

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA

CIVIL RIGHTS COMPLAINT FORM FOR
PRO SE (NON-PRISONER) LITIGANTS IN ACTIONS UNDER
28 U.S.C. § 1331 or § 1346 or 42 U.S.C. § 1983

Betty Caitlin Nicole Smith,

_____ ,

_____ ,

(Write the full name of each Plaintiff filing this complaint. If there is insufficient space to list the names of all Plaintiffs, please write "see attached" in the space above and attach an additional page with a full list of names.)

Case No.: 4:19cv280NW-CAS
(To be filled in by the Clerk's Office)

v.

See Attached,

_____ ,

(Write the full name of each Defendant who is being sued in this complaint. If there is insufficient space to list the names of all Defendants, please write "see attached" in the space above and attach an additional page with a full list of names.)

Jury Trial Requested?
☒ YES ☐ NO

Defendants

Former Judge Andrew J Decker

Zachary Taylor Daniel

Judge Melissa G Olin

Madison County Court

I. PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

1. Plaintiff's Name: Betty Caitlin Nicole Smith

Address: 4973 SE CR 255

City, State, and Zip Code: Lee, FL, 32059

Telephone: 850-274-1038 (Home) _____ (Cell)

2. Plaintiff's Name: _____

Address: _____

City, State, and Zip Code: _____

Telephone: _____ (Home) _____ (Cell)

(Provide this information for any additional Plaintiffs in this case by attaching additional pages, as needed.)

B. Defendant(s)

State the name of the Defendant, whether an individual, government agency, organization, or corporation. For individual Defendants, identify the person's official position or job title, and mailing address. Indicate the capacity in which the Defendant is being sued. Do this for *every* Defendant:

1. Defendant's Name: Andrew J Decker the 3rd

Official Position: Former Circuit Judge

Employed at: Formerly Madison County Court

Mailing Address: believed to be 261 N Marion Ave Lake City FL 32055

Or 320 White Ave SE Live Oak FL 32064

☐ Sued in Individual Capacity ☒ Sued in Official Capacity

2. Defendant's Name: Zachary Taylor Daniel

Official Position: n/a

Employed at: n/a

Mailing Address: 2914 Carters Creek Station RD Columbia TN 38401

☒ Sued in Individual Capacity ☐ Sued in Official Capacity

(Provide this information for all additional Defendants in this case by

attaching additional pages, as needed.) Please see attach page for additional Defendants

II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution” and federal law. Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain Constitutional rights.

Additional Defendants

Melissa G Olin

Circuit Judge

Madison County Court

173 N.E. Hernando Avenue

Room 239

Lake City, FL. 32055

Sued in Official Capacity

Madison County Court

3rd Judicial Circuit Court

125 SW Range Avenue

Madison, FL 32340

Sued in Official Capacity.

Are you bringing suit against (*check all that apply*):

☐ Federal Officials (*Bivens case*) ☒ State/Local Officials (§ 1983 case)

III. STATEMENT OF FACTS

Provide a short and plain statement of the *facts* which show why you are entitled to relief. Describe how *each* Defendant was involved and what each person did, or did not do, in support of your claim. Identify when and where the events took place, and state how each Defendant caused you harm or violated federal law. Write each statement in short numbered paragraphs, limited as far as practicable to a single event or incident. ***Do not make legal argument, quote cases, cite to statutes, or reference a memorandum.*** You may make copies of the following page if necessary to supply all of the facts. Barring extraordinary circumstances, no more than five (5) additional pages should be attached. ***Facts not related to this same incident or issue must be addressed in a separate civil rights complaint.***

Please see attached.

Statement of Facts

1. Since the start of the case 2016-249DR in Madison FL, Betty has tried to get a Domestic Violence Order enforced. The court was aware of the active Domestic Violence Order since Betty's first filings in the case.
2. Since the start of the case the Court was aware that Zachary had hired a private detective to find and stalk Betty and her family. Later it would be revealed by Zachary that it was actually two private detectives and that his mother had paid for them.
3. Despite the Domestic Violence Order, and Betty's protest because of the Domestic Violence Order, Judge Decker allowed Zachary a visit in the Courthouse house lobby on January the 3rd 2017, with the minor child supervised or not, should not have occurred, because of the protective order in place.
4. On January 9th 2017, Betty filed a motion to dismiss child custody and visitation from the case and asked for the court to uphold Federal Law regarding the Domestic Violence Order. The motion was not answered.
5. On January 17th 2017 ATF had to come from Nashville TN to Zachary's home in Columbia TN to remove guns from Zachary's home.
6. On August the 6th, 2017 Betty called Mary Pellegrino owner of Mary Pellegrino and Associates Speech and Language Pathologists in Tallahassee

Florida. Who was the Speech Therapist of the minor child. Mary Pellegrino informed Betty that the Zachary's mother Pam Daniel had emailed Mary's office earlier that week, and wanted to know, when the minor child had appointments. Mary Pellegrino did not reply to the email and while on the phone with Betty, Mary deleted the email. The violence protection order states there is to be no third party contact by Zachary to Betty, nor the minor child.

7. Zachary committed perjury, not once but twice while under oath in court on June the 6th 2017. Zachary also committed perjury in Court on July 2nd 2018, and admitted to committing perjury on his court filings at the same hearing. At that same hearing Zachary stated he wrote his court filings, after he got off work. When in a later court filing his mother Pam Daniel admits she is the one writing them.
8. On August 10th 2017 Betty filed a motion to enforce with the court, over these issues which was ignored. Betty filed a second motion to enforce on August 25th 2017, which was also ignored by the court.
9. On October 9th 2017 an order was issued giving Zachary Parental Responsibility and Visitation, which Betty appealed. The First District Court of Appeal, by their own motion stayed the order giving Zachary Visitation with the minor child.

10. During the course of the appeal, Zachary had his mother repeatedly email Betty, even once demanding Betty respond. Which was even more violations of the Domestic Violence Order. Betty filed each time with the Madison County Sheriff's department.
11. On June 4th 2018 the First District Court of Appeals gave their Opinion in the appeal, reversing the portion of the order giving Zachary visitation and parental responsibility, and told the Madison Court they had to give full faith and credit to the Domestic Violence Order. On June 25th 2018 the First District Court of Appeal issued their Mandate, stating their opinion had to be followed. The case was also published and made into caselaw, one citation of it is Smith V Daniel 246 So. 3d 1279. It is also listed on three different documents on flcourts.org that Betty is aware of. It was case number 1D17-4240 and was made permanent.
12. During the course of the events through the appeal Betty was informed that both Florida and Madison County would not enforce a Domestic Violence Order by everyone Betty and her family went to for the violations, including the State Attorney's office. Betty was also told by the State Attorney's office that Florida would not uphold Federal Laws, because Florida does not follow Federal Law. Those emails will be attached.

13. On June 7th, before the First District Court of Appeals issued their Mandate, Judge Decker set up a hearing for July 2nd 2018, over whether or not Zachary would get visitation, which was Judge Decker already going against the First District Court of Appeals.

14. At the July 2nd hearing, Mandy Scott of Calloway County Kentucky Social Services gave testimony about her investigation of the night on November 16th 2015, where Zachary had held Betty, the minor child, and Betty's mother hostage in their home, threatened Betty and the minor child with knives, and had threatened to burn the house down with everyone in it, she gave testimony to the bruising on Betty and about how she got her information from Betty and her mother, and also from State Troopers and Western State Mental Hospital. After the hearing Judge Decker put in a fraudulent order, which states that Mandy Scott only got information from Betty and her Mother, which by Mandy's Testimony is proven false. Also at the hearing Judge Decker states multiple times that Betty will have full custody of the minor child, and no change of custody was on the table, and Zachary agreed to that. The information about the day of November 16th 2015, such as the threats to burn the house down with everyone in it are mentioned in the Domestic Violence Summons with EPO from 2015.

15. Judge Decker's fraudulent order gave Zachary full custody of the minor child despite the opinion of the First District Court, despite the hearing, and despite the evidence in the case record.
16. Some of the false statements in the Fraudulent order are, it states in 2013 there was no summons issued for the Domestic Violence Order, when the case record shows it was and one was issued, and then states there was a Domestic Violence Order in 2013, after falsely stating no summons was issued. It states multiple times that Betty's mother was charged with 2nd degree murder, where the case record shows it was 2nd degree manslaughter. It has multiple wrong dates. It makes a false statement that Zachary and Betty lived together away from Betty's parents. It makes the false statement that Betty is on disability, when she does not get any money for her disability. The order makes false slanderous statements about Betty and her family. Decker in his order makes the false statement that he has dissolved the 2015 Domestic Violence Order, which was never dissolved, which is proven by the certified domestic violence order, certified by its issuing court, after Judge Decker put in his order to show it was not dissolved and It was also verified to not be dissolved by Madison County Dispatch badge #211 850-973-4151 multiple times and by calling the KY Vineline at 1-800-511-1670. In the order Decker states that there was aggressiveness, when at the end of the

hearing he thanked the parties for how they acted. Judge Decker in his order states that he ruled on Zachary's motion for timesharing, when in fact he did not nor did he make an order on said motion. Decker states that Betty and Zachary were living together in 2011, when they did not live together until 2012. Decker states that Betty and her family incurred debts in Zachary's name, when even in Zachary's first petition to start the case, he states they have no shared debts and that all his debts are his own. Later Zachary added in debts to the case, and at the hearing admitted to lying to the court and on his court papers, which is in the transcript. Judge Decker also makes the false statement that a hearing was held over the burn to the minor child's eye, which is false. Decker also states that the incident when the child was a new born is the same as the time Zachary burned the minor child's eye. The order also makes a statement that Zachary was not on Betty's parent's insurance, which is also proven false by the record. Judge Decker even states the minor child isn't Autistic and for Zachary to have him test for it, when he already was. It makes the false statement that at the time of issuing the Domestic Violence Order, Betty Still had legal Guardianship of Zachary and that the Guardianship of Zachary gave Betty control of Zachary's finances, both are false, the Guardianship had already expired, and control of finances is not

one of the things Betty had control over. This is only a few of the false statements in Decker's order.

17. The order stated Zachary was to come take the minor child from Florida, with no date or time, just as soon as he would show up. The minor child was essentially kidnapped and taken across state lines by Decker for issuing a false order and Zachary using said order.

18. The order itself ignored the evidence in the case record, already mentioned above, and the fact the only time Zachary had unsupervised visitation with the minor child, the minor child was returned with a 2nd degree burn to his eye, ring worm, bad diaper rash, and as the State Trooper later noticed a mark on his head, the hospital report, State Trooper's report, and State Trooper's photos are in the case record Zachary's multiple disappearances in 2015. Zachary's stays in mental hospitals, which in Court Zachary lied about. It ignores the fact when the minor child was a new born, Zachary was alone with him and returned him with a bleeding hole in his head, which Zachary would not explain. When the child was born Zachary had written up, and signed and had notarized a document to relieve him of parental responsibility of the minor child. It ignores the fact Zachary himself told State Troopers he was seeing things. It ignored the fact that Zachary has non-stop lied to the courts. It ignored the fact the Minor child is autistic, is

non-verbal, and has PTSD, because of Zachary. It ignored the fact the house that Zachary had threatened to burn to the ground, did in fact burn to the ground while no one was living in it. It also ignored the threat left by Zachary to Betty's neighbors during one of his disappearances.

19. Betty appealed the order by Decker to the First District Court of Appeals, who refused to uphold their own opinion and mandate, and affirmed the new order without opinion. Every time the Opinion and Mandate is brought up, everyone acts as if it has never existed.

20. On November 16th 2018 Betty had visitation with the minor child, and had taken the minor child to his doctor's office in Madison. The only person who had been told Betty was taking the minor child to the doctor was Kristina Samuels of the First District Court of Appeals. The minor child had bruising, his hair was oily, and he had marks on his feet and chin. The minor child lost weight, his ears and genitals had to be cleaned by the nurse Angela Culpepper. When Betty returned home there was a new order by Decker, stating Betty had gone to the Sheriffs, which was untrue. The order also stated Betty could not go to anyone over abuse of the minor child. This order was emailed from Andrew Decker on November 16th 2018, but the e-portal show it was filed on October 30th 2018, nearly an hour before the order setting the November 16th 2018 hearing. Betty has not personally used this

feature herself, but the e-portal system does have the option to save and submit later, after a document has been uploaded.

21. Also on November 16th 2018, once the hearing was over and Betty had turned off her audio recorder, Decker told Zachary to have his mother file the School calendar, even though Zachary did not even have the minor child in school until February 11th 2018. Six months after he had taken the minor child.

22. Billy Washington, the head clerk of the Madison Court has stated Betty would not make a mockery of his court again.

23. On March 6th 2019 Betty filed a rule 60 motion with the court for a hearing over the fraudulent order, which was denied as “already ruled on” by Judge Olin.

24. On April 1st 2019 the minor child had visitation with Betty. His hair was again dirty, his clothes were nasty, his hands and lips were chapped, and he was covered in fading bruises. The minor child acted like he was starving and dehydrated. Betty took photos of the bruises, but because of the November 16th 2018 order, Betty did not go to anyone. On April 3rd 2019 Betty mailed Zachary court papers and a note she was not returning the minor child to him. Zachary received that on April 5th 2019 which had a tracking number of 9114902307224334875819 with USPS.

25. On April 6th 2019 Zachary still showed up to Florida to retrieve the minor child and contacted the Sheriff's office. The Sheriff Deputy Sexton came to Betty's home, first stating it was for a wellness check on the minor child, and then it was because Zachary was there to pick up the minor child. The Sheriff who came tried to convince Betty to take the minor child to Zachary. The sheriff did say they were going to the State Attorney to get a warrant for the arrest of Betty, after writing Betty's information in a notebook for the warrant. The Sheriff Deputy left and left the minor child with Betty. Betty called State Attorney Jeff Siegmeister's home phone, and spoke to his wife Jamie, who didn't think the State Attorney's office would sign such a warrant. Betty also explained what was going on to Jamie.

26. After speaking to Jamie, Betty contacted Social Services and Laura Mincks came out to Betty's home on April 9th 2019. Betty also filed for a new Domestic Violence Order. While at Betty's home Laura Mincks saw the Order from Decker, and had never seen before where a judge would not allow suspected abuse to be reported. While Laura was at Betty's home Judge Olin denied the petition for a Domestic Violence Order, stating that it was ordered to be amended or supplemented. Betty supplemented it as she was told by Judge Olin to do.

27. On April 10th 2019 at 12:38 PM, Betty was served with papers from the sheriffs who came and took the minor child back to Zachary, listing a court date and time for that same day. On Said order, it states the parties were emailed a copy of the order. It was not emailed to Betty nor was it on the Docket. It was also not on the docket until after Betty returned from the hearing. Zachary says he was called by the court and informed of the hearing on the 9th of April, but the order was not even signed until April the 10th.
28. At the beginning of the hearing Judge Olin stated she had already decided what was going to happen before the hearing had a chance to prove anything. Before the social worker Laura Mincks even got to say anything, Olin said what she had already decided. Judge Olin stated that she does not believe Betty has been a victim of Domestic Violence, despite the past Domestic Violence orders, police reports, and such in the case record.
29. Judge Olin did not give Betty a chance to argue her case, and was very hateful at the hearing. Stating that Betty could not talk at the hearing. At the hearing Judge Olin stated that she had gotten multiple emails, which is untrue. At the hearing Judge Olin stated she has received multiple filings for a Domestic Violence Order, when it was the original and the supplement. Judge Olin jumped on Betty for filing the supplement, when it was in Judge Olin's order. Judge Olin also jumped on Betty about a State Trooper's photo

from a State Trooper's report. Judge Olin Also stated she had no idea what it is, meaning she did not even look at the paperwork, and is unfamiliar with the case record of 2016-249DR, which has that State Trooper's report with its photos already in the case record. On April 10th, Judge Olin allowed Betty's Autistic Minor child to be taken a again across state lines, while there were concerns of recent child abuse by Zachary Daniel, which is why social services were at the hearing, and why Betty had filed for a domestic violence order. Betty was not allowed to ask her questions of social worker Laura Mincks at the hearing. Judge Olin also said she would not answer Betty's motions and called them a waste of the court's time On April 11th the information about the hearing was added to the docket. Kel Putnal the clerk was aware of what was happening and was involved. On May 2nd 2019 Betty filed a Petition requesting Judge Olin Recuse herself as Judge. After Betty filed the petition, Judge Olin entered an Order on the April 10th 2019 hearing. Which does not have an accurate description of the hearing, from what all was testified too, and how Judge Olin did and would not let Betty ask questions of the social worker. Also in the new order, Judge Olin says she has mailed a copy to Betty's old mailing address, when Betty updated the Address on August 19th 2018. The Order also states that Zachary did not receive certified mail from Betty, when there is a tracking

number #9114902307224334875819 with USPS. But, that wasn't even brought up. Judge Olin has still not answered the petition to recuse herself.

30. On April 11th 2019 Betty contacted the court Reporter for a copy of the video of the April 10th hearing, they were already aware of which hearing Betty was calling about. Betty got a data disc containing the video of the April 10th hearing. On May 17th 2019, Betty contacted the Court Reporter to get a transcript of the April 10th hearing. Betty was called and told by Bonnie of the Court Reporter that there was no recording of said hearing, so no transcript could be made of it. Betty is pretty sure it was Bonnie who she had talked to before and who burned the video to the data disc for Betty. After Betty pointed out that she had the data disc from them, Bonnie had Betty hold, and came back on the phone, and said yes it was recorded. Bonnie told Betty how much it would cost, then stated it could not be transcribed, because of an administrative order. Betty pointed out that they had done the transcript of the July 2nd 2018 hearing. Betty ended up contacting the administrative office of the 3rd Judicial and spoke to Chama Raines at 386-758-2163 and she told Betty on that phone that they do not record those types of hearing, and that she was telling Betty there was no recording of the April 10th hearing. Chama even asked Betty if she was sure

she was not talking about an older hearing. Betty was not able to get a transcript of the April 10th hearing.

31. Zachary has fraudulently given Betty's address to Tennessee Health insurance along with her home phone number. Betty keeps getting mail at her home address for the insurance of the minor child in Tennessee, listing his home address as currently Betty's home in Florida. Betty doesn't understand how he even got the insurance from Tennessee listing a Florida address and phone number.

32. On May 21st 2019 Betty filed a Rule 1.540 Motion on the fraudulent order by Decker, which has been ignored.

33. On May 31st 2018 Betty filed a notice of filing and filed a data disc containing the April 10th hearing. On June 3rd the data disc was returned and deemed inadmissible as evidence.

34. On June 18th 2019, since it had gone past the 30 days for Judge Olin to answer the petition to recuse herself, which by rule means it is counted as granted, Betty filed another motion in regards to the recusal of Judge Olin, with attachments, including another data disc with the April 10th hearing. Kel Putnal told Betty, she (Olin) would likely not accept the disc. Over 24 hours have gone by, and the motion itself nor the disc have been placed on the docket, and Kel Putnal did work on June 19th 2019. Betty also filed a

notice of filing with an attached copy of the motion, without the disc to case 2019-82DR in Madison on June 18th 2019, which has also not been placed on the docket.

IV. STATEMENT OF CLAIMS

State what rights under the Constitution, laws, or treaties of the United States have been violated. Be specific. If more than one claim is asserted, number each separate claim and relate it to the facts alleged in Section III. If more than one Defendant is named, indicate which claim is presented against which Defendant.

Please see attached.

V. RELIEF REQUESTED

State briefly what relief you seek from the Court. Do not make legal arguments or cite to cases/ statutes. If requesting money damages (*either actual or punitive damages*), include the amount sought, explaining the basis for the claims.

For the Emergency Return of the minor child to the custody of the Plaintiff and to the State of Florida,
Today.

For charges to be brought against the defendants for the violations of Federal Law, and

For an investigation into the Madison County Court for the Corrupt way it has handled

these matters.

Statement of Claims

1. 18 U.S. Code § 2262 - Interstate violation of protection order and 18 U.S. Code § 2261A – Stalking. Were violated by Zachary when he hired the two private detectives.
2. It was a violation of 18 U.S. Code § 2265 - Full faith and credit given to protection orders and equal protection of the law when Judge Decker allowed the January 3rd 2017 visit with Zachary in the court house.
3. It was a violation of 18 U.S. Code § 2265 - Full faith and credit given to protection orders, a violation of Due Process, and a violation of Equal Protection to both Betty and the minor child under The 14th Amendment of the U.S. Constitution for Judge Decker to refuse to uphold Federal Law when Betty filed the motion to enforce them.
4. Zach was in violation of 18 U.S.C. Section 922(g) when he had guns in his home. The guns were removed from his home, but nothing else was done, which also violated the equal protection of the law again.
5. When Zachary contacted the minor child's speech therapist it was an act of stalking and harassment. This violated 18 U.S. Code § 2261A.
6. When Zachary lied on his court papers and in court it violated 18 U.S. Code § 1621 - Perjury generally. And yet Andrew Decker did nothing about it.

Actually by filing the fraudulent Order, Decker also violated 18 U.S. Code § 1621 - Perjury generally.

7. Decker's Order violates The First Amendment of the U.S Constitution by attacking Betty because Betty had started a petition. The Order also violated The 14th Amendment of the U.S. Constitution of equal protection of the law for both Betty and the minor child. Because Betty was unaware at the hearing she could lose her son, it was also a violation of Due Process. It was a violation of 18 U.S.C 2262 by Zachary and Decker when the minor child was taken across stateliness from Florida to Tennessee. It violated 18 U.S.C 2265 and It violated 28 U.S.C 1738A by going against the child custody part of the Domestic Violence Order. Decker's order also violated 28 U.S.C 1738 when Decker went against and made his own findings on what the Kentucky Courts had already done.
8. Judge Olin refused to have a hearing over the fraudulent order and the laws that were violated. Olin violated Betty and the minor child's rights to equal protection of the law by refusing to answer the motion for relief from a fraudulent order, by Florida's own rule, because of FL Statue 90.201 Matters which must be judicially noticed. Judge Olin Denied Betty Due process, when she told Betty to supplement a petition for a Domestic Violence Order, never made a final ruling on the supplement, used the

supplement has a set up in court, and violated a violation of 28 U.S.C 1738 when Olin stated she did not believe Betty was a victim of Domestic Violence. Olin also denied Betty and the minor child equal protection of the law.

9. At the April 10th hearing Betty was denied Due Process, Betty and the Minor child were both denied equal protection of the law.
10. Because of Florida Statue Tile VII Evidence Chapter 90 Evidence Code, Olin should allow the data disc on the docket, and is denying Betty Equal Protection of the law.
11. Judge Olin refusing to accept the Florida law and rule on recusing herself is denying Betty equal protection of the law.
12. The way the Madison Court has blocked Betty from getting a transcript and their actions have violated Betty's due process and equal protection of the law.

VI. CERTIFICATION

As required by Federal Rule of Civil Procedure 11, I certify by signing below that to the best of my knowledge, information, and belief, this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to timely notify the Clerk's Office if there is any change to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date: 6-20-19 Plaintiff's Signature: 

Printed Name of Plaintiff: Betty Caitlin Nicole Smith

Address: 4973 SE CR 255, Lee FL 32059

E-Mail Address: pennyelliott47@yahoo.com

Telephone Number: 850-274-1038

(Additional signature page(s) must be attached if there is more than one Plaintiff.)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF FLORIDA

TALLAHASSEE DIVISION

Betty Caitlin Nicole Smith

CASE NO.:

4:19cv280NW-CB

Vs.

Andrew J Decker the 3rd

Zachary Taylor Daniel

Melissa G Olin

Madison County Court

EXHIBITS TO COMPLAINT AND AFFIDAVIT

(Attention Chief Judge Mark Walker)

COMES NOW, The Plaintiff by Pro Se and files these exhibits on Data Discs and lists the items on them.

1. Data Disc One Contains the following two Appendixes

Appendix one contains the following;

Certified Domestic Violence Order.....4

Zachary Hired Two Private Detectives.....7

Emails from ATF.....	31
Case Note.....	33
Transcript.....	34
Pam Writes Court Papers.....	145
Stay.....	154
Opinion.....	156
Mandate.....	160
Emails.....	161
Judge Decker’s Order.....	190
2013 DVO Summons.....	221
2013 DVO Summons Reissue with EPO.....	226
2013 Domestic Violence Order.....	229
Data Disc One Contains Appendix Two. Appendix two contains the following;	
Betty’s Mother’s Charges.....	4
Insurance Papers.....	5
Beth Hicks Autism Report.....	7

Decker Confused Betty and Zachary.....	11
Calloway ER Report.....	17
State Trooper’s Report.....	25
State Trooper’s Photos.....	28
Facebook Posts Zachary Missing.....	32
Western State Discharge Papers.....	33
Parental Rights Document.....	36
Little Pines Report.....	37
Speech Evaluation.....	43
PTSD Report.....	48
Message about House Burning Down.....	54
Photos of Burned Down House.....	55
Legal Guardianship of Zachary.....	60
“Kill You” Photos.....	62
Case Made Permanent.....	64
November 16 th 2018 Order.....	65

Photos of Bruising April 2019.....	67
Order to Supplement.....	83
Order hearing April 10 th 2019.....	85
Not on Docket.....	89
Zachary Was Called by the Court.....	90
State Trooper Report 2015.....	98
2015 EPO and Summons.....	100
Tennessee Insurance.....	106

2. Data Disc one also Contains the email from the Inspector General saying to go to the Federal Court.

3. Data Disc One Also Contains a copy of the Motion In Regards To Judge Olin with attachments; those attachments are

A copy of the docket showing where the Petition to recuse Judge Olin was filed on May 2nd 2019.

A Copy of the Notice of filing data Disc

A Copy of the Note returning the Data Disc

A Copy of Zachary's filing where in Bullet point 3 he states the Court called and informed him the hearing for April 10th 2019, when the Order was not even issued until April 10th 2019.

4. Data Disc One also contains a screen cap of the Madison Docket as it was after hours, showing over 24 hours had passed but the motion was still not on the docket.
5. Data Disc One Also Contains, where the email shows the November 16th 2018 order was filed on October 30th 2018.
6. Data Disc One Also Contains the Email where the November 16th hearing was set on October 30th 2018, after the order.
7. Data Disc One also contains the order setting the November 16th hearing.
8. Data Disc One contains Zachary's filing School Schedule where he states the minor child will be starting school on February 11th 2019
9. Data Disc One Also Contains Notice of Status (5) filed by Zachary on November 14th 2018 talking about the minor child's rough spots and such.
10. Data Disc One contains the email where Zachary's mother filed a school calendar at Decker's request on November 16th 2018, even though the minor child was not in school.
11. Data Disc One also contains the Order setting the July 2nd 2018 hearing by Decker, where it is just if Zachary will have visitation.

12.Data Disc Two Contains the video of the July 2nd 2018 hearing where

Decker's order came from, where Mandy Scott testified, and where Zachary admitted to lying on his court papers, in court, and about the events from 2013 through 2015. The Transcript on Data Disc One Appendix one is the official paper transcript of this hearing.

13.Data Disc Two Contains the video of the April 10th 2019 hearing before Judge Olin.

Respectfully Signed and Submitted,

June 20th 2019

Signature 

Betty Caitlin Nicole Smith

4973 SE CR 255

Lee, FL 32059

(850) 274-1038

Pennyelliott47@yahoo.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

Betty Caitlin Nicole Smith

CASE NO.:

4:19 CV 280 MW-GS

Vs.

Andrew J Decker the 3rd

Zachary Taylor Daniel

Melissa G Olin

Madison County Court

Affidavit In Support of Complaint

(Attention Chef Judge Mark Walker)

COMES NOW, the Plaintiff by Pro Se and files this Affidavit in Support of
Complaint. The Plaintiff, Betty Caitlin Nicole Smith, Under Oath, Swears,
Affirms, and States the following:

1. I have been everywhere trying to get this fraud and violations of law and the
United States Constitution taken care of. I have been told since it was
Federal Laws violated, I had to come to this Court. I keep getting told it isn't

a civil matter, but a Federal One because of the Federal Laws and Constitution.

2. I am attaching an email with my complaint where we were told to go to the Federal Court by the Inspector General.
3. I have been told to make this attention to Chief Judge Mark Walker.
4. I swear to the Statements of Facts in my complaint I am filing this with.
5. I will be attaching exhibits on Data Discs with a list of items on each data disc, has evidence.

Respectfully Signed and Submitted,

June 20th 2019

Signature 

Betty Caitlin Nicole Smith

4973 SE CR 255

Lee, FL 32059

(850) 274-1038

Pennyelliott47@yahoo.com