

PARTIES

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BUCKS COUNTY DETECTIVES [Through District Attorney's Office] Bucks County Courthouse 4th FL., 55 East Court Street Doylestown, PA 18901	215-348-6344
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F A C T S

Pennsylvania Law 18 Pa. C.S.A. § 5101, defines Obstruction of Administration of Law or other governmental function as: "The Intentional Obstruction and impairment or perversely of the administration of Law by force, violence, physical interference or obstacles, breach of official duty, or any other unlawful act."

The crime consists of two (2) elements: 1) "an intent to obstruct the administration of Law, and 2) act of affirmative interference with governmental function". See: Comm. V. Gentile, 640 A.2d 1309 (1994) appeal granted, 541 Pa. 634 A.2d 687 (1998).

**DETECTIVES ALFRED H. EASTLACK, THOMAS MILLS,
ROBERT C. POTTS, AND RUDOLPH "RUDY" G. HEIERLING
OBSTRUCTION OF JUSTICE**

Detectives Alfred H. Eastlack, Thomas Mills, Robert C. Potts and Rudolph "Rudy" G. Heierling were assigned to investigate the homicide of Sheila Irene Ginsberg.

Two (2) days into the homicide investigation Detectives Eastlack and Mills questioned Daniel Lyden and Paul Cottman. During interrogation Paul Cottman informed these Detectives that the decease's daughter Sharon Ann Ginsberg was a drug addict and was often violent toward her mother the deceased and Sharon had came to his house on the night of her mother's death changed clothes and left. [See: Appendix "B-1", Paul Cottman's Statements].

Five or Six days after the homicide Paul Cottman found Sharon Ann Ginsber's bloody gloves under the passenger seat of his car and immediately called Detective Alfred H. Eastlack.

Detectives Eastlack and Mills showed up at Paul Cottman's home shortly after his call, obtained the bloody gloves and turned this evidence over to the District Attorney's Office, but never sent this evidence to the State Police for DNA testing.

Detectives Eastlack, Mills, Heierling and Potts refused to investigate Sharon Ginsberg criminal and psychological histories in connection with her mother death. [See: Appendix "B-2" Sharon Ginsberg's Criminal History and Statements]. Also, [See: Appendix "B-3"

These Detectives refused to investigate Sharon Ginsberg for the murder of her mother (Sheila) because Detective Eastlack had a personal and sexual relationship with Sharon Ginsberg.

On 6/12/92, Paul Cottman contacted the Bucks County District Attorney's Office seeking to speak with Detective Potts regarding him testifying about Sharon Ginsberg leaving bloody gloves in his car. However, detective Potts was not available and Mr. Cottman left phone number to be contacted. No one from the Bucks County District Attorney's Office nor Detective Potts returned Paul Cottman's phone call.

Paul Cottman contacted the Bucks County District Attorney's Office a second time and spoke with Assistance District Attorney Diane E. Gibbons lead prosecutor in the case about Sharon Ginsberg stabbing him and his wife, Sharon's violent history against her mother, and the bloody gloves Sharon had hidden under the passenger seat of his car. [See: Appendix "B-1" Paul Cottman's Statements]. Still the detectives nor the district attorney's

office refused to investigate Sharon Ann Ginsberg for the murder of her mother.

In May of 1991 Detectives Heierling and Eastlack came to Sharon's residence to question the Plaintiff regarding the murder of Sheila Ginsberg, and the Plaintiff had informed the detectives that he consumed six (6) beers and six (6) Xanax and had been up for two (2) days and night. Detective Eastlack gripped the Plaintiff up by the arm and directed him to the back door of the unmarked car into the backseat.

Detectives Rudy Heierling and Alfred Eastlack transported the Plaintiff to a building in Levittown and instead of the Bristol Township Police Department which was less than 5 minutes from Sharon Ginsberg's resident in the opposite direction of the Police Department. (See: Appendix "C-1, C-2, C-3, C-4", John David Brookins Affidavits).

While at the Levittown office the Plaintiff again, informed the detectives that he had consumed several beers and Xanax's. Although, Detectives Rudy Heierling and Robert Potts **knew** that the Plaintiff's reasoning faculties was impaired these detectives proceeded to question the Plaintiff anyway.

During questioning the affect of the alcohol and Xanax caused the Plaintiff to become drowsy and Detective Rudy Heierling and Robert Potts began yelling at the Plaintiff "Stay up", "Confess" and began slapping the Plaintiff in the face and in back of the head.

The Plaintiff told Detective Robert Potts to stop hitting him, but Detective Heierling gave the Plaintiff a pen and paper and told the Plaintiff to write his confession down, then Detective Robert Potts physically placed a pen in the Plaintiff's hand and tried to coerce a written confession out of the Plaintiff. When this did not work Detective Potts placed his own hand over the hand of the Plaintiff and tried to write the confession for the Plaintiff. [See: Appendix "C-1, C-2, C-3, C-4", John David Brookins, Affidavits]. Also, [See: Appendix "D", Loretta Brookins, Affidavit, See: Appendix "D-2, E", Report and Affidavit].

Detectives Rudy Heierling, and Robert Potts was demanding the Plaintiff to write something on paper and told the Plaintiff they (detectives Potts, and Heierling) would be very upset if the Plaintiff did not comply with their request. (i.e. threat).

Detectives Potts and Heierling stepped out the room and stood outside the door with it open about a foot, the Plaintiff could see detective Heierling standing very close to the door hold it open with his body, but Heierling continued to shout very loudly into the room to try and keep the Plaintiff awake.

Detectives Heierling and Potts gave up on trying to make the Plaintiff write a confession on paper. Detectives Robert Potts and Rudy G. Heierling then gripped the Plaintiff up and helped the Plaintiff to the back seat of their car.

Detective Heierling kept awakening the Plaintiff with a very loud and rude voice, telling the Plaintiff "you keep falling asleep we could drop you off anywhere". Then Detectives Heierling

and Potts laughed out loud.

Detectives Robert Potts and Rudy Heierling took the Plaintiff back to Sharon Ginsberg residence. Upon arriving at the residence detectives Potts and Heierling, awoken the Plaintiff, opened the car door and helped him out of the car, and walked the Plaintiff to the front door of the residences. And left him there.

In June of 1991, the Plaintiff was at his cousin's apartment where Detectives Eastlack, Potts and Heierling came to arrest the Plaintiff with weapons drawn. The Plaintiff raised his hands over his head to surrender. However, Detective Alfred Eastlack pulled out a hidden hand gun from his back and threw it down onto the bed. Then detectives Potts pushed the Plaintiff in the direction of the gun on the bed.

Detectives Robert Potts, Rudy Heierling, Alfred Eastlack and an unknown Uniformed Officer directed the Plaintiff to pickup the gun, to justify shooting the Plaintiff. But the Plaintiff, took a slow step backwards away from the gun, at that very moment Viola Jackson came down the hallway towards the bedroom yelling "what's going on", and everyone looked at Viola Jackson. Then these officers grabbed the Plaintiff and placed him under arrest.

These law enforcement officers actions demonstrate that they intended to kill the Plaintiff up under the guise of justification i.e., misrepresenting that the Plaintiff had a weapon.

Detective Alfred Eastlack was alone when driving the Plaintiff to the Police Station, while the Plaintiff was in the back seat of

the car Detective Eastlack expressed how he wanted to kill the Plaintiff.

While at the Bristol Township PD. the Plaintiff was again questioned about the death of Sheila Ginsberg. Detective Heierling informed the Plaintiff that he was being arrested for the murder of Sheila Ginsberg, and they have evidence that the Plaintiff was at the crime scene. No Miranda Warning Were Ever Given.

The Plaintiff informed detectives that he went to Sheila Ginsberg apartment and seen Sharon Ginsberg standing over her mother (Sheila) Screaming and cursing at her mother. Sharon Ginsberg was stomping on her Chest. The Plaintiff stepped in and pushed Sharon (the daughter) away, but Sheila was already dead. The Plaintiff stated to Sharon what are you doing, Sharon said Sheila (the mother) needed to die. [See: Appendix "C-1, C-2, C-3, C-4, John Brookins affidavits].

After the Plaintiff informed detectives Potts and Heierling about Sharon Killing her mother detective Heierling stated that detective Alfred Eastlack did not want one of his girls prostitute Sharon Ginsberg going to jail for murder, detective Heierling told the Plaintiff "you did not see anyone."

Everyone on the streets knew that detective Alfred Eastlack prostituted Sharon Ginsberg and other women and also sold drugs. Detectives Robert Potts and Rudy Heierling threaten to hurt the Plaintiff's family and the children of Oretha Green if the Plaintiff said anything. [See: Appendix "C-1, C-2, C-3, C-4, F, G-1, G-2, H, H-2", Affidavits/Statements]. Also, [See: Appendix

"B-2" Sharon Ginsberg Criminal History].

During the interrogation Detective Robert Potts, stated to the Plaintiff give them (detectives) the Jamaicans and all the charges for the murder of (Sheila Ginsberg) will go away. The Plaintiff said NO. Then Detective Potts said there is no hope for you then. [See: Appendix "N", Affidavit].

Plaintiff's responded the Jamaicans are known to kill those who crossed them and they knew where Plaintiff's family lived.

These Law enforcement officers physically assaulted the Plaintiff trying to coerce a confession out of him. And refused to investigate Sharon Ginsberg for the murder of her mother because Detective Alfred Eastlack was having a sexual relationship with Sharon Ginsberg, and prostituting her out is the reason why these detectives did not conduct DNA testing of Sharon Ginsberg's Bloody Gloves, and investigate Sharon for the murder of her mother.

As a result of an F.B.I. investigation detective Alfred Eastlack was busted with an large amount of drugs in his home that he was dealing and was forced to resign for engaging in criminal activities.

Valerie Lynch informed the Plaintiff that Detectives Alfred Eastlack, Rudy Heierling and Robert Potts was threatening the girls (i.e. other prostitutes) NOT to testify on Plaintiffs behalf and if they did something will happen to them.

Because their were other witnesses who knew Sharon Ginsberg personally and heard her (Sharon) openly bragging about killing

her mother. If it was not for the detectives threats of harm many more witnesses would have come forward to testify.

F.B.I. Agent Chester Blithe was told by the Detectives Robert Potts, Rudy Heierling, Thomas Mills, and Alfred Eastlack to look for niger hair only and hold the rest of the "fourteen (14) hairs" [See TT. pages 38-62, 69,71, 75-76 July 7, 1992].

F.B.I. Agent Marciane Fosset, stated that she requested from the Bristol Township PD. The fingerprints of Sharon Ginsberg three (3) different times to compare to the unidentified prints, but each time Bristol Township PD. refused to send fingerprints of Sharon Ann Ginsberg that Marciane Fosset could use [See TT. pages 137-171, 191-193 July 7, 1992].

Detectives Alfred Eastlack, Thomas Mills, Robert Potts nor Rudy Heierling never requested DNA testing on Sharon Ann Ginsberg's bloody gloves. DNA testing would have identified the DNA of the victim and Sharon Ann Ginsberg, and would have established the Plaintiff's innocence.

Detectives Alfred Eastlack, Thomas Mills, Robert Potts and Rudy Heierling was fully aware of Sharon Ginsberg violent history, and the bloody gloves obtained from Paul Cottman's car but she was never investigated for the murder of her mother.

Detectives Alfred Eastlack, Thomas Mills, Robert Potts and Rudy Heierling was fully aware of that Sharon Ann Ginsberg Criminal history consisted of physical violence terroristic threats, stealing money etc. All against her own mother the

deceased Sheila Ginsberg. Detectives refused to investigate Sharon Ann Ginsberg for the murder of her mother.

Detectives Alfred Eastlack, Thomas Mills, Robert Potts and Rudy Heierling was fully aware that Sharon Ginsberg murdered her mother because: Sharon was a severe drug addict, and the deceased didn't want to give Sharon Ginsberg money because she was going to use it for drugs. The Investigating detectives refused to investigate Sharon Ann Ginsberg for the murder of her mother. (Also, See: Appendix "H", Elaine Newkirk Statement).

Detectives Alfred Eastlack, Thomas Mills, Robert Potts and Rudy Heierling were fully aware that Sharon Ann Ginsberg Fingerprints were on the scissor (murder weapon). Had Dr. Halbert Fillinger, Jr. tested them, and Had not used his hands to remove the scissor. [TT. page 25, July 7, 1992].

Detectives Alfred Eastlack, Thomas Mills, Robert Potts and Rudy Heierling, was fully aware when informed by Barry Ginsberg that a few weeks before the murder of his mother Barry Ginsberg informed the detectives that in November of 1990 his mother Sheila Ginsberg (deceased) called him and described a violent argument between Sharon, and herself mother Sheila Ginsberg.

Detectives Alfred Eastlack, Thomas Mills, Robert Potts, and Rudy Heierling was fully aware that on 1/9/1991, Barry Ginsberg Related to detectives two instances, were Sharon attacked him with a knife, the second instance Sharon was very upset, proceeded to breakout the windows of Barry's and one of his friend's cars. And still the detectives refused to investigate Sharon Ann Ginsberg

for the murder of her mother.

Detectives Alfred Eastlack, Thomas Mills, Robert Potts, and Rudy Heierling, was fully aware of that every Holiday especially around Christmas when Barry Ginsberg comes into town from Florida bearing gifts for their mother Sheila Ginsberg and none for Sharon Ginsberg his sister, at this time of the year Sharon Ginsberg's anger in more explosive because Sharon was jealous of the relationship Barry Ginsberg had with their mother and Sharon was envious on how the mother Sheila Ginsberg treated the son Barry.

Detectives Alfred Eastlack, Thomas Mills, Robert Potts, and Rudy Heierling, was fully aware that every holiday Sharon Ginsberg was going to explode but no one knew what conversation between the three (3) Sheila, Sharon and Barry would set Sharon Ginsberg off. [See: Appendix "I", Barry Ginsbergs statement, See: Appendix "I-2"].

Detectives Alfred Eastlack, Thomas Mills, Robert Potts, and Rudy Heierling was fully aware that Sharon Ann Ginsberg is well known for her explosive violent behavior, and as Ms. Marjorie Kaplan stated to the detectives "Sharon would come into the bar and say she wanted to kill somebody, and Sharon quickness to violence, and how Sharon had thrown an axe through some woman window. [See: Appendix "J", Marjorie Kaplan statement], also, [See: Appendix "K", Roy Jennings statements]. [See: Appendix "K-2"].

Detectives Alfred Eastlack, Thomas Mills, Robert Potts, and Rudy Heierling was fully aware of Daniel Lyden (Sharon Ginsberg stepfather) who lived with Sharon. Daniel states to detectives that he slept downstairs because Sharon had ripped so many people

off he was afraid the house was going to be fire bombed. And still detectives refused to investigate Sharon Ann Ginsberg for the murder of her mother.

Detectives Alfred Eastlack, Rudy Heierling Thomas Mills, and Robert Potts actions and omissions intentionally prevented the administration of Justice, Constituting Obstruction of Justice.

DISTRICT ATTORNEY DIANE E. GIBBONS
OBSTRUCTION OF JUSTICE

Diane E. Gibbons never provided the evidence, (i.e. bloody gloves) to the defense. The Plaintiff was made aware of this exculpatory evidence when he received Paul Cottman's statement from a private investigator hired by the Plaintiff.

Diane E. Gibbons never conducted DNA testing on Sharon Ginsberg's bloody gloves. DNA testing would have identified the DNA of the victim and Sharon Ginsberg, and would have established the Plaintiff's innocence.

Diane E. Gibbons was fully aware of Sharon Ginsberg violent history, and the bloody gloves obtained from Paul Cottman's Car that was picked up by Detective Eastlack and Mills but she never investigated Sharon Ginsberg for the murder of her mother.

Diane E. Gibbons knew that Sharon Ginsberg criminal history consisted of physical violence terroristic threat, stealing money etc. Against her own mother the deceased Sheila Ginsberg. The Defendant Diane Gibbons (A.D.A.) refused to investigate Sharon for the murder of her mother.

Diane E. Gibbons, knew that Sharon Ginsberg murdered her mother because: Sharon was a severe drug addict, and her mother was holding Sharon money for an upcoming Florida vacation, the money was being held so, she (Sharon) would not spend it all on drugs.

Diane E. Gibbons knew that Barry Ginsberg stated to detectives that his mother Sheila Ginsberg was not in favor and very outspoken about Sharon Ginsberg returning to Florida with them (son & mother).

Diane E. Gibbons was fully aware that Sharon Ann Ginsberg Fingerprints were on the scissor and refused to have it tested although Dr. Halbert Fillinger, Jr. removed the scissor, using his hands, [TT. page 25, July 7, 1992].

Diane E. Gibbons was fully aware that F.B.I. Agent Chester Blithe testimony and documents stating that none of the hairs found at the crime scene belonged to the Plaintiff. [See: Appendix "C-3, C-4", John David Brookins Affidavits]. Also, [See: Chester Blithe's Statements. TT. pages 38-62, 69, 71, 75-76 July 7, 1992].

Diane E. Gibbons was fully aware that every Holiday especially around Christmas when Barry Ginsberg comes into town from Florida bearing gifts for their mother Sheila Ginsberg, none for Sharon Ginsberg his sister, at this time of the year Sharon Ginsberg's anger in even more explosive because Sharon was jealous of the relationship Barry Ginsberg had with their mother, and

Sharon (his sister) was envious on how the mother Sheila Ginsberg treated the son Barry.

Diane E Gibbons was fully aware of that Sharon Ann Ginsberg is well known for her explosive violent behaviors, and as Ms. Marjorie Kaplan stated to the detectives "Sharon would come into the bar and say she wanted to kill somebody, and Sharon quickness to violence, and how Sharon thrown an axe through some woman window. [See:Appendix "J", Marjorie Kaplan statement]. Also, [See: Appendix "I", Barry Ginsberg statements], [See: Appendix "K", Roy Jennings Statements], [See: Appendix "L", Agnes Wilkie Statement]. [See: Appendix "L-2", Linda Bouley, Letters] and [See: Appendix "L-3", Betty Marucci Watson's Letter/statements].

Diane E. Gibbons knew that on the day Sheila Ginsberg was murdered Sharon went over her mother's apartment to get her (Sharon) money from her mother to spend on drugs. When the deceased refused to give Sharon the money Sharon went into a fit of rage which resulted in Sharon brutally murdering her own mother.

Diane E. Gibbons was fully aware that a number of citizens stated in affidavits or statements that Sharon Ginsberg openly bragged to them that she killed her mother. But still, defendant Diane Gibbons never investigated Sharon Ann Ginsberg for the murder of her mother.

Melinda Hollock, witness who testified that Sharon Ginsberg openly bragged about killing her mother. TT. pages 121-148 July 14, 1992.

Pamela Nettle Holder, witness who testified that Sharon Ginsberg openly bragged about killing her mother. TT. pages 151-173 July 14, 1992.

Pamela A. Simmers, aka Pamela Detweiler on 12-16-91 a hand written statement that Sharon Ginsberg openly told her that She Sharon Ginsberg Killed her mother for drug money. [See: Appendix "M", Pamela A. Simmers Statement]. Also, Appendix "N".

Florence Barrolle, witness who testified that Sharon Ginsberg openly bragged about killing her mother. TT. pages 176-196 July 14, 1992. Also, Mary Jane Burton heard Sharon Ginsberg openly bragging to others in the speak easy about murdering her own mother.

Gaye Gillen: Who was present at the speak easy and heard Sharon Ginsberg openly brag about killing her mother.

A.D.A. Diane E. Gibbons action and omissions prevented the administrate of justice. Diane E. Gibbons also refused to investigate Sharon Ann Ginsberg, and refused to conduct DNA Testing on Sharon Ginsberg bloody gloves or DNA Testing on Sharon Ginsberg hair samples.

**CIVIL RIGHTS VIOLATION
ALL OF THESE DEFENDANTS VIOLATED THE PLAINTIFF'S
CONSTITUTIONAL, CIVIL, AND HUMAN RIGHTS**

Human Rights are outlined in this Country's "Declarations of Independence", and are defined as the Plaintiff's God given rights of Life, Liberty, and the pursuit of happiness. These Human Rights are protected by the Bill of Rights. [See: Declaration of Independence; and Universal Declaration of Human Rights, date December 10, 1948].

The Plaintiff avers, Civil Rights are individual rights of personal liberty guaranteed by the Bill of Rights, 13th, 14th,

15th, and 19th Amendments, which includes Due Process and Equal Protection of the Law.

The Plaintiff contends, these defendants' refusal to investigate Sharon Ginsberg for the death of her mother, even though multiple witnesses are willing to testify and have presented affidavits or statements stating, "Sharon Ginsberg bragged to them about killing her own mother", constitutes and violation of the Plaintiff's Constitutional, Human and Civil Rights. [See: the Bill of Rights, 14th Amendment, and the Declaration of Independence].

According to these Fundamental Rights the Plaintiff has a right to be free from the tyranny and oppression of corrupt government officials, and he has a right to life, liberty and the pursuit of happiness. These defendants deprived the Plaintiff's of these rights.

I. THE UNITED STATES DISTRICT COURT FOR EASTERN PENNSYLVANIA UNLAWFULLY DEPRIVED THE PLAINTIFF OF HIS HUMAN RIGHTS, MEANINGFUL COURT ACCESS, AND HIS RIGHT TO BE HEARD IN VIOLATION OF THE 1ST, 5TH, 7TH, AND 14TH AMENDMENTS.

The United States District Court For the Eastern Pennsylvania Unlawfully Deprived the Plaintiff of His Human Rights, Meaningful Court Access, and His Right to be Heard. Consequently, Violating The Plaintiff's Constitutional Rights.

F A C T S

On 1/13/2014, The Plaintiff filed a § 1983 complaint against the Defendants seeking a DNA Test of Sharon Ann Ginsberg's bloody gloves found in Paul Cottman's car to prove his Actual Innocence. The Defendants knows/knew that Sharon Ann Ginsberg killed her own mother, but chose to prosecute the Plaintiff instead because one the Defendants, Detective Alfred Eastlack was in a personal and sexual relationship with Sharon Ann Ginsberg (better known as half breed) on the streets.

To secure the Plaintiff's conviction the Defendants: I) were physically abusive and threatening to him during interrogations and investigating this incident; II) refused to conduct a DNA Test of Sharon Ann Ginsberg's glove which was found in Paul Cottman's car; III) refused to conduct DNA Testing on the untested hair sample

they found; IV) refused to conduct DNA Testing on Sharon Ann Ginsberg's hair. These DNA Tests would have prove unequivocally that Sharon Ann Ginsberg murdered her own mother in a fit of rage; V) refused to investigate Sharon Ann Ginsberg for her mother's death; VI) Obstruction of Justice; VII) Were Corrupt, and racially discriminatory against Plaintiff while in their official capacity.

The United States District Court for Eastern Pennsylvania Dismissed the Plaintiff's complaint with prejudice, and denied it as moot, without the Defendants defending themselves. The United States District Court showed abject favor to the Defendants when it Dismissed the Plaintiff's complaint in the manner that it did, and also by defending the Defendants as if they were the representing the Defendants. [See: Appendix "A", United States District Court's Opinion dated 6/3/15].

The Plaintiffs injury is on-going and falls well within the Doctrine of Continuing Violation. The Plaintiff tried everything he could to obtain relief.

A R G U M E N T

The Plaintiff avers, all across America Law Enforcement Agents, (i.e. police) has violated citizens' Human and Civil Rights, by physically and psychologically abusing them, and have even murdered citizens suspected of committing a crime.

The Plaintiff filed his complaint against the Defendants, for doing the same to him deprived him of life, liberty, and the pursuit of his happiness when they egregiously, wrongfully prosecuted him for a Homicide they know Sharon Ann Ginsberg better known as (half-breed) committed. As a result, the Plaintiff has continuously suffered Life Imprisonment, where he is confined today.

The Plaintiff's factual allegation has never been disputed, and The United States District Court is mandated to accept all of his factual allegations in his favor, which they refused to do. See: Bell Atl. Corp. V. Twombly, 550 U.S. 544, 570 (2007); Erickson V. Pardus, 551 U.S. 89, 93-94 (2007). The Plaintiff's factual allegation is more than enough to raise a right to relief above the speculative level. Twombly, SUPRA.

The Plaintiff asserts, the Statutes of Limitations Does Not Apply in this instant case because the Plaintiff's injury continues to the present day, thus this case falls under the "Continuing Violation Doctrine". See: Montanez V. Sec'y Pa. Dept. of Corr., 773 F.3d 472, 480-81, (3rd Cir. 2014).

The Plaintiff contends, The United States District Court has a duty to allow the Plaintiff to protect his Human Rights, and to exercise his rights to redress his grievances, meaningful access to the Court, the opportunity to be heard, and to be made whole from a injury. See: U.S. Const. 1st, 5th, 7th and 14th Amendments.

Neither the State Courts, Nor the United States District Court has allowed the Plaintiff to exercise his right to be heard on his claims against the Defendants. Although they should have. The United States District Court dismissed the Plaintiff's complaint in violation of the Plaintiff's constitutional rights of Due Process and Equal Protection of the Law.

WHEREFORE, the Plaintiff requests this Court to Remand this case back to the United States District Court for further proceedings, allow the Plaintiff to be heard on all of his claims, and enjoin the Defendants to defend themselves.

C O N C L U S I O N

All of these defendants' actions and omissions constitutes the intentional obstruction, and impairment of the Administration of the Law.

These named defendants has operated outside of their official capacities when they stepped outside of lawful investigation for truth, and proceeded to convict a knowingly innocent citizen. These defendants' official capacity does not permit them to conspire to convict an innocent man by violating his Civil, Human, and Constitutional Rights. It was in these defendants' individual capacities that they violated the Plaintiff's Civil, Constitutional and Human Rights.

R E L I E F R E Q U E S T E D

Declarative Judgement: The Plaintiff requests this Court to declare that the actions and omissions of these named defendants constitutes a clear obstruction of the administration of the Law.

Injunctive Relief: The Plaintiff requests this Court to enjoin these named defendants to investigate Sharon Ann Ginsberg for the murder of her mother Sheila Irene Ginsberg.

Injunctive Relief: The Plaintiff requests this Court to enjoin these named defendants to conduct DNA Testing on Sharon Ann Ginsberg's hair, untested hair, and bloody gloves.

(BRIEF FILING DATE TO BE ANNOUNCE)

Dated:

Respectfully submitted
Aggrieved party

Filed by:

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