

DEDICATION

I wrote this story the last part of 2001 and I had my own web site. The US Magistrate Judge Pamela Sargent that this story is about later issued a false arrest warrant for me. This is the same Judge that had me incarcerated at the FCI in Butner, NC for the criminal insane the last 3 months of 1999. The doctors at Butner diagnosed me as having no mental disease or defect and ruled I am not a danger to myself or others. This same Judge held my bond hearing in January 2002 and denied my bond because I was in a mental institution in 1995. I was diagnosed in 1995 as having no mental disease or defect. The Asst. US Attorney Randall Ramseyer this story is about was the prosecuting attorney. The US Marshal Woodrow (aka Woody) McGlothlin that this story is about was one of the officers that came to my house and arrested me. The FBI agent that obtained the arrest warrant would not testify that I had committed the last crime that I was railroaded into pleading guilty to a crime I did not commit. He would only testify that the United States Judge James P. Jones that this story is about believed I had committed the alleged crime. I have a motion in the court for a new trial but I have not received a ruling from the court so it is kind of holding me up on writing the part about the last arrest. I am now a convicted felon for writing this story and sending it to the Honorable James P. Jones and I received 5 years probation and I am not allowed to write any judge or elected official and complain about the last injustice that was done to me.

**Thank You;
Ralph Adkins**

**Corruption in Washington County:
A True Story**
Abingdon, Virginia

By: Ralph Adkins
December 12, 2002

Electronically Published by:
Christopher M. Hansen
<http://famguardian.org/>

This is a true story about the most corrupt justice system in America, the Washington County, Virginia Justice System. This story tells about how Deputy Larry Moore was seeing my ex-wife during the time that we were living together, how Deputy Moore was so obsessed with provoking me that on November 14, 1996 in the Washington County, VA Sheriff's Office, he threw me up against the wall, arrested and searched me, and did not find the tape recorder in my shirt pocket. This is how you catch a lying cop lying. This is also how you end up in a federal prison with the criminally insane.

The last three words of the Pledge of Allegiance to the American Flag are, "justice for all." However, when you even *speak* of "justice for all," most Americans will turn their backs and run. The Honorable people of Washington County and anyone who would support them should be banned from going into any building that displays the American Flag. If you ever get caught up in something like this, you will learn that there will be no freedom fighters there fighting for you. When this began on November 14, 1996, I had never been charged with a crime in my life, but look at my criminal record today! It shows five different crimes that I have been charged with! I have never been involved in any kind of criminal activities. I have never even used illegal drugs or alcohol.

Deputy Moore perjured himself to convict me of a crime that I did not commit -- a crime any sane person would not believe that I had committed. I filed over 100 lies under oath by Washington County, VA Sheriff's Deputy Larry Moore, and the court, in turn, attempted to have me committed as being criminally insane to cover this up. The court made sure that I spent almost four months incarcerated and cost me over \$4,000 before I had a chance to prove my innocence. The Honorable James P. Jones sat on his throne during this time with the knowledge that I was there because he had condoned perjury by Deputy Moore and his witnesses and did not have enough integrity to step forward and tell the truth. The only defense these people have is that I am obsessed with my case -- or like some of their partners in crime have said on tape, "he's crazy."

There is nothing I can do about what has been done to me except to write this story in hopes that it might save one person from going through what I have gone through the last five years. When I was 44 years old I would not have believed that something like this could happen. It could have just as easily happened to you or one of your family members.

The United States Constitution, 2nd Amendment, states, "the right of the people to keep and bear arms shall not be infringed." I have never been convicted of a felony and I have three separate mental health reports which clearly state that I have no mental disease or defect. The Honorable people in Washington County still took my guns -- guns that I had owned for over thirty years -- and by their own law, I can never own a gun for the rest of my life.

My ex-wife moved out around the first of June, 1995. I found out two days later that she had been seeing Deputy Moore during the time that we were together. I lived in Washington County until October of 1995. I then left Washington County to try to prevent what eventually happened to me, but this was not good enough for Deputy Moore and my ex-wife. By Deputy Moore's own testimony, I had never once bothered him, and until November of 1996, he did not even know who I was. In the year of my absence I only visited my property three times. The first time was around the beginning of April 1996, when I discovered that Deputy Moore had turned his horses on my property to harass me. The next time was around the middle of May, when my ex-wife drove up my driveway and sat and watched me. She testified that she did this because she was afraid for my 18 year old son to be at my garage alone with me. The third time was also in the middle of May, 1996, and nothing happened. When I returned in November of 1996, I discovered the fence that the Moore's had built to frame me. During

this year Deputy Moore continued to harass me by trespassing at my garage, where my personal belongings were stored. At one trial, Deputy Moore testified that he had never been to my garage. During the Civil Rights trial, he testified that he had only been there once. Moreover, one witness testified that Deputy Moore had been there so many times he thought Deputy Moore was me and that he owned the place.

During my absence, Deputy Moore ran his livestock on my property to harass me. During the Civil Rights trial, he testified that his livestock had never been on my place. I showed Deputy Moore a picture of his cow on my side of the property line, yet he still denied that his cows had ever been on my land.

About August of 1996, Deputy Moore and my ex-wife built a fence on my property for the sole purpose of framing me. In trial, Deputy Moore testified that he used a survey plat to build the fence. I had Mr. L. V. Fleming, my ex-wife grandfather's, subpoenaed and in court, but the prosecuting attorney Roy Evans refused to put Mr. Fleming on the witness stand. During the Civil Rights trial, Deputy Moore denied that he used a survey plat, and that Mr. Fleming had shown him where to build the fence. Deputy Moore testified that Mr. Fleming could ride about five miles and 700 more feet through the field to the middle of the property, but could not ride about 700 more feet to the back of the property to show him where the corner was located. Deputy Moore's excuse was that you could not drive to the back of the property, and Mr. Fleming was too old and too sick to walk. You can go there today and see that you can drive to the corner of this property.

On November 13, 1996, Deputy Moore built the second fence on my land. When he was leaving my property, he stood up on his tractor, smiled really big, and waved with an open hand -- but testified that he was scared that I was going to kill him. This was only an attempt to provoke me.

I hired Holbrook Surveyors of Bristol, Virginia to prove the fence was on my property to prevent me from spending time in prison. Holbrook Surveyors and their employee Brett Watson charged me \$750 to come to court and commit perjury for Deputy Moore. Mr. Watson testified against his own picture, his own survey, and his own letter.

Deputy Moore charged me with threatening to kill him. His story was that the former sheriff of Washington County had told him that I had made a threat to kill him. The former sheriff testified that he did *not* tell Deputy Moore this, and that he did *not* make or sign any sworn statement to a threat to kill warrant. The United States Constitution, 4th Amendment, states, "and no warrants shall issue, but upon probable cause, supported by oath or affirmation."

Deputy Moore testified that I followed he and his wife from my driveway four and a half miles to his wife's place while he was driving a farm tractor. Mrs. Moore's testimony was that this never happened, which was the truth.

Deputy Moore's testimony was that I had watched him for 5 straight hours while he was building a fence on my property. Deputy Moore's own son testified that he helped build the same fence, but had never seen me at all during this 5-hour period.

Deputy Moore charged me with stalking, perjured himself to convict me, and the state Judge convicted on nothing but lies. It is indisputable that a police officer's testimony carries more weight in court than a

private citizen, and it is my belief a police officer should be held more accountable for his actions when he knowingly lies under oath.

I was arrested in the lobby of the Washington County Sheriff's office. There were three deputies, the High Sheriff, and the magistrate present to make the arrest. These people stood by and let Deputy Moore throw me up against the wall and arrest me. Deputy D.L. Edmondson testified that he had arrested me, and that Deputy Moore was not even present at my arrest. Deputy Moore later had to admit that he was the one who arrested me and Judge James P. Jones ruled that it was not relevant. The only difference in court between just plain old lying and perjury is that it has to be relevant to be perjury. Judge Jones was just sending a message to the jury.

After I beat the state charges I filed a Civil Rights suite against Deputy Moore and others. All were dismissed from the suite except for Deputy Moore. Former Sheriff of Washington County Kenneth Hayter testified that he had known the Judge assigned to the case, the Honorable James P. Jones, for several years. One witness informed me that they had been seen at political functions at the same time. Deputy Moore testified that he knew Judge Jones. I went before Judge Jones and asked him to withdraw, and he made this statement, "I would not know Sheriff Hayter if he would walk through that door." This is a small town, and Judge Jones, Deputy Moore, and Mr. Hayter have lived most of their lives.

The jury was stacked against me at the Civil Rights trial. The mental health experts I have seen conveyed to me that any sane person would not believe the jury pool I had would make a fair and impartial jury that is guaranteed me by the United States Constitution. After the trial, Judge Jones told the jury to wait in the jury room, and that he wanted to thank them personally.

After the trial I filed over 100 lies under oath by Deputy Moore with the courts in Washington County. Before the trial Judge Jones had always made his ruling in a matter of days. About 3 months later I made signs that stated, "I ACCUSE DEPUTY LARRY MOORE OF OVER 100 LIES UNDER OATH," and "I ACCUSE JUDGE JAMES P. JONES OF CONDONING PERJURY BY DEPUTY LARRY MOORE," and sat in front of the court with the signs.

The Court, in turn, took out a retaliation warrant. The warrant was for allegedly empty gun that I had in my car on November 14, 1996, a gun that a state judge had ordered returned to me on June 25, 1997. This warrant was issued in September 1999 as a non-bondable warrant, almost 3 years after the alleged offense had taken place. I was asked several times why it took so long to bring this charge. The answer is very simple. If these people had charge me with the signs, the "lies" Deputy Moore had told under oath would have been relevant in court. By charging me with the gun, nothing the Washington County Sheriff Department employees had done would be relevant in court. These people got their conviction for the signs without having a trial via RAILROAD. This will be explained all through this story.

Judge Jones allowed Deputy Moore and his witnesses to lie and denied me the right to testify to the truth. In reality, if you are a member of the Washington County, VA Sheriff's Department, there is nothing wrong with going into the courthouse and lying under oath, but if you sit on a public street and tell the truth, it will get you time in a federal prison.

The court has the knowledge and evidence that Deputy Larry Moore is a pathological liar and has the knowledge that Deputy Moore has committed perjury so many different times and in so many different courts that he should be declared a habitual offender. If you read this story in its entirety I will show

you indisputable proof of all of my allegations, and why I believe a lying cop is the most dangerous person there is. This ended up costing me my right to have a normal relationship with my own son, my life savings, my retirement, my right to use my own property. My right to own a gun for life was taken away, and it destroyed my reputation. The Honorable people of Washington County allowed Deputy Larry Moore to turn the whole Washington County Virginia Justice System into a pack of liars. My Constitutional rights, my civil rights, my human rights, my right to liberty and the pursuit of happiness, and my freedom were abolished to cover this up. If Deputy Moore can go to my property when it was posted and he was told to stay off, yet he has probably cause to arrest me for going to the same property, I would be insane not to think that Deputy Moore owns this property.

A quote from the now Washington County, VA Sheriff Fred Newman, "The members of our sheriff's office should be accountable for their actions, whether good or bad." If you read this story, you will realize that Sheriff Newman's statement is nothing but B.S.

This story has been written under my 1st Amendment rights, Freedom of Speech, and Judge James P. Jones' ruling that you cannot sue a private citizen for lying under oath to convict someone of a crime that they did not commit -- all of which should protect me from being sued for telling the truth. These people can put me in prison, but they cannot take my freedom, because I lost my freedom five years ago when my ex-wife got hooked up with a lying cop.

I want to thank my former probation officer, Mr. Ted Price, for being one of the finest people I have ever known. I also want to apologize to Mr. Price for me voicing all my complaints to him in the past two years. This was because he was the only person I had to complain to, and for this, I apologize to Mr. Ted Price.

ALBUQUERQUE, NEW MEXICO

September 15, 1999

First, I would like to thank all the officers in New Mexico that were involved in my arrest and court appearances, with a special thanks to Joseph Gandert, Assistant Federal Public Defender, for doing an excellent job in representing me, and for being so kind. Most police officers and Judges are honest people, but this does not apply to Washington County, Virginia.

I was in Cuba, New Mexico on vacation when I learned of the federal warrant. I immediately turned myself into the police. I spent three days in jail before the judge released me on my own reconnaissance on the same warrant that was issued in Washington County as non-bondable.

This is a statement made by the federal judge, (A quote from my letter that was used in an attempt to get me detained in New Mexico and again when I returned to Washington County) "Either the deputy's lying and his comrades are covering it up, or I'm insane. He has no felony convictions. The present offense of possessing a firearm after having been committed to a mental institution. The firearms that were recovered at the residence form the basis of the underlying claim. The proffer before the Court indicates that when the defendant was aware of the warrant, he immediately called a sheriff and asked to have the FBI contacted. He has been cooperative with law enforcement. I have no reason to believe that he poses the kind of danger that requires that he be immediately taken into custody. Given his conduct in voluntarily appearing on this matter."

The Judge gave me seven days to get back to Virginia. The Judge, "I am going to reduce that again from 10 days to 7 days, you know, driving time." This would have given me the weekend to get home and Monday and Tuesday to find me an attorney. By the time I arrived back in Kingsport the people in Washington County had moved the hearing to Monday morning at 9:00 AM. When I arrived in court, the court had Attorney Bernard Via from nearby Bristol waiting on me. Mr. Via called the prosecution's witness, Ms. Evelyn Fay Hamilton, mental health examiner, to testify that I needed to be locked up in a mental institution.

**THE F.C.I. REPORT FROM BUTNER, NORTH CAROLINA
October 5, 1999 - January 2000**

The Federal Correctional Institution in Butner, North Carolina is known as the best mental health institution for the criminally insane the U.S. government has to offer. I want to thank all the staff and inmates at Butner for treating me fairly. To be honest, the inmates at Butner were much better people than the people in the Washington County, Virginia Justice System.

The over 100 allegedly false statements that I had filed with the court were not sent to Butner to use in my mental evaluation. I feel this supports my belief that the court had the knowledge that Deputy Moore and his witnesses had lied under oath, and by the court refusing to send the alleged false statements to Butner, they support my belief that they attempted to have me committed as being criminally insane to cover up for Deputy Moore.

Quotes from my mental evaluation from Butner, not in its entirety:

Mr. Adkins' account of the alleged offense is in general agreement with the collateral account. He believes that since the firearm was returned to him by the court, he was justified in possessing the gun. He states that he was charged with possession of this gun based on Court transcripts dated 06/25/97 documenting that this particular pistol was returned to him." (The state court refused to give me the transcript.) "He was adequately groomed, cooperative, and related well to the evaluator. No psychomotor abnormalities were noted. He was alert and friend to person, place, time, and situation. Memory was intact. He evidence no thought disorder. He expressed a belief that the Washington County Sheriff's Department has been biased against him since the problem between he and Deputy Moore surfaced. He believed that this bias extended to the local judiciary, which has sided with Deputy Moore. According to Mr. Adkins' family there may be truth to his beliefs, but they added that local law enforcement has tarnished his standing in the community by portraying him as mentally unbalanced. He did not demonstrate evidence of delusions or hallucinations. His affect was full range and appropriate to content. No gross cognitive deficits were noted.

Upon release to the open compound, he was cooperative with Correctional and Mental Health staff. He received no disciplinary actions or incident reports. No bizarre behavior was noted. He was noted to socialize well with other inmates and participated in activities on the recreation yard. Mr. Adkins did not require psychotropic medications during the course of hospitalization. His mental status remained stable.

Mr. Adkins was cooperative with intellectual testing. He generally understood

directions readily, and would paraphrase them aloud to ensure comprehension. His speech was relevant to tasks at hand. He did not require unusual redirection. He did not appear to have difficulty with fine motor control. His scores on the validity scales indicate that he made no overt attempt to exaggerate or minimize psychological problems, endorsed few unusual complaints, and responded consistently to logically related test content.

Mr. Adkins did not exhibit evidence of a major mental illness or defect. None of his allegations are bizarre or implausible, and to an extent have some basis in reality. He rightly believes that if these "lies" remain in the record, then he is portrayed as mentally ill and delusional. Thus far, there is no evidence that his beliefs are delusional; there is no evidence of other conflicts with law enforcement or courts. At no time has he demonstrated evidence of a thought disorder, hallucinations, bizarre behavior or disorganization. He has demonstrated no evidence of either depression or mania.

Mr. Adkins has an accurate understanding of the charge against him and the possible penalties. He knows the general proceeding of the courtroom and the roles of courtroom personnel. He holds no irrational beliefs or delusions about his defense attorney or those prosecuting him. It is our opinion that Mr. Adkins is not suffering from a mental disease or defect. We view him competent to stand trial.

The current evaluation also found no evidence to support that Mr. Adkins suffered from a severe mental disease or defect at the time of the alleged offense. His impression was that he was not in violation of the statute since the Court returned his firearm after it was confiscated on 11/14/96. He believes that the underlying issue is a RETALIATION by the legal system for the numerous accusations he has made against the Washington County Sheriff's Department. His account and that of collateral sources does not indicate that he was suffering from a serious mental disease or defect at the time of the alleged offense. We view him as criminal responsible at the time of the current charge.

Mr. Adkins is ready to be returned to Court for resolution of his legal situation. At this time his mental status is stable and does not appear to be an imminent risk of harm to himself or others due to mental disease or defect. He does not require psychiatric follow-up. He will be discharged on no medication.

**HOW I HAD TO PAY ATTORNEY BERNARD VIA
TO SEND ME TO PRISON
September 20, 1999**

Ms. Evelyn Fay Hamilton, Highland Community Counseling Center, 802 Hillman Highway, Abingdon, Virginia, the same person that had me sent to Marion in 1995, was called by the court to assist in having me committed. I asked Ms Hamilton to tape the interview or let my family members be present, but she refused both requests. In 1995, Ms. Hamilton had no objection to my ex-wife being present. Ms Hamilton walked straight out of her interview and testified that I needed to be locked up. My so-called court appointed attorney Mr. Via called the prosecution's witness, Ms. Hamilton to testify. Here is part of the transcript. Mr. Via never asked to see, nor did he introduce my mental

records from Marion into evidence, though they were laying on the table at this hearing. Question by Mr. Via, "And he was expressing in that letter that was not completely written, either he's insane or something, or somebody is not telling the truth?" Marshall McGlothlin, "That's correct." The alleged lies I had filed with the court was laying on Mr. Via's table, he refused to introduce them into evidence, nor would he ask Marshall McGlothlin or Ms. Hamilton about them.

Judge Sargent: "Are you satisfied with Mr. Via to go forward and represent you today?"

Mr. Adkins: "He's not representing me yet. I'll tell you when it's over with."

When you read this part, you will understand why I was not satisfied with Mr. Via's service. I have attempted to contact Mr. Via by certified mail on more than one occasions, but he refuses to answer any of my letters or to even acknowledge that he ever represented me.

Mr. Via called the prosecution witness, Ms. Hamilton, with knowledge that Ms. Hamilton was going to testify that I needed to be in a mental institution.

Judge Sargent: Does either the Government or Mr. Via wish to hear from Ms. Hamilton? I think I might wish to hear from her. Does either the Government or Mr. Via wish to call her?

Mr. Via: I'd like to have a discussion with her and maybe we can explore some of the options available to us.

Judge Sargent: Would you like to have a discussion outside our presence?

Mr. Via: I believe it might be just as helpful to have it from the stand.

Judge Sargent: Would you like to call her, Mr. Via, as a witness?

Mr. Via: Let me ask Ms. Hamilton to come forward, please.

Ms. Hamilton: I was called to help the court.

Mr. Via: Would that be done somewhere in Marion or somewhere else? He's not from Southwest Virginia; he's from Tennessee.

Ms Hamilton: It would depend on the Court's decision. If the Court is seeking specific determination. There's no overt threat, I find no overt threat or hostility reported or indicated by Mr. Adkins. I have some concern about some of the ongoing issues that he is involved with. (Mr. Via refused to ask Ms Hamilton to review the 100+ lies that I had filed with the Court)

Mr. Via: He shows a compulsive obsessive type of behavior?

Ms. Hamilton: Yes.

Mr. Via: And that's something he's had for quite a while?

Ms. Hamilton: Yes. (Quote from my mental records from Marion, "There were no delusions, hallucinations, obsessions, compulsions, phobias or tangentially.")

Mr. Ramseyer: "Ms. Hamilton, I want to thank you for testifying here today"

Ms. Hamilton: "I think to give him justice and the Courts, as well, it should be an in-patient evaluation with a psychiatrist doing the evaluation."

Mr. Ramseyer: "Did he continue to want to get back to this court case and talk about those things when you really weren't even asking about that?"

Ms. Hamilton: "There was some of that, yes."

Judge Sargent: Other than "US" calling you over today. Do you think, based on your conversation, Ms. Hamilton, with Mr. Adkins today, do you think he understands the nature of the proceedings against him? I guess what I'm asking is can he understand the charges against him? Does he seem to be able to understand what's going on in court today? (Notice most of the lies I filed with the court were questions asked by me in the Civil Rights trial, all the lies were filed by me) Did he understand your role today?

Ms. Hamilton: I think that's part of the concern. I think on one level he does understand. My concern is that everything that has happened tends to be generalized into this ongoing issue around his marriage, former marriage situation. He connects everything. And that's part of my concern, that Mr. Adkins have a full and lengthy evaluation to determine if there is any delusional thinking there. (Deputy Moore testified that he saw witnesses that were not in court on 1/24/97, and that he did not see or hear witnesses testify on 3/5/97 when he was the defendant, and I supposedly have delusional thinking because I believe that he was lying)

Judge Sargent: So, that's what you've observed in his behavior today that makes you think he needs a more thorough evaluation?

Ms Hamilton: Yes. But this lingering, almost paranoid thinking causes me some concern, and the fact that he is on no medication now also raises another issue. (Quote from my FCI report, "He will be discharged on no medications")

Mr. Via: Were you asking for maybe a 24 hour evaluation locally, or somewhere in Southwest Virginia?

Ms. Hamilton: I think it should be longer than 24 hours. (I mailed a letter to Ms. Hamilton via her boss and asked for her to send me a letter of specific reasons why she testified the way she did, and I would go and get specific help. I have never received one specific reason for her testimony.)

The United States Constitution, 6th Amendment, states, “and to have the assistance of counsel for his defense.” How can anyone deny that my Constitutional Rights were not violated by Judge Sargent? How can anyone deny that Ms. Hamilton was a witness for the prosecution? How can anyone deny that Mr. Via acted as a prosecutor? I filed a motion with Judge Sargent after I was convicted for a copy of my mental records from Ms. Hamilton, and my motion was denied. On September 20, 1999, Judge Sargent ruled that I did not have the money to pay for a mental evaluation, but that I had the money to pay for Mr. Via's services. Judge Sargent threatened to have me in contempt of court if I did not pay for them. I paid his fee under protest for the Court appointed Special Prosecutor Mr. Bernard Via. I filed a complaint with the Virginia State Bar, and they ruled what Mr. Via did was not reviewable. In this country, if the defendant is not capable to assist his or her attorney, it makes the defendant mentally incompetent. So, if the defense attorney cannot or will not assist the defendant, then shouldn't that make the defense attorney mentally incompetent?

When I was released in New Mexico my attorney there conveyed to me that by me being released by a federal judge I would not be locked back up when I returned to Washington County. After Ms. Hamilton's testimony, I was sent straight to the Bristol, Virginia jail. I spent about 15 days in the county jails before I arrived at the F.C.I. in Butner, N.C.

SOUTHWEST VIRGINIA MENTAL HEALTH INSTUTION, MARION, VIRGINIA

In September of 1995, I was sent to Marion by Ms. Hamilton and my ex-wife, who at this time had been gone from home about four months and had been seeing Deputy Moore for at least 8 months. At this time I worked 12 hour shifts and drove 2 hours each way to work. I worked on a coal surface mine. I pushed over burden over 200 feet high walls with cat dozers and dumped over burden over 100 feet high dumps with cat haulers. I stayed about six weeks at Marion and was told by the psychiatrists there that there was no reason I could not put in 16 hour days. I was released that day and returned to work the next day. The last thing the psychologist told me when she was walking me down the hall to release me was, "I never want to see you back here again". I was diagnosed as having no mental disease or defect. During this time, my employer had informed us that the mine we were working was shutting down. After I worked a week, I decided that I had too much against me in Washington County, and I took a job in Nevada. This is when I gave up everything and walked away from Washington County, but this was not good enough for these people. I worked seven 12 hour shifts in Nevada, and only missed one day's work.

The only psychological problems I have ever had were in dealing with a lying, manipulating, adulterous wife. I lost my rights for life to own a gun on Washington County's Evelyn Fay Hamilton's word alone. How can anyone deny that I have to live in the fear that if I go back to Washington County and anyone wants me locked up all they have to do is call good old Evelyn Fay Hamilton?

I will not go into this part in order to protect the innocent. I have indisputable proof that my trip to Marion cost me over \$15,000, and some people made over \$12,000 by sending me there.

THE GUN I SPENT TIME IN A FEDERAL PRISON OVER

On January 24, 1997, Deputy Moore testified falsely to convict me, saying that I had produced or pointed a gun at my driveway when Deputy Moore and his wife went by my driveway in November of '96.

Deputy Moore's testimony during the Civil Rights trial was that when he arrived at the Sheriff's Office on November 14, 1996, he parked directly behind me, walked by my car to get into the Sheriff's Office, but did not know if he looked in my car or not. This empty gun was laying on the front seat and in plain view.

My attorney: "What kind of information did you have that he could be – anybody could be armed, couldn't they?"

Deputy Moore: "From his ex-wife that had live with him over twenty years, gave me information that he could possibly be armed. That he normally was."

My attorney: "Did she tell you everything, his wife? She told you that?"

Deputy Moore: "Yes, sir. Yes, sir, she told me that."

My attorney: "Did she tell you all the things – men that she was seeing?"

Deputy Moore: "Yes, sir."

My attorney: "All of them?"

Deputy Moore: "Yes, sir."

My attorney: "Five or six of them?"

Deputy Moore: "No, sir, I haven't got that high, but I've got a couple."

On June 25, 1997, the Judge caught the Moores lying about this same gun and he dismissed the charge against me and ordered the gun returned to me. Marshall McGlothlin and Mr. Ramseyer had this knowledge before the warrant was issued. This is a quote from the same court order that Marshall McGlothlin used in obtaining the federal warrant. "During the course of this trial certain motions were made and objections interposed which will appear fully in the stenographic record herein made."

Testimony of former Sheriff Kenneth Hayter during deposition:

Question: "Do you know whether there was a transcript made or not?"

Hayter: "In the appeals hearing there was." (June 25, 1997)

Mr. Keuling-Stout (Hayter's Attorney): "I'd object. I think if there's a clarification here, I don't think – I think what he's talking about is he knows there was a court reporter, not that there was a transcript typed up."

The fact that Deputy Moore lied about this same gun under oath in attempt to convict me should have made this relevant during the Civil Rights trial. I tried to obtain the transcript from the state court but my request was denied. I tried to subpoena the witness I had conversed with for the Civil Rights trial, but Judge Jones denied my motion and subpoena. I quote Judge Jones on the morning the Civil Rights trial began: "Well, I don't know what the, what the transcript of the criminal trial would be relevant to anyway."

Mrs. Moore was a part of this suite in the beginning but Judge Jones kicked her out because you cannot sue a private citizen for lying under oath in attempt to convict someone.

Deputy Moore did not have anything about the alleged gun at my driveway in his criminal complaint dated 11/14/96. He testified that he did not see this gun, but Mrs. Moore had stopped him down the road and told him that I had produced this gun.

Deputy Moore: "Debbie stopped me somewhere that day. She was so scared she couldn't drive and we did stop for a minute."

Mr. Adkins: (same gun): "Where was that when she told you that?"

Deputy Moore: "I don't know where we were at. I don't know."

The reason Deputy Moore could not remember was because Deputy Moore had testified that I had followed him while he was driving a tractor. Mrs. Moore's testimony was that while she and Deputy Moore were loading the tractor at her farm on a trailer to haul the tractor is when she allegedly made this statement. If Deputy Moore would have backed up Mrs. Moore's testimony, he would have been telling on his self for lying about driving his tractor from my driveway, four and one half miles to Mrs. Moore place's in the Bethel.

Question: "What did you do when you went down to the river?"

Mrs. Moore: "We loaded the tractor back up onto the trailer, if I'm not mistaken."

Question: "Did you get out of your vehicle?"

Mrs. Moore: "Yes, I got out and told Larry what I saw, that Ralph had a gun on his steering wheel."

Question: "Did you testify in court that Mr. Adkins pointed a gun at Mr. Moore?"

Mrs. Moore: "No, I did not." (6/16/98)

Question: "Did she tell you later that she testified that Ralph pointed a pistol at you?"

Deputy Moore: "Yes, sir."

Question: "Well, you say that Deborah said he pointed a pistol at you. Is that what you said - Deborah testified to that?"

Deputy Moore: "I would assume she did, I wasn't in there."

Question: "She told you that, didn't she?"

Deputy Moore: "Yes, sir."

(8/26/98, after Deputy Moore learned that Judge Jones was not going to allow the June 25 transcript into court)

Question: "You remember testifying one time in court that he pointed a gun, that you testified in court down there when the judge dismissed this case – do you remember when you said he pointed a gun at Mrs. Moore?"

Deputy Moore: "No, sir. That's never been said."

Question: "And she said he pointed a gun at you?"

Deputy Moore: "That never been said."

Question: "You deny that?"

Deputy Moore; "Yes, sir."

(about 30 minutes later)

Question: "What did she tell you?"

Deputy Moore: "That he had a large gun in the car, and was pointing it at me."

Mrs. Moore was not in court on January 24, 1997 to testify about the alleged gun.

Question by Mr. Adkins: "Was Deborah Moore present January 24th, 97, General District Court, to testify?"

Deputy Moore: "I would assume she was, yes."

Question by Mr. Adkins: "Who else was there, do you remember?"

Deputy Moore: "No, sir. I know Sheriff Hayter was, I was, Deborah was, you were. Other than that, I can't say".

Question: "And you testified against Ralph Adkins, didn't you?"

Mrs. Moore: "For what?"

Question: "For anything?"

Mrs. Moore: "For what?"

Question: "Did you testify for Mr. Moore?"

Mrs. Moore: "At his – yes, one court time I did." (It is indisputable that Mrs. Moore did not testify on January 24, 1997, and it is indisputable that Mrs. Moore did testify on June 25, 1997.)

Question by Mr. Adkins: "I read Deborah Moore's transcript the other day and she said that you carry a gun regularly now, is that true?"

Deputy Moore, "Yes."

Question by Mr. Adkins: "That's because of me, I guess?"

Deputy Moore: "Yes, it is."

I asked U.S. Marshal Heddon this question: ("IF") I was to tell you that I was carrying a gun for you would you consider that to be a threat?" Marshall Heddon's reply: "I would handcuff you on the spot and I better not hear you say that again."

Deputy Moore testified on January 24, 1997 that he brought his gun to my property were I was and built a fence on my property. Deputy Moore lived about 13 miles from this property. I wonder, if I had taken a gun to his property, how long I would have spent in prison?

Question: While you was there is that the same time, while you's up there, that you're talking about when you told or made the statement that in my thirty (30) years of law that that's the only time I've ever carried a gun while I wasn't on duty?

Deputy Moore: "Yes, sir."

Question by Mr. Adkins: "How many officers do you know that's been a deputy for thirty (30) years and never carried a gun off duty?"

Deputy Moore: "Very few, most of them do."

Question: "Why didn't you get somebody else to arrest him after you charged him? Do

you know why you didn't do that?"

Deputy Moore: "Bad judgment on my part, I guess."

Question: "Bad judgment?"

Deputy Moore: "Yes, sir."

DEPUTY U. S. MARSHALL WOODROW ALLEN MCGLOTHLIN

The Civil Rights trial was over on August 27, 1998. Before the Civil Rights trial, Judge Jones had always made his ruling in a matter of days. It took me almost 6 months to get the transcripts of the trial. I filed the lies by Moore and his witnesses with the court shortly afterward. I wrote Marshall McGlothlin a certified letter with a copy of all the lies I had filed with the court and requested for the U. S. Marshals to do an investigation. This is a quote from the letter dated February 26, 1999, "I request the United States Marshals Service, Department of Justice to investigate the matter of Sgt. Larry Moore and Ralph Adkins." Marshall McGlothlin testified that he had interviewed me on two separate occasions. (This is Marshall McGlothlin's testimony when I was sent to Butner.)

Question: "He basically was trying to do this through the judicial process without an attorney, is that correct?"

Marshall McGlothlin: "I don't know anything about his civil case."

The first time McGlothlin came to my house, I advised him that I was going to take some signs in front of the courthouse. Marshall McGlothlin did not advise me that it might be against the law. McGlothlin is the same Marshall that ran me off in front of the court house. The only thing I asked him was, "Have you ever read the 1st Amendment to the Constitution?" His answer was "yes." I left and I never returned with any signs after this time.

During the time I spent with the signs in front of the court house, I passed out a little story about part of my problems. Marshall McGlothlin was part of the story, and I quote, "I had the alleged lies under oath and supporting evidence on the table in front of Agent Burk and Marshall McGlothlin and both refused to even discuss it, even though lying under oath is criminal felony if proven."

After McGlothlin ran me off in front of the courthouse he came to my house over a letter I had wrote. I wrote this letter to prove a point to the court - that if you write a letter and sign it, it does mean something to them. The Holbrook letter that I had paid \$750 for had two signatures, tapes, pictures, and a survey to back up the letter. Judge Jones ruled that this letter meant absolutely nothing. The last thing Marshall McGlothlin said when he was leaving was, "if you want a fight I will give you one."

This is the warrant Marshall McGlothlin took out against me on September 9, 1999:

“On or about November 14, 1996, in Abingdon, Virginia, Herman Ralph Adkins was arrested by the Washington County Virginia Sheriff’s Office pursuant to a warrant. On or about that date, in Abingdon, Virginia, a Ruger Super Red Hawk, 44 magnum was located in the vehicle driven by Herman Ralph Adkins”

I was inside the sheriff’s office when I was arrested. Judge Jones’s statement on the August 17, 1998 pretrial hearing, “although I suppose it would be a rare truck in our area that didn’t have a gun in it.” Marshall McGlothlin’s warrant, “On or about June 25, 1997, in response to a motion, Herman Ralph Adkins, the Washington County Circuit Court of Virginia, issued an order that the Washington County Sheriff’s Office return the above listed firearm to Herman Ralph Adkins. This firearm was then turned over to Herman Ralph Adkins by the Washington County Sheriff’s office. (Marshall McGlothlin had the information at this time that the reason the alleged gun was returned to me was that the Judge had caught the Moores lying about this same gun on June 25, 1997. This is when the Judge dismissed Deputy Moore’s criminal charge against me.) In Marshall McGlothlin’s criminal complaint and his testimony on September 20, 1999, he stated that he got his information from “members” of the Washington County Sheriffs Office. If you read this story you will understand why McGlothlin was ashamed to give the names of his witnesses. I have never seen a signed statement from McGlothlin’s witnesses that he had before the warrant was issued. McGlothlin cannot honestly testify that, to his own knowledge, this gun was ever in Washington County. On September 10, 1999, Marshall McGlothlin came to my mother’s house before day break (according to the reports and the neighbors) and waited until my mother turned the lights on before he came in and asked her if I was home. Her reply was that I was gone on vacation. McGlothlin left and came back about 4 or 5 hours later with about four other officers in some in SWAT gear. These people came in on my mother in swat gear, and she was 86 years old at this time. Marshall McGlothlin knew she was home alone.

Question: “When you found these firearms were you able to find any ammunition with any of these guns?”

McGlothlin, “No, sir.”

(The guns I had were guns I had owned for over 30 years, my deer rifle, my shotgun, one Browning .22 rifle, one pistol I had possessed for over 30 years which had never been shot, and one Browning pistol that had not been made since the earlier seventies.)

Question: "Did you recover the firearm mentioned in the complaint for the arrest warrant, the .44 magnum?"

Marshall McGlothlin: "No, I did not."

I very seldom print anything that I cannot prove, but this is an exception to the rule. On September 20, 1999, when I was in the holding cell and Marshall McGlothlin was putting the handcuffs on me to take me to the Bristol jail, I made this statement to him: "If there were any justice in this country, you would be putting the handcuffs on Deputy Moore instead of me." His reply was, "I didn’t even look at that stuff you sent me." The United States Constitution, 14th Amendment, states, “nor deny to any person within its jurisdiction the equal protection of the laws.” How can anyone deny that Marshall McGlothlin violated my Constitutional Rights?

After I was RAILROADED into the conviction and sentenced on October 3, 2000, I walked out of the courtroom and Deputy U.S. Marshal Woodrow Allen (aka Woody) McGlothlin was all reared back on a desk and said to me, "Have a good day Mr. Adkins."

**HONORABLE PAMELA M. SARGENT,
UNITED STATES MAGISTRATE JUDGE**

Judge Sargent was the judge that issued the alleged gun warrant and was the only judge that I went before in Washington County from the time the warrant was issued until the time my probation was over. After I was run off from in front of the courthouse, I attempted to talk with Judge Sargent and her office refused my request.

Judge Sargent had access to all the information that took place in the Civil Rights Trial, Adkins vs. Moore, before she issued the warrant. You have already read Judge Sargent's questioning of Ms. Hamilton and the lies I filed with the court were not even mentioned by her during this hearing. This is a statement that Judge Sargent made to me on July 20, 2000:

"Again, you are under oath now and you need to understand that if you do not answer any questions truthfully, your answers may be used now or later against you in another prosecution for perjury or for making false statements. Do you understand that, Mr. Adkins?"

I went before Judge Sargent on August 29, 2000 and again attempted to bring perjury charges against Deputy Moore.

Mr. Adkins: "No, ma'am. The matter we're fighting over, the crimes have been committed against me." (*then, after Judge Sargent's response*) "Anyone in the United States that I could go see?"

Judge Sargent, "Sir, I don't know the answer to that."

It is indisputable that when Marshall McGlothlin went before Judge Sargent concerning a crime that I had allegedly committed, she had the knowledge that she was the right person to see.

Judge Sargent's ruling dated April 6, 2001:

"A review of the supervising officer's records shows that the only psychiatric records in his possession regarding the defendant are the nine-page report from FCI Butner and a five-page discharge summary dated September 8, 1994 from Southwestern Virginia Mental Health Institute."

I was discharged from Marion in October of 1995. This is the only time I have ever been in the Southwest Virginia Mental Health Institute.

A few days after I was indicted I contacted the court and requested that I be sent back to Marion for a second opinion. I wanted this to help keep me from spending five years in prison, then sentence which

the gun charge carried. My request was denied. Later Judge Sargent stated in a ruling that the court had no records that this ever took place. It is indisputable that this is a false statement by Judge Sargent.

My probation officer requested that I go to Frontier Health in Kingsport, TN to see mental health experts, even though my Butner report stated that I needed no psychiatric follow-up. I took the alleged lies I had filed with the court and left them with the mental health examiner so she could be prepared to treat me when I came in for my appointment. When I returned to Frontier Health, this material was returned to me, and I was told that the problem did not lie with me, but with the people in Washington County. I quote, "if Deputy Moore is not deaf, blind, or hallucinating, then he is lying." Judge Sargent stated in her ruling that the court had no record that I had ever been sent to Frontier Health. It is indisputable that this is yet another false statement by Judge Sargent.

Judge Sargent on September 20, 1999, "I had presented to me today a financial affidavit which, to me, shows that you are not indigent, and that you have resources that could be used to retain an attorney." Judge Sargent, on the same day, when it was to her advantage for me to be indigent, "I don't have any evidence before me to show that, Mr. Adkins, that you have any ability, were I to order you to self report somewhere to a local private psychiatric hospital for evaluation, I don't have any information before me that you have any resources, any type of health insurance program, or anything to allow me to do that."

Judge in New Mexico on September 15, 1999: "I have no reason to believe that he poses the kind of danger that requires that he be immediately taken into custody."

Judge Sargent September 20, 1999: "I am going to order that you be detained."

A few days before my trial, I was railroaded into accepting a plea agreement by Attorney Richard Spivey of Kingsport, TN. This will be explained in detail later.

The Sentencing Hearing was held on October 3, 2000. Statements from Judge Sargent:

"... charge of basically attempting to influence a federal judge by picketing." (I will show indisputable proof in this story that the Honorable James P. Jones had been influenced before the Civil Rights Trial was held.)

"... it's clear that, you know, Mr. Adkins has cooperated in these investigations fully."

"I want to state that really the evidence with regard to that charge, or at least the evidence that I have, seems to show me that Mr. Adkins was cooperative. I think he was honest in admitting that he possessed firearms. I think the particular firearm in question was even returned to Mr. Adkins by local law enforcement officials, who knew at the time they returned the firearms to him, or should have known, that he was a person that was disqualified from owning firearms." (Remember, I had already spent almost 4 months incarcerated on this warrant, and it was issued by Judge Sargent)

"With regard to this charge, I note that Mr. Adkins' conduct was completely peaceable."

“. . .has been no allegation that Mr. Adkins has done anything except try to make a peaceable comment about the cases and the injustice that he sees that's been done to him.” (The United States Constitution, 1st Amendment, states, “or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.”)

“. . . in this case must include the agreed-to condition that Mr. Adkins not have any contact with Larry Moore or Deborah Moore.” (There has never been any evidence that either Larry or Deborah Moore has ever been a Federal Judge)

“That might even mean that temporarily you might have to leave your own property. But I want to make clear to you that I intend to impose that condition, and that's what I'm going to expect.”

“. . . and that may mean that on occasion, you have to walk on the other side of the street or that you have to leave somewhere they [the Moores] are, but that will be what is expected of you.”

“I intend to sentence Mr. Adkins to the custody of the Bureau of Prisons for a term of six months, and I am imposing the one-year period of supervision. The Court orders that the defendant shall pay the United States a fine of \$500.”

The truth about my sentence is this: the six months was to include time served, plus the rest in home confinement. If you add the total cost, the fine was over \$6,000. I was officially banned from my own property for over two years. The four months that I was incarcerated were from October 1999 to January 2000. On pretrial release from January 2000 to October 2000, I was not allowed in Washington County, with the exception of going straight to the courthouse and straight back. Judge Sargent stated that I had to leave my own property. If you read this in its entirety, you will realize that in reality, I received life without parole from my own property, and my own son, who lives in Washington County, Virginia -- all of this because I accused Deputy Larry Moore of "lying under oath," and the court has the knowledge that he is a pathological liar!

**S. RANDALL RAMSEYER,
ASSISTANT U. S. DISTRICT ATTORNEY**

Mr. Ramseyer was the prosecuting attorney on the gun charge. After I was run off from in front of the courthouse, I contacted Mr. Ramseyer by certified letter and attempted to bring perjury charges against Deputy Moore. I mailed Mr. Ramseyer a copy of the lies that I had filed with the court. This was about three months before the gun warrant was issued. Deputy Moore testified that he sat in the courtroom on March 5, 1997 as the defendant and did not see or hear six different witnesses testify. I have the transcripts of the trials, I have a letter from the prosecuting attorney Roy Evans, the attorney who prosecuted the charge which states that these witnesses *did* testify. I have the witnesses, and the courtroom was full of people. Yet, Mr. Ramseyer's answer to me was that there is no evidence that Deputy Moore lied under oath. Either Mr. Ramseyer does not have the mental capacity to distinguish truth from lies, or he is a bigger liar than Deputy Larry Moore. Mr. Ramseyer made the statement to me at this time that I should be prosecuted for having the sign in front of the courthouse, "I ACCUSE DEPUTY LARRY MOORE OF OVER 100 LIES UNDER OATH."

Mr. Ramseyer received my mental records from Butner, in which I was diagnosed as having no mental disease or defect, and as being sane when the alleged offense took place. At this time it had been almost three years since the alleged offence had occurred. Mr. Ramseyer had the knowledge that he did not have the gun that I was charged with, and he knew that Deputy Moore had previously lied about this same gun. Yet, Mr. Ramseyer still went before the grand jury and obtained an indictment from them. Ms. Jennifer Clark, Agent for the Alcohol, Tobacco and Firearms, one of the officers that searched my mother's house, had the knowledge of my FCI report and knew that she found no such gun as I was charged with. Yet, Ms. Clark testified that I should be prosecuted for the gun charge.

Ramseyer's statement at the sentencing hearing, "the special condition be that he will not have any contact in any form with Larry or Deborah Moore." Ramseyer also stated, "Your honor, in this case we would ask for the maximum range of probation to be imposed, which I believe is five years."

This is a statement made by Mr. Ramseyer on October 3, 2000, the day that I was sentenced for accusing Deputy Moore of lying. "Your Honor, I would just like to state on the record, in case Larry Moore and his wife look back at the record, that I apologize to them for what I have done in this case and that I should have done a better job of presenting evidence to the Court to show that it would be appropriate to keep Mr. Adkins away from them for five years, and the fault lies with me and no one else, and for that I apologize." This does not mean much right now. The charge I was railroaded into pleading guilty to was "attempting to influence a federal judge." Judge Sargent and Mr. Ramseyer's statement was in reference to the Moores.

**ATTORNEY RICHARD A. SPIVEY,
KINGSPORT, TENNESSEE**

After Mr. Via, I talked to Attorney Richard Spivey and informed him that if he did not have the guts to defend me, he should not to take my money. His reply was, "I am not afraid of these people." Mr. Spivey charge me \$10,000 to take my case. After he railroaded me into the plea agreement, I obtained my files from his office. I found a letter from Mitchell Spinkle, Correctional Treatment Specialist from the FCI in Butner, dated October 15, 1999. This is a quote from the letter, "We respectfully request that you forward copies on any collateral information." Since my statement "either Deputy Larry Moore is lying and his comrades are covering it up, or I am insane," was used against me to send me to Butner, the lies that I had filed with the court should have qualified as "collateral information." Mr. Spivey would not or did not send a copy of the lies to Butner to help me get released.

After I was indicted by the grand jury, Mr. Spivey had given me reason to believe that he was not going to help me. I decided to fire Mr. Spivey and try to find an attorney that would. Mr. Spivey begged me not to do this, and promised that he was going to take care of the gun charge. This is Mr. Spivey's letter dated March 8, 2000. "This will confirm our conversation today wherein I informed you that if you are acquitted of the charges in Federal court that I would pursue whatever civil action is necessary to protect your interests." You have read Mr. Ramseyer's evidence against me, and Mr. Spivey would not even make or file a motion with the court in attempt to get the gun charge dismissed. Mr. Spivey continued to convey to me up until a few days before the trial that he was going to take care of the gun charge. At that time, however, he turned against me.

Here is why I believe this. Mr. Spivey told me that I was diagnosed at Marion as being a paranoid schizophrenic. I have a copy of my mental records from Marion, and nowhere in the records can you

find the words “paranoid schizophrenic.” How could I go to court, facing five years in prison on a gun charge, because I had been committed to a mental institute after he made this false statement?

I told Mr. Spivey that my records from Butner show that I was diagnosed as being sane in November of 1996, at the time when the alleged offense took place. He then told me that the doctors in Butner could not diagnose me as being sane back then.

I was sent to Butner after the September 20, 1999 hearing.

Judge Sargent: “Mr. Via, I would consider, if you are requesting it, I would also consider that evaluation determine whether Mr. Adkins was sane at the time of the alleged offense, because, as you know, the alleged offense was fairly close to the period of time of his involuntary committal. However, I won’t do that unless I have a motion asking for that.”

Mr. Via: “We would so move to have an evaluation.”

Judge Sargent: “I ask that the evaluation also determined if he was sane at that time.”

This is a quote from my evaluation at Butner, “His account and that of collateral sources do not indicate that he was suffering from a serious mental disease or defect at the time of the alleged offense.”

Mr. Spivey told me that the people in Washington County would not let the doctors from Butner testify for me. If he had known this a few days before the trial, he would have known this for the previous six months. Why did Mr. Spivey not have me seeing a psychiatrist whom I could use in my defense? The U.S. Constitution, 5th Amendment, states, “to have compulsory process for obtaining witness in his favor,” and, “to have the assistance of counsel for his defense.”

I tried to get Mr. Spivey to get the transcript of the June 25, 1997 trial, the transcript that would show that the state charge was dismissed against me because the Judge caught the Moores lying over this very same gun. He would not get the transcript.

After I received the transcript of the Civil Rights trial, which had taken me almost six months to get, I had less than a week to file my appeal with the higher court. All court transcript lines are numbered so that attorneys can quote certain lines by numbers. The lines were numbered in part of the transcript and left out on the rest of the pages. The numbers on the lines were not the only thing left out of the transcript either. On the day I was sent to Butner, the same court reporter from my Civil Rights trial was present. I asked Mr. Via if he had ever seen a court transcript that did not have the line numbered. His reply was that he had not. Mr. Via asked this court reporter why this happened and her reply was that she had no explanation. About nine months later, I asked Mr. Spivey if he had ever seen court transcripts that the lines were not numbered on. His reply was, "I've seen several."

Mr. Spivey returned \$6,000 to me to sign the plea agreement. So, basically, I paid Mr. Spivey \$4,000 to railroad me into being convicted of a crime! After these people got the conviction that they wanted, Judge Sargent's own statement was that the only thing I had done was exercise my 1st Amendment rights. In reality, Mr. Spivey gave me two choices: accept the plea agreement, or spend five years in

prison. He charged me \$4,000 to tell me that I should never go back to the County where my son lives and my own property is located. When you read the jury pool in the Civil Rights Trial, it will show what kind of fair and impartial jury I would have received in Washington County. I had no choice but to accept the plea agreement.

Mr. Spivey gave me reason to believe he was going to send me to prison just like Mr. Via. I have mailed Mr. Spivey certified letters, and he has refused to answer any of these letters or questions.

THE BEGINNING OF MY DOWNFALL

I will now go into what took place before the retaliation gun warrant was issued. When my son was growing up, I never missed anything that he was involved in, and we never had a single problem when he was growing up. Now, I can't be involved in anything that he does, because he lives in Washington County. This is the main reason that I have fought this so hard. This is my son's testimony in Deposition during the Civil Rights trial:

Mr. Adkins: "I want to ask you – tell us about all the trouble you and I had at the time – as far back as you can remember to your ninth grade year in school? Your own words?"

Travis: "Not much."

Mr. Adkins: "Was there ever a day between the time as far back as you can remember in your ninth grade year that you didn't think I loved you more than anything in this world?"

Travis: "Not much."

Mr. Adkins: "Can you remember any days I missed not telling you I loved you and giving you a hug?"

Travis: (shakes head no)

Mr. Adkins: "How many ballgames would you say I missed during this time period unless I was working?"

Travis: "Not many."

Mr. Adkins: "How many school activities, how many did I miss?"

Travis: "Not many."

Mr. Adkins: "During that time period, did you ever need anything, shoes, nice clothes, anything like that?"

Travis: "No, you took care."

Mr. Adkins: "You ever know me to spend any time away from my family other than work during this time period?"

Travis: "Just went hunting occasionally."

Mr. Adkins: "Did I ever miss any of your Christmases?"

Travis: "No."

Mr. Henderson: "I think that when he [Mr. Adkins] first questioned you, you indicated he had been a pretty involved father and had come to a lot of activities and stuck with you all through your childhood?"

Travis: "Yes."

Mr. Henderson: "You all were pretty close?"

Travis: "We were."

I have been told by the Honorable People of Washington County that if I wanted to see him, I could meet my son half way between my house and his house in Bristol, TN every once and a while for lunch.

In 1991, I caught my ex-wife in a motel with the principal where our son had gone to school. This was going on while he was attending this school. During this time period, Mrs. Moore took several thousand dollars of our saving out of the bank without my knowledge. She would have gotten it all, but a friend of mine at the bank did not believe that it would be right for her to get it all, so he called me and informed me what was going on.

Soon after this, I moved to Washington County in an attempt to give my son a decent life. We lived in the Alvarado section until June of 1995 when my ex-wife moved out. A few days after I left Washington County in October 1995, Mrs. Moore went to my property after she had been gone for about five months and took things that did not belong to her. This was only done to cause trouble between my son and I, which it did. At this time, I got my sister to post my property, and I informed Mrs. Moore not to trespass, and sent word via my son for Deputy Moore to stay off the property. My son and I made an agreement at this time that he could use my garage but the Moores were not to go, as my personal belongings were stored there. Travis agreed to these terms.

From October 1995 until November 12, 1996, I had only been to my property three times. The first was in early April 1996, when I discovered that Deputy Moore had his horse pasturing my property. The second time was in May 1996, and Mrs. Moore drove about 500 feet up my driveway, sat in a car, and watched me. Her excuse was that she was afraid for my son to be at my garage alone with me. The third time was in the middle of May 1996, and nothing happened on this day.

Around the first of August, 1996 the Moores intentionally built a fence on my property to cause me trouble. They stayed on their side until they got back far enough for cover, then came on my side about 160 feet. During this same time period, Deputy Moore trespassed several times at my garage for the sole purpose of harassing me.

On November 10, 96 my sister sold my stock trailer, on November 11, 96 I spent the biggest part of the day packing to go back to Nevada where I had obtained a job. On November 12, 1996 I drove to Washington County to check on my property and to tell my son that I was going back to Nevada to work. I drove by my property and could tell that the fence was on my land, just by driving by. I drove to the sheriff's office and talked to former Sheriff Hayter and complained about the fence. Hayter gave me reason to believe he would not help me on this matter. My ex-wife had trouble telling the truth when we were together and had seen a counselor who advised me to tape her to show her when she was not telling the truth. This is how I knew how to protect myself from the possibility of untrue statements being made. I then left and purchased a microrecorder to fit into my shirt pocket.

Former Sheriff Hayter did not lie in attempt to send me to prison, and for this, I want to thank him. He did tell a few to get out of the Civil Rights suite. After I purchased the tape recorder, I returned to him again. He called Deputy Moore and informed him that I was in his office complaining about the fence. I talked to Deputy Moore briefly and told him that the fence above the barn was on my property, asked him to stay off my property, and informed him that I was going over there to cut it down. After I hung up the phone, I asked Mr. Hayter to send a deputy over to my property to protect me while I removed the fence. He refused on the grounds that it was a civil, not a criminal matter. I then returned to my property and removed only the part of the fence that was built on my land. I did not go across the property line and touch the Moore's part of the fence. My property had a good fence all the way around it, and their cattle had been using my side of the fence anyway.

On November 13, 1996, the Moores came to where I already was and built the second fence on me. I was at my garage, about 300 yards away, when they arrived. I never approached the Moores about the fence, even though I knew the second fence was also being built on my property on purpose. In most cases, if someone is on your land building a fence, you would approach them. This is what Deputy Moore was trying to trick me to do. He even testified that he expected me to approach him while he was building the second fence. Of this I have no doubt. Knowing what I do today, if I would have approached him, I would have either been shot by him, or I would have spent a lot of time in prison. After the Moores starting building the fence, I drove up the road and cut a gap going into my property so I could get into my property without climbing the fence. When I left in October of 1995, this property was used as one field, and I had no entrance to my property. I left and drove to Damascus and got something to eat. I later returned to my property. I did some work in my garage and on my rental trailer. I conversed with my renters. This was the first time that I had spoken to the people that rented my trailer. During this time, my renter informed me that the Moores had been going into my garage.

On the day the Moores built the second fence, while he was leaving, Deputy Moore stood up on his tractor, smiled really big, and waved at me in an attempt to provoke me. This was the same time that Deputy Moore testified about when he said that he was so scared that I was going to kill him, he was carrying his gun off duty for the first time in 30 years.

On November 14, 1996 I again went back to Hayter and again complained about the fence and the Moores' trespassing. Mr. Hayter advised me to see Magistrate Michael Lang. I explained to Magistrate Lang that my property was posted, that the Moores had been notified to stay off the property, and that I had witnesses who had seen the trespass. Lang advised me that I could not use any witnesses against Deputy Moore, and that I would have to see the trespass myself. Lang advised me to repost my property or give notice to Deputy Moore again in person, but reiterated that I could not use anyone as a witness against Deputy Moore, and that I would have to witness the trespass myself. I took Lang's advice and drove back to my property and posted more "No Trespassing" signs.

At about 6:00 PM on November 14, 1996, I returned to the sheriff's office and talked to Mr. Hayter. I asked him when I could catch Deputy Moore at his office. He told me that Moore would be there later that night, after 10:00 PM. I informed Hayter that I had done exactly what Magistrate Lang had advised me to do earlier that day, and that I would be back later that night to give Deputy Moore notice to stay off my property.

When I returned later that night, Deputy Moore took out a warrant for me, issued by Magistrate Michael Lang, for doing exactly what Lang had advise me to do earlier that day! Deputy Moore arrested me and threw me up against the wall, even though Deputy Chuck Bishop, Deputy D.L. Edmondson, Sheriff Kenneth Hayter, and Magistrate Lang were all present to make the arrest. This was yet another attempt to provoke me. Deputy Moore made the arrest, but Deputy Edmondson testified that he had arrested me, and even further, that Deputy Moore was not even present at my arrest. Deputy Moore did a search and did not find a tape recorder in my shirt pocket. This later came back to haunt both Deputy Moore and Edmondson.

I had \$2,500 cash on me, and Magistrate Lang set my bail at \$3,000 so I could not bail myself out. When I got out of jail on November 15, 1996, the fence that the Moores had built had already cost me \$900.00. By the time I finally got Deputy Moore's warrant taken care of on June 25, 1997, my loss of work had cost me over \$30,000, plus all the other expenses!

**COMMONWEALTH vs. RALPH ADKINS
JANUARY 24, 1997**

Conversation between Judge Joseph S. Tate and I on May 7, 1997:

Mr. Adkins: "Could you explain the perjury to me? What is perjury?"

Judge Tate: "Perjury is giving false testimony, and knowing it to be false testimony."

Quote from a picture hanging in the Virginia State Court House: "PERJURY IS A FELONY, PUNISHMENT IS 10 YEARS IN PRISON, CIRCUIT COURT."

1. Deputy Moore testified that I followed him from my driveway four and one half miles to his wife's place in the Bethel Community while he was driving a farm tractor. (perjury)
2. Deputy Moore testified that I had threatened to kill him. (perjury)
3. Deputy Moore testified that I sat and watched him for five straight hours while he built the second fence. (perjury)
4. Deputy Moore testified that I had pointed or produced a gun when his wife went by my driveway. (perjury)
5. Deputy Moore testified that November 12, 1996 was the first time he had ever carried a gun off duty. (perjury)
6. Deputy Moore testified that the reason he stood up on his tractor and waved at me was that in being a deputy for 30 years, he was just in a habit of waving at everybody. (perjury)
7. Deputy Moore testified that he was scared that I was going to kill him. (perjury)
8. Deputy Moore testified that he did not know the fences were built on my property. (perjury)

**HOW I PAID HOLBROOK SURVEYORS AND BRETT WATSON
\$750 TO COME TO COURT AND COMMIT PERJURY
FOR DEPUTY LARRY MOORE**

On January 24, 1997, I was convicted for being on my own property, and for Deputy Moore being on my property. I testified to where the fence was located, but the Judge took Deputy Moore's word over mine. A few days later I hired Holbrook Surveyors to survey the property line and fence to prove that I knew where my property line was located, to prevent me from spending time in jail. On January 31, 1997, Mr. Frank Holbrook (now deceased) drove to this property. I showed Mr. Holbrook the corners at the front and pointed out the corner at the back and the 30" oak tree the Moores had started their fence from on a survey plat. When the survey was done, it came out to the same place that I had showed Mr. Holbrook on the previous plat.

On February 3, 1997 Brett Watson, Rodger Breeding, Mark Walters, and I drove from their office in Bristol to this property and did the survey. I showed Mr. Watson all the corners in question before the survey was conducted. From the time we arrived back at the Holbrook office in Bristol and the March 5, 1997 court date, I never spoke to Mr. Watson.

This is a letter written to me, dated February 6, 1997, and signed by Mr. Frank Holbrook and Mr. Brett Watson, a letter that I paid \$750 for:

TO WHOM IT MAY CONCERN;

THIS IS A LETTER STATING THE FACT THAT RALPH ADKINS KNEW WHERE THE FENCE WAS LOCATED BEFORE FRANK HOLBROOK WENT TO THE PROPERTY (TRACT 13, PICKLE FARM) JANUARY 31, 1997. LET IT ALSO BE KNOWN THAT RALPH ADKINS KNEW WHERE THE OAK TREE AND LOCATION OF CORNERS ON PROPERTY BEFORE BRETT WATSON WENT TO THE PROPERTY TO SURVEY ON FEBRUARY 3, 1997.

I have been in federal court in Abingdon more than once over writing letters. The Courts can no longer use the defense that a letter does not mean anything to them.

When the actual survey was being conducted, Mr. Walter had walked out the hill to get back on top where the road was, and had come out past the tree that marked the corner. This is what was said, verbatim, at the back corner of my property on February 3, 1997:

Mr. Adkins: "Ah, Brett, if Mark is going to the corner he has gone too far."

Brett: "Where is the corner?"

Mr. Adkins: "The tree with the flags on it . . . ah, Mark, if you are going to the corner you have already passed it . . . come on back this way . . . come on back . . . come on back . . . stop right there."

Brett: "Is it the tree that's leaning out?"

Mr. Adkins: "No, it's the tree with the ribbons on it."

Mr. Walter: "Is this it?"

Mr. Adkins: "Yes."

Mr. Breeding: "I can't see you, Mark, there's a tree between us in the way . . . I'm going to have to move."

Brett: "Just lean out a little so Rodger can see Mark."

Mr. Breeding: "Mark, go on up through there so I can shoot that line up that way."

Brett: "Just wait a minute -- if it comes out right, we won't have to shoot that . . . we won't have to shoot that line if my figures come out right . . . *(a few minutes later)* That's it, it came out to 3" of the first survey and that's pretty close---it's probably where that tree was, in between you and Mark."

This is Mr. Watson's testimony on March 5, 1997, one month after the survey was done (transcript from Commonwealth vs. Deputy Larry Moore [trespassing on my property while the Moores were building the fence]):

Mr. Evans: "Did you talk with Mr. Adkins about the corners?"

Mr. Watson: "No, not really." (How can you spend almost four hours together, do a survey, and not even talk about the corners that were being surveyed?)

Mr. Evans: "You wrote a letter saying that Ralph knew where the oak tree and location of corners were before you went there. How did you make that determination?"

Mr. Watson: "I didn't know that he knew that."

Mr. Evans: "Did he tell you where to mark the corners?"

Mr. Watson: "No, sir."

Question: "Okay. And you prepared this --"

Mr. Watson: "I just found the corners off the map."

Mr. Evans: "You were with Mr. Adkins when you located the corners, but he didn't tell you where they were, is that right?"

Mr. Watson: "That's correct."

Everyone in the courts that I have been to is referred to as "Mr." Deputy Moore's attorney on March 5, 1997: "Brett, these fences here show on--"

Mr. Evans, special prosecutor, knew that Mr. Holbrook would not lie, so he refused to ask him about my property, the survey, or the Holbrook letter. On February 3, 1997, Mr. Holbrook and I rode to the property, but did not return to the back.

Deputy Moore's attorney: "Were you there when the corners were posted?"

Mr. Holbrook: "No, sir. Brett Watson was."

Deputy Moore's attorney: "Did you actually go back on the back part and view that where this fence is supposed to be?"

Mr. Holbrook: "No. Brett Watson did it." (How would the Moore's attorney know to ask these questions if he hadn't already talked to someone?)

After the March 5, 1997 trial was over, I had left the Holbrook letter with Mr. Roy Evans. After I learned what had taken place in court, I felt like Mr. Evans owed me one lie. On March 11, 1997 I contacted Mr. Evans and told him that the Holbrook letter he had was the only copy of that letter I had and asked him if he would mail it back to me by certified mail to be sure that it did not get lost. Here is a quote from his March 11, 1997 letter, "Per your request on March 11, 1997, I am sending this by certified mail and enclosing the surveyor's letter which you brought to court." When I received Mr. Evans' letter, the Holbrook letter was not enclosed as I expected. On April 14, 1997, I mailed former Sheriff Hayter a letter with some information to show these people that I carry a tape recorder in my pocket. I received a letter from Mr. Evans dated May 1, 1997, and I quote, "Enclosed is a copy of the Holbrook Surveyors letter dated February 6, 1997." I wonder how Mr. Evans mailed the same Holbrook letter twice?" Mr. Evans' letter on March 11 was two full pages, yet his May 1 letter had only two lines. The power of a tape recorder will never cease to amaze me. Mr. Evans' letter dated March 11 states, "If you wish to discuss this further, please contact me." Mr. Evans' letter dated May 14, 1997 states, "Any further questions should be addressed to or through your attorney." In the trial Mr. Evans and I were involved in, I was the plaintiff on a criminal charge that I had obtained, and Mr. Evans was the prosecuting attorney. By law, Mr. Evans was the only attorney that I was allowed to have, since I was the one who brought the criminal complaint.

April 14, 1997, I went back to Holbrook's office and talked to Mr. Holbrook. I told him, "You know, they testified in court that I did not know where the corners of my property were." His reply was, "They know better than that." The next day I was at Holbrook's office again, and I talked to Rodger Breeding. He confirmed that I had shown Mr. Watson the corners of my property before the survey was done. He also confirmed that the above quoted conversation *did* take place on February 3, 1997. Mr. Watson was present when this conversation took place.

Mr. Watson was a witness for Deputy Moore at the Civil Right trial, Adkins vs. Moore. Mr. Henderson, Deputy Moore's attorney, did not disclose Mr. Watson as Deputy Moore's witness until the deposition was over. By rules of civil procedures, he was supposed to do so, and I did not get to take Mr. Watson's deposition. These questions were asked at the trial:

Question: "When you got up to the top of the hill, do you remember seeing the tree, the 14" ash that had ribbons around it?"

Mr. Watson: "Yes, sir."

Question: "You remember him [Mr. Adkins] pointing it out to you?"

Mr. Watson: "No sir, he didn't point that out to us." (Read the previous conversation on February 3, 1997.)

Question: "And he showed you that, didn't he?"

Mr. Watson: "He showed me what?"

Question: "Where the corners were?"

Mr. Watson: "No, he didn't."

On February 3, 1997, I got Mr. Watson to take a picture of this 14" ash tree with his man Mark Walters leaning up against the tree, pointing out the three red ribbons, so I could show the court. I have the picture.

Question: "Ash tree. Is that a 14" ash?"

Mr. Watson: "Yes, sir."

Question: "Did it have ribbons around it?"

Mr. Watson: "I don't recall."

Question: "You didn't see those?"

Mr. Watson: "No, I don't recall."

This is a quote from Mr. Evans' letter, dated March 11, "Brett Watson testified, even in light of the February 6th letter, that he had no way of knowing if you knew where the corners were before he located them."

Questioning of Deputy Moore in the Civil Rights trial:

Mr. Adkins: "How many times has Brett testified? Did you hear him testify?"

Deputy Moore: "No, sir, he's been in court but I didn't hear him." (Deputy Moore was the defendant on March 5th)

Mr. Evans's letter, dated March 11, 1997, "Mr. Holbrook's presence allowed us to get the survey in evidence without a hearsay objection, but he had no personal knowledge of the property." How would Mr. Evans know this since, he refused to ask Mr. Holbrook any questions about the survey, my property, or the Holbrook letter?

Questioning of Deputy Moore on June 24, 1998:

Mr. Adkins: (Deputy Moore was looking at a picture of Mr. Holbrook) "Have you ever seen that man before in your life?"

Deputy Moore: "Not to my knowledge, no."

By Mr. Adkins: "You ever see him in court on March 5th, 1997, General District Court, in front of Judge Tate?"

Deputy Moore: "Not that I recall, no." (Deputy Moore was the defendant)

In depositions, Deputy Moore at first denied that he knew Mr. Holbrook or Mr. Watson. Deputy Moore's statement concerning Brett Watson was, "don't know the man's name. He's a large fellow," and, "I believe that's correct. The tall gentleman, Mr. - what did you say his name was again?" Deputy Moore's testimony at a later date, after I had learned that he had hired Holbrook surveyors to do a survey soon after Mr. Watson testified falsely for him on March 5, 1997:

Mr. Adkins: "When was it that you talked to Brett?"

Deputy Moore: "I can't give you an exact date, probably March."

Mr. Adkins: "Did you have Brett to set the stakes?"

Deputy Moore: "Not on this line."

Mr. Adkins: "On the other line?"

Deputy Moore: "Yes sir, we did . . . when we found out about it, we went back over and saw the survey, after Mr. Holbrook had told us about it."

During the trials I had learned that Holbrook Surveyors did a survey on the adjoining farm on the back of my property. I wrote Mr. Tony Holbrook a letter and asked for some information on this survey. This is a quote from Mr. Holbrook's letter, dated August 18, 1998, "The request for survey of the Booher Farm located behind your land cannot be provided you unless written permission is received from the Booher's." I have never signed or given Holbrook Surveyors permission to discuss my survey with anyone but me. This is a quote by Deputy Moore's attorney on July 26, 1999, "After the defendant interviewed Mr. Watson over the telephone and looked at this, a transcript of his prior testimony in another proceeding, we simply decided to name him and call him as a witness because there was a discrepancy between his testimony and Mr. Adkins' that we felt was significant." (Deputy Moore's attorney stated that Mr. Watson's testimony was significant, but Judge Jones did not think so when I wanted to take Mr. Watson's depositions to use in my appeal.)

The morning the trial started, I had the other surveyors present to testify, but Judge Jones told us to send our witnesses home. However, he had no objection to Mr. Watson testifying for Deputy Moore. I filed a motion and cited the proper case law with Judge Jones to take the deposition of Brett Watson to use in my appeal motion for a new trial, and Judge Jones denied my motion. Like I stated earlier, the people in Washington County can no longer use the argument that the Holbrook letter meant nothing to the court. This is now indisputable.

Before the gun warrant was issued, I talked to Mr. Ramseyer and asked him if he would send the Marshals to Bristol to talk with Mr. Watson. His reply was, "I'm not sending anyone all the way to Bristol." Holbrook's office is about 15 minutes from Abingdon. The Marshals came right through Bristol twice on the way to Kingsport to question me about letters I had written. On August 29, 2000, I had Mr. Watson subpoenaed at a hearing, and he did not have to appear in court. On this date, I gave Mr. Ramseyer a tape of Mr. Watson. He gave it back, and refused to even listen to it.

COMMONWEALTH VS LARRY MOORE AND DEBROAH MOORE MARCH 5, 1997

On January 24, 1997, Deputy Moore committed perjury to convict me for being on my own property. I talked to the attorney whom I had at that time, and he told me that the court in Washington County would never convict Deputy Moore of any crime. From my own knowledge, I knew the Moores had intentionally built the fence on my property to cause me trouble. I also knew that the Moores would never admit to this. I went outside Washington County and obtained a warrant for Deputy Moore for trespassing the day the Moores built the second fence. These are my civil and Constitutional rights. I felt like if it was a criminal offense for me to be on my property and seeing Deputy Moore on my property, it should be a criminal offense for Mrs. Moore to come about 500 feet up my driveway and sit and watch me, since the property was posted and she had been notified to stay off. This warrant disappeared before it got to court. I will go into this part later. In reality, on March 5, 1997, Deputy Moore was in court lying to beat a trespass charge, and I was there to catch the Moores lying about the fence to keep me from spending time in jail. Mr. L.V. Fleming, my ex-wife's grandfather, had shown Mrs. Moore and I on two separate occasions where the corners were located when we were together. I had Mr. Fleming subpoenaed, and he was present in court, but Mr. Evans refused to put him on the witness stand. In the Civil Rights trial, the Moores used the excuse that Mr. Fleming had shown them where to build the fence, but Mr. Fleming was sick and could not testify.

After I obtained the trespass warrant for the Moores, the Washington County Commonwealth Attorney withdrew because of a conflict they had, and Smyth County Commonwealth Attorney Roy Evans was appointed special prosecutor.

Deputy Moore's testimony on March 5, 1997:

Question: "All right. And on November the 11th, you said you had occasion to speak with Mr. Adkins. What was that in regards to?"

Deputy Moore: "The sheriff called me at home and advised me that Mr. Adkins was there at the office wanting to speak to me. He told me on the phone that we built the fence twelve feet on his land, and he had cut it down."

Question: "And after that, what happened?"

Deputy Moore: "We went back over the next morning and rebuilt the fence fifteen feet, or close to it, from the previous fence. We left the old fence where it was at. We didn't go over there and get it. It's still there."

Question: "You didn't move the one that was already there?"

Deputy Moore: "No, it's still there."

Question: "And where did you build this fence?"

Deputy Moore: "We built it about fifteen feet down from the other fence. We weren't sure that maybe we were not twelve feet on his property, so we moved fifteen feet just to be sure."

Question: "Is that fence still there?"

Deputy Moore: "Yes sir, it is."

Question: "Is it still in original shape?"

Deputy Moore: "Yes, sir."

Question: "When you talked to Mr. Adkins on the 11th of November, did he say anything to you other than that the fence you built was twelve feet on it [Mr. Adkins' land]?"

Deputy Moore: "That he had cut it down."

Question: "That he'd cut it down."

Deputy Moore: "Yes, sir."

Question: "And when you went back and moved or went back to redo the fence, what did you do?"

Deputy Moore: "We left the old fence where it was at, because we weren't going to go over on his property. The wire and post and stuff is still over there."

Question: "And he had told you, you were twelve feet over on his land?"

Deputy Moore: "Yes, sir."

Deputy Moore's testimony during the depositions, *after* he learned of the tape recorder:

Mr. Adkins: "If you testified that you built the second fence fifteen feet from the first

fence, would that be a true or false statement?"

Deputy Moore: "Be a false statement."

Question: "Now your lawyer is saying there that Mr. Adkins claimed he's just twelve feet across from his line?"

Deputy Moore: "I didn't use the words 'twelve feet.'"

Question: "You testified before, you said 'twelve feet.'"

Deputy Moore: "I think he said ten (10) to fifteen (15)."

Mr. Adkins: "Now, when I talked to you on the phone, did I use the words 'twelve (12) feet' when I told you about the fence?"

Deputy Moore: "It's my -- best of my knowledge it was fifteen (15) to twenty (20) foot."

Mr. Adkins: "When I was talking to you on the phone and from the Sheriff's office, was I going over there to cut the fence down, or had I already cut the fence down at that time?"

Deputy Moore: "I don't know if you'd cut it or went back and cut it."

Mr. Adkins: "Well, Sheriff Hayter -- you heard Sheriff Hayter testify that I asked him to send a deputy over there to protect me, and he refused, because it's a civil matter, is that correct?"

Deputy Moore: "Yes."

Former Sheriff Hayter sat in the courtroom on March 5, 1997, and Mr. Evans refused to call him as a witness.

Transcript from depositions:

Mr. Adkins: "At that time, had I cut the fence down and was I -- did I say I was going to tear it down?"

Mr. Hayter: "You were going to tear it down."

Mr. Adkins: "Going to tear it down, okay?"

Mr. Hayter: "On your way out."

Deputy Moore's testimony on March 5, 1997:

Judge Tate: "Point with this." (Pointing at the Holbrook Survey)

Deputy Moore: "Yes, sir. We built this one first (indicating), and then we moved it. This would be about fifteen feet (indicating)"

Holbrook's Brett Watson, on March 5, 1997:

Question: "The fence that's located on here, is, from your observation, there on the scene at the site?"

Mr. Watson: "Yes, sir. They were tied down."

Question: "Pardon me?"

Mr. Watson: "I tied the fences down with the instrument."

Question: "When you say 'tie them down,' that means that you actually --"

Mr. Watson: "Located them?"

Question: "-- located, just as you would a property line?"

Mr. Watson: "And distance. All that." (The survey shows that the second fence was built about sixty feet from the first fence. There was no distance of fifteen feet on the Holbrook Survey. If Deputy Moore could tell twelve feet from fifteen feet, he could tell fifteen feet from sixty feet!)

Question: "Have you had a survey done?"

Deputy Moore: "No, sir. Didn't know this one had been done. [Holbrook Survey]"

Deputy Moore testified on March 5, 1997, that he had never been to my garage. The truth is, he trespassed several times at my garage, just to harass me. March 5, 1997:

Question: "Mr. Adkins testified a while ago that you had been on the property several times. And that was more or less reiterated by Mr. Summers. Before this November 12th, why would you have been on his property before?"

Deputy Moore: "Well, I've never been across the fence anytime on Mr. Adkins' property. If he's saying that the fence was off the line and I was near the fence, I probably was, but I haven't ever been on his land (my garage is about 400 yards from the fence)."

During depositions, Deputy Moore testified that he had only been to my garage one time. The only reason that he admitted to this one offense is because of the statement he made on November 14, 1996 during my arrest (at my arrest).

Mr. Adkins: "Who said these words: 'You've been up to my garage several times and you know you're not supposed to be there?' Who said those words?"

Deputy Moore: "I would assume you did?"

Mr. Adkins: "Who said these words, 'I've only been up there one time, and that was to mow your garden off?' Who said that?"

Deputy Moore: "I did."

Willie Vernon Summers rented my trailer during the time the Moores trespassed at my garage. Following is an excerpt of Mr. Summers' testimony on March 5, 1997:

Mr. Summers: "See, I didn't look at the calendar. They were there, but I couldn't tell you for sure when they were." (Mr. Summer moved into my trailer around first of July 96, my trouble started in November 96) "I have seen them back in there, (my garage) I moved back in July. I've seen them about August or, no specific date, but I have seen them several times."

Question: "And when you say 'them,' are you referring to these two folks sitting over here (Larry and Deborah Moore)?"

Mr. Summers: "Yes. See, I didn't know who they were. See, when I first moved there, I didn't know Ralph or anybody, and I thought Larry was him. I didn't know who they were. Well, I've seen him on the front there back at the garage there on the property. (My sister rented and took care of my trailer during this time. I never met Mr. Summer until November of 1996.)"

Question: "Mr. Summers, what do you mean you didn't know Ralph or anyone?"

Mr. Summers: "Before I moved on his place, I didn't know who he was. I got his place through his sister Helen."

Deputy Moore during depositions:

Question: "How about when you were -- when you had a charge against you? Did Willie Summers testify when you had a charge against you?"

Deputy Moore: "No sir, he didn't show up at court. I don't know if he was subpoenaed or not. He was not at court."

Question: "Who all testified that day of that charge against you?"

Deputy Moore: "Mr. Adkins."

Question: "Anybody else?"

Deputy Moore: "No, sir."

Roy Evans' letter, dated March 11, 1997, "We did not get a chance to talk about the Moore's cases after the March 5th trial," and, "Mr. Summers could only say that he saw the Moores working on a fence, but could not established a precise date, nor could he say from his own knowledge that they we on your property."

Depositions:

Mr. Adkins: "Did you hear Willie Summers testify on March the 5th?"

Deputy Moore: "No, I did not (Deputy Moore was the defendant)."

Roy Evans' letter, dated 3/11/97, states, "Therefore, for all practical purposes, it was your testimony, aided by the plat map, against the Moore's testimony."

Mrs. Kathryn Summers, the wife of Mr. Summers, testified on March 5, 1997:

Mrs. Summers: "I've seen them up there, but I don't remember the date."

Question. "When you say up there, where are you talking about?"

Mrs. Summers: "On Ralph Adkins' land."

Question: "Ma'am, where did you see them?"

Mrs. Summers: "Up on the land, Ralph Akins' land."

Question: "And what was he doing when you saw him?"

Mrs. Summers: "They just came up in a truck one time, and then on a tractor, and then in their car."

Deputy Moore during depositions:

Mr. Adkins: "Did you hear Kathryn Summers testify on March 5th?"

Deputy Moore: "No (Deputy Moore was the defendant)."

My sister Helen Fleming took care of my place after I left Washington County. This is her testimony on March 5th, 1997:

Question: "Ma'am, you're familiar with Mr. Adkins' property there. Was it posted?"

Mrs. Fleming: "Yes."

Question: "When was it posted?"

Mrs. Fleming: "November, 1995. Yes. I put the 'No Trespassing' signs on the post as you go onto his property into his driveway."

Question: "At his driveway at the road?"

Mrs. Fleming: "Yes."

Question: "Did you go anywhere else?"

Mrs. Fleming: "I put it on the garage, and another building on his property."

Question: "At the front on the road?"

Mrs. Fleming: "Right."

Roy Evans' letter, dated March 11, 1997: "You should know that Helen Fleming was unable to say when the posted signs were on the property."

Deputy Moore's testimony during deposition:

Mr. Adkins: "Did you hear Helen Fleming testify on March the 5th?"

Deputy Moore: "No, I did not (Deputy Moore was the defendant)."

Larry Wayne Gobble rented my trailer from the time I left Washington County in 1995 until May 17, 1997. This is his testimony on March 5, 1997:

Question: "And I'm sorry. The dates again were November '95 till about June of '96?"

Mr. Gobble: "No. It was May, second week of May."

Question: "During that time, sir, was the property posted?"

Mr. Gobble: "They posted signs. There was one at that time at the end of the road as you entered the driveway, and there was one posted on the second building at the top of the hill."

Question: "Do you remember which way the 'No Trespassing' sign faced?"

Mr. Gobble: "The one that was nailed on the fence post was at, it was facing the highway right there in front of the mailboxes. The one on the second building was

facing -- well, it would run diagonally toward the driveway at the top of the hill."

Mr. Evans' letter, dated 3/11/97, "Mr. Gobble gave a rough time frame when the signs were there, but did not establish that they were visible at the place where the Moores would have crossed." Mr. Evans did not ask Deputy Moore if he had seen the "No Trespassing" signs.

Deputy Moore during depositions:

Mr. Adkins: "Did you hear Larry Wayne Gobble testify on March 5th?"

Deputy Moore: "No, I did not (Deputy Moore was the defendant)."

Deputy Moore's testimony, June 18, 1997:

Judge: "Do you know where this property is located?"

Deputy Moore: "Yes I do."

Judge: "Have you seen any 'No Trespassing' signs there?"

Deputy Moore: "Yes, sir."

Judge: "Did you see them there prior to 5/17/96?"

Deputy Moore: "I can't say when the first time I saw them was. I know they were up back this past winter."

Mr. Roy Evans' letter, dated May 14, 1997, "I am not aware of any facts surrounding the trial which would reasonably support a conviction for perjury."

I mailed Mr. Evans the evidences that Deputy Moore committed perjury on March 5, 1997, and Mr. Evans refused to accept the information by certified mail.

MAY 7, 1997
COMMONWEALTH vs. DEBORAH MOORE

April 14, 1997. I mailed Kenneth Hayter, the former sheriff of Washington County, a certified letter to let him in on the secret that I was carrying a tape recorder. The May 7th court date was the first time that I was back to court after I notified these people of the tape recorder. This was in General District Court of Washington County. The Commonwealth Attorney at that time was Dennis L. Godfrey, and the assistant was D. Jeffrey Coale, who is now is the Commonwealth Attorney. The courtroom was filled with several people who had cases pending on this day. Mr. Godfrey and the Moores' attorney sat in the courtroom until about 2:00 pm and waited until everyone had left before the Moores' charge was heard. This was done to keep anyone in Washington County from knowing about what was going on.

On February 11, 1997, the Washington County Commonwealth Attorney went before a Judge and withdrew from the prosecution of "Larry Moore and Debbie Moore" on these grounds, "The Commonwealth's Attorney for Washington County, having orally advised the Court that he is so situated with respect to the accused as to render it improper in his opinion for him to act as the attorney for the Commonwealth." The defendant on May 7th was the same "Debbie Moore," and Mr. Coale was the prosecutor. By this time Mr. Coale had enough evidence to know that Deputy Moore was lying, and that Mr. Roy Evans had chickened out, and would not could back to court.

Mr. Adkins: "Could I have a perjury charge explained to me, Your Honor, what perjury is?"

Judge (judge from March 5th): "Well, yes sir. The commonwealth might want to do it, rather than me. Let me take a minute and take a break - and Mr. Coale, let me know when you're ready."

At this time, everyone went in a different direction, leaving the court reporter and I in the courtroom by ourselves. In a few minutes, the Bailiff came back in the courtroom and took my tape recorder. Soon after this, Mr. Coale came out and was going to explain perjury to me.

After the court recess:

Mr. Adkins: ". . . I'm afraid it may. I feel like I have no witnesses in this room other than myself. I felt like I've been done very wrong in this courtroom, your Honor . . . Could you explain the perjury to me, sir? What is perjury?"

The Court: "Perjury is giving false testimony, and knowing it to be false is perjury."

Mr. Adkins: "If I have a deputy sheriff I feel like I can prove perjured himself against me - "

The Court: "Sir, you need to talk with the Commonwealth's Attorney about any crimes that you think may have been -"

Mr. Adkins: "The Commonwealth Attorneys, they tell me it's conflict of interest to talk to me."

The Court: "I'm sure the Commonwealth's Attorneys have a method for resolving conflict cases. If you think there's a crime been committed, you need to talk with them."

Mr. Adkins: "I don't think. I know it, sir."

The Court: "Well, I'm the wrong person to tell it to, because I may have to try it. If you think you have a crime, then you need to talk to the Commonwealth's Attorney. I'm certain that they have some mechanism by which they resolve their conflict cases."

Mr. Adkins: "Could you ask Jeff Coale if he would speak to me?"

The Judge: "Well, that's up to him."

Mr. Adkins: "I can't get anyone to talk to me."

The Court: "He doesn't work for me."

Mr. Adkins: "Okay. Thank you, sir."

During depositions:

Mr. Adkins: "Have you ever been questioned by either the Smyth or Washington County Commonwealth Attorney's Office about the May 7, 1997 conversation that I had with Judge Tate in General District Court in your presence?"

Deputy Moore: "No."

Mr. Adkins: "Do you remember me bringing up to the Judge that I felt like I could prove you perjured yourself against me?"

Deputy Moore: "You were saying several things that day.:

Mr. Adkins: "Nobody ever did question you about that?"

Deputy Moore: "No."

JUNE 18, 1997
COMMONWEALTH vs. DEBORAH MOORE

This trial was the first time that I had been back in court since May 7, 1997. When I made this statement to the court, Mr. Coale was present:

Mr. Adkins: "If I have a deputy sheriff I feel like I can prove perjured himself against me -"

The Court: "Sir, you need to talk with the Commonwealth's Attorney about any crime that you think may have been."

How can anyone deny that Mr. Coale was covering up for the perjury that was committed by Deputy Moore?

Mr. Coal: "Are there any witness you would like to have called?"

Mr. Adkins: "Yes, I would like to call Deputy Larry Moore. "

Mr. Coal: "No further questions."

The Court: "Is Deputy Larry Moore related?"

The Moores' attorney, Mr. Watson: "To the accused, yes."

Mr. Coal: "I expect Deputy Moore to be a defense witness."

The Court: "I think he would have a right to decline, the way the thing is now. It used to be that the defendant did, but now it would be the witness. I think that is the way the law is now."

Mr. Coal: "I agree."

Mr. Adkins: "Even though they weren't married at the time?"

The Court: "Well, he is going to testify for the defendant anyway."

Mr. Watson: "I don't know if we will call him or not."

The Court: ": "If they weren't married at the time call him . . ."

Mr. Coal: "May I ask another question of Mr. Adkins?"

The Court: "Yes."

Mr. Coal: "Was Deputy Moore there?"

Mr. Adkins: "On this day?"

Mr. Coal: "Yes."

Mr. Adkins: "No, sir."

Mr. Coal: "What does he know about this?"

Mr. Adkins: "I feel like I pay taxes in Washington County, and he is with the Washington County Sheriff's Department. I know he has been out there several times, and I just want to know if he has seen the signs himself when he went by. He is the deputy sheriff that patrols out there, I understand."

Mr. Watson: "If that is the question he wants to ask, I have no objection."

The Court: "Do you know where this property is located?"

Deputy Moore: "Yes, I do."

The Court: "Have you seen any 'No Trespassing' signs there?"

Deputy Moore: "Yes, sir."

The Court: "Okay, do you want to ask him anything further, Mr. Coale?"

Mr. Coal: "No."

The Court: "I take it you don't want to ask him anything?"

Mr. Watson: "No, Your Honor."

Notice that the Chief Law Enforcer of Washington County, Mr. Coale, refused to ask Deputy Moore one single question!

The way that Mr. Coale had to resolve his conflict was to change to a different Judge. He was the Commonwealth's Attorney again on June 18, 1997. Again, Mr. Coale attempted to clear the courtroom before this charge was heard in order to keep people in Washington County from knowing what was going on.

Mr. Adkins: "May I approach the bench, Your Honor?"

The Court: "Yes."

Mr. Adkins: "I would like to request permission to talk to you in private."

The Court: "No, you can't do that. (I only wanted to tell the Judge about the conflict that Mr. Coale had in this case.)"

Mr. Adkins: "Sorry about that. May I speak to Mr. Coale?"

Mr. Coale: "I have told him in the past, I only want to communicate with him through his attorney." (In a criminal charge in this country, the person that brings the charge cannot have a private attorney in court because the Commonwealth Attorney is the Chief Prosecutor.)

Mr. Adkins: "May I say something, Your Honor? I took out the 5-17 and then the November 13, those are two separate dates."

Mrs. Moore's attorney: "November 13, we tried the last time, appealed to Circuit Court, and it was dropped. This is the third time we have been here on these charges." (To my knowledge, the November 13, 1996 charge against Mrs. Moore has never been tried. I mailed Mr. Coale a certified letter requesting this information and never got a response.) "May I say something?"

The Court: "You told me a while ago that you wanted to talk to me, and I told you I could not talk to you about this case. Have a seat and proceed to testify, if you're going to testify. If you are not, you are not." (I was simply going to tell the Judge that the charge had never been tried. I wrote him a letter after the trial but never received a reply.)

The November 13, 1996 charge was the same exact date and event that Deputy Moore had used to convict me on January 24, 1997. Deputy Moore's attorney and Mr. Coale conspired to do away with the November 13 charge with false statements to the Judge to cover up the lies by Deputy Moore over the building of the fence. The very next week, on June 25, 1997, the same Mr. Coale was in court, attempting to send me to prison, over the exact same date and event as the November 13, 1996 charge!

JUNE 25, 1997 COMMONWEALTH vs. RALPH ADKINS

On January 25, 1997, there was a big story in the Bristol paper: "**KINGSPORT MAN FOUND GUILTY OF STALKING A DEPUTY.**" Before the June 25 trial, I contacted the reporter who wrote this story and asked him if he would come back to court and clear my name. He did not show up at the June 25 trial. It took me about two months, but the Bristol paper printed a small article stating that the conviction had been squashed on appeal. It also stated that "Special Judge A. Dow Owens emphasized in his decision to dismiss the case that the Sheriff's Office had done nothing wrong." After the article came out, I contacted this same reporter again and asked him where he got his information. His reply was, "the Washington County Commonwealth Attorney." I was the one on trial on June 25, 1997 - not the sheriff's office. Why would the Judge rule that the sheriff's office had done nothing wrong?

This is how the Bristol paper covered up for the court, and how Judge Jones covered up for the Bristol paper during the Civil Rights trial:

Mr. Adkins: "Later on, after I was acquitted, there was nothing that came out in the paper, so I contacted the reporter that wrote this article, and I contacted the paper, and it took me - I think that came out in September, but they finally printed something about this big (showing less than a inch with my fingers) that it had been squashed, and I call and I asked him, 'Where did you get the information that you put in the paper?'"

Judge Jones (without an objection from Moore's attorney): "Don't tell what somebody told you." (The reporter said, "I got it from the Commonwealth Attorney.")

This was my testimony during the depositions. This was the first time that this was brought out in Judge Jones's presence. How can anyone deny that Judge Jones had been influenced before the Civil Rights trial? (Deputy Moore testified that he never actually *saw* a gun at my driveway, that Mrs. Moore had only told him about the gun, and Judge Jones never had any objections to this hearsay.)

UPDATE: I bought an ad in the Bristol paper that was supposed to run for seven days. This add only gave the title of this story and the web page address. The add ran for two days only, and the Bristol paper removed the ad from their paper and refused to fulfill the rest of our agreement.

After what had already taken place before the June 25th trial, the attorney whom I had at this time, Freddie Adkins of Norton, Virginia (no relation to me) had given me reason to believe that he was not going to ruffle anyone's feathers because of a nobody like me. On June 24, 1997, the day before the trial was held, I went to this attorney's office and dismissed him from my case. On June 25, 1997, this attorney was in court, pretending as if he was there to represent me. After the trial, he sent a bill in the amount of \$600 for the June 25 trial, which lasted less than 1 hour. I had already paid him \$600 for the January 24, 1997 trial. He had charge me \$100 an hour in between for talking to me. His fee totaled about \$900. I paid the amount I owed him, up until June 25, 1997, minus the \$600. This was about four years ago, and I have not heard from this attorney. I have mailed him certified letters on more than one occasion, and he has refused to respond to any of them.

How Judge Jones covered this up and kept the jury from hearing the truth:

Judge Jones: "Well, you said that you paid the lawyer \$600. Did you pay him some more?"

Mr. Adkins: "Yes."

Judge Jones: "So, altogether was it \$1,000? Just tell how much it was altogether."

Mr. Adkins: "Well, up to the day I dismissed him it was \$900 and some dollars. I dismissed him on June 24, 1997."

Judge Jones: "Okay. That's all you need to say."

This was my testimony during the depositions, the first time that this was discussed in front of Judge Jones. How can anyone deny that Judge Jones had been influenced before the trial? How can anyone object to the fact that Judge Jones denied me the right to testify to the truth? How can anyone say that he did not cover the violation of my Constitutional rights?

During the Civil Rights trial, I had accused Attorneys Mr. Coale, Mr. Evans, and Mr. Freddie Adkins of conspiring to cover up crimes committed by Deputy Moore. One juror that sat on the Civil Rights trial was the wife of an attorney that Judge Jones knew, and one juror's family member was the Commonwealth's Attorney in nearby Russell County.

Deputy Moore's attorney: "Linda Davis Stout, if I'm not mistaken, that's Ed Stout's wife."

My attorney: "What number?"

Judge Jones: "She's the wife of an attorney in Bristol."

(different juror)

Juror: "My brother works in the prison system. My husband's uncle is police in Russell County."

Judge Jones: "Your husband's Uncle is in the Sheriff's Department?"

Juror: "His cousin is a district - I'm nervous - he's Commonwealth Attorney in Russell County."

I knew as soon as the June 25th trial was over that I had been hood winked, but I did not know how until I read Judge Jones's ruling on dismissing Mrs. Moore from the Civil Rights suite. Judge Jones, in his ruling, explained this to me very clearly: You cannot sue a private citizen for lying to convict someone of a criminal offense, but you can sue a deputy sheriff for the same thing. This is why Deputy Moore testified in the Civil Rights trial that Mrs. Moore had told one thing about the gun and then later told him that she had testified differently on June 25, 1997. This was to show the court that it was not him that lied about the gun, it was her.

From the Civil Rights trial:

Deputy Moore: "Debbie stopped me somewhere that day. She was so scared she couldn't drive, we did stop for a minute."

Question: "Scared of what?"

Deputy Moore: "Mr. Adkins had produced a pistol at her."

Question: "Where was that, where she told you that?"

Deputy Moore: "I don't know where we were at. I don't know."

Question: "Did she tell you later that she testified that Ralph pointed a pistol at you?"

Deputy Moore: "Yes, sir."

Question: "She told you that, didn't she?"

Deputy Moore: "Yes, sir."

This is why, on June 25, 1997, the Judge dismissed the charge, and about three years later, I spent time in a federal prison over this exact same gun.

"JUSTICE FOR ALL"

After the Civil Rights trial, I filed the lies by Deputy Moore and his witnesses with Washington County Commonwealth Attorney Jeffrey Coale by certified mail, but I have never received a response.

**UNITED STATES CONSTITUTION, 7TH AMENDMENT,
RIGHTS IN CIVIL CASES**

"In suits at common law, where the value in controversy shall exceed twenty dollars, the right of a trial by jury shall be preserved" and 6th Amendment, "by an impartial jury."

The Honorable James P. Jones, United States District Court, Western District of Virginia, Abingdon Division, was the presiding Judge at the Civil Rights Trial, Ralph Adkins vs. Deputy Larry Moore.

Motion made by my attorney after the jury voir dire:

Judge Jones: ". . . which is a legal term that literally means to tell the truth".

My attorney: "Judge, I'm going to make a motion to dismiss this whole jury. There's too many people with officers in it. I think the whole jury is tainted, and I'd ask the Court to dismiss them all."

Judge Jones: "Your motion is denied . . . very well. I find all the jury members qualified."

The jury voir dire. One juror waved at Deputy Moore in the courthouse on the morning of the trial, but did not admit that he knew him.

Mr. Henderson (Deputy Moore's attorney): "Before you bring them in, I always like to advise Court and counsel if I see any familiar names on the jury list." (Mr. Henderson is from Tazewell, Virginia, a very small town located about 90 miles from Abingdon where the trial was held.) "There are several people's names here that I recognize. One is a lady who lives in Tazewell, and her parents live across the street from us. If I'm not mistaken, that's _____'s wife."

Judge Jones: "She's the wife of an attorney in Bristol. Works at the post office in Tazewell and a year ago there was one occasion _____ came to me for legal advice on a subject."

Mr. Henderson: "He's a state forester, and I occasionally see him at meetings, for example, the water conservation district."

JUDGE JONES QUESTIONING JURORS

Judge Jones: "And do you know the defendant, Mr. Moore?"

Juror: "Yes. I do."

Judge Jones: "Tell me how you know him, what is the circumstances of your knowing him?"

Juror: "He's a neighbor."

Judge Jones: "How long have you known him?"

Juror: "I don't know. Six, seven years."

Juror: "Yes, he's my parents' neighbor."

Juror: "I'm just a Tazewell County native, and I've seen him [Mr. Henderson] in court before."

Judge: "And how do you know Mr. Henderson?"

Juror: "I work at the Postal Service. I see him come in Tazewell."

Judge Jones: "_____, how do you know Mr. Henderson?"

Juror: "I just know him as a native of Tazewell."

Judge Jones: "Was that a criminal case, somebody charged with a crime, or civil case, somebody suing?"

Juror: "I don't know for sure what it was. It was marijuana and rape. (This juror sat on a jury and did not know whether it was a civil or criminal case.)"

Juror: "I do enforce some law for Department of Forestry."

Judge Jones: "I take it that those are laws relating to fires?"

Juror: "Yes, sir."

Judge Jones: "And your area of responsibility is Tazewell County?"

Juror: "Basically Tazewell and Buchanan, but I do work throughout Southwest Virginia."

Juror: "My son is a sergeant at the Red Onion. (state prison)"

Juror: "I know my third cousin's son by the first marriage works for the county, he's a deputy."

Judge Jones: "What county is that?"

Juror: "Washington County, and my brother-in-law is deputy to the sheriff in Tazewell County. My nephew is a jailor in Tazewell County, and my sister works for Juvenile Court in Tazewell County."

Juror: "My brother works in the prison system. My husband's uncle is police in Russell County. His cousin is a - he's Commonwealth Attorney in Russell County."

Juror: "My husband's cousin is a deputy in Buchanan County. Juror: My uncle also

worked in the prison system, and was injured."

QUESTIONING OF JURORS BY MY ATTORNEY

My attorney: "I see several people that know or are involved in some way, or something, somewhere or another, I could start to see - let me start right here. Are you involved with any law enforcement officer, or any member of you family?"

Judge Jones: "I've asked the jury those questions, and so I'd like you to ask them other questions than those that I've asked them."

Juror: "A deputy in Buchanan County."

My attorney: "Do you ever talk to this officer up there?"

Juror: "Yes."

My attorney: "Do they visit with you?"

Juror: "He has."

My attorney: "The fact that he is a deputy, do you feel like you ought to give more credit to the officers because he's an officer?"

Juror: "Well, I don't know. He got run over by somebody once and almost killed him."

My attorney: "Do you ever talk with police officers?"

Juror: "Yes. I have a brother-in-law that's a police officer."

My Attorney: "Do you see them pretty often?"

Juror: "Yes."

My Attorney: "You all have been friends, associated together?"

Juror: "Yes, sir."

My attorney: "Go out together?"

Juror: "Yes, sir."

My attorney: "Do you all discuss cases sometimes?"

Juror: "No, he does not discuss his cases."

My attorney: "The fact that he's a police officer, you talk to him and associate with him - would that cause you - would that cause you to be more likely to give more

weight to an officer than you would somebody else?"

Juror: "No. I believe I'd listen to the evidence."

My attorney: "You don't have any member of your family that's a lawyer, do you?"

Juror: "Yes."

My attorney: "Have you talked to him [Mr. Henderson] lately?"

Juror: "I talked to him, he comes in the post office, yes, sir."

The Honorable James P. Jones' statement after the jury rendered the verdict on August 27, 1998 in Deputy Larry Moore's favor: "So, when you leave here today, you need to hold your head a little higher, knowing that you've been able to participate in our great judicial process. And you are now discharged."

Judge Jones: "I'll ask you to return to the jury room and wait just one moment. I won't keep you long. I want to thank you personally before you leave. Thank you, very much."

This would have been the same "fair and impartial" jury I would have received if I had went to trial on the alleged gun charge. I filed a motion to have the jury recalled, and Judge Jones denied my motion. Later, I found a story in the Knoxville paper that told of how a federal Judge had granted a new trial on a Civil Rights case against police officers because one juror had worked for the prison system and would have known police officers. I mailed the jury voir dire to this reporter. Her reply to me was, "What do you want to do about it?"

Before the depositions, a witness had informed me that Judge Jones and Mr. Hayter had been seen at political functions at the same time. During the deposition on the Civil Rights case, during the time that former Sheriff Kenneth Hayter was one of the defendants, I asked Mr. Hayter if he knew Judge Jones.

Mr. Adkins: "Do you know Judge Jones?"

Mr. Hayter: "I know Judge Jones, and all the rest of them down there."

Mr. Adkins: "How long have you know him?"

Mr. Hayter: "Several years. I went before Judge Jones and asked him to withdraw because he would have know the former sheriff, and Judge Jones' reply was, "I would not know Sheriff Hayter if he would walk through that door."

Abingdon is a small town in rural American where both Judge Jones, Deputy Moore, and Mr. Hayter had lived most of their lives.

Question: "You know Judge Jones that sat on this case?"

Deputy Moore: "Yes, sir."

When I filed the Civil Rights suite, Magistrate Michael Lang was a defendant. Judge Jones dismissed him on the grounds that a magistrate is compatible to a Judge and cannot be sued. January 24, 1997: The magistrate office in Washington County refused to speak to me, declaring themselves a conflict of interest because the Washington County Sheriffs Department was involved. I had to go outside of Washington County to speak to a magistrate. I filed a motion for Judge Jones to withdraw on the grounds that if a magistrate is comparable to a judge, and one judge from Washington County declared a conflict of interest, then all judges should have the same conflict. Judge Jones denied my motion and stayed in the case.

At this same conference, my attorney cited a case against the Lee County Sheriff's Department in which Judge Jones was the attorney for the sheriff's department, and he was the attorney for the plaintiff. My attorney stated to Judge Jones that Judge Glen William had withdrawn from the case because he knew members of the Lee County Sheriff's Department, and Judge Jones stated, "I am not getting out of this case." I allege that Judge Jones could not beat my attorney as a lawyer, but he did an excellent job for Deputy Moore as a judge. I will explain this later.

STATEMENTS MADE TO ME ABOUT MAKING FALSE STATEMENTS

Here is a question asked by me and answered by Deputy Moore during the Civil Rights case:

Question: "Okay. Has anyone ever told you that you can give me a false statement under oath if you want, and nothing will be done?"

Deputy Moore: "That would not be correct, no."

It is indisputable that Deputy Moore gave false statements under oath, and that nothing was done about it.

WARNING: If you are a police officer, please read this paragraph before you continue.

Mr. Adkins: "Well, you say it's your obligation, if you see a crime committed, that you're supposed to protect people's property in Washington County?"

A police officer: "Which crimes are you speaking of?"

Mr. Adkins: "Any crime. Any crime. If you see a crime being committed are you - it's your duty to -"

A police offer: "Yes, that's correct."

Mr. Adkins: "Okay. If you're off duty, if you see a crime committed, are you still under that same obligation?"

A police officer: "Obligated."

A quote from my monthly supervision report, "WARNING: ANY FALSE STATEMENTS MAY RESULT IN REVOCATION OR PROBATION, SUPERVISED RELEASE OR PAROLE, IN ADDITION TO 5 YEARS IMPRISONMENT, A \$250,000 FINE OR BOTH (18u.s.c. 1001)."

Quote from my FCI report: "He rightly believes that if these "lies" remain in the record, then he is portrayed as mentally ill and delusional."

Kenneth Hayter, Deputy D.L. Edmondson, Deborah Moore, Brett Watson, Larry Guy Moore, and Travis Adkins were all Deputy Moore's witnesses during the Civil Rights trial. I am now going to show perjuy after perjury by Deputy Larry Moore. Most of my examples will be Deputy Moore's testimony against his own testimony at another time, or his testimony against his own witnesses' testimony.

DEPUTY LARRY MOORE - THE TRUTH

During depositions:

Question: "Do you know he was away from here for some time?"

Deputy Moore: "I never met the gentleman. "

Question: "You never heard anything about Ralph there until the Sheriff called you up there, had you?"

Deputy Moore: "No, sir. I'd never met Mr. Adkins."

Deputy Moore: "No, sir. First time I ever talked to him or met him was the night that the Sheriff called me at home. So, you sort of resented Mr. Adkins because of past experience there, didn't you? The fact that he'd lived with her?"

Deputy Moore: " Why I'd never met the man before.

Question: " Have you been mad at Ralph for long time?"

Deputy Moore: "I've not known Ralph till November, never met him."

Question: "Did you ever tell him to stay off your property?"

Deputy Moore: "I have no reason to, he's never been around."

Mr. Adkins: "Well, from your own testimony, did I follow you or come around you or bother you or anything, anyway, from the day that you started seeing your wife, that you knew I left Washington County? Did I ever bother you in any way?"

Deputy Moore: "I never met you till November."

Mr. Adkins: "Well, I never bothered you in any way?"

Deputy Moore: "No, sir."

DEPUTY LARRY MOORE AND MRS. DEBOAH MOORE'S MEETING

A coworker of Mrs. Moore had informed another person on a taped interview that Deputy Moore took flowers to Mrs. Moore at her place of work on Valentine's Day in 1995. The Court has a copy of the tape.

By. Mr. Adkins: "What date would you say you sent her flowers?"

Deputy Moore: "First to middle of June maybe."

By. Mr. Adkins: "You know, we talked to a lady that worked up there, and she tell us that it was Valentine's Day, '95."

Deputy Moore: "I didn't know her in '95 on Valentine's Day."

Question: "I understand you're saying it was February that he was up there and brought you roses?"

Mrs. Moore: "Right."

Question: "And he only brought it to you one time?"

Mrs. Moore: "One rose."

Question: "I mean when you were working up there and he came up there, Mr. Moore came up there, where were you living at that time?"

Mrs. Moore: "At the time I was living in the same trailer that Ralph was."

Tax dollars at work.

Question: "At Winks Uniform. Have you ever rode your police car to Winks to see Mrs. Moore while she worked there?"

Deputy Moore: "Yes."

Question: "How many times?"

Deputy Moore: "I couldn't answer that, several."

Mr. Adkins: "You had met her first when, '95? When in '95?"

Deputy Moore: "Probably around April or May of '95."

Mr. Adkins: "And you hadn't seen her before that?"

Deputy Moore: "No, sir."

Mr. Adkins: "Met her before that?"

Deputy Moore: "No, sir."

Mr. Adkins: "You could have been seen together in the month of May on Sunday, '95?"

Deputy Moore: "Yes." (The reason I asked this question was because Mrs. Moore was gone the four Sundays I was off from work in May of 1995, and she did not work on Sunday.)

Mrs. Moore: "I never saw Mr. Moore socially until I moved into the trailer at Bethel."

Question: "Never saw him socially at all, until you moved where, in the trailer at Bethel?"

Mrs. Moore: "That's exactly right."

Mrs. Moore: "I was living in the same trailer that Ralph was, till June - let's see, June the 11th."

Deputy Moore testified on June 25, 1997 that the reason I was in Washington County in November of '96 was because I had heard him and Mrs. Moore were getting married, and I was trying to break up the wedding plans. Deputy Moore put me in jail on November 14, 1996, and soon after this, they were married. The truth is that I never heard anything about wedding plans until after they were married.

Mr. Adkins: "You testified up there, you know, that I knew you were getting married. That's what you testified to."

Deputy Moore: "I know you knew it on November 9th, from before that."

Mr. Adkins: "What I'm saying, how did I know that?"

Deputy Moore: "You called your son and asked him why we'd put a bus on the area."

Mr. Hayter's attorney (7/23/98): "Before today, had your dad ever asked you anything about the school bus, that you recall?"

Travis: "Not that I recall."

Question: "When did you make your announcement to Mrs. Moore's family? What date was that on?"

Deputy Moore: "I don't know that we ever officially made a announcement, it was just something that came up."

Mr. Adkins: "So, you came up and you got married pretty quick, is that what you're saying?"

Deputy Moore: "No, no, no. I'm saying that it was in just a normal conversation that the wedding came up. I don't recall an official announcement."

According to Mrs. Moore's family, the Moores had never said anything about getting married until after I was put in jail.

Deputy Moore's attorney introducing this into evidence will show the true colors of the court and the jury:

Mr. Henderson, Deputy Moore's attorney: "Question, do you recognize this note?"

Mr. Adkins: "Yes. It says, 'I love you, and I wish I could turn back time. All I wanted was my family. Love, Ralph.' (still in transcript) That is a very true statement. I have told Mrs. Moore that when she was my ex-wife, several times. My family was my life. I did write this note. But, I wrote her several notes, and she's written me several notes, and I didn't know, I mean, I could probably come up with some she wrote me."

ON OR ABOUT AUGUST 1996, THE MOORES INTENTIONALLY AND KNOWINGLY BUILT A FENCE ON MY PROPERTY TO FRAME ME

I proved in court on March 5, 1997 that at the same time Deputy Moore had convicted me of stalking, he was on my land building a fence. On June 25, 1997, Washington County Commonwealth's Attorney D. Jeffrey Coale was in court attempting to send me to prison with this knowledge, and with the knowledge that Deputy Moore had lied about what had taken place.

Deputy Moore is such a pathological liar, it prevented me from asking a lot of the right questions. The most important - why did he not drop the stalking charge after I proved that the fence was on my property, and that *he* was on my property?

Mr. Adkins: "Was it proved in General District Court on March 5, 1997 that I was on my land, and you were on my land building a fence the day you charged me with stalking?"

Deputy Moore: "No sir, that's not correct."

Mr. Adkins: "Did the judge rule that the fence was on my property, that it was my fence and I could do whatever I wanted with it on March 5 1997 in General District

Court, and Judge Tate?"

Deputy Moore: "I don't recall what Judge Tate's ruling was."

By Mr. Adkins: "So, it wasn't proved that day that you had built the two fences on my property, is that what you're denying now?"

Deputy Moore: "Yes, I'm denying that."

Ruling from Judge Tate, March 5, 1997: "I'm not sure that I can conclude from the evidence before me, and, of course, I don't have jurisdiction to determine boundary line disputes anyway, but I cannot conclude from the evidence before me that the fence is a boundary line fence. Mr. Adkins has testified that the cut fence that was on his property, and the survey that's been introduced here today shows that there is a portion of the fence that is on his property. He is, I supposed, entitled to cut fence that's on his property if he wants to do so."

Question: "Well, didn't somebody say that during the hearing there, that the fence was on his land and he had a right to cut the fence, didn't he?"

Deputy Moore: "He [Mr. Adkins] said that."

Question: "Did somebody else say it?"

Deputy Moore: "No, he did, Mr. Adkins did."

Mr. Adkins: "From November 14, 1996, to January 24th, did you make any attempt to determine that the second or first fence was on my property? Did you make any attempt whatsoever?"

Deputy Moore: "No. I didn't know they were on your property."

Mr. Adkins (at my arrest on November 14, 96): "'Yes, I'm here to notify you to stay off my property, and the fence above the barn is on my property.' Do you remember that?"

Deputy Moore: "Yes."

Mr. Adkins: "I said that, correct?"

Deputy Moore: "Or something to that effect, yes."

Deputy Moore was asked why, after I cut the fence, he did not get it surveyed before he built the second one. His testimony was that he had to go back and build the fence because I had cut the fence at the road, so his cattle could get out onto it. Later, Deputy Moore testified that he saw me cut the gap to the entrance to my field after he returned to build the second fence.

Deputy Moore (6/16/98): "Well, he cut the fence in thirty-three (33) places, let the

animals out on his side. Then he went to the road and cut the fence on his line to let the animals on out in the road."

Question: "Who is that?"

Deputy Moore: "Let me answer the question, sir. And we had to go get them back in before they got out and injured themselves or somebody else, which is the reason we were over there."

Deputy Moore (6/16/98): "Question, what day was it that he cut the fence at the road?"

Deputy Moore: "Well, it was between Sunday and Tuesday, so I'm going to say Monday. It was fine Sunday when we were there, and we went back Tuesday and it was cut."

Mrs. Moore's testimony during depositions:

Mrs. Moore: "I think like all the goats and everything had already gone across, maybe, and - because when we were fixing the second fence, when we were fixing it then, one of the people who lived across the road came by and said, 'Your goats are getting out in the road.' And we couldn't figure out how they were getting out in the road. He said, 'The fence is cut at the road, too.'"

Deputy Moore on 8/5/98:

Mr. Adkins: "How did you know I cut the woven wire fence at the road?"

Deputy Moore: "I saw you."

Mr. Adkins: "When did you see me?"

Deputy Moore: "While we were repairing the fence."

Deputy Moore's testimony was that the fence was only down one time, and that there was no livestock on my property then. How did me cutting a entrance in the wire to my property have anything to do with the Moores' animal getting out?

Question: "Did you ever hear Ralph tell Travis or your wife, saying that Ralph didn't want Travis' goats or horses on his property? You ever hear that?"

Deputy Moore: "Yes sir, I have."

Question: "Who did you hear it from?"

Deputy Moore: "Travis. Mr. Adkins called, is the reason the first fence was built, and requested that the fence be built to keep the animals off that he was going to sell his

property."

Mr. Adkins: "Have I ever told you to get your animals and goats off my place?"

Travis: "Not that I recall."

Mr. Adkins: "But I'd never told you to get your horses off my property, is that correct?"

Travis: "Not that I remember."

Mr. Hayter's attorney: "Do you know why the fence was built here?"

Travis: "Just to keep cattle from going from here to here (Indicating on plat, from Mrs. Moore's property to my property. I sold my cattle in 1995, and this was in August of 1996.)"

Mrs. Moore (March 5th, 1997): "We built the - we didn't build the fence until we took our cattle over there. Travis had his things over there, his animals there, the goats and his horses. We didn't build the cattle - the fence until we got ready to take the cattle over there in July."

Deputy Moore March 5, 1997; No. We built the fence in July or August and then took the cattle over there, I believe, the first week of August.

Remember, they attempted to have me committed for being insane for believing that Deputy Moore lied under oath!

Mr. Adkins: "Would it surprise you if I told you that Mrs. Moore testified that you didn't build the fence till you got ready to take the cattle over there?"

Deputy Moore: "Yes, it would."

Mr. Adkins: "It would."

Deputy Moore: "Yes."

Mr. Adkins: "Would you say that's a false statement?"

Deputy Moore: "I'm saying it would surprise me that she would say something like that."

Deputy Moore was the defendant on March 5th, 1997, when Mrs. Moore made this statement.

The property that belonged to Mrs. Moore and I in 1985 was one big farm that was subdivided into smaller tracts. There was a survey plat made of the whole farm in which Mrs. Moore grandfather's, Mr. L.V. Fleming, Mrs. Moore, and I both bought several tracts that are located side by side. On March 5, 1997, Deputy Moore testified that he used this survey plat to build the first fence. I had Mr. L.V.

Fleming subpoenaed, and he was present at court on March 5, 1997, but Mr. Evans refused to call him to testify. On this date, Deputy Moore's testimony was that he used this plat to build the first fence. During the Civil Rights trial, Deputy Moore denied that he used this plat, and claimed that Mr. Fleming had shown him where to build the fence. However, Mr. Fleming was sick and could not testify. Deputy Moore testified that he drove right by Mr. Fleming's house on his way to build the second fence, but did not even stop to inquire about the location of the corners of the property.

Deputy Moore, on March 5th, 1997: "We started from it and ran a straight line. We had one of these [survey plat] is what we went by."

Question (a few minutes later): "You say you used this map here, or one like this?"

Deputy Moore: "Yes, one like that."

Question: "Like this map?"

Deputy Moore: "I believe. Debbie has it with her."

During the Civil Rights trial:

Question: "Did you make the statement on that date I first asked you, did you say you used this map here, or one like that? Your answer was, 'Yes, one like that, like a map, I believe.' Do you remember that?"

Deputy Moore: "No."

Question: "Do you remember that?"

Deputy Moore: "I'll look at it, but I don't remember. Yes, sir, that's correct."

Question: "So, you did have a map or plat?"

Deputy Moore: "The next question down says, 'Debbie did have it with her. I didn't have it.'"

Question: "You said if I had it. His ex-wife had it. She had it there?"

Deputy Moore: "Yes, sir."

Question: "And from your testimony you knew she had it, didn't you?"

Deputy Moore: "Yes, sir."

Judge Jones: "The question Mr. Moore is whether you had a - you and your wife had

a map with you when you built the first fence."

Deputy Moore: "She had a plat from the sale when they auctioned."

Mrs. Moore's testimony during depositions:

Question: "So, you say at one time there was - when it was sold it had been surveyed and platted or something?"

Mrs. Moore:(shakes head, yes)

Question: "So, there was a plat somewhere?"

Mrs. Moore: "Yes."

Question: "When had you seen it?"

Mrs. Moore: "I hadn't seen one until I saw one they - when papaw bought the land. (1986)"

Question: "Okay."

Mrs. Moore: "And then I saw one again when the surveyors brought it to court that day, when Ralph had it (March 5, 1997)."

Question: "But you didn't have one when you -"

Mrs. Moore: "When we built that fence, no, I did not."

Question: "You agree that Mr. Moore and you all had a plat when you all was up there putting the fence up? Had the plat?"

Mrs. Moore: "No, we did not."

Question: "You deny that?"

Mrs. Moore: "We didn't have one."

Question: "So, you were building a fence without a plat, is that what you're saying?"

Mrs. Moore: "We went on what my grandfather, where he said the line was."

Question: "Did he [Mr. Fleming] tell you that it went to a fourteen inch ash tree? You remember that?"

Mrs. Moore: "I don't think he would have said something like that, no."

The survey plat that Mrs. Moore testified about clearly states that the corner is a 14" ash tree. Mr. L.V. Fleming pointed this same tree to she and I on two separate occasions when we were together. The fence that the Moores built started from a 30" oak tree.

Mrs. Moore, Civil Rights trial:

Question: "Is your grandfather Verlin Fleming?"

Mrs. Moore: "Yes he is."

Question: "He gave you description of where to go up the hill?"

Mrs. Moore: "Yes."

Question: "Did he actually go up and locate that spot for you?"

Mrs. Moore: "No, he wasn't able to go."

Question: "How old is Mr. Fleming?"

Mrs. Moore: "He's 84."

Question: "That's a pretty steep walk up there?"

Mrs. Moore: "Yes, it is."

Anyone can go to this property today and see that you can easily drive to the corner where Mr. And Mrs. Moore built the fence. If Mr. Fleming could drive five miles and to the middle of the property, then there is no reason why he could not ride 700 more feet to the back of the property.

Question: "You couldn't drive up where the fence was, could you? First fence?"

Deputy Moore: "No."

Question: "There's no way you could drive up there?"

Deputy Moore: "No, sir. I really don't follow your questioning, but you can't drive all the way up there."

Mr. Adkins: "Can you drive up to this first fence? We drove up there and turned around and came back off many a time, hadn't we?"

Travis (Deputy Moore's witness): "Yes."

Mr. Adkins: "Did you see Mr. Fleming in court on March 5th, 1997?"

Deputy Moore: "No."

Mr. Adkins: "Do you know if he was present that day?"

Deputy Moore: "No, Mr. L.V. Fleming sat with seven different witnesses during this trial, and walked out of the courthouse with two people and I on March 5, 1997. Mr. Evans refused to put Mr. Fleming on the witness stand on March 5, 1997."

Mr. Adkins: "The tractor that morning, you brought it from the Wyndale section, is that correct?"

Deputy Moore: "Are you saying did I bring it from home that morning?"

Mr. Adkins: "Yes."

Deputy Moore: "Yes."

Mr. Adkins: "So, you came by L.V. Fleming's house on the way to build the second fence, correct?"

Deputy Moore: "Yes."

Mr. Adkins: "Did you stop and ask L.V. Fleming if he'd go over there and show you where the line was or inquire or anything about L.V. at that time?"

Deputy Moore: "This is on the second fence?"

Mr. Adkins: "Second fence."

Deputy Moore: "No."

Mr. Adkins: "You also testified when you were building the second fence that you stood at the back and couldn't see the corner at the road?"

Deputy Moore: "Yes, sir, that's correct, I remember that."

Mr. Adkins: "Why couldn't you see it?"

Deputy Moore: "It's too hilly, too steep."

Mr. Adkins: "How did you know I cut the woven wire fence at the road?"

Deputy Moore: "I saw you."

Mr. Adkins: "When did you see me?"

Deputy Moore: "While we were repairing the fence."

If Deputy Moore could stand at the back of the property and see me, there is no reason why he could not see the corner when he was building the fence.

Mr. Adkins: "When I found this fence, there were three red ribbons tied around this corner tree. What I'm asking you, if that survey was- and I know it was done before I discovered the fence – how come you never did notice these ribbons tied around this ash tree?"

Deputy Moore: "I have no idea."

This is the same tree that Deputy Moore's witness, Brett Watson, took a picture of, and he did not know that the tree had ribbons around it. I saw Deputy Moore and by his own testimony, he drove within ten feet of this tree on November 13, 1996.

Mrs. Moore's testimony during the Civil Rights trial was that, "They had flags and all that stuff up everywhere, but through the years and the flags - the markers on the top of the fence had been cut. They'd gone back on the backside of the hill up there and they'd cut all that timber and stuff off. So, a lot of the markers and stuff were gone." (See Brett Watson's picture.)

Deputy Moore testified that he built the fence from the front to the back. He claimed that he started the fence on Mrs. Moore's side and got off on my property going to the back. The truth is that the fence was started on my property at the back. Deputy Moore's own son testified that the fence was built from the back to the front.

Question: "You went from the bottom of the road up to the top of the hill?"

Deputy Moore: "I believe that's correct, yes sir."

Question: "Well, that's what you testified to, wasn't it?"

Deputy Moore: "Yes, sir."

Larry Guy Moore: "We got a line and we built it coming down the hill, because you can't walk up that hill rolling wire."

Deputy Moore testified in the Civil Rights trial that on November 12, 1996, when I cut the fence, that I had cut 160 feet of fence on the Moores' side. The Holbrook survey shows that I only cut the part that was on my land, and I never crossed the line onto the Moores' property. Deputy Moore drew a diagram to try to prove this lie. I have the Holbrook survey, and I have Deputy Moore's diagram.

Mr. Adkins: "How many feet would you say I cut on the Moore side?"

Deputy Moore: "You cut fifty-seven steps. That would be roughly -"

Mr. Adkins: "Fifty-seven steps on the Moore side?"

Deputy Moore: "Yes, sir, that would be roughly a hundred and sixty feet."

Deputy Moore's testimony on March 5, 1997:

Deputy Moore: "We left the old fence where it was at. We didn't go over there and get it. It's still there."

Brett Watson's testimony on March 5, 1997 about the February 3, 1997 survey:

Question: "The fence that's located on here is, from your observations, there on the scene at the site."

Mr. Watson: "Yes, sir. They were tied down."

Question: "Pardon me?"

Mr. Watson: "I tied the fences down with the instrument."

Question: "And when you say "tie them down" that means that you actually -"

Mr. Watson: "Located them."

Question: "Located, just as you would a property line? You located the fence?"

Mr. Watson: "And distance. All that."

Mr. Adkins (8/5/98): "Did you point out a fifteen foot distance to the judge on March 5th, 1997 - to Judge Tate on a certified plat?"

Deputy Moore: "Did I?"

Question: "Yes."

Deputy Moore: "No."

Deputy Moore on 3/5/97:

Judge Tate: "Point with this."

Deputy Moore: "Yes, sir. We built this one first (indicating), and then we moved it. This would be about 15 feet (indicating)."

There was no 15 foot distance on the Holbrook Survey, and that was what Deputy Moore was pointing it out on.

Question: "While you were up there is that the same time, while you were up there, that you're talking about when you told or made the statement that 'in my thirty years of law enforcement, that's the only time I've ever carried a gun while I wasn't on duty?'"

Deputy Moore: "Yes, sir."

On November 13, 1996, when Deputy Moore was leaving my property after he had built the second fence, he stood up on his tractor, smiled real big, and waved at me. This was an attempt to provoke me, and nothing but intimidation by a lying deputy sheriff.

Question: "You remember why you told - testified in court that you waved at Ralph?"

Deputy Moore: "Yes, sir, I do. That normally it's a habit of thirty years as being a deputy."

Question: "Is that the day you had the gun on you?"

Deputy Moore: "Yes, sir."

Question: "Is that the same day that you were scared of him, afraid he'd kill you, and you went down - the same day to build a fence on his property?"

Deputy Moore: "Yes, sir."

Question: "That's the first time that you'd ever carried a gun, when you were trying to take his property?"

Deputy Moore: "It was the first time I had carried a gun off duty."

ALLEGED FOLLOWING OF DEPUTY LARRY MOORE

I have never in my life, in any way, shape, or form, *ever* followed Deputy Larry Moore from my driveway four and one half miles to the Bethel Community in Washington County.

Deputy Moore's criminal complaint, dated November 14, 1997, "On Nov. 12, 1996, while working on the farm at Alvarado, he sat across the field for five hours watching me, and on 11-14-96, he followed me down the road."

Deputy Moore's testimony was that he loaded his tractor on a trailer in the Wyndale section of Washington County, hauled it about 10 miles, stopped about four and a half miles before he got to where he was going, unloaded it at Mrs. Moore's place in the Bethel Community, drove it about four and a half miles, built a fence, and drove it back to Mrs. Moore's place. The temperature was around 32 degrees on this day. Deputy Moore's testimony was that I followed him from my driveway to Mrs. Moore's place in Bethel. He claimed that it was him on a farm tractor, Mrs. Moore behind him driving a truck, then me, and finally, his son, Larry Guy Moore. If this had happened as Deputy Moore said, it would have taken place for no less than 20 minutes, considering the speed of a farm tractor. I have two witnesses, witnesses that I have taped interviews of in 1996, that saw me leave my property on these days, witnesses that know that when I left, the Moores went one direction, and I went in the opposite direction. The Courts in Washington County knows about these witnesses.

This is Deputy Moore's testimony during the Civil Rights trial:

Deputy Moore: "You have never heard me make the statement that Debbie was not behind me. I've always stated that."

Mr. Adkins: "I've never been behind you in my life going down the road, is that correct?"

Deputy Moore: "You were behind her, which she was behind me."

Mr. Adkins: "The day that she was driving and the day I got in behind her, that's the day I followed you four and half miles to her place in Bethel, is that correct?"

Deputy Moore: "Yes."

Mr. Adkins: "Were there any other cars in that line of traffic?"

Deputy Moore: "Well, there was me, her, and you, and my son, is all that I can recall . . ."

(later)

Deputy Moore: "I thought you were talking about the people that were helping me. Debbie was behind me, where the two boys were, I do not know, Mr. Adkins was behind Debbie. Following us."

Mr. Adkins: "Where was your son at that time?"

Deputy Moore: "He was behind you."

Mr. Adkins: "Did you pull over and offer to let me by at any time on that four and half mile trip?"

Deputy Moore: "No, sir."

Mr. Adkins: "When was the first time you actually saw me behind you?"

Deputy Moore: "About the bridge or somewhere along the river."

Mr. Adkins: "So, you don't know that I followed you from my driveway do you?"

Deputy Moore: "Well, you pulled out behind us. I saw you pull out and then I didn't look back."

(later)

Deputy Moore: "Yes, sir. When I looked around about - somewhere around the river, which would be a half a mile three-quarters of a mile or so, you were behind me."

Question: "Do you remember exactly who was behind you?"

Deputy Moore: "Debbie was directly behind me, in the truck."

Question: "You're sticking to that?"

Deputy Moore: "Yes, sir."

Question: "Which day did I follow you down the road?"

Deputy Moore: "The - been Tuesday, the 12th (Deputy Moore's criminal complaint, dated Nov. 14, 1996, 'on 11-14-96 he followed me down the road.')

(later)

Deputy Moore: "I drove the tractor to Debbie's house."

Question: "You was riding the tractor when you left, weren't you?"

Deputy Moore: "I rode it to her house, yes, sir."

Question: "When you got down there - you had stopped somewhere down there and loaded the tractor onto the trailer and you had pulled the tractor on the trailer, weren't you?"

Deputy Moore: "No, sir. The trailer was at Debbie's house, where we loaded the tractor back onto a trailer."

Question: "You took it off the trailer at Debbie's house didn't you?"

Deputy Moore: "We always do. We can't unload down there where the farm is

(you can go there today and unload a tractor at Mrs. Moore's farm.)"

Mr. Adkins: "Did you ever know of him unloading his tractor down on the Creeper Trail in front of the gates there where Mrs. Moore's property - ever know him to unload it there?"

Larry Guy: "Yes."

MRS. MOORE' TESTIMONY ON THE ALLEGED FOLLOWING OF DEUTY LARRY MOORE, THE TRUTH

Mrs. Moore: "I didn't see Ralph after he pulled out behind me. I didn't look behind me to see."

Question: "You know that you went probably half a mile before you got down to where the tractor - where the Lowboy was?"

Mrs. Moore: "Probably, yes."

Question: "You assume it was? So, you all parked it down there as you came up?"

Mrs. Moore: "We usually did (Mrs. Moore's part of the farm is at the river.)"

Question: "How far did you all go down through there?"

Mrs. Moore: "We went to the river."

Question: "What did you do down there?"

Mrs. Moore: "We loaded the tractor up. I didn't see Ralph after - when we got down there?"

Question: "No, you said that you usually loaded and unloaded the tractor down at the river, was there any other place where you unloaded and loaded the tractor?"

Mrs. Moore: "Sometimes we did up at the church parking lot, (about 300 feet from Mrs. Moore's farm) but not very often."

Question: "Anyplace else?"

Mrs. Moore: "No."

**DEPUTY LARRY MOORE'S OWN SON, LARRY GUY MOORE,
ON THE ALLEGED FOLLOWING OF DEPUTY MOORE**

Mr. Adkins: "Has he discussed anything about your testimony today?"

Larry Guy: "My dad doesn't bring his work home."

Mr. Adkins: "So, you don't know anything about what's going on here today?"

Larry Guy: "No, I do not."

Mr. Adkins: "So, you don't remember what you did, or anything when you got there that, day, do you?"

Larry Guy: "When I got where?"

Mr. Adkins: "To Mrs. Moore's property, when you came to Mrs. Moore's property in Alvarado?"

Larry Guy Moore: "What did we do?"

Mr. Adkins: "Yes."

Larry Guy: "Built a fence."

Mr. Adkins: "On November the 14th?"

Larry Guy: "That's the only day I've seen you."

Mr. Adkins: "The day I followed you is the day you built the fence?"

Larry Guy: "It's the only day I've seen you. I followed you down the road because you were - he was on the tractor, and there was a car in front of him, then there was you and then there was me."

Mr. Adkins: "I got in between you and Sergeant Moore at my driveway?"

Larry Guy: "There was another car in the middle."

Mr. Adkins: "Another car in the middle, so I wasn't actually following Sergeant Moore. I was following a car that was following Sergeant Moore, wasn't I?"

Larry Guy: "I didn't say that you were following Sergeant Moore."

Mr. Adkins: "Did we stop anywhere?"

Larry Guy: "Not that I'm aware of."

Mr. Adkins: "Where's the first place we stopped?"

Larry Guy Moore: "First place I stopped was at Mrs. Moore's."

Mr. Adkins: "That's a four and a half mile trip, you know. Tractor does what, approximately eighteen, twenty miles an hour?"

Larry Guy: "Somewhere around there."

Mr. Adkins: "How many times did he offer to let the traffic by?"

Larry Guy: "I don't know."

Mr. Adkins: "Did you know whose car it was in front on me?"

Larry Guy Moore: "No, I do not."

Mr. Adkins: "So you watched me the whole time from my driveway to Mrs. Moore's trailer, is that correct?"

Larry Moore: "No. I wasn't worried with you, why should I watch you the whole time? (This is the day Deputy Moore was scared that I was going to kill him.)"

Mr. Adkins: "You were following me, why isn't there something wrong with it?"

Larry Guy: "I wasn't following you, I was driving on the road."

Mr. Adkins: "I didn't threaten the guy in front of me, did I? I didn't try to run over the guy in front of me?"

Larry Guy: "Like I said, I wasn't watching you the whole way. I don't know what all you did."

Mr. Adkins: "I understand the tractor came through Abingdon to the Bethel Community, is that correct, that day?"

Larry Guy: "Yes."

Mr. Adkins: "You stopped at Mrs. Moore's place, unloaded the tractor. Is that

correct?"

Larry Guy: "I don't remember. I don't remember where we unloaded it at."

Mr. Adkins: "Well, now, you just testified that you followed him back to the place, did you load the tractor up on the trailer at that time?"

Larry Guy: "I do remember going there and taking the tractor there, but I don't remember if we loaded it there."

Mr. Adkins: "So, when you drove into the driveway Sargeant Moore turned in, the car in front of me went on, I went on, and did you turn in behind him?"

Larry Guy: "Of course."

Mr. Adkins: "Did you not help load the tractor or did you go in?"

Larry Guy: "I told you I don't remember if we unloaded the tractor."

Mr. Adkins: "Did you go in and talk to Mrs. Moore?"

Larry Guy: "I don't remember."

Mr. Adkins: "Did you talk to Sergeant Moore?"

Larry Guy: "Oh, I'm sure I did, but I don't remember it."

Mr. Adkins: "But you didn't help him - don't remember helping load the tractor?"

Larry Guy: "No."

Mr. Hayter's Attorney: "You talked about this caravan of cars and truck and tractor, now what was going on, on the day that you remember going down this road with the tractor and you remember seeing a blue Camaro in which you identified this gentlemen here? What was happening that day? Why were you out at the property at Alvarado?"

Larry Guy: "I believe we were building a fence. (Deputy Moore's criminal complaint states that the fence building was on 11/12/96 and the incident in question was on 11/14/96.)"

Mr. Hayter's attorney: "Now, let's see, in this grouping of cars, who did you say was Number 1?"

Larry Guy: "The tractor."

Question: "The tractor, and on the tractor was your dad?"

Larry Guy: "Yes."

Question: "Now, what was the next vehicle?"

Larry Guy: "I don't remember. I can remember another vehicle, but I don't remember what it was."

Question: "Now, what was the third vehicle?"

Larry Guy: "That was his Camaro."

Question: "Now, what was the fourth vehicle? That was me."

Question: "Now, where was Debbie Moore?"

Larry Guy: "I don't remember."

Question: "I just don't know whether she was there or not. That's why I'm asking you."

Larry Guy: "She was there that day, but I don't remember how she left."

Question: "Okay, and you don't know what car she was in or whether she was in a vehicle at all?"

Larry Guy: "I don't remember."

ALLEGED WATCHING OF DEPUTY LARRY MOORE FOR FIVE STRAIGHT HOURS

I have never sat for five hours and watched Deputy Moore at any time in my life. I went to my property on November 13, 1996, and the Moores came to where I was at and started building a fence on my property. I went up the road and cut the gap to my field, then drove to a nearby town and ate. Deputy Moore witnessed this. I later returned, but I was at my garage and in my trailer doing some things. My garage is about 1,200 feet from where the fence was built. The judge ruled on June 25, 1997 that I could sit at my garage as long as I wanted to, and if Deputy Moore did not want to be seen, he had the right to leave.

Question: "It's good - now, you also said that he sat across the field for five hours watching you. Is that what you said?"

Deputy Moore: "Yes, sir, it is."

Question: "So, you're saying today that he watched you for five hours?"

Deputy Moore: "I'm saying his vehicle sitting with him in it towards me for that time."

Mr. Adkins: "How did you know I cut the woven wire fence at the road?"

Deputy Moore: "I saw you."

Mr. Adkins: "When did you see me?"

Deputy Moore: "While we were repairing the fence."

Mr. Adkins: "Is that the same time I was supposed to have been sitting down there and watching you at my garage?"

Deputy Moore: "I'm not sure if it was the same time or not (You have already read Larry Guy's testimony that he helped Deputy Moore build the same fence that Deputy Moore testified that I sat in the field and watched him build.)"

Mr. Adkins: "Did you see a Camaro sitting over in the field?"

Larry Guy: "No, I did not. The only time I seen the Camaro is when we were leaving."

Mrs. Moore's Testimony:

Question: "Could you see him down there near the garage?"

Mrs. Moore: "Yes, you could see him."

Question: "What was he doing down there?"

Mrs. Moore: "He was sitting in his car. Then he would sit out on the tailgate of Travis' truck."

TRESPASSING BY DEPUTY LARRY MOORE TO HARASS ME

When I left Washington County in 1995, the harassment by Deputy Moore's friends in the Sheriff's Department had already started. After I left, Mrs. Moore went to my trailer and took things that belonged to me. She only did this to cause trouble between my son and I, which it did. My two sisters, one of which had my power of attorney, went to the Washington County Magistrate Office and was told that there was nothing she or I could do about Mrs. Moore taking my things and trespassing. Mrs. Moore had been gone for about five months at this time.

Mr. Adkins questioning my sister, who went to the Magistrate in 1995 during the Civil Rights trial. This is how Judge Jones kept the jury from hearing the truth:

Question: "So, I called my sister, which is your sister, Linda, and you all came to the magistrate's office."

Judge Jones: "Let me ask you this. This is about your efforts to get a trespass warrant?"

Mr. Adkins: "No. This is an effort to get them to do something about trespassing on my property."

Judge Jones: "You've already testified to this. I think this would be cumulative."

I was 2,000 miles away. How could I testify what took place after I left Washington County? Mrs. Moore had already been notified not to trespass on my property. I did testify to this in deposition. How can anyone deny that Judge Jones had been influenced before the trial started?

At this time, my son and I made an agreement that he could use my garage, on the condition that Mr. and Mrs. Moore were not to be there. You have already read Helen Fleming's testimony, the sister who put the "No Trespassing" signs up. You have already read that my renter through May 1997's testimony states that the signs stayed up until he moved. You have read Deputy Moore's testimony that he never saw Mr. Gobble in court on March 5, 1996. The Summers, who rented my trailer from July until this mess got started, testified on March 5, 1997 that they had seen Deputy Moore at my garage several times. Again, Deputy Moore denied that he had even heard or seen Willie and Kathryn Summers in court on March 5, 1997. You have already read Deputy Moore's testimony on June 18, 1997, stating that he had seen the "No Trespassing" signs. The Moores' repeatedly going to my garage cannot be anything but harassment. Deputy Moore's criminal complaint states, "at 10:00 PM on 11-14-96, he was at the Sheriff Office asking for me." The reason I was there is because the Moores had been trespassing on my property, and I wanted to notify Deputy Moore in person to stay off .

Deputy Moore's own witness during the Civil Rights trial:

Question: "Did he make an agreement with you about using his garage?"

Travis: "Yes."

Question: "What was that agreement, to the best of your recollection?"

Travis: "It was just as long as I kept it up, and I could use it as much as I wanted to, and, everything, and he really didn't want my mom or anyone else up there."

Question: "Did he talk specifically about your mom?"

Travis: "Yes, and Mr. Moore."

Mrs. Moore's Testimony on March 5, 1997:

Question: "Ma'am, Mr. Adkins testified a while ago that he had told you several times not to be on the property. Why is that? Why has he had to say that several times?"

Mrs. Moore: "He had told me one time that he didn't want me back over there again."

Question: "And when was that?"

Mrs. Moore: "I have no idea. Right after I first moved out."

Question: "What year?"

Mrs. Moore: "'95."

Mr. Adkins: "Mrs. Moore testified that she'd already been notified to stay off my property."

Deputy Moore: "I don't know about that part."

Mr. Adkins: "You were in court that day, weren't you?"

Deputy Moore: "I was on the Rule, I don't know what was said."

Mr. Adkins: "No, I'm talking about June 18th and March the 5th?"

Deputy Moore: "Again, I don't know what she testified to (Deputy Moore was the defendant)."

I could quote over 30 lies by Deputy Moore just like this one just over the trespassing charge alone.

Mr. Adkins: "Did you testify in court that you had seen a posted sign at the entrance of my driveway?"

Deputy Moore: "I'm not sure I testified or not to that."

Mr. Adkins: "Did you see the posted sign at the entrance to my driveway before you went to my garage?"

Deputy Moore: "I'm not sure."

You have already read Deputy Moore's testimony on June 18, 1997, when he stated that he had seen the "No Trespassing" signs at my property.

Deputy Moore: "If you're telling me - asking me if Willie Summers and them testified, I have never heard Willie Summers and them testified I have never heard Willie

Summers (again, Deputy Moore was the Defendant.)"

Mr. Adkins: "So, if you never heard him, you never heard him make the statement in court, under oath, that you'd been up at my garage so many times that he thought you were me, and that you owned the place? Did you ever hear him make that statement?"

Deputy Moore: "No, I did not."

Willie Summers, March 5, 1997: "See, I didn't know who they were. See, when I first moved there, I didn't know Ralph or anybody. And I thought that Larry was him, so I didn't know who they were."

Question: "When you had a charge against you? Did Willie testify when you had a charge against you?"

Deputy Moore: "No, sir he didn't show up at court. I don't know if he was subpoenaed or not. He was not at court."

Question: "Who all testified the day of that charge against you?"

Deputy Moore: "Mr. Adkins."

Question: "Anybody else?"

Deputy Moore: "No, sir."

March 5, 1997 transcript, and I quote, "Helen Fleming, Larry Wayne Gobble, Frank Holbrook, Brett Mathew Watson, Willie Vernon Summers and Kathryn Summers."

"Either Deputy Larry Moore is lying and his comrades are covering it up, or I am insane."

If you remember on March 5, 1997, Deputy Moore testified that he had never been on my property, and Mr. And Mrs. Summers testified that Deputy Moore had been there several times. The court took Deputy Moore's testimony over these two people. During the Civil Rights trial, Deputy Moore had learned of the tape recorder, and knew that he had made this statement the night he arrested me, "I have only been up there one time and that was to mow his garden off (speaking of the garden at my garage)."

Question: "When - she's been there - you and her both have been down at his garage, haven't you?"

Deputy Moore: "The day we moved the yard, yes, sir."

Question: "You've been down there other times, too, haven't you?"

Deputy Moore: "Only one time. We went through this. I was on his yard one

time and moved his garden at his son's request. That's the only time I've been on his property. It's not a different time, it's the only time."

Deputy Moore's own witness, Travis Adkins:

Mr. Adkins: "Well, you agree that Sargeant Moore came up to my garage more than one time?"

Travis: "More than once. I can't remember exactly how many times."

Mr. Adkins: "Would you say it's more than once?"

Travis: "Yes."

Mr. Adkins: "What about Mrs. Moore, she been there more than once?"

Travis: "Yes."

Deputy Moore's criminal complaint on 11/14/96 states, "at 10:00 PM on 11-14-96, he was at the Sheriff's Department asking for me." If he had not been trespassing on my property, I would have had no reason to be at the Sheriff's Office.

On May 17, 1997, Mrs. Moore drove up my driveway about 500 feet and sat in the car and watched me. She had been told at this time not to trespass, and the property was posted. In testimony, Mrs. Moore stated that her reason for this was because she was afraid for my son to be at my garage alone with me. After Deputy Moore had lied to convict me for being on my own property and him being there as well, I felt like it should be a crime for Mrs. Moore to sit on my property and watch me. I had to go outside of Washington County to see a magistrate, because the Washington County Magistrate's office had declare a conflict of interest since the Washington County Sheriff's Department was involved. Later, after I had obtained the warrant and I was inside the Washington County Sheriff's lobby where the Magistrate's office is also located, the name of the magistrate whom I had seen in Bristol was on the door in the lobby of the Washington County Sheriff's Office.

The Magistrate in Bristol issued two separate warrants for Mrs. Moore, and I witnessed the Magistrate staple these two warrants together. By the time I got to court on March 5, 1997, the warrant issued for Mrs. Moore sitting at my garage and watching me had disappeared. This was discussed at the start of the trial, and at the end, in Deputy Moore's presence. I went back to the Magistrate in Bristol and had the warrant reissued, and the Magistrate remembered that he had stapled the warrants together. After the March 5, 1997 trial, I went to the Washington County Circuit Court and looked at the warrant that did make the trip from Bristol. The Circuit Court Clerk and I were looking at and discussing the corner of the warrant, where you could see something had been stapled there and was torn when it was ripped off. I asked the court clerk if she would sign me a statement as to what she saw on the corner of the warrant. Her reply was, "The only thing I can see is that something has been stapled there and then torn apart." How can two warrants, stapled together with the matching criminal complaint, leave one place, with one criminal complaint and matching warrant making the trip, while one criminal complaint and matching warrant do *not* make the same trip?

This is the conversation on May 7, 1997, in court, in Deputy Moore's presence.

General District Court Clerk: "Is this not the one that you said they misplaced down there and didn't serve, and you had it reissued?"

Mr. Adkins: "This is the one that I feel like Deputy Larry Moore intentionally destroyed before I came to court that day."

During depositions:

Mr. Adkins: "Nobody never questioned you about it?"

Deputy Moore: "About a warrant?"

Mr. Adkins: "Yes, sir, missing warrant?"

Deputy Moore: "No."

This is Deputy Moore's testimony during depositions:

Question: "Then, did you later learn that one of those warrants was missing?"

Deputy Moore: "Just this morning, when you were talking to the sheriff."

Deputy Moore: "I didn't know one was missing until today (6/16/98).

(later)

Deputy Moore: "Not that I recall, anybody mentioning a warrant. I've never heard anything about a warrant till you brought it up this morning."

Question: "And you didn't know it was mentioned by Ralph that day down there? Discussed with the Court in front of everybody?"

Deputy Moore: "No, sir."

Question: "They's trying to find the warrant?"

Deputy Moore: "Not to my knowledge, and I was in there."

DEPUTY LARRY MOORE RUNNING HIS ANIMALS ON MY PROPERTY TO HARRASS ME

The first time that I returned to my property after I left in 1995 was in April of 1996. A friend and I rode to my place so I could check on my personal belongings and property. I discovered Deputy

Moore's horses there on my property. The next day, I contacted my son and he informed me that the horses were Deputy Moore's, and I told my son to contact Deputy Moore and tell him to get his horses off, and to stay off my place. Travis called me back in a few minutes and told me that they were on their way over there to get them. I never checked back any further on this matter. After I discovered the fence in November of 1996, the neighbors informed me that Deputy Moore's cattle had been on my side as much as the Moores' side, since they were turned onto Mrs. Moore's property.

Questions during the Civil Rights trial:

Mr. Adkins: "From the day that you rebuilt - no matter which day it is, the day you fixed this second fence, are you saying your animals were never on my property?"

Deputy Moore: "Well, I'm saying I didn't have any animals over there. There may have been animals, but they weren't mine."

Mr. Adkins: "Did you testify on March 5th that you went over there and got - moved the horses on my property before you built the first fence?"

Deputy Moore: "I've never had any horses on your property."

Roy Evans's letter, dated March 11, 1997, "The evidence from you and the Moores establish without contradiction that you told the Moores via your son to get their animals off your tract. They had no practical choice but to transport the animals elsewhere or fence the property."

Deputy Moore, during depositions on June 16, 1998:

Deputy Moore: "I never left my horse over there."

Mr. Adkins: "Is it not your testimony, that you said you never had horses turned on your place before the first fence was built? That's what you testified, wasn't it?"

Deputy Moore: "Well, before or after the fence was built?"

Mr. Adkins: "Well, you said before the fence was built. So, what you're saying is, if you didn't have it before, you had it after?"

Deputy: "No, sir, that's what you're saying. I'm saying I never had them [his horses] over there."

Deputy Moore on August 5, 1998, during depositions:

Mr. Adkins: "Are you denying that your horses, on May - in April of 1996, that four horses were behind my garage?"

Deputy Moore: "I don't know what day you're referring to. My horses were on

Debbie's land one night. We turned them loose on the bottom, went back and got them the next day, where they was still in the same place (I had not been to my property in over 6 months at this time)."

Mr. Adkins: "How could you turn horses on Mrs. Moore's property without a fence to keep them from coming on my property, and know that they didn't come on my property?"

Deputy Moore: "Because this land is so steep, these horses are not going to go through there unless they're taken."

You can go there today and see that this is a lie by Deputy Moore. Cattle and horses have been going from Mrs. Moore's farm at the river to the round water trough where I saw Deputy Moore's horse in April, 1996 for years.

Deputy Moore on June 24, 1998, during depositions:

Mr. Adkins: "So, if you turned them on Mrs. Moore's property without a fence to keep them off mine, that's breaking the fence law, isn't it?"

Deputy Moore: "Well, they were placed in there with your son's horses that had free roam."

On February 3, 1997, Rodger Breeding, Mark Walters, Brett Walters, and I saw Deputy Moore's cattle on my property. Mr. Watson took a picture of these cows, and I have the picture. You could see fresh cow manure in my field. The neighbors informed me the cattle had been on my side of the fence as much as on the Moores' side.

Question: "You have cattle that got on his property? On both sides of his property?"

Deputy Moore: "No, sir."

Question: "You deny that?"

Deputy Moore: "Yes, sir."

Deputy Moore: "I didn't have any cattle that got out."

Mr. Adkins: "You said in your complaint there the cattle was out solely because I cut the fence, I cut this fence, you say, on the 11th. You rebuilt it back on November 12, 1996, and it's not been touched since then?"

Deputy Moore: "No."

Mr. Adkins: "What I'm asking is how did the cattle - how were they out in

February and March is what I'm asking?"

Deputy Moore: "I don't know that they were out."

Mr. Adkins: "If I had pictures to show you?"

Deputy Moore's attorney: "I'm not sure there's anything you could show him. He said he didn't know that they were out and didn't know how."

Mr. Adkins: "Right here's a picture. Can you tell me which side of the fence that cow is standing on?"

Deputy Moore: " Looks to me like it would be on our side of the fence, best I can tell by looking at this picture."

Mr. Adkins: "So, you're saying that cow right there in that picture is on your property?"

Deputy Moore: "Best I can tell, yes, sir."

Mr. Adkins: "Okay, that's what I wanted (as I said before, "I have the picture")."

ALLEGED THREAT TO KILL DEPUTY LARRY MOORE

This is the testimony of former Sheriff Kenneth Hayter in depositions:

Question: "Well, that's what you said in court. You said he mumbled, didn't you?"

Mr. Hayter: "Yes."

Question: "You said attempt to - threat to kill -"

Mr. Hayter: "No, sir, that's nothing to do with stalking."

Question: "Well, let's ask him that, that's another charge you have against him."

Mr. Hayter: "Only charged with stalking?"

(later)

Mr. Hayter: "As far as I know."

Question: "You didn't know that he was charged with the threat to kill?"

Mr. Hayter: "I told you what I knew."

Question: "You didn't know he was charged with that?"

Mr. Hayter: "He was charged with stalking."

Question: "Were you behind him as you walked out?"

Mr. Hayter: "Yes."

Question: "He wasn't looking at you, wasn't talking to you?"

Mr. Hayter: "Talking to the wall, I guess, I was the only one there."

Question: "If he's said that, Sheriff, wouldn't it have been your duty then and there to put him under arrest or call one of the other officers in there and have him arrested?"

Mr. Hayter: "He didn't present a threat to me."

Question: "You didn't tell the Sargeant there- you didn't call the Sargeant and tell him that this man made a threat against him, did you?"

Mr. Hayter: "I had already talked to Larry Moore before he made this statement."

Question: "I'm talking about the incident after - after you said this happened. Did you call Deputy Moore and tell him that this man had made a threat?"

Mr. Hayter: "No."

Question: "Well; now, you never discuss it - tell Larry Moore or anybody else about it?"

Mr. Hayter: "No."

Question: "Well, now did Larry Moore, when you were down at the Sheriff's Office, down there, you say, three days later, how did he- if you didn't tell him about it. How did he know to get the warrant wrote?"

Mr. Hayter: "Hey, he was coming to work. I don't know why he got the warrant that night. Ask him."

Question: "You didn't talk to him, you said. You didn't tell him nothing?"

Mr. Hayter: "I didn't. I didn't."

Question: "You were the only one present when you say he mumbled out

something, weren't you?"

Mr. Hayter: "That's correct."

Question: "How did Sergeant Moore know then that - to get a warrant three days later against him, threat to kill."

Mr. Hayter: "Did he? I don't know."

Question: "So you want to look at it [threat to kill warrant]?"

Mr. Hayter: "I don't want to look at it."

(later)

Mr. Hayter: "The only knowledge that this witness has is of a warrant for stalking."

Question: "You don't know? That's all I'm asking you?"

Mr. Hayter: "Ask Larry, I don't know. I thought it was a stalking. That's the only one I saw."

Question: "You're claiming that you didn't participate in any way with the issuing of the warrant?"

Mr. Hayter: "I did not touch the man."

Question: "Did you participate in some other way besides touching him?"

Mr. Hayter: "No way, and don't you try to say that I did."

Here is the truth as to what took place on November 12, 1996. I talked to Deputy Moore on the phone, in Mr. Hayter's presence. I told him not to trespass on my property, and that the fence above the barn is on my property, and I was going over there to take it down. At this time, I asked Mr. Hayter to send a deputy to my property to protect me while I was removing the fence. He refused on the grounds that it was a civil, not a criminal, matter. When I was in the lobby, I thought I was by myself, I did not know that Mr. Hayter had walked out behind me. I mumbled, "I ought to just kill'em." I was only talking to myself. If anyone can prosecute me on words alone, they would have to prosecute me on all the words that I spoke. If you will look in the Webster's Dictionary, the definition of the word, "ought" and I quote Webster, "a form of nought, nothing." I bet if most people would tell the truth, most have said these exact words before. I could have been like Deputy Moore in court and simply lied about it, but I told the judge the truth on what I said. This was the first time in my life that I had ever been charged with a crime. The threat to kill warrant was dismissed as soon as it got to court. Even though it was dismissed as soon as it got to court, it was still on my criminal records when I was in the New Mexico court, and at Butner.

Deputy Moore's testimony, after he had heard Mr. Hayter's testimony:

Question: "Did you say you were scared to death of Ralph?"

Deputy Moore: "Yes, sir."

Question: "You were afraid he was going to kill you?"

Deputy Moore: "Yes, sir."

Question: "He afraid of you, or are you afraid of him?"

Deputy Moore: "I'm afraid of that man. He's dangerous."

Question: "So, you don't think he had a right to be on his own land, and watch you build a fence on his land?"

Deputy Moore: "I didn't feel like he had a right to threaten me and follow me and watch me."

Question: "Took your gun - only time you ever took it when - you thought you needed a gun if you were going to take his property, didn't you?"

Deputy Moore: "No, sir, I felt if he came in the Sheriff's Office threatening me, I needed a gun (according to Mr. Hayter, Deputy Moore did not even know anything about the alleged threat until two days later). I started carrying an off-duty weapon on the 14th, after he came into the office and threatened me."

(later)

Deputy Moore: "The Sheriff called me and advised me, asked me if I was building a fence. I said, 'No, sir, I'm not building a fence.' He said, 'There's a Ralph Adkins in here threatening to kill you over building a fence.' At that time, I know what fence he was talking about."

Mr. Hayter's Testimony:

Question: "You didn't tell the Sargeant there - you didn't call the Sargeant and tell him that this man made a threat against him, did you?"

Mr. Hayter: "I had already talked to Larry before he made this statement."

MAGISTRATE MICHAEL LANG

The United States Constitution, 4th Amendment, states, "and no warrants shall issue, but upon probable cause, supported by oath or affirmation."

I quote my threat to kill warrant, "assault by threats to kill Deputy Larry Moore, 18.2-57, dated 11/14/96."

Here is the testimony of the only other person that was present when I made the alleged statement.

Question: "He's the one that made the sworn statement. Mr. Moore made the sworn statement."

Mr. Hayter: "No, I - my name on it? I didn't swear to nothing."

Question: "You didn't swear - go down before the magistrate and swear that Mr. Adkins made a threat against Mr. Moore?"

Mr. Hayter: "Why would I do that?"

Question: "You didn't do that did you?"

Mr. Hayter: "No."

How can anyone deny that my Constitutional Rights were violated on November 14, 1996?

On the morning on November 14, 1997, I spoke to Magistrate Lang in an attempt to get a trespass warrant against Deputy Moore. I advised Lang that my property was posted, that Deputy Moore had been told to stay off the property, and that I had witnesses that had seen the trespass. Lang advised me that I could not use any witnesses against Deputy Moore, and informed me that I would have to see the trespass myself. I asked Lang, "You mean Deputy Moore can post his property and tell me to stay off, and if I wait until he leaves and I go on his property, no matter how many people see me, there is nothing Deputy Moore could do about it?" His answer was, "that's right." I used his property with the same example and his answer was still the same "that's right." I started another example and he said, 'You can't understand this can you?' Lang advised me to returned to my property and repost it, or to notify Deputy Moore in person, but emphasized that I would have to see the trespass myself, that I could not use anyone as a witness against Deputy Moore.

Deputy Larry Moore's criminal complaint, dated November 14, 1996, states, "On Nov. 11, 1996, Ralph Adkins came to Sheriff Hayter at the Sheriff's Office and said that he was going to kill me. On Nov. 12, 1996, while working on the farm at Alvarado, he sat across the field for five hours watching me, on 11-14-96 he followed me down the road, at 10:00 pm on 11-14-96, he was at the Sheriff's Office asking for me, He had a 44 mag. Ruger laying in the seat of his car."

Concerning the November 11, 1996 date on Deputy Moore's criminal complaint, I was not even in Washington County, Virginia on 11/11/96. Mr. Hayter testified that I was in his office one day, the next day I was not there, and the very next day was the day that I was arrested. If you count backwards, the day that I was arrested was the 14th, the day I was not there would be the 13th, and that would put me in Mr. Hayter's office on the 12th, which is the truth.

This is how the Moores accounted for the missing day:

Deputy Moore: "On the 13th we weren't around, we were at the - doing some personal business, and then the 14th, you came in the office. "

Mrs. Moore: "I think it was probably Wednesday that we didn't go over there, after we'd built the fence that day."

Mrs. Moore's Testimony on March 5, 1997:

Mr. Adkins: "Talking about from the time I cut the fence and Tuesday the next week. Did you get the goats back in?"

Mrs. Moore: "It took us about a week. We were there every day."

You have read for yourself the threat to kill Deputy Moore. The alleged gun was empty, and was not concealed. When I left Marion, I was diagnosed as not having any mental disease or defect, and was said to be capable of putting in 16 hours days.

That only leaves "on Nov. 12, 1996, while working on the farm at Alvarado, he sat across the field for five hours, watching me." The farm that Deputy Moore was working on was my farm, and I had notified Moore the day before to stay off. Magistrate Lang advised me that I had to see Deputy Moore trespass myself. I was only doing exactly what Lang told me to do on 11/14/96.

"On 11-14-96 he follow me down the road," Lang advised me to go to my property and repost it again, which I did. The alleged following from my driveway did not happen, but it was alleged it took place on the road from my property to the Washington County Sheriff's Office. "At 10:00 pm on 11-14-96 he was at the Sheriff's Office asking for me." I went to the Sheriff's Office around 6:00 pm and notified Sheriff Hayter that I would be back later that night to do exactly what Lang had advised me to do, notified Deputy Moore in person to not trespass on my property.

The United States Constitution, 4th Amendment, states, "and no warrant shall issue, but upon probable cause." I never did anything that most people in the Alvarado section of Washington County don't do every day.

Deputy Moore came to where I was on November 12, 1996, carried his gun on my property, and watched me for five hours. Again, on November 14, 1996 at about 10:00 PM, he came to the Sheriff's Office looking for me. He knew that I was already there. Again, carrying his gun. Deputy Moore testified that he was going to have to put a stop to me notifying him not to trespass on my property, or he was going to have to hurt me. When he and his friends surrounded me and he threw me up against the wall, my life was very much in danger. Deputy Moore testified that he is carrying a gun for me. In reality, it was Deputy Moore doing the stalking.

18.2-60.3 Stalking: penalty - A. "Any person who on more than one occasion engages in conduct directed at another person with the intent to place, or with the knowledge that the conduct places, that other person in reasonable fear of death, criminal sexual assault, or bodily injury to that other person or to that person's family or household member."

On March 5, 1997, I produced the Holbrook survey that proved that Deputy Moore was on my property building a fence the same day that he charged me with stalking. The evidence showed that

Deputy Moore had more than once trespassed on my property. On June 25, 1997, Deputy Larry Moore and Washington County Commonwealth Attorney D. Jeffrey Coale were in court with this knowledge, attempting to send me to prison.

This is how Judge James P. Jones covered this up, and covered up Lang issuing the threat to kill warrant without a sworn statement, and the stalking warrant without probable cause.

Judge Jones: "I want to know why the magistrate is relevant to testify?"

Mr. Adkins: "The only thing I want to ask the magistrate, I saw Michael Lang on the morning of November 14th concerning Sargeant Moore trespassing at my garage. He advised me what to do to prevent that. When I went out there, I did exactly what he told me to, and when I was coming back, I came to the Sheriff's Department, and they knew what I was coming back for. They knew he advised me that morning -"

Judge Jones: "That really doesn't have anything to do with this case (this is the very thing I filed the Civil Rights suite over.)"

NOVEMBER 14, 1996 ARREST

Mr. Adkins: "So, you remember me coming back about 6:00 that evening?"

Mr. Hayter: "Yes."

Mr. Adkins: "I asked him, I said, when I came there on about - it was approximately 6:00 on November 14th, I came in and asked you if Sargeant Moore was working that night. You looked at your book and said 'yes, 11:00.' I said, 'well, I've done exactly what the magistrate told me to do, and I want to come back tonight and notify Sargeant Moore to stay off my property.' And I asked you to have a deputy present for a witness. Do you remember that?"

Mr. Hayter: "Yes."

Mr. Adkins: "So, I left and I came back later that night?"

Mr. Hayter: "Yes."

Question: "Are you all telling us that you and the magistrate and Sheriff, none of you all discussed the fact that Ralph had been trying to get a warrant - Ralph Adkins had been trying to get a warrant? You all didn't discuss that at all?"

Deputy Moore: "No, sir."

When I went back at a little after 10:00 PM, Deputy Moore had taken out the two warrants, and they were issued by Magistrate Michael Lang. Magistrate Lang, Deputy Chuck Bishop, Deputy D.L. Edmondson, and Sheriff Kenneth Hayter stood in the lobby and let Deputy Moore throw me up against

the wall and arrest me in an attempt to provoke me into doing something stupid, and you know what would have happened then. This did not work. I said, "yes, sir," and "no, sir" to Deputy Moore. He made the arrest, but got Deputy Edmondson to sign the paper work as the arresting officer. If I hadn't had a tape recorder, I would have went to court and told the truth, and these people would have made me out to be the liar. These are the people that send people to jail in Washington County.

Deputy Moore: "Mr. Adkins, I'm not through. Things had gotten out of hand, and it was getting to the point that I was in fear of my life, that I was going to have to hurt you to protect myself or get hurt myself. I knew on the way, after the call I received at home, that I would have to do something this night to try to stop this."

Mr. Adkins: "Are you saying I called you at home?"

Deputy Moore: "No, sir, the Sheriff called me and told me that you were there waiting on me (again, Deputy Moore came to where *I* was)."

Question: "Was that a planned thing with the magistrate?"

Deputy Moore: "No, sir."

Question: "Was it a planned thing with the Sheriff?"

Deputy Moore: "No, sir. Mr. Adkins came in the office, we couldn't have planned anything, he came in our office."

Mr. Adkins, during deposition:

Mr. Adkins: "Were you aware the night that I was arrested that he was seeing my ex-wife?"

Edmondson: "Yes."

Mr. Adkins: "Could you tell me why Sergeant Moore did this instead of you, Deputy Edmondson?"

Edmondson: "I'm sorry?"

Mr. Adkins: "Why Sargeant Moore was allowed to make this arrest, since he was personally involved in this case?"

Edmondson: "Sargeant Moore didn't make the arrest, I did."

Question: "What role, if any, did Sergeant Moore have in arresting Mr. Adkins?"

Edmondson: "None during the arrest."

Question: "Was Sargeant Moore present?"

Edmondson: "He was probably in the Sheriff's Office, which is right beside the lobby."

Questions during the trial:

Mr. Adkins: "In depositions, you testified that Sargeant Moore was not even present when you made the arrest."

Edmondson: "He wasn't present in the lobby, no."

Mr. Adkins: "You said, you told the words, 'You're under arrest.'"

Edmondson: "Yes."

Mr. Adkins: "And you made the arrest on me?"

Edmondson: "Yes. I told you were under arrest, that I had two warrants for you, yes."

Edmondson: "Where was Sargeant Moore at that time?"

Edmondson: "I can't recall."

Mr. Adkins: "When I'm arrested one time, you can bring other charges, I can't be arrested twice, I can't be rearrested, can I?"

Judge Jones: "I'm going to sustain the objection. I don't think that's really relevant."

First of all, where is the objection? There was no objection, except for Judge Jones's objection. How can anyone deny that Judge Jones condones perjury in his court? If who arrested me is not relevant, the transcript of the trial the suite was filed over is not relevant, and the magistrate who issued the warrant for doing exactly what he told me to do was not relevant, I don't know what I could have had that would be relevant to Judge Jones.

Deputy Moore's attorney: "Deputy Edmondson, you were asked about your deposition testimony. Concerning that, do you recall whether or not you were even asked during your deposition where Sargeant Moore was when you served the papers?"

Edmondson: "I don't recall being asked that, no."

During deposition:

Question: "Was Sargeant Moore present?"

Edmondson: "He probably was in the Sheriff's office, which is right beside the lobby."

Question: "What did Mr. Moore tell you about what happened down there the night they arrested Mr. Adkins? Did he tell you about what happened that night?"

Mrs. Moore: "All he told me was that he was arrested."

Question: "He tell you who arrested Mr. Adkins?"

Mrs. Moore: "I believe that - it wasn't him."

Question: "But you do know he said it wasn't him, you knew that though don't you- you know that, don't you?"

Mrs. Moore: "Yes."

Mr. Adkins: "Who said these words, 'You're under arrest, put your hands up against the wall?'"

Deputy Moore: "I did."

Mr. Adkins: "Did you make the arrest on me November 14, 1996?"

Deputy Moore: "I was there, one of the officers, yes."

Mr. Adkins: "Who made the arrest?"

Deputy Moore: "I arrested you."

Question: "Why didn't you get somebody else to arrest him after you charged him? Do you know why you didn't do that?"

Deputy Moore: "Bad judgment on my part, I guess."

Question: "Bad judgment?"

Deputy Moore: "Yes, sir."

Deputy Moore: "No, sir. The magistrate - I heard the magistrate explain to him that he

could be released, and Mr. Adkins refused.

(later)

I don't think that was very funny, but the magistrate offered him a bond and Mr. Adkins says, 'lock me up.'

Question: "You all didn't want him bonded, you wanted him put in jail, didn't you?"

Deputy Moore: "No sir, I could care less. I felt like I had done what I wanted to."

(later)

Mr. Adkins: "Did you have any discussion whatsoever, after I was arrested, about me?"

Deputy Edmondson: "Not that I'm aware of, no."

(later)

Mr. Adkins: "You learned it, but you don't know how you learned it?"

Edmondson: "We- several of us around there discussed what had happened that night (after my arrest)."

Question: "The papers you served on him, did they give him notice of a court proceeding for a trial later on?"

Deputy Edmondson: "Yes."

Question: "That's the trial at which you testified?"

Edmondson: "Yes."

Question: "Did you testify on January 24, 1997?"

Edmondson: "Is that the General District hearing?"

Question: "General District case."

Edmondson: "More than likely, yes."

It is indisputable that Deputy Edmondson did not testify in the January 24, 1997 trial, Commonwealth vs. Adkins.

I could give more than 25 examples of direct opposite answers to questions surrounding my arrest, much like this one:

Question: "When you walked into the magistrate's office, was the Sheriff present at that time?"

Deputy Moore: "In the magistrate's office?"

Question: "Yes."

Deputy Moore: "No."

Question: "He wasn't present at that time?"

Deputy Moore: "Not to my knowledge, no."

(later)

Question: "You went into the Magistrate's Office, and that's where these people were, weren't they?"

Deputy Moore: "Where the Sheriff and the magistrate were?"

Question: "Okay, that's when there was three people when you got in there?"

Deputy Moore: "Yes, sir."

SERVING OF THE CIVIL RIGHT SUITE, ADKINS vs. MOORE

When this suite was filed, the attorney I had at that time hired a man to serve the papers to Deputy Moore and the other defendants, which were Magistrate Lang, Mr. Hayter, and Mrs. Moore. My attorney advised this man to carry a tape recorder and take a witness with him for his own protection. This man went to the Sheriff's Office to inquire about where he could find Deputy Moore, and he ran in to Deputy Edmondson. Edmondson told him where Deputy Moore lived. After this man left, Deputy Edmondson then called Deputy Moore and advised him that they were on their way to his home to serve the papers. Before these people got to the Moores', Deputy Edmondson had caught up to them and followed them into the driveway. Deputy Moore refused to answer the door, and the papers could not be served.

I had to pay this man another \$100 to go back the next day to serve the papers. He again went to the Sheriff's office and ran into Magistrate Lang. Lang conveyed to him that Deputy Moore was in the deputy's quarters, which is in a different building, behind the Sheriff's Office. By the time this man got there, Magistrate Lang had taken a short cut and was already there. This is Deputy Moore and Deputy Edmondson's testimony on the serving of the Civil Rights suite, Adkins vs. Moore:

Deputy Moore: "I don't think this is a joke, sir. I'm telling you the truth." (When the papers were served, Deputy Moore and his buddies were laughing about the suite, and about the United States Marshals. Marshal McGlothlin has a copy of the tape. I am sure that if anyone would want to listen to the tape, Marshal McGlothlin would be more than happy to play it for you.)

Mr. Adkins: "Then someone said, 'Yes, I was up there.' Do you know who said that?"

Deputy Moore: "No, I don't recall anybody saying that."

Mr. Adkins: "Then someone said, 'Yes, he followed me up there, followed me up the driveway.' Do you remember someone saying that?"

Deputy Moore: "No."

Mr. Adkins: "Did anyone call you the first day that - day before this, did anyone call you and tell you that they were coming to your house to serve you federal papers?"

Deputy Moore: "No."

Mr. Adkins: "Do you know the name of the Deputy that was out there the same day that these people came to your house to serve the papers? Do you know his name?"

Deputy Moore: "Edmondson (If Deputy Moore was not home, how did he know it was Deputy Edmondson who was at his house?)"

In the Civil Right suite, Deputy Moore had denied that he had talked to anyone except his attorney about this suite.

Question: "Have you ever been in a discussion with Deputy Edmondson, Michael Lang, and yourself when this federal suit was being discussed in any way, shape, or form?"

Deputy Moore: "No."

Mr. Adkins: "Have you and Magistrate Michael Lang ever discussed this suit?"

Deputy Moore: "No."

Mr. Adkins: "Was Michael Lang present the day you were served the federal papers in the deputy's quarters?"

Deputy Moore: "I don't recall that he was (Lang in the deputy's quarters. 'I've

already turned mine over to the Attorney General's office, let them worry about mine')."

Mr. Adkins: "Well, Sheriff Hayter refused to help me on a civil matter, that I can't come up here, afraid of harassment, but when people come up here to serve the papers, he called Sargeant Moore and told him that he was coming. He followed him out there, and I have two witnesses to testify that he followed them out there, and Sargeant Moore wasn't home by the time he got there."

Deputy Edmondson: "Produce those witnesses."

Mr. Adkins: "I have two witnesses."

Deputy Edmondson: "Because I ain't followed anybody."

Mr. Adkins: "Well, I mean, - ever who's on this tape, that's what I mean. But there were two witnesses that talked to this deputy."

(later)

Mr. Adkins: "But that's what I'm saying ... you were already out there. I've got two witnesses that are going to testify that you - someone followed them out there, and I've got tapes that -"

Deputy Edmondson: "Well, can I say one thing?"

Mr. Adkins: "Yes."

Deputy Edmondson: "I live past Sargeant Moore, so if I was going that way, I was headed home, also."

Mr. Adkins: "Did you follow them out there?"

Deputy Edmondson: "No, I didn't. They were there when I got there. As far as I know, I can't remember. That's pretty far back, but I can't say that - I know I didn't follow them in there (it is on the tape, 'You follow me in the driveway.')

(later)

Deputy Moore's attorney, Mr. Henderson: "I mean, we haven't established at this point that it was him. I mean, I take it now you're expressing some doubt that it was Deputy Edmondson who was there."

Mr. Adkins: "Deputy Moore testified that it was Deputy Edmondson, that's what he testified to."

Mr. Henderson: "Deputy Edmondson who - what?"

Mr. Adkins: "Was out at his house that day. And Deputy Edmondson says he -"

Deputy Edmondson: "I told you I was at the house. The people didn't tell me who they were. They said they were looking for Sargeant Moore."

(about five minutes later)

Mr. Adkins: "He said that he was already out there."

Deputy Edmondson: "Who said that? I did not say I was out there."

Mr. Adkins: "Do you remember telling that guy that you called Sargeant Moore and told him that they were on their way out there?"

Deputy Edmondson: "No, I didn't do that. I didn't know who these people were out there (on the tape, Edmondson, 'I called and told him you were on your way out there')."

Mr. Adkins: "You didn't-"

Deputy Edmondson: "They asked me if I knew where Sargeant Moore was, and I said, 'no, I don't.' I said, 'I came by here to see where he was at.'"

Mr. Adkins: "Are you denying that you said that?"

Deputy Edmondson: "Yes, I am."

Mr. Adkins: "Have you ever been in the presence of Sargeant Moore, Magistrate Michael Lang, when they were together in your presence, that this court case was being discussed?"

Edmondson: "No."

Mr. Adkins: "Was Magistrate Lang in the deputy's quarters the day the papers were served?"

Edmondson: "Can't recall."

Mr. Adkins: "You can't recall or --"

Edmondson: "I went outside."

Mr. Adkins: "I think it's time to play this for them."

During the Civil Rights trial, the Honorable James P. Jones kept me from presenting this evidence to the jury. This is indisputable proof that Judge Jones condones perjury in his court, and it proves that he was influenced before the Civil Rights trial. The serving of the Civil Rights suite testimony was in depositions, and I turned over the tape to Deputy Moore attorney's at this time. This was never discussed in Judge Jones' presence until the question below was asked in court:

During the trial, Mr. Adkins: "Have you ever been in a discussion, a discussion with Magistrate Lang and Sergeant Moore?"

Edmondson: "I can't recall anything like that, no."

Mr. Adkins: "Were you in the deputie's quarters when Sergeant Moore served, was served the federal suit?"

Edmondson: "Yes, I was."

Mr. Adkins: "When these, the day before they was served they came up here and attempted to serve these papers, were you out at Sergeant Moore's house?"

Judge James P. Jones: "Excuse me, I really think you're exceeding the scope of direct examination. I'm going to, you need to move on to something else."

How can anyone deny that if I was in Washington County and members of the Sheriff's Department followed me to harass me that the court would cover it up, even if it had the knowledge that the officers were lying?

These are only a few examples. All through the trial Judge Jones stopped me from testifying to the truth. He never once stopped Deputy Moore from lying, when Judge Jones knew that Deputy Moore was lying the whole time.

Remember the statement that was used against me in attempt to commit me as being criminal insane, "Either Deputy Larry Moore is lying and his comrades are covering it up, or I am insane?" How can anyone deny that Deputy Moore and his witnesses lied under oath? How can anyone deny that Judge Jones had this knowledge and condoned perjury by Deputy Larry Moore? How can anyone deny perjury after perjury was covered up for Deputy Moore?

What the Honorable James P. Jones did to me is no different than taking a gun and robbing me. The only difference is that he used the power of his gavel instead of a gun. The Honorable James P. Jones is a disgrace to the United States Constitution, the American Flag, and the human race. I spent several thousands of dollars to get the Civil Rights suite to court, and several since the injustice was done to me on August 26 and 27 of 1998. These transcripts that I have quoted have only 25 lines to a page, with some lines having only having 4 or 5 words. These transcripts cost me \$3.00 a page, in which I have several thousands of pages, and they are nothing but garbage. I have to send all my letters and motions by certified mail, which cost me at the least \$4.00, and I have mailed many. This is because if it were in these people's favor, they would deny that they ever received the information in the letters or motions.

This is a story I found in a Kingsport, TN. newspaper:

Former Sheriff's Detective Charged

ABINGDON -- A Washington County, VA. Detective captain who has retired from service was charged with giving a false or fictitious address to obtain a driver's license Friday. According to a news release, a warrant was obtained by Sheriff Fred Newman for former Capt. Tommy J. Cheek, no age or address given. The offense allegedly occurred April 24. "The members of our sheriff's office should be accountable for their actions, whether good or bad." Newman said. A trial date for Cheek has been set for Aug. 30 in Washington County General District Court. The charge is a class 2 misdemeanor and can carry a penalty of up to six months in prison and a \$1,000 fine.

I mailed Sheriff Newman a certified letter with a copy of the lies and the story in the paper, and asked him why his statement applied to Mr. Cheek, but not to Deputy Moore. To date, I have never received a reply from Sheriff Newman.

I took these same lies to the Kingsport paper with my mental evaluation from Butner, but I have never seen anything in the paper about Deputy Moore. The next time you see a story in the Kingsport Paper where Sheriff Newman is smearing someone's name before they get to court to prove their innocence, you will know for a fact that Sheriff Newman's statement "The members of our sheriff's office should be accountable for their actions, whether good or bad," is nothing but B.S.

Mr. S. Randall Ramseyer, Assistant U. S. District Attorney, made this statement after I was sentenced to 6 months, a \$500.00 fine, and one year supervised probation for accusing Deputy Larry Moore of lying under oath: "Your Honor, I would just like to state on the record, in case Larry Moore and his wife look back at the record, that I apologize to them for what I have done in this case, and that I should have done a better job of presenting evidence to the court to show that it would be appropriate to keep Mr. Adkins away from them for five years, and the fault lies with me and no one else, and for that I apologize."

This is a statement made by Mr. Ramseyer at the July 20, 2000 railroad plea hearing. "He also understands that the United States will have a continuing objection to him receiving credit for acceptance of responsibility until he has testified truthfully at his sentencing hearing."

The Honorable People took a pack of lies and took my right to my own son away. Took my rights to use my own property away. Ended up costing me my life savings and my retirement, and destroyed my reputation -- and then tell me that I need to get on with my life.

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