

Entered: Clerk, Circuit Court for Baltimore County, MD September 25, 2024 CC: SAO; DEF

**DENIED**

Entered: Clerk, Circuit Court for Baltimore County, MD September 4, 2024

IN THE

09/24/2024 3:34:00 PM

STATE OF MARYLAND

CIRCUIT COURT

VS.

FOR

DIANA R. WILLIAMS

BALTIMORE COUNTY

Case No. C-03-CR-20-002995

\*\*\*\*\*

1.) 1<sup>ST</sup> MOTION TO THE JUDGE-IN-CHARGE OF ASSIGNING JUDGES TO CRIMINAL CASES TO

ASSIGN JUDGE M. GLASS TO PRESIDE OVER THE DEFENDANT'S: a) 1<sup>ST</sup> MOTION TO STAY THE

EXECUTION OF HER ORDERS ENTERED BY THE CLERK ON 8-27-24 IN THIS CASE UNTIL THIS

CASE IS RESOLVED IN ITS ENTIRETY. b.) 2<sup>ND</sup> MOTION BY THE DEFENDANT TO CONTINUE THE

STAY ON THE EXPUNGEMENT OF JUDGE M. GLASS' ORDER ENTERED IN THIS CASE ON JUNE

12, 2024 UNTIL THIS CASE IS RESOLVED IN ITS ENTIRETY. c.) 1<sup>ST</sup> MOTION TO HAVE A

HEARING ON THESE INSTANT MOTIONS AND ON THE DEFENDANT'S MOTIONS DOCKETED

ON 7-10-24 AS PROVIDED UNDER MARYLAND RULE 2-311. 2.) 1<sup>ST</sup> MOTION TO HAVE THE

JUDGE-IN-CHARGE OVER CRIMINAL CASES ORDER THAT THE DEFENDANT'S CASE CONTINUES

TO APPEAR ON THE COURT'S WEBSITE, "CASE SEARCH"

I, Diana R. Williams, the Defendant who is being represented Pro Se, hereby, requests that the Defendant's 1.) 1<sup>ST</sup> Motion To The Judge-In-Charge Of Assigning Judges To Criminal Cases To Assign Judge M. Glass To Preside Over The Defendant's: a) 1<sup>ST</sup> Motion To Stay The Execution Of Her Orders Entered By The Clerk On 8-27-24 In This Case Until This Case Is Resolved In Its Entirety. b.) 2<sup>ND</sup> Motion To Continue The Stay On The Expungement Of Judge M. Glass' Order Entered In This Case On June 12, 2024 Until This Case Is Resolved In Its Entirety. c.) 1<sup>ST</sup> Motion To Have A Hearing On These Instant Motions And On The Defendant's Motions Docketed On 7-10-24 As Provided Under Maryland Rule 2-311. 2.) 1<sup>ST</sup> Motion To Have The Judge-In-Charge Over Criminal Cases Order That The Defendant's Case Continues To Appear On The Court's Website, "Case Search based on the grounds and authorities cited below.

CR59 (a)(4) cites that newly discovered evidence, material for the party making the application that could not have been reasonably discovered and produced earlier, are grounds for granting

the Petitioner's Motions. The newly discovered evidence, material for the Defendant, who is being represented Pro Se and making the application, which could not have reasonably been discovered and produced earlier by the Defendant, is that: 1.) For the 1<sup>st</sup> time, the Defendant is motioning the Judge-in-Charge Over Criminal Case to assign Judge M. Glass to preside over the Defendant's: a) 1<sup>st</sup> Motion to Stay the execution of her Orders entered by the Clerk on 8-27-24 in this case and the Defendant's 2<sup>nd</sup> Motion to continue the Stay on the expungement of Judge M. Glass' Order entered in this case on June 12, 2024 until this case is resolved in its entirety because this case would no longer exist without The Stay on the Expungement and, therefore, the Defendant's Motions entered on the Court's website on 7-10-24, her instant Motions filed on 9-4-24, and/or any other Motions and/or Appeal filed by the Defendant, thereafter, would not be disclosed, considered, and resolved by any presiding Judge because the case would no longer exist. b.) Motions entered on the Court's website on 7-10-24 by the Defendant, in which in one of her Motions to pleads for the 2<sup>nd</sup> time to continue the Stay on the Expungement of Judge M. Glass' Order entered in this case on June 12, 2024 until this case is resolved in its entirety for the same reasons cited in 1a above. c.) 1<sup>st</sup> Motion to have a hearing on these instant Motions and on the Defendant's Motions docketed on 7-10-24 as provided under Maryland Rule 2-311 to determine, amongst other things, if Judge S. Bailey breached the Defendant's 14<sup>th</sup> Amendment Right, her 2<sup>nd</sup> Amendment Right, and her Civil Right under Title 18, U.S.C., Section 242 due to: 1.) Judge S. Bailey's denial of the Defendant's 5-20-23 Motions in her Findings and Order entered on the Court's website on 6-25-24 without disclosing, considering, and resolving all of the material facts and legal arguments in the Defendant's 5-20-23 Motions. ii.) Judge S. Bailey being in violation of Federal Statute 28 U.S.C. & 455(a) and Maryland Rule 18.102.11 if she fails to voluntarily disqualify and recuse herself as the presiding Judge over the Defendant's instant Motions and/or her 7-10-24 Motions because there is an appearance that she would be impartial and/or biased in deciding the Defendant's instant Motions filed on 9-4-24 or deciding on the Defendant's Motions docketed on 7-10-24 due to Judge S. Bailey being alleged in the Defendant's 14<sup>th</sup> Amendment Right, her 2<sup>nd</sup> Amendment Right, and her Civil Right under Title 18, U.S.C., Section 242 due to the denial of the Defendant's 5-20-23 Motions as ordered in Judge S. Bailey's Findings And Order entered on the Court's website on 6-25-24. 2.) For the 1<sup>st</sup> time, the Defendant is motioning the Judge-in-Charge over Criminal cases to Order that the Defendant's case continues to appear on the Court's website, "Case Search", in order for the Defendant to continue to utilize the website to assist her in filing the necessary Motions and/or Appeal in a timely manner.

## INTRODUCTION

As a believer in JESUS CHRIST as her LORD and personal SAVIOR, the Defendant believes that our great Country is founded on Judeo-Christian principles, which mean that our laws are patterned after the Commandments and Laws in the WORD OF GOD. Thus, in terms of judges being impartial in their ruling, the WORD OF GOD states in Exodus 32:11, "And the LORD spake



into Moses face to face as a man speaketh unto his friend", and Moses informed the judges in Israel of GOD'S law and employed the judges over the various tribes in Israel in Judges 6:16-17, saying, "And, I charged your judges at that time, saying, Hear the causes between your brethren, and judge righteously between every man and his brother, and the stranger that is with him. Ye shall not respect persons in judgment: but ye shall hear the small as well as the great: ye shall not be afraid of the face of man: for the judgement is GOD'S; and, the cause that is too hard for you, bring it unto me, and I will hear it."

In the United States Constitutional Law, a Due Process Clause is found in both the Fifth and Fourteenth Amendments to the United States Constitution. The Constitution uses the phrase in the 5th and 14th Amendments, declaring that the government shall not deprive anyone of life, liberty, or property, without due process of law. The 5<sup>th</sup> Amendment protects people from actions of the federal government, and the 14th protects them from actions by state and local government.

The written Due Process Clauses of the United States Constitution require judges to recuse themselves from cases in two situations, namely, where the judge has a financial interest in the case's outcome and where there is otherwise a strong possibility that the judge's decision will be biased. In the United States Constitutional Law, a Due Process Clause is found in both the Fifth and Fourteenth Amendments to the United States Constitution. The Constitution uses the phrase in the 5th and 14th Amendments, declaring that the government shall not deprive anyone of life, liberty, or property, without due process of law. The 5<sup>th</sup> Amendment protects people from actions of the federal government, and the 14th protects them from actions by state and local government.

The Supreme Court has held that, if a judge wars against the Constitution in breaching the Due Process Clause of the U.S Constitution or if he/she acts without jurisdiction, then that judge has engaged in treason to the Constitution, which suggests that he/she is engaging in criminal acts of treason and may be engaging in extortion and/or in interference with interstate commerce. Since both treason and the interference with interstate commerce are criminal acts, no judge has immunity to engage in such acts.

Germane to Federal Statute 28 U.S.C. & 455(a), the Supreme Court has ruled and reaffirmed the principle that "justice must satisfy the appearance of justice", Levine v. United States, 362 U.S. 610, 80 S.Ct. 1038 (1960), citing Offutt v. United States, 348 U.S. 11, 14, 75 S.Ct. 11, 13 (1954), in 1994, the U.S. Supreme Court held that disqualification of a judge is mandatory if an objective observer would entertain reasonable questions about the judge's impartiality ( Liteky v. U.S., 114 S.Ct. 1147, 1162 (1994). The Court has, too, affirmed that, should a judge not disqualify himself/herself as required by law, then the judge has given another example of his/her "appearance of partiality" which could potentially further disqualify the judge. Further, the Court have determined that, should another judge not accept the disqualification of the judge, then the second judge has evidenced an "appearance of partiality" and has possibly disqualified himself/herself. Moreover, the Courts have affirmed that, if a judge issues any Order after he/she

has been disqualified by law, then that judge has acted in the judge's personal capacity and not in the judge's judicial capacity and has, further, violated his/her oath of office. Wherefore, the U.S. Supreme Court has already established that "Fraud upon the Court" makes the Orders and judgments of the Court void and that "a void Order is void at all times, does not have to be reversed or vacated by a judge, cannot be made valid by any judge, nor does it gain validity by the passage of time. The Order is void ab initio." The Supreme Court has decided that, should a judge issue any Order after he/she has been disqualified by Section 455(a) of the Judicial Code, 28 U.S., and if the party has been denied of any of his/her property, then the judge could be engaging in the federal crime of "interference with interstate commerce" because the judge is, again, disqualified by law.

In regard to the written Maryland Rules in Civil and Criminal proceedings, Maryland Rule 18-102.11 asserts that a judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned.

Maryland Rule 2-311 (f) Hearing--Other Motions states that "A party desiring a hearing on a motion, other than a motion filed pursuant to Rule 2-532, 2-533, or 2-534, shall request the hearing in the motion or response under the heading "Request for Hearing. The title of the motion or response shall state that a hearing is requested. Except when a rule expressly provides for a hearing, the court shall determine in each case whether a hearing will be held, but the court may not render a decision that is dispositive of a claim or defense without a hearing if one was requested as provided in this section."

#### STATEMENT OF FACTUAL BACKGROUND

As a result of successfully completing on 5-20-23 all of the conditions mandated in the 4-page 5-20-21 Probation/Supervision Order (Exhibit 1) of the presiding judge, namely, Judge Bailey, the Defendant mailed her Motions to the Court and the other party on 5-30-23, but the Defendant's Motion was docketed on 6-1-23. The Defendant's Heading in her Motions docketed on 6-1-23 is entitled "1. Motion To Have The Defendant's Legal Firearm And Ammunitions Returned To The Defendant. 2. Motion To Have The Defendant's Record Expunged".

In the body of the Defendant's Motions docketed on 6-1-23, she cites that.... "According to the Probation/Supervision Order issued on 5-20-21, the Defendant was ordered Probation before Judgment (Criminal Procedure Article & 6-220) for two years, with no supervision, to have no contact with the victim, Amy Penn, to surrender firearms, and may not own or possess a firearm during her probationary period. With today being 5-30-23, the evidence of the material fact that the Defendant record available to the Court substantiates the material fact that the Defendant has honored all of her probation requirement. Since the Defendant is pleading that the Court dismiss the action against the Defendant and, thus, no criminal proceeding will take place, and, therefore, the State Prosecutor and/or the Police Department do not need to continue to



hold the Defendant's legal firearm and her 15 bullets for evidence during the criminal proceedings. During the arrest of the Defendant on 10-19-20, the police confiscated the Defendant's gun which was inside the Defendant's blue gun case which was closed, six ammunition inside the gun, 9 ammunition, a thumb drive, a piece of paper with notes written it, and the certificate indicating the Defendant's ownership of the firearm underneath the sponge inside the gun case. On this same day and as witnessed by the Defendant's roommate, Mr. Jimmy Porter, a police officer returned the Defendant's blue gun case and all of the Defendant's items except for her firearm which was loaded with 6 ammunition and the Defendant's 9 ammunition were under the sponge in the Defendant's gun case. Consequently, the Defendant is pleading that her firearm and 15 ammunition be returned to the Defendant in a timely manner. Furthermore, the Defendant is pleading that, since she has successfully complied with her 2-year unsupervised probation, the Defendant no longer has a conviction on your record. Therefore, the Defendant is, also, pleading that the Court has her record be expunged as soon as possible." ...

On 6-9-24, there was a hearing on the Defendant's Motions docketed on 6-1-23, presiding over by Judge M. Glass. Amongst her Findings and Orders dated 6-13-24, Judge M. Glass cites that ... "The Court STAYED the entry of the Order for Expungement of Records for thirty days", and Judge J. Glass, also, ORDERED that the "undersigned Court's review of the Court file, the Order for Probation, docketed May 20, 2021, states Petitioner was ordered to "surrender firearms." Additionally, a docket entry from the date of sentencing that "all items seized [are] to be forfeited to the forfeiting authority." As such, this matter SHALL be forwarded to the sentencing Court for consideration of the request to have the seized firearm and ammunition returned to Petitioner as requested in Petitioners' Motion docketed on June 1, 2023." ...

In response to Judge M. Glass' Order dated 6-13-24, Judge S. Bailey, who presided over the Defendant's 5-20-21 hearing and who was the sentencing Court germane to ordering the conditions in her 4-page 5-20-21 Probation/Supervision Order (Exhibit 1), presided over the Defendant's Motions docketed on 6-1-23 as evidenced in her Findings and Order entered on the Court's website on 6-25-24. The Defendant is alleging that the evidence of the facts cited in and/or lack thereof of facts stated in Judge S. Bailey's Findings and Order entered on the Court's website on 6-25-24, and the evidenced of the material facts and legal arguments declared in the Defendant's Motions docketed on 6-1-23, from which Judge S. Bailey respond to in her Findings entered the Court's website on 6-24-23, substantiate the material facts that Judge S. Bailey fails to disclose, consider, and resolve the material facts and legal arguments in the Defendant's Motions docketed on 6-1-23, which include the material facts which substantiate the allegations that the Defendant's 14<sup>th</sup> Amendment Right, her 2<sup>nd</sup> Amendment Right, and her Civil right under title 18, U.S.C., Section 242 were infringed upon by Judge S. Bailey in denying the Defendant's Motions docketed on 6-1-23 because the evidence substantiate the material facts, namely, that: 1.) As of 5-20-23, the Defendant successfully maintained and complied with all of the conditions under Judge S. Bailey's two year mandates in her 4-page Probation/Supervision Order entered on 5-20-21 and has successfully completed the States 3-year probation requirement before permitting the



expungement of the Defendant's criminal case. 2.) Since 5-20-23, the evidence substantiate that the Defendant has successfully maintained and complied with all of the conditions under Judge S. Bailey's two year mandate as ordered in her 4-page Probation/Supervision Order 5-20-21, the 5-20-21 Probation/Supervisory Order and the conditions stipulated under the Order signed by the presiding Judge, Judge S. Bailey, are no longer in effect and/or applicable to the Defendant. 3.) Judge Bailey does not assert in anywhere in her 4-page 5-20-21 Probation/Supervision Order that after the Defendant has successfully maintained and complied with all of the conditions under her Probation/Supervision Order, the Defendant cannot repossess her legally owned firearm and her ammunition. 4.) In her Findings and Order entered on the Circuit Court's website on 6-25-24, Judge Bailey doesn't cite specifically what Court Recording and documents contained in the Court record that would justify her denying the Defendant's 2nd Amendment Right to repossess her legally owned firearm and ammunition. As evidenced by the facts stated in her Findings and Order entered on the Court's website on 6-25-24, Judge S. Bailey, but simply declares that "After review of the Court Recording and documents contained in the Court file, the Motion to Have Defendant's Legal Firearm (sic) [should be "Firearm"] and Ammunitions Returned is hereby DENIED". 5.) As proclaimed in the Defendant's Motions entered on the Court's website on 7-10-24 and which respond to Judge Bailey's Findings and Order entered on 6-25-24 on the Court's website, during the 6-9-24 hearing before Judge M. Glass, the attorney representing the State of Maryland informed the presiding Judge that, since the Defendant had fulfilled her requirement for expungement of her Records by the State of Maryland, the State of Maryland would not disagree with the Defendant receiving expungement and of the repossession of her firearm and ammunition. Also, during the hearing on 6-9-24, the State of Maryland informed Judge M. Glass that there is no citing in Judge S. Bailey's Probation/Supervision Order entered on the Circuit Court's website on 5-20-21 that asserts that the Defendant's firearm and ammunition are forfeited. After this statement, the attorney representing the State of Maryland walked over to the Defendant's side of the Court and showed the Defendants her copy of page 3 of Judge S. Bailey's 4-page 5-20-21 Probation/Supervision Order, namely, condition number 33 box, whose box is checked and the only statement written is "Surrender firearms and Def may not own or possess a firearm". The Defendants declares that she her copy of this same Order and was, already looking at the same page when the attorney representing the State of Maryland came over to the Defendant's seating.

Again, in responding to Judge S. Bailey's Findings and Order entered on the Circuit Court's website on 6-25-24, the Defendant mailed her Motions on 6-28-24 to the Court and the other party as evidenced by the 6-28-24 receipt from the local post office (Exhibit 2), although the Defendant's Motions were entered on the Circuit Court's website on 7-10-24. The two attachments to the Defendant's 6-28-24 Motions are entered on 7-11-24 on the Circuit Court's website under the title of "Supporting Exhibit", and "Supporting Exhibit 1" is on the Defendant's website, *www.daniellaw.com*, as Exhibit 83 and Supporting Exhibit 2" is on the Defendant's website as Exhibit 91. The Heading in the Defendant's 7-10-24 Motions entered on the Circuit Court's website on 7-10-24 is entitled "1.) MOTION TO HAVE A RECONSIDERATION OF THE COURT'S ORDER FILED ON 6-25-24. 2.) MOTION TO HAVE A HEARING ON THE MOTION FOR



**RECONSIDERATION. 3. MOTION TO HAVE THE COURT'S ORDER FILED ON 6-12-24 TO STAY THE DEFENDANT'S EXPUNGEMENT FOR 30 DAYS BE EXTENDED UNTIL THE CASE IS RESOLVED".**

In the body of her Motions mailed entered on the Circuit Court's website on 7-10-24, the

Defendant asserts that "...According to the Probation/Supervision Order issued on 5-20-21 by the presiding Judge, Judge Bailey, the Defendant was ordered Probation before Judgment (Criminal Procedure Article & 6-220) for two years, with no supervision, to have no contact with the victim, Amy Penn, to surrender firearms, and may not own or possess a firearm during her probationary period. Furthermore, as evidenced by the transcript of the hearing on 6-12-24 before the presiding Judge, the State of Maryland confirmed that the Defendant has, also, completed their required 3 year probationary period, and, therefore, the State of Maryland declared during the hearing that the Defendant meets the qualification for having her record to be expunged and that the State of Maryland will not deny the Defendant her right to have her legally owned firearm and ammunition returned to her. Therefore, the Defendant is alleging that her 2<sup>nd</sup> Amendment Right, her 14<sup>th</sup> Amendment Right, her Civil Right under Title 18 U.S.C., Section 241, and/or the Defendant's Civil Right under Title 18 U.S.C., Section 242 have been violated by Judge Bailey's Findings and Order filed by the clerk on 6-25-24 which responds to Defendants 5-30-23 Motions due to, amongst other things, the material facts that the Defendant has honored all of her probation requirements as, also, reiterated in the 6-13-24 Findings and Order by the presiding Judge and because Judge Bailey du. [should be "or" instead of "Judge Bailey du.,"] the failure of Judge Bailey to disclose, consider, and resolve in her Findings and Order [should leave out "Judge"] Bailey fails to disclose, consider, or resolve in her Finding and Order filed on 6-25-24 any of the material facts and legal arguments in the Defendants 5-30-23 Motion from which Judge Bailey responds to in her 6-25-24 Finding and Order. Further, Judge Bailey fails to include in her Findings and Order filed 6-25-24 any tangible evidence, indicating the specific "Court Recording" or "document" that she alleges substantiate her Finding and Order, but simply alleges in her Findings and Order that "After review of the Court Recording and documents contained in the Court file, the Motion to Have Defendant's legal Firearm [should be "Firearm"] (sic) and Ammunitions Returned is hereby DENIED".

The Defendant is alleging that the evidence in the record, the 2 Exhibits which accompany these Motions, the Exhibits on the Defendant's website, the material facts cited below, and/or other material facts that will be forthcoming, substantiate the allegations that the Defendant's 2<sup>nd</sup> Amendment Right, her 14<sup>th</sup> Amendment Right, her Civil Right under Title 18 U.S.C., Section 241, and/or the Defendant's Civil Right under Title 18 U.S.C., Section 242 have been infringed upon by Judge Bailey in failing to grant the Defendant's 5-20-21 Motions, which include the Defendant's Motion to have her legally owned firearm and ammunition. The material facts are: 1.) The Defendant is alleging that Judge Bailey is breaching her mandates in her 5-20-21 Probation/Supervision Order because Judge Bailey's Order does not state in this Order that part of the probation requirement would include the Court ordering the "forfeiting" of the Defendant's firearm and ammunition. 2.) As evidenced in the 6-13-24 Order by the Court, the Court granted the Petitioner's request for expungement,

The Defendant is alleging that the evidence in the record, the 2 Exhibits which accompany these Motions, the Exhibits on the Defendant's website, the material facts cited below, and/or other material facts that will be forthcoming, substantiate the allegations that the Defendant's 2<sup>nd</sup> Amendment Right, her 14<sup>th</sup> Amendment Right, her Civil Right under Title 18 U.S.C., Section 241, and/or the Defendant's Civil Right under Title 18 U.S.C., Section 242 have been infringed upon by Judge Bailey in failing to grant the Defendant's 5-20-21 Motions, which include the Defendant's Motion to have her legally owned firearm and ammunition. The material facts are: 1.) The Defendant is alleging that Judge Bailey is breaching her mandates in her 5-20-21 Probation/Supervision Order because Judge Bailey's Order does not state in this Order that part of the probation requirement would include the Court ordering the "forfeiting" of the Defendant's firearm and ammunition. 2.) As evidenced in the 6-13-24 Order by the Court, the Court granted the Petitioner's request for expungement,



which substantiate that the Defendant had completed the requirements as mandated in Judge Bailey's 5-20-21 Probation/Supervision Order and has been in compliance with the mandate for expungement by the State of Maryland since 5-21-24. 3.) The Defendant is alleging that it is essential that the presiding Judge who issued the 6-13-24 Finding and Order, which included ordering a 30-day stay on the expungement, order another extension to "stay the expungement until the case is resolved, since during the 6-12-24 hearing, the Court informed the parties that she was ordering a "stay of 30 days on the expungement Order, otherwise the case would be dismissed and the Defendant would no longer have a case and her right to have her 5-30-21 Motions considered, disclosed, and resolved by Judge Bailey. 4.) The Defendant is asserting that, during the 5-20-21 hearing before Judge Bailey, she does not recall hearing Judge Bailey assert that she was mandating that the "forfeiting" of the Defendant's firearm and ammunition as part of the plea bargain. 5.) The Defendant is asserting that, prior to and/or during the hearing on 5-20-21, the Public Defender never informed the Defendant that the Public Defender's Office had agreed with the State of Maryland to settle for a plea bargain and that the plea bargain would include having the Defendant's legally owned firearm and ammunition "forfeited". 6.) The Defendant is alleging that during the only meeting with this Public Defender, namely, the meeting they had before the hearing on 5-20-21, the Public Defender's responses assured her that he had neither read any of the Defendants emails forwarded to the attorney whom she had prior to his representing her, namely, Attorney Coleman, especially her email forwarded to Attorney Coleman on 11-6-21 (Exhibit 1) and the Defendants' Official Complaint to the President of the U.S. and others government officials against the Police Department, the State of Prosecutor's Office, and others. In her Official Complaint, which the Defendant alleges that she mailed a copy to Attorney Coleman on 11-20-21, the Defendant asserts, amongst other things, the tampering with evidence as it relates to the Defendant's firearms and/or ammunition and/or gun case, removal of evidence relevant to the Defendant's firearms and/or ammunition, and fraud in the facts stated in police report from the Police Department and/or in the charging documents of the State Prosecutor's office germane to the Defendant's firearms and/or ammunition. 7.) The Defendant is alleging that this email, her Official Complaint, and/or other emails and Addendum to her Official Complaint against the Police Department, the State Prosecutor's Office, and other agencies which has been forwarded to our Hon. President of the U.S. are included on the Defendants website as Exhibits 83-86 and Exhibits 88-91. 8.) The Defendant is asserting that she has never read or received a copy of the plea bargain, nor did she sign any plea bargain, nor would she have given her Public Defender permission to have her firearm and ammunition forfeited as part of any plea bargain. 9.) The Defendant is asserting that she was never informed by her Public Defender at any time during her only contact with her Public Defender before the hearing on 5-20-21 that part of the plea agreement included confiscating, permanently, her legally owned firearm and ammunition. 10.) As evidenced in the transcript of the hearing held on 6-12-24, after the Court informed the Defendant that there was a document in the record of the 5-20-21 hearing before Judge Bailey that declared that the Defendant's legally owned firearm and ammunition are "forfeited", the Defendant informed the Court that she does not recall ever hearing Judge Bailey state that her firearm and ammunition were being forfeited and had she read or had known



410-868-6013

Baltimore, Maryland 21222

131 Calvin Hill Court

Diana R. Williams, Pro Se

Respectively Submitted

Thus, in conclusion, the Defendant pleads that the Court grants her Motions and/or grant the Defendant's Motion for a hearing on these Motions.

CONCLUSION

The Defendant is alleging in that the evidence substantiate the material facts in these instant Motions filed on 9-4-24, in her Motions entered on the Court's website on 7-10-24, and in her Motions entered on the Court's website on 6-1-24, namely, that, amongst other things, Judge S. Bailey's Findings and Order entered on the Court's website on 6-25-24, which respond to the Defendant's Motions entered on the Court's website on 6-1-23, breaches the Defendant's 14<sup>th</sup> Amendment Right, her 2<sup>nd</sup> Amendment Right, and her Civil Right under Title 18, U.S.C., Section 242 in denying the Defendant her right to repossess her firearm and ammunition.

ARGUMENT

about there being such a stipulation in the plea agreement of her right to possess her legally owned firearm and ammunition, she [the Defendant] would have certainly not agreed to a plea bargain. 11.) As evidenced in the transcript of the hearing on 6-12-24, the Defendant informed the Court that, although the Complainant never appeared for the hearing, the Defendant asserts that she would have certainly requested a hearing if she knew that having her firearm and ammunition forfeited was part of the plea bargain. 12.) Also, during the hearing on 6-12-24, the attorney representing the State of Maryland informed the Court that, since the Defendant had fulfilled her requirement for expungement by the State of Maryland, the State of Maryland would not disagree with the Defendant receiving her firearm and ammunition. 13.) During the hearing on 6-12-24, the State of Maryland informed the presiding Judge that, in mandates in Judge Bailey's 5-20-21 Probation/Supervision Order, there is no citing that the Defendant's firearm and ammunition are forfeited as part of the Probation/Supervision Order, and the attorney from the State of Maryland walked over to the Defendant's side of the Court and showed the Defendants a copy of Judge Bailey's 5-20-21 Probation/Supervision Order, although the State of Maryland did not know that the Defendant had her copy of this same Order with her", ...