaving with impropriety or the appearance of impropriety applies to both the professional and personal conduct of a judge. Because it is not practicable to list all prohibited acts, the proscription is necessarily cast in general terms that extend to conduct by judges that is harmful although not specifically mentioned in the Code. Actual improprieties under this

standard include violations of law, court rules, or other specific provisions of this Code. The test for appearance of impropriety is whether the conduct would create in reasonable minds, with knowledge of all the relevant circumstances that a reasonable inquiry would disclose, a perception that the judge's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired.

- 222. Judge Jeffrey L. Ashton gets an "F" on complying with the law and acting in a manner that promotes public confidence in the integrity and impartiality of the judiciary. ANY reasonable mind, with knowledge of all the relevant circumstances that a reasonable inquiry would disclose, would find that Judge Jeffrey L. Ashton's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired. He has no integrity. He is hopelessly biased against me, and he may be absolutely incompetent to serve as a judge. He may be mentally ill.
- 223. Canon 3 A JUDGE SHALL PERFORM THE DUTIES OF JUDICIAL OFFICE IMPARTIALLY AND DILIGENTLY: (4) A judge shall be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity, and shall require similar conduct of lawyers, and of staff, court officials, and others subject to the judge's direction and control. (5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the performance of judicial duties, by words or conduct manifest bias or prejudice, including but not limited to bias or prejudice based upon race, sex, religion, national origin, disability, age, sexual orientation, or socioeconomic status, and shall not permit staff, court officials, and others subject to the judge's direction and control to do so. This section does not preclude the consideration of race, sex, religion, national origin, disability, age, sexual orientation, socioeconomic status, or other similar factors when they are issues in the proceeding.

- (8) A judge shall dispose of all judicial matters promptly, efficiently, and fairly.
- 224. C. Administrative Responsibilities: (1) A judge shall diligently discharge the judge's administrative responsibilities without bias or prejudice and maintain professional competence in judicial administration, and should cooperate with other judges and court officials in the administration of court business. (2) A judge shall require staff, court officials, and others subject to the judge's direction and control to observe the standards of fidelity and diligence that apply to the judge and to refrain from manifesting bias or prejudice in the performance of their official duties.
- 225. Judge Jeffrey L. Ashton and his Judicial Assistant, Keitra Davis, are both biased liars.
- 226. E. Disqualification: (1) A judge shall disqualify himself or herself in a proceeding in which the judge's impartiality might reasonably be questioned, including but not limited to instances where: (a) the judge has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of disputed evidentiary facts concerning the proceeding.
- 227. Judge Jeffrey L. Ashton's impartiality has been proven, not just "reasonably questioned." Judge Jeffrey L. Ashton must disqualify himself.
- 228. Commentary to 3B(5): A judge must perform judicial duties impartially and fairly. A judge who manifests bias on any basis in a proceeding impairs the fairness of the proceeding and brings the judiciary into disrepute. Facial expression and body language, in addition to oral communication, can give to parties or lawyers in the proceeding, jurors, the media and others an appearance of judicial bias. A judge must be alert to avoid behavior that may be perceived as prejudicial. Judge Jeffrey L. Ashton is either so mentally ill or so self-righteous that he does and says improper things regularly expecting no repercussions.

- 229. Judge Jeffrey L. Ashton is not impartial, and he has done nothing fairly in regard to me and my case. By manifesting his bias in a variety of ways, he has impaired the fairness of the proceeding and has brought the judiciary into disrepute. Facial expression and body language at the 4/5/2021 hearing, in addition to oral communication, gave me and the lawyers in the proceeding the appearance of judicial bias. The same goes for other hearings.
- 230. Commentary to 3E(1): Under this rule, a judge is disqualified whenever the judge's impartiality might reasonably be questioned, regardless of whether any of the specific rules in Section 3E(1) apply.
  - 231. Judge Jeffrey L. Ashton is DISQUALIFIED.
- 232. At the hearing on 4/5/2021, Judge Jeffrey L. Ashton established his bias against me as a senior citizen and a person with a disability:

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

THE COURT: "Well, sir, since you've raised that, if you suffer from that cognitive decline so that you can -- as you said you can't remember -- you have no short-term memory, how is it that you can represent yourself if you can't remember whether you took your pills a few minutes ago?" [APPENDIX 82 – Transcript - P. 21: 4-12.]

- 233. All I want is to have someone fair and impartial with an open mind to listen to the facts and review as much of the evidence as is needed to prove each of my claims. It is established that Judge Jeffrey L. Ashton doesn't care about the facts and doesn't want to apply the law.
- 234. The United States Constitution allegedly guarantees an unbiased judge who will always provide litigants with full protection of ALL RIGHTS. Judge Jeffrey L. Ashton is biased against me. Judge Jeffrey L. Ashton has demonstrated this.

- 235. My motions, affidavits, certificates of good faith, and memorandum of authorities meet the requirements for a motion to disqualify.
- 236. This Affidavit of Prejudice states the facts and the reasons for the belief that bias and prejudice exist. The reasons for the belief are material and stated with particularity.
- 237. On 1/5/2023, a deposition was held with Florida Highway Patrol Trooper Gregory S. Linzmayer. I believe Trooper Gregory S. Linzmayer has committed crimes relative to this case. When I began to cross-examine him, I asked if he had an attorney. He didn't. He refused to answer my questions. He was supposed to resume his deposition when he had legal counsel, but he never did.
- 238. On 2/10/2023, a hearing was held on my Motion for Contempt against Trooper Gregory S. Linzmayer. It was denied. Judge Jeffrey L. Ashton said I THREATENED the Trooper and told a large group "I don't believe for a second what you say." These are clear violations of the Code of Judicial Conduct.
- 239. On 2/21/2023, there were supposed to be two hearings in this case. I happened to notice a standard efiling notice hit my in-box. I opened it, and I was surprised to see the hearings canceled. I was SHOCKED to see that Judge Jeffrey L. Ashton entered an order allegedly revoking my right to self-representation. [EXHIBIT A.] This had never been discussed, and there was no notice or opportunity to be heard. The judge had no jurisdiction to do what he did. It is a void order. The cases cited as "authority" by Judge Jeffrey L. Ashton both indicate it's a denial of due process to do what he did without notice and an opportunity to be heard. So he takes an action that is a violation of my Constitutional rights, and he does it in an order citing cases that establish he can't do what he had just done.

240. Judge Jeffrey L. Ashton knows the DEFENDANTS are liable, so he needs to dismiss my case before my Motion for Partial Summary Judgment can be heard. He knows I have been unable to obtain an attorney. By requiring me to have an attorney, he knows I will not be able to comply with his order and will lose.

241. The accident has given me five herniated discs in my neck, four in my back, and an abdominal injury, Diastasis Recti. I have lost all sense of balance. I have fallen dozens of times. When I fall, I can't get up. I can no longer walk unaided. I am always in pain unless seated in a special chair. I have lost the use of my left hand, and I have gone from a two-finger typist to a one-finger typist. I am always in pain. I live alone in a trailer, and I have no help. I am denied medical care (Medicare) because the case is still pending. I am bankrupt. Judge Jeffrey L. Ashton knows all of this, and it seems he is ready for me to die injured and bankrupt.

242. My case will be dismissed because I can't obtain an attorney. Judge Jeffrey L. Ashton is well aware of this. This is why he did what he did on 2/21/2023.

243. Judge Jeffrey L. Ashton could be mentally ill. Or he is simply a corrupt narcissist. Or he has been bribed to do whatever it takes. One thing's for sure, he has committed a significant number of violations of the Code of Judicial Conduct. He needs to be removed and disbarred.

## FURTHER SAITH AFFIANT NOT.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of February, 2023,

William M. Windsor

# **DECLARATION**

Pursuant to Florida Statute 92.525, under penalties of perjury, I declare that I have read the foregoing document and that all facts in it are true.

This 24th day of February, 2023,

William M. Windsor

# Exhibit

A

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

2018-CA-010270-O

WILLIAM WINDSOR

Plaintiff(s),

VS.

ROBERT KEITH LONGEST

Defendant(s).

# ORDER REVOKING PLAINTIFF'S RIGHT TO SELF REPRESENTATION

THIS MATTER comes before the Court, and the Court, having reviewed the file and being otherwise fully informed, finds as follows:

Pursuant to the authority acknowledged in <u>Lowery v. Kaplan</u> 650 So. 2d 114 (4 DCA 1995) and <u>Rodriguez-Diaz v. Abate</u> 613 So. 2d 515 (3DCA 1993), Plaintiff's Right of self-representation is hereby revoked. Plaintiff shall be given thirty days to obtain counsel.

The History of this case is replete with examples of the Plaintiff's abuses<sup>i</sup>. The efforts by the Court to curtail these abuses by requiring review by counsel have utterly failed. In a recent hearing, the Court has learned that plaintiff threatened a witness during cross examination resulting in the Court requiring the continuation of the deposition to be taken by a licensed attorney or before a Special Master. In response, Plaintiff threated to un-necessarily prolong the questioning of the witness at trial.

In response to the hearing set for this date Plaintiff has returned to his abusive filings. He has, in the last four days filed 1,504 documents. Plaintiff has previously been sanction for his

abusive conduct in litigation ii. The right to self-presentation does not the right to threaten, harass and abuse.

### **THEREFORE**

- The clerk shall reject all pro-se filings by the Plaintiff
- 2) The Courts Judicial Assistant shall block all email communications from the Pro-Se Plaintiff.
- 3) Defendant need not respond to any communication from the Plaintiff.
- 4) Motion set for today are canceled, Defendant shall reset it's motion, to dismiss no sooner than 45 days from the date of this order.

by Jeffrey Ashton .02/21/2023 12:09:27 z4gW44jJ

DONE AND ORDERED in Chambers, at Orlando, Orange County, Florida, on 21st day of February, 2023.

Jeffrey L Ashton

Circuit Judge

The foregoing was filed with the Clerk of the Court this 21st day of February, 2023 by using the Florida Courts E-Filing Portal System. Accordingly, a copy of the foregoing is being served on this day to all attorney(s)/interested parties identified on the ePortal Electronic Service List, via transmission of Notices of Electronic Filing generated by the ePortal System.

Order on Defendant's Motion to Dismiss and for Sanctions filed 10/01/2020; Order to Show Cause filed 3/2/2021; Interim Order on Pro Se Filings filed 3/25/2021; Amended Interim Order on Pro Se Filings filed 4/6/2021; ii Order of Judge Thrash of the United States District Court.