

THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

MAY 11 1999

LUTHER D. THOMAS, Clerk
By *[Signature]*
Deputy Clerk

GEORGE W. HIGH, SR., VIRGINIA C. HIGH,
ERIC L. HIGH, JENIQUE DRAKE HIGH,
GEORGE W. HIGH, JR., BEVERLEY HIGH,
GEORGIA HOME IMPROVEMENT CO., INC.,
HIGH-FIVE LTD. AND ALL AGGRIEVED
BLACK PARTIES,

PLAINTIFFS

v.

BARBARA BROWN (FBI AGENT), TERRY SOSBEE
(GFI AGENT), WILLIAM SILINSKI (IRS AGENT)
SHELIA WHIPPLE (IRS AGENT), DAVID JONES
(IRS AGENT), UNKNOWN "NEGRO" FEMALE
(IRS AGENT), AND "THOSE FEDERAL AGENTS
WHO IT IS INDICATED BY THE RECORDS OF
THE UNITED STATES ATTORNEY PARTICIPATED
IN THE UNREASONABLE SEARCHES AND SEIZURES
AT THE HIGH'S RESIDENCE AND THE OFFICE OF
GEORGIA HOME IMPROVEMENT CO., INC., AND
HIGH-FIVE LTD., ON JULY 27, 1992"

DEFENDANTS

Case No. 99-CV-1197

Case No. _____

BIVENS CIVIL ACTION

COMES NOW GEORGE W. HIGH, SR., the lead plaintiff, pursuant to Federal Rules of Civil Procedures and request monetary damages against the above named defendants who did conspire to deny a person equal protection and due process of law, as guaranteed by the fourteenth admendment of the United States Constitution. Said defendants also deprived plaintiffs of their civil rights as guaranteed by the fourth and fifth admendment of the United States Constitution.

THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

GEORGE W. HIGH, SR., AND
VIRGINIA C. HIGH,

PLAINTIFFS

v.

WILLIAM A. MORRISON INDIVIDUALLY,
AND DBA JONES, MORRISON & WOMACK,
P.C.. AND C. MICHAEL ABBOTT
INDIVIDUALLY, AND DBA C. MICHAEL
ABBOTT, P.C..

DEFENDANTS

Case NO. 1 99-CV-1616

JUN 22 1999
LUTHER D. THOMAS, Clerk
By: *JM*
Deputy Clerk

CIVIL RIGHTS ACTION

COMES NOW the plaintiffs, pursuant to Federal Rules of Civil procedures and request monetary damages against the above named defendants who did conspire among themselves, and with others to deny a person equal protection and due process of law as guaranteed by the fourteenth amendment of the United States Constitution, and in conjunction with 42 USC § 1985 (2) and (3), and 28 USC § 1343 (1) and (2). Said defendants also deprived plaintiffs of "the right to effective assistance of counsel", as guaranteed by the sixth amendment of the United States Constitution. Defendants further deprived plaintiffs of their Civil Rights as guaranteed by the first, fifth and thirteenth amendments of the United States Constitution.



Office of Professional Responsibility

The OPR Process: How to File a Complaint

OPR's jurisdiction is limited to reviewing allegations of misconduct made against Department of Justice employees which involves the core functions of prosecution, litigation, and investigation. Complaints against DOJ employees must be forwarded to OPR in writing. No particular forms are required. The complaint should include the names and titles of the individuals suspected of misconduct, the details of the allegations including case names, and any other relevant information. Complainants should include copies of any documentation they have pertaining to the matter. The information should be mailed to:

H. Marshall Jarrett, Counsel
Office of Professional Responsibility
20 Massachusetts Avenue, N.W., Suite 5100
Washington, D.C. 20530

Upon receipt of a complaint, OPR will review the matter and contact the complainant.

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Updated page September 10, 2002
usdoj/jmd/lst/tvu

Office of Professional Responsibility

The OPR Process: How Complaints Are Handled

OPR receives reports of allegations of misconduct made against Department of Justice attorneys from many sources. Nearly half of all such allegations are reported to OPR either by the attorney involved or by other Department sources. The remaining complaints received by OPR come from a variety of sources, including private attorneys, defendants and civil litigants, other federal agencies, state or local government officials, judicial and congressional referrals, and media reports. Judicial findings of misconduct are given expedited attention by OPR.

Upon receipt, OPR reviews each allegation and determines whether further investigation is warranted. The determination whether to open an investigation in a specific case is a matter of investigative judgment. Many factors are weighed, including the nature of the allegation, its apparent credibility, its specificity, its susceptibility to verification, and the source of the allegation. A decision to open a matter does not give rise to a presumption of misconduct nor does it shift the burden of proof to the person being investigated. OPR's investigations involve a wide range of allegations, and the investigative methods used vary accordingly.

In many cases, OPR notifies the attorney against whom the allegation has been made and requests a written response. OPR may also conduct on-site investigations. Based on the results of the investigation, OPR prepares a report to the component head concerned with a copy to the Office of the Deputy Attorney General setting forth its findings and conclusions, and advises the complainant and the attorney involved of the conclusion reached.

- **How to File a Complaint**

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Updated page December 26, 2001
usdoj-jmd/irm/lb/aab



U.S. Department of Justice

Office of Professional Responsibility

20 Massachusetts Avenue, NW, Suite 5100
Washington, D.C. 20530

MAR 5 2004

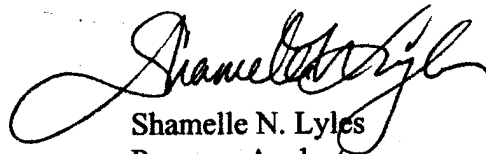
George Sr. and Virginia High
6715 Jojanne Lane
Lithonia, Georgia 30038

Dear Mr. and Mrs. High:

This is in response to your correspondence to the Office of Professional Responsibility (OPR) dated November 17, 2003. In your letter you alleged misconduct by federal prosecutors and the presiding judge, and others relating to the prosecution of your cases.

OPR has jurisdiction to investigate allegations of misconduct involving Department of Justice (DOJ) attorneys or law enforcement personnel that relate to the exercise of an attorney's authority to investigate, litigate or provide legal advice. It is, however, the policy of this Office to refrain from investigating issues or allegations that were addressed or that could have been addressed in the course of litigation, unless a court has made a specific finding of misconduct by a DOJ attorney or law enforcement personnel or there are present other extraordinary circumstances. Based on our review of your correspondence, we have determined that your allegations are matters for the court and no court has made such a finding of misconduct. Accordingly, there is no basis on which action by this Office would be warranted. You may wish to seek private counsel to determine what additional legal avenues, if any, may be available to you.

Sincerely,



Shamelle N. Lyles
Program Analyst

George W. High, Sr. &
Virginia C. High
6715 Jojanne Ln.
Lithonia, Ga. 30038

March 25, 2004

U.S. Department of Justice
Office of Professional Responsibility
20 Massachusetts Avenue, NW, Suite 5100
Washington, D.C. 20530

Attn: Ms. Shanelle N. Lyles, Program Analyst
Or: To whom it may concern

Ms. Lyles,

We are in receipt of your letter dated March 5, 2004, a copy of which is attached hereto. Let me begin by saying that your letter was very ambiguous, and with very little (if any) substance what-so-ever. Judging from your response to my complaint, I can only assume that you are not aware that on, On October 21, 1998, The Congress enacted and the President signed a statue subjecting prosecutors to State Laws and Rules, as well as to Local Federal Court Rules governing lawyers conduct in the States where they engage in their activities. The Citizens Protection Act [28 U.S.C. Section 5308] took effect April 1, 1999, and Enclosing you copies of **Title 28 USC 530B**, (Ethical standards for attorneys for the Government), and copies of **28 CFR 77.1—77.5**. (rules of the Department of Justice). You seems to have arrived at some arbitrary conclusion to justify your position, which is not based on any law or fact, and I might add that we are being portrayed as the villains, when in fact we are the victims. The individuals named in the complaint are (were) associated with the Justice dept. (in one way or another) and representatives of the United States of America. We will not be deterred in our quest for Justice and restoration, and "Justice delayed is Justice denied."

I am therefore this day, in the interest of justice, filing an Amended Complaint with the Office Of Professional Responsibility against the aforementioned named individuals, with a request for reconsideration, and have taken the liberty to forward copies to the following persons, who may possess a little more insight, foresight and not hindsight.

AMENDED COMPLAINT

&

REQUEST FOR RECONSIDERATION

(an addition to that previously Filed Complaint)

George and Virginia High has been the victims of a campaign of Discrimination, Injustice, Threats, Intimidation, Harassment, unfair-ness, Puritanism, Unlawfulness, Inexcusability, Prejudice, Unjust conviction, False Imprisonment, Framing, which is Shocking and Deplorable, by "Rogue Agents" within the FBI, IRS, the U.S. Attorneys office, two counterfeit defense attorneys and a District Judge. These false charges brought against George and Virginia High by the United States of America are of the most outrageous conduct which transcends all possible bounds of decency so as to be regarded as "atrocious and utterly intolerable in a civilized society". George and Virginia had a "sham trial" before a Kangaroo Tribunal, which was tantamount to a "Judicial Lynching"...

18 USC Sec. 241 Conspiracy against rights

If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured, They shall be fined under this title or imprisoned not more than ten years, or both...

Joe D. Whitley, Former U.S. Attorney Northern District of Georgia

H. Allen Moye, Assistant United States Attorney

Barbara Brown, F.B.I. (Case Agent)

William A. Silinski I.R.S. Criminal Investigator

Shelia Whipple Geer I.R.S. Criminal Investigator

Judge Robert L. Vining, Jr.

Kyle Henry, undercover agent (paid informant)

William A. Morrison, (Court appointed) trial & appeal attorney for George High

C. Michael Abbott, (Court appointed) trial & appeal attorney for Virginia C. High

18 USC Sec. 242 Deprivation of rights under color of law

Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United

States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both....

Joe D. Whitley, Former U.S. Attorney Northern District of Georgia
H. Allen Moye, Assistant United States Attorney
Barbara Brown, F.B.I. (Case Agent)
William A. Silinski I.R.S. Criminal Investigator
Shelia Whipple Geer I.R.S. Criminal Investigator
Judge Robert L. Vining, Jr.
Kyle Henry, undercover agent (paid informant)
William A. Morrison, (Court appointed) trial & appeal attorney for George High
C. Michael Abbott, (Court appointed) trial & appeal attorney for Virginia C. High

18 USC Sec. 2 Principals

- (a) Whoever commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission, is punishable as a principal.
- (b) Whoever willfully causes an act to be done which if directly performed by him or another would be an offense against the United States, is punishable as a principal.

Joe D. Whitley, Former U.S. Attorney Northern District of Georgia
H. Allen Moye, Assistant United States Attorney
Barbara Brown, F.B.I. (Case Agent)
William A. Silinski I.R.S. Criminal Investigator
Shelia Whipple Geer I.R.S. Criminal Investigator
Judge Robert L. Vining, Jr.
Kyle Henry, undercover agent (paid informant)
William A. Morrison, (Court appointed) trial & appeal attorney for George High
C. Michael Abbott, (Court appointed) trial & appeal attorney for Virginia C. High

This the 25th day of March 2004

George W. High, Sr. and on behalf of Virginia C. High

Cc: H. Marshall Jarrett, Counsel & Civil Rights & Civil Liberties
Office of Professional Responsibility Office of the Inspector General
20 Massachusetts Ave. NW, Suite 1500 U.S. Dept. of Justice
Washington, D.C. 20530 950 Pennsylvania Ave., NW
Washington, D.C. 20530

George W. High Sr. &
Virginia C. High
6715 Jojanne Ln.
Lithonia, Ga. 30038
770-484-5893

November 17, 2003

Civil Rights & Civil Liberties Complaints
Office of the Inspector General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Room 4322
Washington, D.C. 20530

This Complaint is primary against the following named individuals although, there may be other persons mentioned who were involved in this Criminal case one way or another. All of the below named individuals may or may not be under the Jurisdiction of this Office, that being the case, if you would kindly inform me of such, I will pursue a proper course of action against them.

Joe D. Whitley, Former U.S. Attorney Northern District of Georgia
H. Allen Moye, Assistant United States Attorney
Barbara Brown, F.B.I. (Case Agent)
William A. Silinski I.R.S. Criminal Investigator
Shelia Whipple Geer I.R.S. Criminal Investigator
Judge Robert L. Vining, Jr.
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William A. Morrison, (Court appointed) trial & appeal attorney for George High
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High

**George W. High Sr. &
Virginia C. High**
6715 Jojanne Ln.
Lithonia, Ga. 30038
770-484-5893

November 17, 2003

H. Marshall Jarrett, Counsel
Office of Professional Responsibility
20 Massachusetts, Ave. N.W., Suite 5100
Washington, D.C. 20530

This Complaint is primary against the following named individuals although, there may be other persons mentioned who were involved in this Criminal case one way or another. All of the below named individuals may or may not be under the Jurisdiction of this Office, that being the case, if you would kindly inform me of such, I will pursue a proper course of action against them.

Joe D. Whitley, Former U.S. Attorney Northern District of Georgia
H. Allen Moye, Assistant United States Attorney
Barbara Brown, F.B.I. (Case Agent)
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Shelia Whipple Geer I.R.S. Criminal Investigator
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George W. High, Sr.
& Virginia C. High
6715 Jojanne Ln.
Lithonia, Ga. 30038

July 14, 2004

STATE BAR OF GEORGIA
CONSUMER ASSISTANCE PROGRAM
104 Marietta Street, Suite 100
Atlanta, Ga. 30303
Attn: Ms. Lynda Sewell Hulsey, Director, CAP

Ms. Hulsey,

These facts being submitted to The State Bar Of Georgia (CAP) on a claim of Misconduct is primary for the purpose of establishing sufficient evidence to justify CAP implementing an investigation against the named individuals, and by no means is this to be considered the crux of our complaint. We understand that the "Bar of Justice" is raised exceedingly high when convicted felon's, also being black, makes any claim of misconduct against law enforcement personnel, much less, the U.S. Department of Justice. However, we maintain that each and every charge against all of the named conspirators are true and that this tribunal, after a through and just determination, will revoke the licenses of all of these racist members alleged to "BE IN GOOD STANDING."

The High's reserve the right to amend this complaint and/or respond to any Counter-claim or reply made by any person or entity with an interest in this complaint.

I Swear to tell the truth, the whole truth And nothing but the truth so help Me God

This is only a small percentage of information that I have uncovered over the past 13 years relating to the governments unjust conviction and false imprisonment of myself and my wife, and I would be happy to share any/all of it with your office.

1. I have the complete trial transcript containing about 2,500 pages.
2. I have copies of all 3 of the indictments.
3. I have copies of both of our Pre sentence Report.
4. I have about 20 + letters from Bill Morrison.
5. copies of every filing (by us) in the U.S. district court.
6. Copies of every denial by the district court.
7. Copies of every filing (by us) to the Court of Appeals.
8. Copies of every response from the Court of Appellate.
9. Copies of 2 petitions to the U.S. Supreme Court.
10. Docket for George and Virginia High.

Hon. Robert L. Vining Jr.
Senior Judge, U.S. District
Court
P.O. Box 6226
Rome, GA 30162-6226
UNITED STATES
Phone: 706-378-4070
Fax:

Admit Date: 12/17/1958
Law School: University of
Georgia

Status: Active Member in
Good Standing

Mr. Joe D. Whitley
Alston & Bird, LLP
One Atlantic Center
1201 W. Peachtree St.
Atlanta, GA 30309-3424
UNITED STATES
Phone: 404-881-7657
Fax: 404-881-7777
E-Mail:
jwhitley@alston.com

Admit Date: 06/13/1975
Law School: University of
Georgia

Status: Active Member in
Good Standing

Mr. H. Allen Moya
U. S. Attorney's Office
Suite 600, Russell Federal
Bldg
75 Spring Street, S. W.
Atlanta, GA 30303-3315
UNITED STATES
Phone: 404-581-6275
Fax: 404-581-6171

Admit Date: 11/30/1973
Law School: University of
Georgia

Status: Active Member in
Good Standing

**Mr. Charles Michael
Abbott**
75 Fourteenth Street, Suite
2500
Atlanta, GA 30309-3644
UNITED STATES
Phone: 404-885-1994
Fax: 404-885-1677
E-Mail:
cmabbott@mindspring.com

Admit Date: 04/21/1975
Law School: Duke
University

Status: Active Member in
Good Standing

Mr. William A. Morrison
Jones, Morrison & Womack
Suite 1250
230 Peachtree St., N. E.
Atlanta, GA 30303-1505
UNITED STATES
Phone: 404-658-1670
Fax:
E-Mail:
bmorrison@jonesmorrison.com

Admit Date: 06/10/1980
Law School: Emory University

Status: Active Member in Good
Standing



CONSUMER ASSISTANCE PROGRAM

September 2, 2004

CONFIDENTIAL

Mr. George W. High, Sr.
6715 Jojanne Lane
Lithonia, GA 30038

Dear Mr. High,

Please review my previous letters to you. My position remains the same. Per your request, your correspondence is being returned to you. Please do not send the Consumer Assistance Program (CAP) such documentation, because we have no need for it.

At your insistence, a Memorandum Of Grievance is enclosed. It is quite likely that it will be dismissed.

The Consumer Assistance Program (CAP) keeps correspondence for only thirty days. After that, it is destroyed.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. Hulsey".

Lynda Sewell Hulsey
Director, CAP

LSH/bd

State Bar Of Georgia
CONSUMER ASSISTANCE PROGRAM

Attn: Ms. Lynda Sewell Hulseay
Director, CAP

COMPLAINT OF "GROSS" MISCONDUCT Against:

Joe D. Whitley, Former U.S. Attorney Northern District of Georgia
H. Allen Moye, Assistant United States Attorney
William A. Morrison, Court appointed trial & appeal attorney for George High
C. Michael Abbott, Court appointed trial & appeal attorney for Virginia C. High
William A. Silinski I.R.S. Criminal Investigator
Shelia Whipple Geer I.R.S. Criminal Investigator
Barbara Brown, FBI, Case Agent
Judge Robert L. Vining, Jr.

SUPPORTING DOCUMENTATION

George W. High, Sr., Pro Se
& Virginia C. High
6715 Jojanne Ln.
Lithonia, Ga. 30038
770-484-5893

July 14, 2004