

**COMPLAINT VERIFICATION INFORMATION**

**Your name, address, and telephone number(s):**

Celeste Dobbs



**Name, address, and telephone number(s) of person(s) who discriminated against you:**

Retired-Detective David Phelan -0493, Cpl. Dwana Pelton-1366  
Orange County Sheriff Office  
2500 W Colonial Dr,  
Orlando, Fl. 32804  
Phone no. (407) 254 - 700C

Re: John W. Dobbs, Florida inmate no. C00618, case no.48 – 2006- CF-15201-0

(Contact: John Dobbs, Florida inmate no. C00618 for more information at Okeechobee Correctional Institution, 3420 N.E. 168th Street, Okeechobee, Florida 34912, see attached files and more)

**Name, address and telephone number(s) of agency or organization involved in your complaint:**

- 1.) Ret.-Detective David Phelan 0493 and Cpl. Dawana Pelton 1366, Orange County Sheriff Office, 2500 W. Colonial Dr., Orlando, Fl. 32804, ph.no. (407) 254-700C
- 2.) Mr. Inch, Florida Department of Corrections, 501 South Calhoun Street, Tallahassee, Fl. 32399 - 2500 ph. no. (850) 488 - 5021
- 3.) Former Judge Stan Strickland, bar no. 402605, 981 E. Lake Sue Ave., Winter Park, Fl. 32789 – 5903, phone no. (321) 663 - 1486
- 4.) Judge Lisa T. Munyon, bar no. 513083, Orange County Clerk of Courts, 425 N. Orange Ave., Orlando, Fl. 32801, ph. no. (407) 836 - 200C
- 5.) U.S. District Court, Middle District of Florida, Orlando Division, 401 West Central Boulevard, Orlando, Fl. 32801, ph no. (407) 835 - 4200
- 6.) Robin A. Compton, Assistant Attorney General bar no.846864, 444 Sealyeese Boulevard 5 fl. Daytona Beach, Fl.32118 ph.no. (386) 238 - 499C
- 7.) Mollie Deputy Clerk of Court, U.S. Middle District of Florida, 401 West Central Boulevard, Orlando, Florida 32801 ph. no. (407)835 - 4200
- 8.) Jerry L. Brewer, bar no. 320528, Senior Judge, Orange County Courthouse, 425 N. Orange Ave., # 430, Orlando, Fl 32801, ph. no. (407) 836 - 2352.

**Are there other persons or organizations involved in this discrimination case?**

- 9.) Kimberly Eve Laskoff bar no.136476, City Attorney's Office, PO Box 4990, Orlando, Fl. 32802 - 4990, ph. no. (407 ) 246 - 2295
- 10.) Melissa Vickers, bar no. 151165, Fighter, 120 E Robinson St., Orlando, Fl. 32801 - 160C

**If YES, please give the names, addresses and telephone numbers below:**

- 11.) Assistant State Attorney James Altman, bar # 906557, Office of State Attorney, P.O. Box 1673, Orlando, Fl. 32802 - 1673, ph. no. (407) 836 - 2400
- 12.) John M. Radabaugh, bar no. 277185, Drawer J - 115, PO Box 9000, ph. no. (863) 534 - 6963  
(Contact: John Dobbs, Fl. inmate C00618 at Okeechobee C.I., 3420 N.E. 168th Street, Okeechobee, Fl. 34972, see attached files w/ dates, time, case dockets and more)
- 13.) Bill McCollum, bar no. 112233, attorney, Dentons US LLP, 600 Thistlewood Ct., Longwood, Fl. 32779 - 3379, ph.no. (202) 408 -9145
- 14.) Monica West - Clerk of Court, Office of Tiffany Moor Russell, Orange County Clerk of Court, Orlando, Fl. 32801, ph. no. (407) 836 - 200C
- 15.) Catherine Chien Conlon, bar no. 663271, Attorney, Office of the Public Defender, Ninth Judicial, 435 N. Orange Ave. Ste. 400, Orlando, Fl. 3280 - 1526, ph. no. (407) 836 - 4768
- 16.) Kevin Richard Holtz, bar no. 161624, Appeal Attorney, Department Children and Families, 210 N. Palmetto Ave., Ste.412, Daytona Beach, Fl. 32114 -7522, ph.#(386 ) 481 -9190

**Which of the following describes the nature of the discrimination involved?**

Race/Color  National Origin  Religion  Sex  Disability  Age  Sexual Orientation  Gender Identity

(Contact John Dobbs, Fl. inmate no. C00618 at Okeechobee C.I., 3420 NE168th Street, Okeechobee, Fl. 34972, see attached files w/ dates, time case docket and more)

**Does your charge of discrimination involve:**

a. Your job or seeking employment?	OR b. You using facilities or someone providing services/protection to you (or others)?
If yes, which of the following apply?	If yes, how?
Hiring	Brutality <input checked="" type="checkbox"/>
Work Assignment	Harassment <input checked="" type="checkbox"/>
Promotion	Language
Demotion	Applying rules/laws differently <input checked="" type="checkbox"/>
Discipline	Access to buildings/programs <input checked="" type="checkbox"/>
Layoff/Recall	Retaliation <input checked="" type="checkbox"/>
Retaliation	Different standards/opportunities/programs <input checked="" type="checkbox"/>
Termination	Segregation
Other (Specify)	Other (Specify) <input checked="" type="checkbox"/> illegal detainment

( Contact John Dobbs, Fl. inmate no. C00618 at Okeechobee C.I., 3420 N.E. 168th Street, Okeechobee, Fl. 34972, see attached files with dates, time, case docket and more)

**Which month(s), day(s), and year(s) did the most recent discrimination against you take place?**

Beginning: Month 10 Day 25 Year 2006

Ending: Month 11 Day 9 Year 2021 ( it's on going )

( Contact John Dobbs, Fl. inmate no. C00618 at Okeechobee C.I. 3420 N.E.168th Street, Okeechobee, Fl. 34972, see attached files w/ dates, time, case dockets and more )

**Explain in detail what happened and how you were discriminated against. State who was involved and show how other persons were treated differently from you. (Also, attach any written materials or documentation pertaining to your case.)** The listing of events is compiled from several of Mr. Dobbs' prior efforts to obtain justice.

The uncontested facts hold that: Petitioner and his then girlfriend Deanna Washington were visiting the State of Florida, when they stopped at a topless bar called Thee Doll House. Inside the club the couple met William Troy and briefly engaged in a not at all hostile, but not quite polite conversation. At closing time, the couple left the club and saw Troy with 3 or 4 other men, they were intoxicated. Petitioner's vehicle and the vehicle transporting Troy's party was parked six parking spaces apart. One or more from Troy's party yelled to the couple something to the affect of they needed security to walk them out. Initially the statement appears light hearted. Petitioner is entering his car when Troy's friend and employee Andre Blanco starts to approach the passenger side of the couple's vehicle. Petitioner's girlfriend being the passenger, points out that one of them is walking over. Petitioner asks her to stay in the car, leaves the driverside, and walks around the back of the car to meet him. When Blanco arrives, a fight initiates between them which all parties and witnesses perceive as a fist fight. The fight takes place close to the rear passengerside of Petitioner's vehicle. Almost instantly, Blanco is knocked down and Francisco Gotay approaches Petitioner swinging. Petitioner evades the punches and strikes Gotay with what all parties and witnesses perceive as fists. After being knocked down Blanco swiftly recovers and attacks Petitioner from behind. Petitioner's girlfriend exits the vehicle and enters the fight to help petitioner, as Anthony Riollano and William Troy approach. The couple hears someone yell 'get her' or 'get the girl.' It's around this time that one of them appears to get seriously injured and Petitioner concedes to starting to use his pocket knife, as Ms. Washington is grabbed by Riollano and tossed to the side ending her feeble attempts to ward them off.

( More details continue on attached files with dates, time and case no. and more )

(Contact John Dobbs, Florida inmate no. C00618 for more information at Okeechobee Correctional Institution, 3420 N.E. 168th Street, Okeechobee, Fl. 34972, Phone no. (863)462-5400)

**Has the opposite sex or have persons of other races, national origin, religions, or disabilities been treated differently from you in this particular matter? \_\_\_\_ If yes, please explain and identify:**

John was the only one arrested, the only black man arrested in a public brawl and selected for prosecution, without even a qualified complaint against him.

( see attached files with dates, time, case dockets and more )

Note: Any questions contact John W. Dobbs, Florida inmate no. COO618, Okeechobee Correctional Institution, 3420 N.E. 168TH Street, Okeechobee, Florida 34972-4824, case no.48-2006-CF-15201-0, ph. no. (863) 462 - 5400

**Why do you believe this occurred?**

We believe this occurred to appease the wealthy families that was effected, to prevent Mr. Dobbs from exercising his constitutional rights and to discourage descendants of the slave trade from exercising their constitutional rights, as well; thus the promotion of African American oppression. Please contact John Dobbs for more information in the matter.

See attached files dates, time and case dockets

Any questions contact John W. Dobbs, Florida inmate no. COO618, Okeechobee Correctional Institution, 3420 N.E. 168TH Street, Okeechobee, Florida 34972-4824, case no.48-2006-CF-15201-0, ph. no. (863) 462 - 5400

**What other information do you think might be helpful to our investigation?** 1.) Police Narrative, 2.) The uncontested fact: Petitioner and his then girlfriend... (3 page Police Report, Police Statements: from John Dobbs, Deanna Washington, Leonard Bolanco, Justin Idle, Phillip Westfall, Andre Blanco, Francisco Gotay, Anthony Riollano, Hanzel Holiday Police Records and alleged victims and witness statement that was not made part of the " Record ", we got them from the "Discovery"

certify see attached file.

Mollie Deputy clerk of Court [redacted], John Dobbs vs. DOC- case no. 6:10 - cv - 663 - Ori - 18 GJK, and email from Mrs. Celeste Dobbs about unauthorized removal of Justin- Court Operations SUPERVISOR [redacted] bar# 84686, Assistant Attorney General [redacted] Ori-18 GJK

John's injury photos mailed out to Mrs. Dobbs from John's Public Defense Attorney Catherine Chien office with letter date January 25, 2008

John's injury photos given to him when trial was over "Discovery" by his Public defense attorney Catherine Chien she show them to the jurors as exhibits

John Dobbs, Florida inmate no. C00618 - October 25, 2006, Police Interview video tape, about 2 hours long.

(See attached files with dates, time, case no. and more)

**If this complaint is resolved to your satisfaction, what remedy do you seek?** Note: Any questions contact John W. Dobbs, Florida inmate no. COO618, Okeechobee Correctional Institution, 3420 N.E. 168TH Street, Okeechobee, Florida 34972-4824, case no.48-2006-CF-15201-0, ph. no. (863) 462 - 5400

**Immediate release from prison**

See attached files w/ dates, time and case no. and more

Any questions contact John W. Dobbs, Florida inmate no. COO618, Okeechobee Correctional Institution, 3420 N.E. 168TH Street, Okeechobee, Florida 34972-4824, case no.48-2006-CF-15201-0, ph. no. (863) 462 - 5400

**Please list below any persons (witnesses, fellow employees, supervisors, or others) whom we might contact for additional information to support or clarify your complaint:**

**Name Address Telephone Number**

1.) John W. Dobbs, Florida inmate no. C00618, Okeechobee C.I., 3420 N.E 168th Street, Okeechobee, Fl. 34972-4824, ph.# (863)462 - 5400

2.) Prosecutor Kimberly Laskoff, bar# 136476, [redacted]

3.) Attorney Melissa Vickers, bar no. 151165, address: [redacted]

4.) Attorney Catherine Chien Conlon, bar# 663271, [redacted]

5.) Polk County Judge John M. Radabaugh, bar# 277185, [redacted]

6.) Attorney James Altman, bar# 906557, [redacted]

7.) Judge Lisa Taylor Munyon, bar # 513083, [redacted]

8.) Detective David Phelan, 0493 in ( homicide unit ) retired in 2021 from [redacted]

9.) Allison Wright, Crime Scene Investigator ( CSI ) [redacted]

John W. Dobbs, Florida inmate no. C00618, Okeechobee Correctional Institution, 3420 N.E. 168th Street, Okeechobee, Florida 34972 - 4824, ph.# (863) 462 - 5400

Deanna Washington, 12.) Andre Blanco, 13.) Phillip Westfall, 14.) Justin Idle, 15.) Francisco Gotay, 16.) Anthony Riollano, 17.) Leonard Bolans, 18.) Hanzel Holiday

Appeal Attorney Kevin Richard Holtz, bar# 161624, [redacted]

Robin A. Compton, Assistant Attorney General Florida, bar no. 846864, [redacted]

Retired Judge William L. Wright, [redacted]

PL Dawana Pelton, [redacted]

Mrs. Celeste Dobbs, [redacted]

(see attached files w/ dates, time and case dockets and more)

Have you filed a case or complaint with any of the following? (Check the appropriate items.)

Civil Rights Division, U.S. Dept. Of Justice	<input checked="" type="checkbox"/>	State or local Human Relations Commission
U.S. Equal Employment Opportunity Commission		State Law Enforcement Planning Agency
Other Federal Agency		Attorney (Note the name and address above)
Federal or State Court	<input checked="" type="checkbox"/>	Other (specify)

For any item checked above, please provide the following information:

Name of Agency: (1.) U. S. Department of Justice, Civil Rights Division, case no. DJ 144-17M-0 (2.) U.S. Department of Justice/Civil Rights Division, case no. DOC NO. 423920

Date Filed: (2.) August 23, 2013

Case or Docket Number: Doc # 423920


Date of Trial or Hearing: NONE

Location of Agency or court: (2) Federal Coordination and Compliance Section of the Civil Rights Division, 950 Pennsylvania Avenue, NW Washington, DC 20530 ( see attached files)

Name of Investigator Deeanna Jano

Status of Case: denied assistance

Additional comments: Judicial Qualifications Commission, letter 12/2/2008, Executive Director Brooke S. Kennerly, Florida Department of Corrections, letter April 8, 2008, General Counsel Kathleen Von Hoene, (See Attached Files)

DATE: November 23, 2021 SIGNED: 

(Continue any question on additional sheets if necessary)  
Supplement exhibits will be file separately

(Please also complete and submit the Identity Release Statement)  
Supplemental exhibits will be file separately

Office for Civil Rights  
Office of Justice Programs  
U.S. Department of Justice  
810 7<sup>th</sup> Street, NW  
Washington, D.C. 20531

**Which of the following describes the nature of the discrimination involved?**

Race/Color  National Origin  Religion  Sex  Disability  Age  Sexual Orientation  Gender Identity

(Contact John Dobbs, Fl. inmate no. C00618 at Okeechobee C.I., 3420 NE168th Street, Okeechobee, Fl. 34972, see attached files w/ dates, time case docket and more)

**Does your charge of discrimination involve:**

a. Your job or seeking employment?	<b>OR</b> b. You using facilities or someone providing services/protection to you (or others)?
If yes, which of the following apply?	If yes, how?
Hiring	Brutality <input checked="" type="checkbox"/>
Work Assignment	Harassment <input checked="" type="checkbox"/>
Promotion	Language
Demotion	Applying rules/laws differently <input checked="" type="checkbox"/>
Discipline	Access to buildings/programs <input checked="" type="checkbox"/>
Layoff/Recall	Retaliation <input checked="" type="checkbox"/>
Retaliation	Different standards/opportunities/programs <input checked="" type="checkbox"/>
Termination	Segregation
Other (Specify)	Other (Specify) <input checked="" type="checkbox"/> <i>illegal detainment</i>

(See attached files with dates, time, case no. dockets and more)

Note: Any questions contact John W. Dobbs, Florida inmate no. COO618, Okeechobee Correctional Institution, 3420 N.E. 168<sup>TH</sup> Street, Okeechobee, Florida 34972-4824, case no. 48-2006-CF-15201-0, ph.no. (863) 462-5400

**Which month(s), day(s), and year(s) did the most recent discrimination against you take place?**

Beginning: Month 10 Day 25 Year 2006

Ending: Month 11 Day 9 Year 2021 (*it's on going*)

(Contact John Dobbs, Fl. inmate no. C00618 at Okeechobee C.I. 3420 N.E.168th Street, Okeechobee, Fl. 34972, see attached files w/ dates, time, case dockets and more)

Note: Any questions contact John W. Dobbs, Florida inmate no. COO618, Okeechobee Correctional Institution, 3420 N.E. 168<sup>TH</sup> Street, Okeechobee, Florida 34972-4824, case no.48-2006-CF-15201-0, ph. no. (863) 462 – 5400  
(Supplemental exhibits will be file separately)

COMPLAINANT CONSENT/IDENTITY RELEASE FORM

Your Name: Celeste Robbs

Address: [REDACTED]

[REDACTED] State [REDACTED] Zip [REDACTED]

Complaint number(s): (if known) 22-OCR-0077<sup>21</sup> 91215-HTV

*Please read the information below, check the appropriate box, and sign this form.*

I have read the Notice of Investigatory Uses of Personal Information by the Department of Justice (DOJ). As a complainant, I understand that in the course of an investigation it may become necessary for DOJ to reveal my identity to persons at the organization or institution under investigation. I am also aware of the obligations of DOJ to honor requests under the Freedom of Information Act. I understand that it may be necessary for DOJ to disclose information, including personally identifying details, which it has gathered as a part of its investigation of my complaint. In addition, I understand that as a complainant I am protected by DOJ's regulations from intimidation or retaliation for having taken action or participated in action to secure rights protected by nondiscrimination statutes enforced by DOJ.

**CONSENT/RELEASE**

- CONSENT** - I have read and understand the above information and authorize DOJ to reveal my identity to persons at the organization or institution under investigation. I hereby authorize the Department of Justice (DOJ) to receive material and information about me pertinent to the investigation of my complaint. This release includes, but is not limited to, personal records and medical records. I understand that the material and information will be used for authorized civil rights compliance and enforcement activities. I further understand that I am not required to authorize this release, and do so voluntarily.
  
- CONSENT DENIED** - I have read and understand the above information and do not want DOJ to reveal my identity to the organization or institution under investigation, or to review, receive copies of, or discuss material and information about me, pertinent to the investigation of my complaint. I understand this is likely to impede the investigation of my complaint and may result in the closure of the investigation.

[REDACTED]

SIGNATURE

November 23, 2024

DATE

Department of Justice/ Civil Rights Form / Answers on October 19, 2021, Form for clarification  
(This is a duplicate of the Department of Justice/ Civil Rights form for clarification and more information)  
Supplemental exhibits will be file separately  
**Complaint Verification Information**

**Your name, address, and telephone number (s):**  
Celeste Dobbs

[Redacted]

**Name, address, and telephone number(s) of person(s) who discriminated against you:**  
Retired -Detective David Phelan 0493, Cpl. Dwana Pelte-1366

[Redacted]

Re: John W. Dobbs, Florida inmate no. C00618, case no.48 – 2006- CF-15  
(See attached files and more)

Note: Any questions contact John W. Dobbs, Florida inmate no. C00618, Okeechobee Correctional Institution, 3420 N.E. 168<sup>TH</sup> Street, Okeechobee, Florida 34972-4824, case no.48-2006-CF-15201-0, ph. no. (863) 462 – 5400

**Name, address and telephone number(s) of agency or organization involved in your complaint:**

- 1.) Ret. Detective David Phelan 0493 and Dwana Pelton 1366, [Redacted]
- 2.) Mr. [Redacted]  
488 -5021.
- 3.) Former Judge Stan Strickland, bar no. 402605, [Redacted]
- 4.) Lisa T. Munyon, bar no 513083, [Redacted]
- 5.) U.S. District Court, Middle District of Florida, Orlando Division, 401 West Central Boulevard, Orlando, Florida 32801, ph.no (401) 835 – 4200.
- 6.) Robin A. Compton, Assistant Attorney General bar no.846864, [Redacted]
- 7.) Mollie Deputy Clerk of Court, [Redacted]
- 8.) Jerry L. Brewer, bar no. 320528, Senior Judge, [Redacted]
- 9.) Kimberly Eve Laskoff, bar no. 136476, [Redacted]
- 10.) Mellissa Vickers, bar no. 151165, [Redacted]
- 11.) James Altman, bar no. 906557, Assistant State Attorney, [Redacted]

- 12.) John M. Radabaugh, bar no. 277185, [Redacted]
- 13.) Bill Mc Collum, bar no.112233, [Redacted]

- 14.) Monica, West, Clerk of Court, [Redacted]

- 15.) Catherine Chien Conlon, bar no. 663271, [Redacted]

- 16.) Kevin Richard Holtz, bar no. 161624, Appeal Attorney, [Redacted]

(See attached files w/ dates, time, case docket and more)

Note: Any questions contact John W. Dobbs, Florida inmate no. C00618, Okeechobee Correctional Institution, 3420 N.E. 168<sup>TH</sup> Street, Okeechobee, Florida 34972-4824, case no.48-2006-CF-15201-0, ph. no. (863) 462 – 5400

### **Why do you believe this occurred?**

We believe this occurred to appear the **wealthy families** that was affected, to prevent Mr. Dobbs from excising his constitutional rights and to discourage Descendants of the slave trade from exercising their constitutional rights, as well; thus, the promotion of African American oppression. Please contact John Dobbs For more information in the matter.

(See attached files with dates, time, case dockets and more)

(Contact John Dobbs, Fl. Inmate no. C00618 for more information at Okeechobee C.I., 3420 N E 168<sup>th</sup> Street, Okeechobee, Fl. 34972, ph. no. (863)462 – 5400).

### **What other information do you think might be helpful to our investigation?**

- 1.) Police Narrative. Document # 06-100229 Supp,9/25/06 at approximately 2:00 am.
- 2.) The uncontested facts: Petitioner and his then girlfriend ...(3 pages).
- 3.) Police Report, Police Statements from: (a) John Dobbs, case no. 06-100229,10/25/06, (b) Deanna, Washington, case no. 06-100229, 10/25/06 at about 7:13 am,(c) Leonard Bolanco, case no. 06-100229,10/25,06,5:04 am,(d) Justin Idle, case no. 06-100229, 10/25/06,5:35 am, (e) Phillip Westfall, case no. 06-100229, 10/25/06, (f) Andre Blanco, case no. 06-100229, 10/25/06 at about 4:12 am, (g) Francisco Gotay, case no. 06-100229, 10/25/06, (h) Anthony Riollano, case no. 06-100229, 10/25/06,at about 5:25 am, (i) Hanzel Holiday, case no. 06-100229, 10/25/06, at about 0456 hours.
- 4.) Police Records and alleged victims and witness statements that was not made part of the "Record," we got them from the "Discovery."
- 5.) We Certify.
- 6.) Ms. Mollie Deputy Clerk of Court for the [REDACTED], John Dobbs DOC- Supplement Response- case no. 6:10-cv-663-Orl-18 GJK. and email from Mrs. Celeste Dobbs about unauthorized removal of 15 pages, John's "prosecutor misconduct" from his petition
- 7.) Anita Justin (supervisor) to Ms. Mollie- email to Mrs. Celeste Dobbs, as well as Robin A. Compton- bar # 846864, Assistant Attorney General informing John that on bottom of page 15 of 33 "Respondents will address this claim as it was raised in Petitioner's direct appeal as the facts addressing this claim are missing from Petitioner's documents. (Petitioner's 118-page document attached to his petition jumps from 79 to 95,"
- 8.) John's injury photos given to him when trial was over "Discovery" by his Public Defense attorney Catherine Chien, showed at trial to jurors as exhibits
- 9.) John's injury photos mail out to Mrs. Dobbs from John's Public Defense attorney Catherine Chien office with Letter date January 25, 2008.
- 10.) John Dobbs, Florida inmate no. C00618 - Police Interview video tape, October 25, 2006, about 2 hours long
- 11.) William Troy 111 -Proof of wealthy family -trial court transcript
- 12.) Jury Instructions

**Explain in detail what happened and how you were discriminated against State who was involved and show how other persons were treated differently from you. (Also, attach any written materials or documentation pertaining to your case.)**

The listing of events is compiled from several of Mr. Dobbs' prior efforts to get justice. The uncontested facts hold that: Petitioner and his then girlfriend Deanna Washington were visiting the State of Florida, when they stopped at a topless bar called Thee Doll House. Inside the club the couple met William Troy and briefly engaged in a not at all hostile, but not quite polite conversation. At closing time, the couple left the club and saw Troy with 3 or 4 other men, they were intoxicated. Petitioner's vehicle and the vehicle transporting Troy's party was parked six parking spaces apart. One or more from Troy's party yelled to the couple something to the affect of they needed security to walk them out. Initially the statement appears light hearted. Petitioner is entering his car when Troy's friend and employee Andre Blanco starts to approach the passenger side of the couple's vehicle. Petitioner's girlfriend being the passenger, points out that one of them is walking over. Petitioner asks her to stay in the car, leaves the driver side, and walks around the back of the car to meet him. When Blanco arrives, a fight initiated between them which all parties and witnesses perceive as a fist fight. The fight takes place close to the rear passenger side of Petitioner's vehicle. Almost instantly. Blanco is Knocked down and Francisco Gotay approaches Petitioner evades the punches and strikes Gotay with what all parties and witnesses perceive as fists. After being knocked down Blanco swiftly recovers and attacks Petitioner from behind. Petitioner's girlfriend exits the vehicle and enters the fight to help petitioner, as Anthony Riollano and William Troy approach. The couple hears someone yell 'get her ' or get the girl.' It's around this time that one of them appears to get seriously injured and Petitioner concedes to starting to use his pocketknife, as Ms. Washington is grabbed by Riollano and tossed to the side ending her feeble attempts to ward them off.

(More details continue on attached files with date, time, case no.)

(Note: John appeared in court wearing shackles throughout the entire court procedure, his conduct did not create a necessity to justify restraints)

Any questions contact John Dobbs, Fl. inmate no. C00618 for more information at Okeechobee Correctional Institution, 3420 NE 168<sup>th</sup> Street, Okeechobee, Fl.34972, phone no. (863) 462 – 5400)

**Has the opposite sex or have persons of other race, national origin, religion, or disabilities been treated differently**

**from you in this particular matter? ---if yes, explain and identify:**

John was the only one arrested, the only black man arrested n a public brawl and selected for prosecution, without even a qualified complaint against him.

(See attached files with dates, time, case dockets and more)

(Contact John Dobbs, Fl. Inmate no. C00618 for more information at Okeechobee C.I., 3420 N E 168<sup>th</sup> Street, Okeechobee, Fl. 34972, ph. no. (863)462 – 5400).



Have you filed a case or complaint with any of the following? (Check the appropriate items.)

Civil Rights Division, U.S. Dept. Of Justice	<input checked="" type="checkbox"/>	State or local Human Relations Commission
U.S. Equal Employment Opportunity Commission		State Law Enforcement Planning Agency <input checked="" type="checkbox"/>
Other Federal Agency		Attorney (Note the name and address above)
Federal or State Court	<input checked="" type="checkbox"/>	Other (specify)

For any item checked above, please provide the following information:

Name of Agency: (1.) U. S. Department of Justice, Civil Rights Division, case no. DJ 144-17M-0 (2.) U.S. Department of Justice/Civil Rights Division, case no. DOC NO. 423920

Date Filed: (2.) August 23, 2013

Case or Docket Number: Doc # 423920


Date of Trial or Hearing: NONE

Location of Agency or court: (2) Federal Coordination and Compliance Section of the Civil Rights Division, 950 Pennsylvania Avenue, NW Washington, DC 20530 ( see attached files)

Name of Investigator Deeanna Jang

Status of Case: denied assistance

Additional comments: Judicial Qualifications Commission, letter 12/2/2008, Executive Director Brooke S. Kennerty, Florida Department of Corrections, letter April 8, 2008, General Counsel Kathleen Von Hoene, (See Attached Files)

DATE: November 23, 2021 SIGNED: 

(Continue any question on additional sheets if necessary)  
Supplement exhibits will be file separately

(Please also complete and submit the Identity Release Statement)  
Supplemental exhibits will be file separately

Office for Civil Rights  
Office of Justice Programs  
U.S. Department of Justice  
810 7<sup>th</sup> Street, NW  
Washington, D.C. 20531

This comes from the family and the original is notarized

- (1) We certify that the subject matter jurisdiction of this Court regarding case # 48-2006-CF-015201-0 is called into question as it was invoked by fraud on the court.
- (2) We certify that on October 25, 2006, John was arrested, for alleged offenses involving at least five other men who posed a threat to John's female companion and John, by the Orange County Sheriff's Department despite its awareness that they were approached unprovoked and John was assaulted and battered in a continuous episode in and around the parking lot of a bar with topless dances. At least 3 of the no less than 5 men were highly intoxicated. At least 4 of these men were convicted felons. John was the only man classified as Black or African American and the only man arrested despite his, at the time, uncontradicted demonstration of justifiable use of force. Neither of the no less than 5 men were arrested and neither they nor the 4 eyewitnesses provided any evidence contradicting John's claim of defending myself and another. Despite the fact that no complaint was made against him Detective David Phelan disregarded Fla. Stat. 776.032's immunity clause and his duty to act in accordance with the conclusions of a reasonable person's assessment of the totality of the circumstances standard. This is clearly shown in his response to John's exasperated question to him during his interrogation of John where John ask "what do you think happened?" and he answers " You get into a fight with four guys you pull out your knife and go to work". Thus, despite his own reasonable conclusion along with that of Crime Scene Investigator Allison Wright who responds to John's question " Have you ever heard of anything like this?" and she answers " self defense, yea" at that same interrogation while photographing my multiple injuries and; the assessment of the original detaining officer Deputy Herbert Mercado who refers to John as the victim twice while testifying at the Adversary Preliminary Hearing on Dec.22,2006; Detective David Phelan commits fraud on the court by alleging probable cause.
- (3) We certify that the submitting of the instrument, alleging to be a charging affidavit, in absence of being sworn to before a person authorized to administer oaths, by Detective Phelan, to legitimize the arrest and detainment demonstrates fraud on the court as it in fact does not qualify as an "affidavit".

- (4) We certify that the court docket titled "case History/Register of Actions for "case number 48-2006-CF-015201-0 gives notice, while referring to John by his county jail inmate number 06048638, that John's October 25,2006, detainment and processing was not based on an actual complaint as the clerk alerts the court that "None" was filed. Thus, demonstrating that any allegation of having probable cause to detain or seek prosecution against him by any officer of Orange County Sheriff's Office; officer of the court, or, prosecutor on behalf of the state; including the First Appearance Hearing findings of Judge Jerry Brewer, especially in light of John's self defense claim, manifested fraud on the court, as the demonstrable evidence illustrates that John was charged with crimes that never occurred.
- (5) We certify that the designated Assistant State Attorney James Altman, alleged to have signed the charging "Information" on November 20, 2006, acted outside his authority at the time having failed to have taken his Oath of Office and thereby perpetrated fraud on the court.
- (6) We certify that Assistant State Attorney James Altman allegedly signing the charge "Information" in good faith after having received testimony under oath from material witnesses, which if true, would constitute the charged offenses, is false; and his signature and submitting of the "Information" to the clerk was done manifesting fraud on the court.
- (7) We certify that the photocopy of the unsigned charging " Information " stamped by the clerk of as having been filed on November 20, 2006, provided, upon request for discovery to the Public Defender's Office, verified by John's trial representative P.D. Catherine Chien's letter to my mother on June 9,2008; and was acknowledged as an issue but not one that should be brought up on direct appeal by John temporary appellate counsel P.D. Kevin Holtz, as verified by his letter to John on February 20, 2008; as well as by the order dismissing John's original petition for writ of habeas corpus file in the 14<sup>th</sup>

Judicial Circuit for Jackson County, Florida in 2008, where Judge William L. Wright held that after reviewing the record It was in fact an issue that should be raised on direct appeal; is sufficient demonstration that the copy alleging to have been signed on Nov. 2006, is an actual backdated manifest fraud on the court.

- (8) We certify that in light of the fact that former Orange County Circuit Judge Stan Strickland silenced John's objection to the "Information" and his request for dismissal based on the fact that no complaint or evidence of culpability was submitted by the alleged victims, right after John specifically invoked the protection and immunity of Florida's "Stand Your Ground" law Fla.Stat.776.013 (3), at the beginning of the Dec.22,2006, Adversary Preliminary Hearing; and used affirmative defense against John, finding probable cause claiming that the standard was only for him to hear information that leads him to believe John was the "one involved", despite the preponderance of the evidence, the absence of demonstrable evidence supporting count 3 and, absolutely no evidence being presented in support of counts 1,2,4 and 5; John was prevented from effectively participating in the actions against him and further victimized by fraud on the court.
- (9) We certify that alleged victim Andre Blanco makes the only sworn criminal accusation against John starting with his Dec.22,2006, Adversary Preliminary Hearing Testimony alleging the altercation initiated with John parking directly next to his vehicle, jumping out, lunging, and stabbing him in the face. In light of his elaborate testimony demonstrating that he has no personal knowledge to support the pivotal theory that the violence initiated with him being stabbed, as he saw no knife and recognized nothing that would indicate that he was stabbed at the time, only that he was punched really hard; while John admits to punching him really hard and stabbing him further into the altercation; his claim providing the only theory of guilt from a witness throughout John's entire judicial process renders the evidence circumstantial and insufficient. And his transcript of taped interview with detectives where he claims he only entered the fight to help a friend and which shows the detective had to inform him of where and how many times he was cut or stabbed because he says he never knew he was stabbed because of how much he drunk. Added to crime scene

investigator (CSI) findings that their cars were actually parked six parking space apart and that the altercation actually took place at the rear passenger side of John's vehicle. Along with the testimony of alleged victim Francisco Gotay, and other witnesses such as Deanna Washington, Phillip Westfall, and, Justin Idle that Blanco approached John and it started as a fist fight which Gotay joined before anyone was stabbed. The prosecutor pursuit of the charges demonstrates a diligent will to defraud John and perpetrate fraud on the court, especially as no other relevant evidence exists.

- (10) We certify that Public Defender Melissa Vickers' submitting of the defense and jury instructions on "Necessity" derived from the "Duress or Necessity" defense and instructions, at John's trial which in essence amounts to a guilty plea where a defendant places themselves at the mercy of the court; without advising or discussing any such defense or pleading with him, knowing John never presented evidence to support any criminal aspect of the charges and being fully aware of his actual innocence and immunity claim of justifiable use of force, demonstrates her intent to defraud John and manifest fraud on the court.
  
- (11) We certify that prosecutor for the State Kimberly Laskoff's practice of law before the court acting as an Assistant State Attorney in John's case without having at the time taken the oath of office manifest fraud on the court.
  
- (12) We certify that prosecutor Kimberly Laskoff Knowingly used perjured testimony from Andre Blanco as demonstrated in the contradictory statements and fabricated evidence he offered in his statements pointed out in the # (9) certification of this complaint and supplemental affidavit. She must also be held to have been aware of his statement to detectives that he didn't know what happen between William Troy and John, also his Adversary Preliminary Hearing testimony that he never saw William Troy and John in a confrontation, then his uncorrected trial testimony that he saw William Troy and John wrestling, and scuffling at which time William is on the ground; evidence unsupported by any corroborating evidence and the first and only demonstration inferring Troy at a disadvantage or as the victim. She also perpetrated fraud on the court with her opening statement that the

altercation initiated with Blanco and John “in a fighting stance “abandoning Blanco’s testimony and the only theory of guilt submitted by an alleged victim, misleading the jury, as to what she set out to prove; what she was burdened to prove; and misleading John as to the accusations John been defending against. Then further in closing arguments abandoning all prior theory and evidence by making fraudulent claims asserting John “was mad” and “Fired up “and “the only thing “John was finding “it necessary to protect was his ego”, building off her entirely fabricated verbal exchange between Deanna and John. Also that Blanco’s friends came to rescue him based on information they each denied having, and; the conflicts in their stories “really didn’t matter” and rather demonstrates their honesty. Telling the jury John cut himself rather than being cut by his assailants as John testified by what witnesses say John was being struck by what may have been a “key or a ring “. Contradicting all her witnesses and alleged victims to get a conviction with statements like the “only time they start to engage in a brawl is after John “start to stab and cut all of them”. Telling the jury it doesn’t need to think about John’s fear for the well being of his girlfriend because that’s a “magic trick”; and there’s no way John didn’t get out of his car and commit second degree murder or manslaughter and aggravated battery; despite the fact that John’s theory of events along with the evidence clearly demonstrated the “way “. She abused the jurors clearly demonstrated the “way “ she abused the jurors trust, her presentation of the case was fraud on a massive scale, especially at the close of the case and at a time when John’s further participation was prevented. She basically begged for his conviction despite her failure to prove the corpus delicti, using her capacity as an officer of the court to infer her knowledge of facts off the record that warrant John’s conviction rendering his participation ineffective.

- (13) We certify that Assistant General Brittany Quinlan abandoned her legal and ethical duty to her office intentionally facilitated the fraud on the court, to protect the Respondent, were she stated a fraudulent standard as grounds for dismissal. While a complaint

based or mere fraud may expire a complaint based on fraud on the court may be brought up at any time. Thus, her assertion that John's complaint and request for declaratory judgment was moot based on the passage of time was itself fraud with intent of rendering his participation ineffective and undermining the integrity of the preceding in case number 48- 2018-10658.

(14.) We certify that the appointed conflict judge for the case number 48-2018-CA106558. John Radavaugh of 10<sup>th</sup> judicial circuit indulged in fraud on the court by dismissing John's complaint and request for declaratory judgment to protect the Respondents. Were his dismissal was based on a finding that John's claims were moot while rule of law holds the fraud on the court in such a substantial claim that it can be bought at any time his findings were none of the Respondents contest the merits undermined the integrity of the proceedings and rendered John's participation ineffective.

(15) We certify that fraud or fraud on the court has been facilitated by Mark Inch secretary of Florida DOC for detaining John on clearly redacted in Uniform Commitment and Sentencing papers as the heading/ titles on the original documents on the Record were blacked out electronically rendering them void prior to being received by the Department of Correction. As, John complained through DOC grievance process (1) That DOC i based on the absence of a complaint being filed against John at the inception of the case and; (2) that DOC must release him immediately based on it's lack of sufficient documents to detain him; for example: redacted Uniform Commitment and Sentencing papers that are no more legitiment than scrape paper. Mr. Inch became libel party.

(16) We certify that cumulatize fraud and misconduct evinces collusion and a conspiracy by the Respondents to punish John for exercising a Constitutional Rights.



U.S. Department of Justice

Office of Justice Programs

Office for Civil Rights

Washington, D.C. 20531

October 26, 2021

Celeste Dobbs  
[REDACTED]

Re: Dobbs v. 9th Judicial Circuit Court (22-OCR-0077)

Dear Ms. Dobbs:

The Office for Civil Rights (OCR) at the Office of Justice Programs (OJP), U.S. Department of Justice (DOJ), received notice of your Complaint against 9th Judicial Circuit Court.

The OCR is responsible for ensuring that recipients of financial assistance from the OJP, the Office on Violence Against Women, and the Office of Community Oriented Policing Services comply with federal laws that prohibit discrimination in employment and the delivery of services or benefits based on one or more of these protected classifications: race, color, national origin, religion, sex, and disability, among others.

For the OCR to proceed with reviewing your Complaint, please provide the OCR with specific details about your allegations, including dates, times, places, and the names and contact information of alleged perpetrators and witnesses.

Please complete and return the enclosed Complaint Verification Information form. Although some responses may repeat information that you previously provided, please answer all applicable questions and return this form. The OCR must know how you (or whomever you are filing on behalf of) are treated differently from others, how rules and regulations are applied differently, or how programs and activities that are routinely available to others are not made available to you (or whomever you are filing on behalf of) because of one of the protected classifications listed above. Once we receive your response, we will use the information to determine whether the OCR has the authority to investigate your allegations.

Please also complete and return the enclosed Complainant Consent/Identity Release Form. The OCR may need to reveal your identity to persons at the agency or organization under investigation to investigate your allegations and receive information about you. If your Complaint was filed on behalf of someone else, that person must complete and sign the Complainant Consent/ Identity Release Form. Although consent is voluntary, the OCR may not be able to investigate the Complaint unless this release is authorized.

**See Attached  
Notarial Certificate**



Court et al (22-OCR-0077).“ also your department received my DOJ/Civil Rights complaint in the year **2021** not in 2022 please make corrections on my DOJ/ Civil Rights ( OCR) case complaint number.

***Note: The original document was signed in front of the notary on this page.***

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of [redacted]  
County of [redacted]

Subscribed and sworn to (or affirmed) before me on this 17 day of February, 2022 by  
Date Month Year

(1) Celeste [redacted] Dobbs

(and ~~2~~ \_\_\_\_\_),  
Name(s) of Signer(s)



proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature [Handwritten Signature]  
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Sworn Statement Re. Written Request

Document Date: Oct 26, 2021; 2.17.2022 Number of Pages: 3

Signer(s) Other Than Named Above: S/A

February 24, 2022

Mrs. Celeste Dobbs



The Office of Justice Programs  
U.S. Department of Justice  
Office of Civil Rights  
810 7<sup>th</sup> Street NW, Washington D.C. 20531

Re: 22 -OCR - 0077

Complainant Celeste Dobbs files this appeal asserting the following questions regarding case no. 22 -OCR - 0077 to this Honorable Department

Issues for review:

Whether this administration of the Civil Rights Department of the U.S. Department of Justice:

- 1.) is aware that it itself is denying Mr. Dobbs a Constitutional Right by asserting a time bar that according to Federal Rules of Civil Procedures Rule 60 (d) section (3) does not apply to a court's power to set aside a judgment for fraud on the court, as "Fraud on the court" may be addressed at any time and is distinguishable from mere "fraud;" and,
- 2.) acts within its mandate in continuing to allow the Federal government to sponsor state officials whose actions promote the illegal detainment of African Americans, simply because their "fraud on the court" won them a conviction; and,
- 3.) has determined that a time lapse can make an illegal detainment legal or the rendering of a guilty verdict, regarding an illegally detained US citizen, requires this department to recognize his conviction and detainment as Constitutional.

Also, appellant seeks clarification as to why this department has titled this case as John W. Dobbs vs Orange County Sheriff's Office Case # (22-OCR-0077) when previously it was titled John W. Dobbs vs Florida's 9<sup>th</sup> Judicial Circuit Court and it more properly should state either Orange County Sheriff's Office et al. or Florida's 9<sup>th</sup> Judicial Circuit Court et al. since all the named officials in the complaint are not part of the same agency.

As well perhaps you can answer why it appears that in several departments (state and federal), regarding his case, a supervisor relieves the assigned official of the burden of reaching the merits only to deny Mr. Dobbs based on a nonapplicable procedural bar or without an actual investigation of the merits themselves?

This department's mission statement declares its duty is to "ensure fair and impartial administration of justice for all Americans," it does not have the comfort to bow out in the face

of convictions clearly based on "fraud on the court" perpetrated by officials this government allocates funds to as well as misapplications of law.

See attached file where the assigned U.S. attorney investigator Matthew Blair (OJP) Matthew Blair, states that this department has jurisdiction over this "type" of case.

Wherefore, I Celeste Dobbs and the over 1000 other US citizens who signed the petition attached to the complaint as witnesses to the civil rights violations, my son has and is subjected to based on the public record humbly request this appeal be granted and this civil rights department press a full investigation on the merits.

Sincerely,  
Mrs. Celeste Dobbs

- 13.) Orange County Clerk of Court, charge account balance for court trial expenses
- 14.) Complaint Docket
- 15.) Probable Cause
- 16.) Charge Information, unsigned given to John by his public defender Catherine Chien and mail out to Ms. Dobbs from Santa Rosa C.I. on 12/16/2007.
- 17.) Charge Information, unsigned given to Mrs. Celeste Dobbs by public defender Catherine Chien, with discovery and letter dated January 25, 2008.
- 18.) Letter from public defender Catherine Chien, dated January 25, 2008 mail out to Mrs. Celeste Dobbs with the Discovery received on January 31, 2008.
- 19.) Letter from public defender Catherine Chien to John W. Dobbs, January 25, 2008, Re: State v. John w. Dobbs; 06CF015201AOR.
- 20.) Letter from Mrs. Celeste Dobbs, date June 05, 2028 (8 pages).
- 21.) Response letter from Catherine Chien, date June 9, 2008.
- 22.) Charge Information, backed dated and signed faxed date 2/26/08 to Mrs. Celeste Dobbs by Appeal Attorney Kevin Holtz
- 23.) Legal Mail receipt - letter dated and stamped 12/16/07, from Santa Rosa C.I., hand written receipt for the unsigned charge information with officer Carter verifying the unsigned charge information.
- 24.) Response letter 911 tape call, date August 6, 2007 (stating on October 25, 2006 there was an equipment malfunction ).
- 25) Case History Docketed, October 25,2006 "Complaint Filed 10/25/06 None 06048638 on page 4 of 4.
- 26.) Charge Affidavit- Orange County Sheriff Office, date October 25, 2006, time 11:48, case no. 06CF15201-0, inmate no. 06048638.
- 27.) John appeared in court wearing shackles - No meeting and no court order to restraint John, was put in the "Record" or case docket. John worn shackles on his ankles throughout the entire court procedure.
- 28.) Orange County Clerk of the Court Record Management Monica West
- 29.) Motion To Dismiss
- 30.) Edward Lawrence Dobbs: September 10, 2013, Affidavit (1 page).
- 31.) Donald Eady -September 23,2013, Jurat Certificate.

(More issues continue attached files dates, time, with case dockets and more)

Note: Any questions contact John W. Dobbs, Florida inmate no. COO618, Okeechobee Correctional Institution,3420 N.E. 168<sup>TH</sup> Street, Okeechobee, Florida 34972-4824, case no.48-2006-CF-15201-0, ph. no. (863) 462 – 5400)

**If this complaint is resolved to your satisfaction, what remedy do you seek?**

Immediate release from prison

(See attached files with dates, time, case dockets and more)