

OPPOSITION TO JUDGE THOMAS F. PARKER'S REAPPOINTMENT

Sylvester Traylor
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Quaker Hill, CT. 06375
(860) 331-4436

January 16, 2015

State of Connecticut
Judiciary Committee
State Capitol
Hartford, CT. 06106

RE: Opposition to Judge Thomas F. Parker, Re-appoint

Dear Rep. Fox and Sen. Coleman

I, Sylvester Traylor do hereby submit this objection to Judge Thomas F. Parker being reappointment as a judge for Connecticut Judicial Branch, for the following reasons:

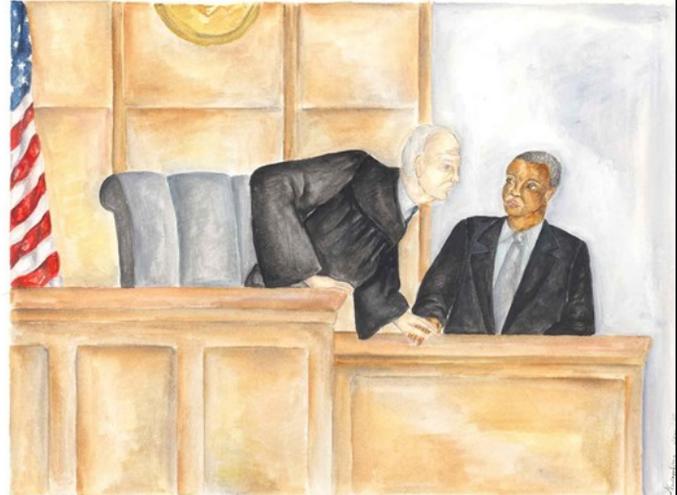
Judge Parker's offenses include ..., intimidating witnesses or parties to legal action. It is my contention that Judge Parker committed a Civil Rights violation against me by reaching into the witness box and grabbing my wrist, and then asking me if I felt intimidated by him with the intent to intimidate and bully me because of my race and color, under the color of law.

First and foremost, it is a well known fact that Judge Thomas F. Parker was a member of the New London Country Club, during a time period that African-Americans, Hispanics and Jews were discriminated against by not being allowed to join their exclusive golf club.

The first minority person that was ever allowed to join the New London Country Club, was a Jewish lady by the name of Marie S. Conover, who was only permitted to join the New London Country Club in the 1980s after confronting the club that she was going to expose the names of the judges and clerks such as Judge Thomas F. Parker, who is affiliated with the silent group society that discriminates against African-Americans and Jews. Please read the Silent Gentleman's

1. Furthermore, kindly find attached an Affidavit marked Exhibit "A" from Habibah Abdul-Hakeem a former employee of the New London Superior Court who stated: ***"In my opinion, the animus based discrimination by the New London Superior Court towards Mr. Traylor, was in fact intended to discredit him, and this discrimination lessened his chances of obtaining a jury trial."***

Judge Thomas F. Parker's "Bullying" – Lack of Judicial Temperament



INTIMIDATION OF A WITNESS

What would have been the consequences for an African-American Plaintiff [if] the roles had been reversed, and he had reached into the judge's bench to touch a judge?

2. Pro-Se discrimination on pages 2, 3, 27 and #28 of the July 8, 2010 transcript in Docket # KNL-CV-06-5001159-S , Judge Parker stated:

- MR. TRAYLOR: Sylvester Traylor, present, is representing myself.
- THE COURT: You're silent.
- MR. TRAYLOR: I have an appearance in the file, Your Honor.
- MR. HALL: Are you striking - - Mr. Traylor has filed an in addition to appearance. Are you striking that appearance today, Your Honor?
- THE COURT: I haven't seen it. He can file all appearance he wants, but he's not going to be heard in open court. That's why he has a lawyer.

3. On September 7, 2010 the following dialogue took place in Docket # KNL-CV-06-5001159-S:

- THE COURT: Do you want to say anything, Mr. Hall? MR. TRAYLOR: Can I?
- THE COURT: No. No. See, that's why we have lawyers. That's why we have lawyers, even one who represents Sylvester Traylor.
- MR. TRAYLOR: I just - my new counsel will be filing an appearance tomorrow.
- THE COURT: You know what? MR. TRAYLOR: Sorry.
- THE COURT: I really believe you. He's going to file a new appearance. This is another lawyer that didn't even look at the file this size and takes the case and going to come in here with an appearance and then he's going to say hey, Judge, this is over 400 filings. I'm going to need until Christmas 2014 to be able to respond.

4. On September 20, 2010 the following dialogue took place in Docket # KNL-CV-06-5001159-S:

- MR. TRAYLOR: Your Honor, --
- THE COURT: Never mind Your Honor. Answer me yes or no. The pleading that you are relying upon, the reply which you said was filed on behalf of the estate, you, Sylvester Traylor, the man standing in front of me, filing?

5. On January 19, 2011, I appeared before the Honorable Thomas F. Parker for a hearing concerning (judge Parker's) own judicial review complaint for which I drafted on June 15, 2010.

- During this hearing Judge Parker conducted the hearing as if I was nonexistent in the room by asking the Defendants counsel questions concerning what I intend to do and/or say regarding filing specific documents. The Defendants counsel didn't know the answer. Judge Parker continued to conduct this hearing without once acknowledging my existence in the same room by asking the same questions to my attorney, Attorney Berdick. Judge Parker and the Defendants counsel would then make legal conclusions about my character without allowing me to offer any feedback. By doing so, I felt further intimidated and retaliated against me for making a previous complaint against Judge Parker.
- Judge Parker appeared to avoid the intent of the complaint and switch the blame back to me by nit picking over —clerical errors and/or “scrivener’s errors” dates and page numbers. The date of the complaint was June 15, 2010 and Judge Parker acted as if it were a crime when he pointed out a typographical error within the body of the complaint and the numbering of the pages. It was obvious that minor mistakes were just that of a “scrivener’s errors” in nature, certainly nothing to be harassed over.

6. PROBLEMATIC ASSOCIATIONS AND FRIENDSHIP. It is my contention that Judge Thomas F. Parker should not be reappointed as a judge because of his problematic associations and friendships. **See Judicial Conduct and Ethics Fourth Edition Sec. 10.05, 10.05A.** Judge Thomas F. Parker’s integrity is in question.

- Further, I contend that Judge Parker ignored a problematic association between himself and his relationship with Attorney Donald Leone, Lawrence Memorial Hospital, and the Defendant Dr. Bassam Awwa of whom is all are affiliated with the same medical insurance practicing at Lawrence Memorial Hospital of which the Defendant Dr. Bassam Awwa was once employed. See Problematic Associations and Friendship pursuant to Judicial Conduct and Ethics Fourth Edition Sec: 10.05, 10.05a, 10.05c, 10.05d.
- On January 19, 2011, the problematic relationship was further identified during a hearing. Judge Parker asked Attorney Berdick which office he was E-filing from. Attorney Berdick expressed that he didn't feel as though he needed to provide such information as it wasn't relevant. Judge Parker ordered him to tell him where he e-filed from and Attorney Berdick stated it was from Attorney Anne P. Hatfield’s office. Attorney Hatfield had once worked under Judge Parker as a case flow coordinator while he served as Chief Administrative Judge for New London County. In addition, Attorney Hatfield is a personal friend of Judge Parker’s son. They participate in Republican campaigning and social networking. When Judge Parker learned that Attorney Berdick was using Attorney Hatfields office to E-file, Judge Parker displayed signs of concern by leaning back in his chair while taking off his glasses off, while realizing the distinct connection. At that point Judge Parker should have recused himself from the case just as when jurors are excused from jury duty as part of the judicial process when a juror has a relationship with one of the attorneys, the judge, or a party to the case.

7. JUDICIAL DEMEANOR AND COMPETENCE. See Judicial Conduct and Ethics Fourth Edition

Sec. 3.01, 3.02^a, and 3.02B. See page 3-13 “We take this opportunity to remind ourselves as judges that tyranny is nothing more than ill used power. We recognize that it is easy . . . to lose one’s judicial temper, but judges must recognize the gross unfairness of becoming a combatant with a party. A litigant, already nervous, emotionally charged, and perhaps fearful, not only risk losing the case, but also contempt and a jail sentence by responding to a judge’s rudeness in kind. The disparity in power between a judge and a litigant requires that a judge treat a litigant with courtesy, patience and understanding. Conduct reminiscent of the **playground bully** of our childhood is improper and unnecessary.”

- On different occasions Judge Parker has attached the wrong information to his orders, which resulted in having to reschedule hearing dates. The January 19, 2011 hearing was rescheduled to January 20, 2011 because Judge Parker had directed the clerk to send out the wrong judicial complaint which was only sent to Judge Parker via the Judicial Review Council. However, Judge Parker blames the clerk for his incompetent actions.

8. ABUSE OF CONTEMPT POWER. See Judicial Conduct and Ethics Fourth Edition Sec. 2.03A and 2.03B “Individuals were denied fair treatment and often denied personal freedom in violation of their rights.”

- On January 20, 2011, my attorney and I appeared before Judge Parker, Immediately Judge Parker’s behavior became off color by pointing his finger in a scolding manner saying that I could not represent myself even though I had a right to represent myself in my personal capacity. Judge Parker went on to say to Attorney Berdick that he had to represent me in my personal capacity. Attorney Berdick told Judge Parker that he did not have to represent me in his personal capacity. Judge Parker then ordered Attorney Berdick to represent me in my personal capacity. Attorney Berdick refused because it was his belief that I had a right to represent myself in my own personal capacity. Judge Parker then directed the marshal to handcuff and shackle Attorney Berdick with the full knowledge that Attorney Berdick had just been released from the hospital and was under medication due to a major surgery. Attorney Berdick was escorted to a jail cell where he was then exposed to the risk of TB or other infectious diseases due to the freshly open wound due to the surgery.
- At 3:30pm, I was under duress so I then withdrew my Pro-Se appearance (just for that day) so that Attorney Berdick would not go to jail. I felt that the judges mental mind state was incompetence. I also believed that Attorney Berdick mental state was altered due to the medication he was under.
- This is just another example of many reasons why the Judiciary Committee should not reaffirm Judge Parker’s reappointment as well as the reason why Attorney Berdick filed a Motion to Recuse Judge Parker on October 26, 2010 which Attorney Anne Hatfield was instrumental in drafting. Furthermore, it is a good example of why I filed (6) other judicial review complaints against Judge Parker.

9. WRONGFULLY DETAINED OUT OF RETALIATION.

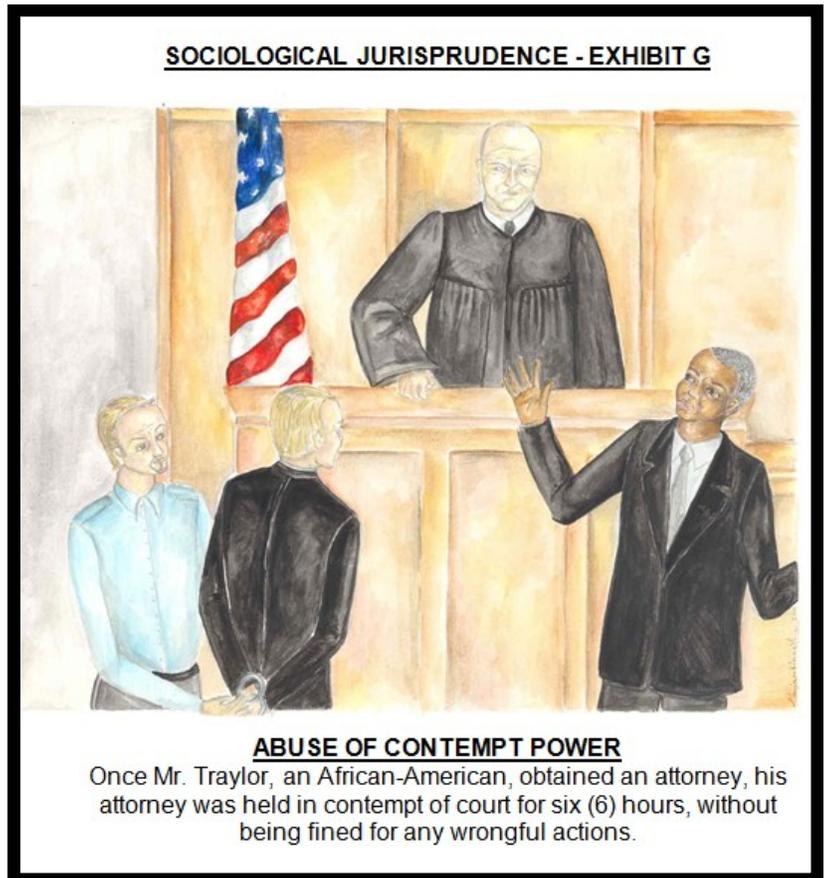
- It is my belief that Judge Parker was deliberately trying to cause tension between myself and my attorney, Attorney Berdick. It is also my belief that Judge Parker harassed Attorney Berdick because he was helping an African American. When Attorney Berdick stood his ground for his belief concerning my rights, he was wrongfully detained, forcing me to make instantaneously decisions which I may have not made otherwise.

10. UNDER DURESS

- It is further my belief that on January 20, 2011 Judge Parker made me feel that I had to perform an act under duress. I felt threatened that if I didn't withdraw my appearance, my attorney would go to jail for six (6) months.

11. INTERROGATION

- On February 3, 2010, Judge Parker leaned forward from the judge's bench into the witness box grabbing my right wrist with his face approximately one foot away from my face and then he stated to the court reporter that it be noted, that the judge and the Plaintiff, Mr. Traylor were looking eye to eye. Judge Parker asked me if I felt intimidated by him. I responded to Judge Parker's question by stating that I had an example of a case where a litigant approached the judge's bench and pointed his finger at the judge and that litigant's case was referred to the Chief Administrative Judge because of the threat.
- It is hereby submitted that I believe that Judge Parker's demeanor by grabbing my wrist and leaning forward towards me... are showing early signs of dementia. I felt threatened by the Judge as he displayed his abusive power. Furthermore, I do not know the Judge on a personal level; therefore, I felt that not only was my personal space invaded but I felt as though Judge Parker abused his authority by taunting and/or provoking me into a physical confrontation. At one point Judge Parker showed signs of erratic behavior, —standing up ranting, and raving while the witness, Defendants counsel and Plaintiffs counsel were all still seated. While doing so, the Judge was starring down at me. Again, I felt threatened.



12. PROVOKING THE PLAINTIFF IN RETALIATION

- On February 3, 2011, Judge Parker's demeanor was in fact provoking me through taunting me by requesting me to respond to my third complaint dated June 15, 2010 but not allowing me to express or articulate my complaint in words. As an African American, I felt Judge Parker displayed bias behavior.

13. SIGNS OF DEMENTIA AND/OR INCOMPETENCY

- Judge Parker would ask me questions regarding my employment. For instance, Judge Parker asked me how long my employment was. I repeatedly, responded one (1) year between 1996 and 1997. The judge would —tell me no, that's two (2) years. How long did you work there? Together with my counsel we would correct Judge Parker and Judge Parker would come back with an argumentative and wrong conclusion. By doing so, Judge Parker either could not remember the answer just stated or showed his incompetence by avoiding a reasoned answer.

14. SYSTEMIC DISCRIMINATORY PRACTICE

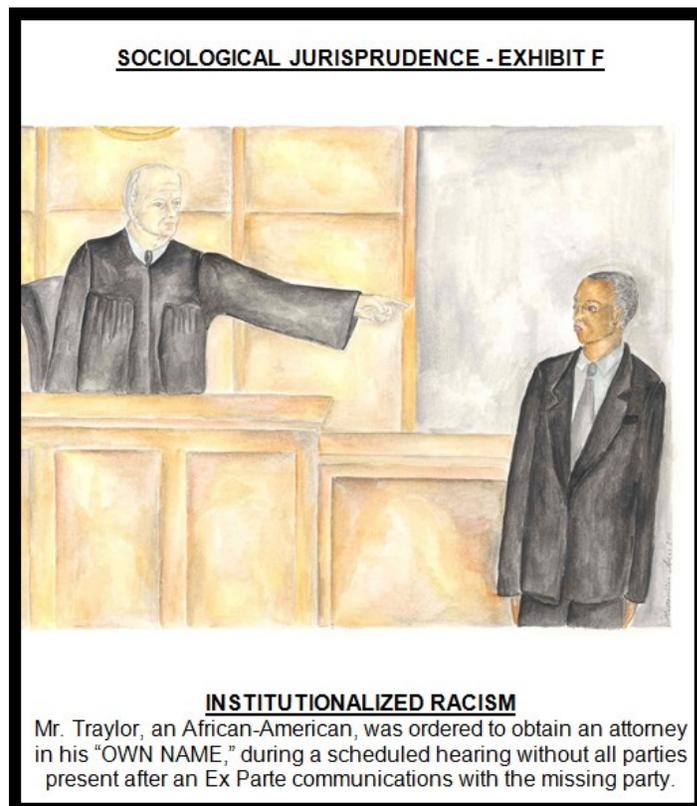
- **IN THAT:** It is hereby submitted that Judge Parker directed and encouraged the Judicial Marshals to racially profile me. On the day that I had to appear as a witness in the criminal case against my brother-in law for his continuing threatening and discriminating behavior towards me, my In-laws came out of the court into the hall way and made threatening comments towards me, in front of the Marshals. The Marshal wouldn't do or say anything to them in requesting them to cease and desist their threatening comments. David Kimes, looked at Marshal Pucci and said, "If Bob gets convicted, you're messed up. We're going to get you." Marshal Pucci, just laughed and said: "Oh Boy!"
- **IN THAT** on May 27, 2009 I was forced to contact Joseph D'Alesio's Office regarding the Judicial Marshal's racial profiling demeanor.
- **IN THAT** on October 16, 2009, once again, I was compelled to contact Joseph D'Alesio's office regarding the Judicial Marshals' racial profiling. The Norwich Police Department was also contacted concerning Marshal Winski who instructed Marshal Zeimet to single me out, with the intent to intimidate me as I was approaching the metal detector in the doorway of the court located at 1 Courthouse Sq Norwich, CT 06360. Once again, Joseph D'Alesio's office failed to request the perpetrators to cease and desist the hostile environment under the color of law because their systemic discrimination was directed from Judge Parker.
- **IN THAT** on November 3, 2009 the following stereotypical and discriminatory comments were made by Judge Parker, who was stereotyping me by comparing me to Booby Seal:
 - THE COURT: "Okay."

- MR. TRAYLOR: "Their motion to dismiss for subject jurisdiction, I filed an objection to that and said clearly that they-that they are off point, even in their case law of saying that in Higgins versus Mulvey."
- THE COURT: "Huggins, Erica Huggins, you're too young to know who she is."
- MR. TRAYLOR: "No, I don't. Who was she, your Honor?"
- THE COURT: "Well, that's **back in the days of the riots in New Haven**, and she was a very prominent defendant, and she was involved in a whole in the **Bobby Seal** affair back in New Haven. You're probably all too young. **Maybe not YOU!**"
- **IN THAT** on July 28, 2010, it is hereby submitted that Judge Parker has further allowed a hostile environment towards me to continue by attempting to provoke me into violence in the court as well as attempting to intimidate me from making any further complaints against Judge Parker, by assigning four (4) State Marshals to be present during a hearing concerning my request for a disqualification of Judge Parker. During this hearing, I was denied my substantive Due Process Right to be heard in open court regarding my own complaint against Judge Parker while having an appearance in his own case.
- **IN THAT** on October 18, 2010 Judge Parker made a "Hip-Hop" rappers hand and facial GESTURE, in open court, with the intent to taunt and mark me because of my race and color. The hand and facial gestures took place immediately after Judge Parker refused to acknowledge my counsel's appearance.

15. INSTITUTIONALIZED RACISM

- On December 21, 2009, I was ordered to obtain an attorney in my OWN NAME, during a scheduled hearing without all parties present after an Ex Parte communications with the missing party.
- To be in contact with the missing party without all persons including myself present constitutes a conspiracy against me. Judge Parker conspired to defraud and to deprive me of my civil rights. I was denied both knowledge and access to the exparte communications that Judge Parker had with an absent Defendant in my action which played a substantial part in my case.
- An example, of the present INSTITUTIONALIZED RACISM: The Plaintiff goes to a store and see the price of an item which is one dollar \$1.00, but the cashier, tells him that the price for that same item is two dollars \$2.00, "for him" because he's an African-American and Pro Se. The Connecticut General Statutes and the Connecticut Practice Book regarding the rules for self-representing party should NOT change just because the Plaintiff is a Pro-Se, African-American, of who has been GRANTED indigent status by the court. It would appear that since the death of the late Hon. Judge Hurley the New London Superior Court has not applied the rules of the court equally to all parties.

- The Pro-Se discrimination continues on pages 2, 3, 27 and #28 of the July 8, 2010 transcript of Judge Parker who stated:
 - MR. TRAYLOR: Sylvester Traylor, present, is representing myself.
 - THE COURT: You're silent.
 - MR. TRAYLOR: I have an appearance in the file, Your Honor.
 - MR. HALL: Are you striking - - Mr. Traylor has filed an in addition to appearance. Are you striking that appearance today, Your Honor?
 - THE COURT: I haven't seen it. He can file all appearance he wants, but he's not going to be heard in open court. That's why he has a lawyer.



16. Wherefore, I hereby move the Judiciary Committee to deny Judge Parker the right to be reappointed for the following reasons:

- **IN THAT**, I was wrongfully assaulted and made to feel intimidated by Judge Parker;
- **IN THAT**, Judge Parker, directed the State Judicial Marshalls to practice systemic discrimination;
- **IN THAT**, Disparaging treatment under the color of law, by Judge Parker by attempting to provoke me into violence inside the State Court House;
- **IN THAT**, Intimidation under the color of law, towards me and my counsel by State Judicial Marshalls;
- **IN THAT**, Intimidation under the color of law, by the Hon. Judge Parker towards me while on the witness stand;
- **IN THAT**, Intimidation under the color of law, by the Hon. Judge Parker towards me by making a "Hip-Hop" rappers hand and facial GESTURE, in open court, with the intent to taunt and mark the Plaintiff;
- **IN THAT**, Reckless infliction of emotional distress, under the color of law, by Judge Parker who

stated on page 23 of his transcript dated September 20, 2010: "I don't care if you're going in the hospital!!!"

- **IN THAT**, Intimidation under the color of law, by Judge Parker through wrongfully holding my counsel in contempt;
- **IN THAT**, Ex parte communications with a party to my case;
- **IN THAT**, Ex parte communications via a cell phone in open court without identifying to all parties regarding "who" was giving the Hon. Judge Parker instruction how to conduct the Plaintiff case....during said scheduled hearing;
- **IN THAT**, The State Court Clerk blatantly fabricated on the witness stand if he had or had not seen the State Attorney in open court on December 21, 2009;
- **IN THAT**, Judge Parker tampered with transcripts;
- **IN THAT**, Depriving me of my due process and equal protection right by applying Conn. Gen. Stat. Sec. 52-190a unconstitutionally to me through ignoring the Law of the Case, set down by the Hon. Judge Michael Hurley memorandum two years earlier;
- **IN THAT**, Depriving me of my due process and equal protection right by applying Conn. Gen. Stat. Sec. 51-88 unconstitutionally to me through ignoring the fact that Connecticut Laws are absent of any legislator's action which will prevent the Plaintiff from filing an appearance in his "OWN NAME", SYLVESTER TRAYLOR, in his capacity as the Sole Administrator.
- **IN THAT**, my case was not put on the regular docket list, but was continually put in an isolated courtrooms closed from the public viewing;
- **IN THAT**, Reopening default judgments against the Defendant, Bassam Awwa without the Defendant's counsel filing any answers to the late Hon. Judge Hurley's discovery orders;
- **IN THAT**, Allowing Destruction of evidence during a legal proceeding;
- **IN THAT**, Ex parte communication with criminal prosecutors, regarding the spoliation of evidence after the Defendants counsel openly admitted to destroying evidence in open court which was after the Hon. Judge Hurley's discovery orders;
- **IN THAT**: Refusing to enforce the late Hon. Judge Hurley's discovery orders because he was also interracially married, as myself;
- Agreement Society and/or Joining the Club Society written by Dan A. Oren, concerning the Race, Politics, and Citizenship in the Jim Crow of the north.

[Washington State Supreme Court](#)

held on Tuesday February 24th 2009, 10:00AM

Oral arguments: Kimme Putman v. Wenatchee Valley Medical Center, P.S., et al. **(Is the certificate of merit requirement for medical malpractice cases constitutional?)**

Certificate-Of-Merit "Struck Down" by Washington Supreme Court



Please [click here](#) to watch video or paste this url into your browser address bar:
http://tvw.org/index.php?option=com_tvwplayer&eventID=2009020027B#start=12&stop=2836

CONTACT INFO FOR: Attorney Robert S. Peck
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777 6th Street NW
Suite 520
Washington, DC 20001
Phone: work(202) 944-2874
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- **IN THAT:** Making disparaging comment. regarding why Judge Hurley's orders denying the Defendant, Bassam Awwa's motion to dismiss: Judge Parker stated: "Judge Hurley was smitten by the Pro Se litigant."
- **IN THAT:** Disparaging treatment under the color of law, by the Connecticut Appellate Court Clerk by granting the Plaintiff's motion for an extension after the deadline;
- **IN THAT:** Evidence will show that there is existence of a 'meeting of the minds' between Dr. Bassam Awwa, Judge Parker (State Actor), Dr. Awwa's counsel Dr. Awwa's insurance company CONNECTICUT MEDICAL INSURANCE COMPANY, and State legislator, all of whom attend an annual Christmas banquet at Lawrence Memorial Hospital and banquet called the Red Wine Nights. During these annual banquets they all contribute money's. During these annual banquets the above State and private parties discuss pending lawsuits which is before the State of Connecticut Courts, Appellate and Supreme, and their potential financial repercussion;
- Despite the fact that the Certificate of Merit have been declared unconstitutional in five states. See the click on the attached video. It is my contention that Judge Parker conspired with the medical insurance industry by depriving me of the right to challenge the constitutionality of C.G.S Sec. 52-190a.
- **IN THAT:** Evidence will show that both the Plaintiff was in fact invited to one of the annual banquets, so that he may observe the above State and private parties does in fact discuss pending lawsuits which are before the State of Connecticut Courts. See the Civil Rico Federal Racketeering Act USC 18, 1961-1963;
- It is also my contention that the Connecticut Judiciary Committee should not reaffirm Judge Parker as a judge because of his ex-parte communication with private parties. This demonstrates an unethical and conflict of interest between litigants and the insurer, Connecticut Medical Insurance Company executes while attending special events such as the Lawrence & Memorial Hospital; annual Christmas event where the meeting of the minds take place.

- **IN THAT:** Evidence will show that both the Plaintiff and the Plaintiff's counsel filed a Motion to Disqualify the Hon. Judge Parker because of his failure to remain impartial to the Plaintiff's medical malpractice action;
- **IN THAT:** Evidence will show that both the State legislators and the Plaintiff's counsel filed a Motion to Disqualify the Hon. Judge Parker because of his failure to remain impartial to the Plaintiff's medical malpractice action;
- **IN THAT:** Evidence will show that the State legislators were in fact aware of the Plaintiff's pending state action and the disparaging treatment while engaging in unethical and/or a conflict of interest with their own family members, who pay the "State Legislators" to help them pass bills and/or vote against bills, so that they may put a road block against a possible medical malpractice law suit?

Finally, despite the fact that the Federal Court has reversed Judge Parker's part of Judge Parker's ruling concerning the spoliation claim against Dr. Awwa. I am **'AFRAID!'** of the continual retaliation against me from the other New London Superior Court Judges because of Judge Parker and Judge Cosgrove's actions which are depicted in Habibah Abdul-Hakeem's affidavit.

Wherefore, I, Sylvester Traylor, do hereby request the FBI and the Department of Justice to charge Judge Thomas F. Parker and Judge Cosgrove with a civil rights violation because of the above and attached reasons.

January 16, 2015

The Opposition to Judge Parker's reappointment,

/s/ Sylvester Traylor/
Sylvester Traylor
881 Vauxhall St. Ext.
Quaker Hill, CT. 06375
Email: syltr02@gmail.com

EXHIBIT A

UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

SYLVESTER TRAYLOR

Plaintiff

DOCKET No: # 3:11CV132 (AWT)

Vs.

**BASSAM AWWA, M.D. AND CONNECTICUT BEHAVIORAL HEALTH ASSOCIATES P.C;
ATTORNEY DONALD LEONE OF CHINIGO LEONE & MARUZO LLP;
ROBERT AND NEIL KNOWLES ON BEHALF OF ADVANCED TELEMESSAGING INC;
RICHARD BLUMENTHAL, CONNECTICUT ATTORNEY GENERAL AND ON BEHALF OF THE
STATE OF CONNECTICUT SUPERIOR COURT and on behalf of ("State Actors": Hon. Judge
Thomas F. Parker, Hon. Judge James W. Abrams, Hon. Judge Robert C. Leuba, Hon. Judge Robert
A. Martin, and Hon. Judge A. Susan Peck, State of Connecticut Judiciary Chief Justice Chase T.
Rodgers, and Judge Barbara M. Quinn Chief Court Administrator);
CONNECTICUT ATTORNEY GENERAL GEORGE C. JEPSEN
CITY OF NEW LONDON;
JOSEPH D'ALESIO OF THE STATE OF CONNECTICUT COURT OF OPERATIONS;
NEW LONDON CRIMINAL DIVISION STATE ATTORNEY'S (State's Attorney, Michael L. Regan,
Supervisory Assistant State's Attorney Lawrence J. Tytla, and Supervisory Inspector Philip Fazzino);
DR. ROBERT GALVIN, COMMISSIONER FOR THE STATE OF CONNECTICUT DEPARTMENT
OF PUBLIC HEALTH;
CONNECTICUT MEDICAL INSURANCE COMPANY;
DEFENDANTS**

JURY TRIAL REQUESTED

DATE: August 10, 2011

**Affidavit by
Habibah Abdul-Hakeem
Concerning Connecticut Judicial Bullying**

I, Habibah Abdul-Hakeem, I am an African American female, being duly sworn, deposed and say:

I am over the age of 18 years old, and believe in the obligation of an oath.

I make this affidavit of my own free will because of my personal knowledge and concerns about the institutionalized racism within the New London Superior Court.

I am a resident of Connecticut, residing at 10 Franklin St. #2, New London, Connecticut 06320.

I have lived in the State of Connecticut since 1974.

I am a citizen of the United States of America.

I was employed by the New London Superior Court in 2005, as a TAC.

In 2005, when I was first employed by the New London Superior Court located at 70 Huntington Street, New London Connecticut 06320, I immediately observed the fact that I was the only African-American employed as a clerk.

On one occasion, during my initial stage of employment, Mr. Sylvester Traylor of Quaker Hill, Connecticut, came to the clerk's window while conducting a civil litigation matter and introduced himself as a Life Member of the NAACP. Mr. Traylor informed me that he had filed a complaint prior to my employment that there were no African-American clerks or Judges, employed at the New London Superior Court.

Immediately after this conversation with Mr. Traylor, I was made to feel and believe by upper management, that Mr. Traylor, an "African American" was going to enter the court some day with a gun and shoot and kill everybody by going "postal".

Upper management caused me to further question Mr. Traylor's credibility and demean him because he was indigent and an African American.

There was, in fact, disparaging treatment towards Mr. Traylor. It is my belief that I was deliberately influenced by my co-workers that Mr. Traylor did not have a legitimate lawsuit. However, I later learned that he had in fact obtained a Certificate of Merit to support his complaint by the Director of Medicine at Yale University, who had signed a letter instructing the court that Mr. Traylor did in fact have a legitimate complaint of medical malpractice.

In my opinion, the animus based discrimination by the New London Superior Court towards Mr. Traylor, was in fact intended to discredit him, and this discrimination lessened his chances of obtaining a jury trial.

I have never observed Mr. Traylor threatening violence towards any of the State of Connecticut Judges or staff. I believe that the State of Connecticut employees did, in fact, conspire and retaliate against Mr. Traylor, as a Life member of the NAACP, for making a complaint against the New London Superior Court's officials and staff.

On a personal note, it is my belief that after years of employment by the court, they used the same tactic and mode of operation against me to cause fear based on race and attempted to sway others into believing that I, "an African American," was going to enter the court and shoot and kill everybody with a gun, thus going "postal".

Additionally, management influenced my co-workers to make the same falsehood against me via a petition signed by only white employees, which was based on animus based discrimination. Their attitude was in fact discriminatory against both Mr. Traylor and me because of our race.

IN CONCLUSION

Between 2010 and 2011, the New London Superior Court clerk's office staff received a memo of concern from Jorene Couture, Chief Clerk, which outlined concerns that Court Operations had regarding our "handling" of the public at large. The memo was issued by Ms. Couture after receiving a report from Court Operations indicating that they had sent "secret shoppers" to observe the staff's work habits and daily interaction with the public. After this memo was issued by Jorene Couture, Ms. Couture announced that she alone would "handle" Mr. Traylor whenever he came into the clerk's office for assistance. It is my belief that Mr. Traylor was in fact singled out because everyone knew that he had made a complaint to our Human Resource Office concerning our disparaging treatment.

From 2010-2011, I also personally observed unusual behavior by Judge Thomas F. Parker in relation towards Mr. Traylor regarding the civil litigation of Traylor v Awwa, docket number CV-06-5001159-S. I noted that Judge Parker would keep Mr. Traylor's file under lock and key in his chambers. Judge Parker would even request the clerks and staff to inform him whenever Mr. Traylor had entered the court, and to inform him of the exact nature of Mr. Traylor's business.

Clearly, the Connecticut Judicial System needs to clean up its act as evidenced by the disparity in treatment in both my complaint and Mr. Traylor's complaint. The disparity of treatment in POWER by judges and court clerks is reminiscent of a playground bully of our childhood which is improper and unnecessary.

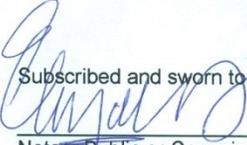
I, Habibah Abdul-Hakeem, do hereby attest to and affirm, and support the fact that the New London County Superior Court located at 70 Huntington St. New London, Connecticut 06320 did in fact conspire to deprive Mr. Traylor of his civil rights to have a fair trial by a jury. This was a form of retaliation against Mr. Traylor through the practice of animus based discrimination and caused state employees to fear Mr. Traylor because of his race and color.

The bottom line is that institutional racism does exist in the Judicial Branch, and especially in the New London County Judicial District via the practices of nepotism, cronyism, race, age, sexual and gender discrimination, harassment and bullying of which Mr. Traylor and I have repeatedly faced by State Employees. It is my belief that Mr. Traylor was in fact denied his access to court. I further believe that Judicial Bullying based on race and color should be eradicated. There is a definite need for the creation of a Healthy Workplace Environment, as well as, improvement of Services to all members of the general public, minus the public bullying based

on race and economic status.

I, Habibah Abdul-Hakeem, being first duly sworn under oath according to the law, deposes and says that I, Habibah Abdul-Hakeem, have read the foregoing Affidavit which I have subscribed, that the matters stated herein are true to the best of my knowledge and belief.


Habibah Abdul-Hakeem
10 Franklin St. #2,
New London, Connecticut 06320
Tel: 860.514.5140

Subscribed and sworn to before me

Notary Public or Commissioner of
the Superior Court
My Commission Expires: _____ Elizabeth A. Sabina

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

SYLVESTER TRAYLOR
Plaintiff

DOCKET No: HHD-CV11-5035895-S

vs.

STATE SENATOR TERRY GERRATANA, (State Actor); ET. AL.

CONNECTICUT GENERAL ASSEMBLY; (State Actors), State Senator Robert Kane, State Senator Tony Guglielmo, State Senator Len Fasano, State Senator Toni Boucher, State Senator Jason Welch, Senator Toni Nathaniel Harp, State Senator Kevin Witkos, State Senator Michael McLachlan, Senator Anthony Musto; State Senator Len Suzio; State Representative Prasad Srinivasan;

THE HONORABLE JUDGE THOMAS F. PARKER (In His Personal and Official Capacity);

CONNECTICUT MEDICAL INSURANCE COMPANY;

And THE STATE OF CONNECTICUT:

("State Actors" which includes: **1.)** The New London Superior Court, **2)** The Connecticut Court of Appeals, and it's employee Alan M. Gannuscio of the Connecticut Court of Appeals, **3)** The State of Connecticut Superior Court, Chief Court Administrator, the Honorable Judge Barbara M. Quinn, and **4)** State of Connecticut Judiciary, Chief Justice Chase T. Rodgers, all of whom have applied law unconstitutionally as to the Plaintiff, in an effort to shield and conceal a medical malpractice murderer.

Defendants

JURY TRIAL REQUESTED

DATE: August 24, 2012

**IN SUPPORT OF THE ABOVE
CAPTIONED MATTER**

Affidavit by
Tiana Armstrong

**Concerning: Institutionalized Racism and Segregation of
Disability in the State of Connecticut Judicial System.**

I, Tiana Armstrong, an African-American female, being duly sworn, deposed and say:

1. I am over the age of 18 years old, and believe in the obligation of an oath.
2. I make this affidavit of my own free will because of my personal

knowledge and concerns about the institutionalized racism, discriminatory practices based on race and physical disabilities within the State of Connecticut Judicial Branch, located at 90 Washington Street, Hartford, Connecticut.

3. I am a resident of Connecticut, residing at 110 Benjamin Court, Windsor, CT. 06095.
4. I have lived in the State of Connecticut since birth.
5. I am a citizen of the United States of America.
6. I was employed by the State of Connecticut Judicial Branch, most recently as an Adult Probation Officer II (APO II).
7. First and foremost, I would like to state for the record that I am in full support of Sylvester Traylor, a Life Member of the NAACP, in his fight to eradicate all forms of discrimination within the Connecticut Judicial Branch. It is my belief that institutionalized racism does exist in the Connecticut Judicial Branch.
8. The practices of nepotism, cronyism, race, gender discrimination, harassment and bullying of individuals such as Mr. Traylor, Habibah Abdul-Hakeem, and myself is rampant. Many of us have faced the same Human Resources Department of the Connecticut Judicial Branch with similar complaints. However, Human Resources, has in fact, ignored the practice of institutionalized racism within the State Court System, and they have repeatedly denied the validity of discrimination complaints. This practice has de-humanized us. Why would so many people of color be making the same complaint, if there were not some degree of truth in their complaints concerning the Connecticut Judicial Branch's racial bullying of its' employees and the public? Who can possibly remedy this situation if it is occurring within our court system? When racism takes place outside of

the court system, individuals are allowed to have their complaints heard, but when individuals within our court system have complaints of institutionalized discrimination, who can they turn to?

9. I believe that there is substantial evidence that I have endured much of the same institutionalized racism that Mr. Sylvester Traylor and Ms. Habibah Abdul-Hakeem have also endured.
10. Clearly, there is substantial evidence of a pattern of institutionalized racism, as well as an effort made by high ranking officials in the State of Connecticut Judicial System to discredit and disparage anyone who makes a complaint of racial discrimination, or anyone who questions the practices or procedures within the court system and other agencies within the Judicial Branch such as the Human Resources Department and Probation Department.
11. The totality of the systemic discrimination practiced by the Connecticut Judicial Branch is so egregious that they target any person of color who makes a discrimination complaint against the Connecticut Judicial system. The victim's characters are being defamed in order to discredit them, so that the Human Resource Department may cover up a discrimination complaint.
12. For example, in my personal experience, in 2009, I filed an internal hostile environment/racial discrimination complaint to Laurie Parent in the Human Resources Department of the Judicial Branch.
13. I had requested an ergonomic evaluation of my work station due to my disability. I had cervical and lumbar spine pain which aggravated my migraine headaches. I requested a particular style of desk which was used by a co-worker and which I also used on days when the other employee was not there with the permission of said employee. The use of that

particular desk helped to alleviate my symptoms. I was informed by my immediate supervisor that I could not use that desk and must remain at my desk. Furthermore, I was not to leave the office for any reason other than breaks and lunch. In other words, I was not permitted to conduct home visits, field visits, obtain police reports, etc. even though I was expected to maintain a high-level supervision of a full caseload in Hartford, CT. The out of office work is not only required for my job but clearly has an integral role with public safety. It took me more than a year to obtain that particular style of desk despite repeated requests by myself and physicians.

14. Thereafter my initial complaint, the retaliation and harassment began and continued for the next 3 years getting increasingly worse. I was threatened that I would be terminated when my physician took me out of work due to the failure to accommodate me with an ergonomic desk/chair, even though my physician had not cleared me to return. This was, in my opinion, a clear violation of the Americans with Disabilities Act by the State of Connecticut. I had my attendance altered and changed by Management in Judicial Human Resources directly impacting my pay as well as accrued times, at times my accrued vacation time disappearing without my knowledge and without my being paid. I was also said to have created a hostile work environment and violence in the workplace because my immediate supervisor said she felt fearful that I was keeping a "paper trail" and she feared being sued or arrested. This being only some examples of what I had to endure.

15. It is my contention that I was treated differently as an African-American woman, and I did not receive the same treatment as my fellow White-American co-workers.

16. Furthermore, I believe that the State of Connecticut Judicial Branch targeted me after the filing of my complaint. This targeting of individuals

who complain has had a chilling effect on current employees who are too fearful to speak up about unfair practices. Another individual such as Habibah Abdul-Hakeem, who was employed on the opposite end of the state, has also filed a similar complaint in regards to the institutionalized racism in the Connecticut Judicial System. This clearly illustrates a pattern of animus based discrimination within the Connecticut Judicial System which is creating a hostile work environment for African-Americans and Hispanics, both protected classes. For example, I am aware of two Hispanic females (both Adult Probation Officer II) being targeted by the same supervisors. One of them was being given a caseload that was known to be in bad shape and once she advised the supervisor that there was reason to believe the previous white female Probation Officer who had the caseload had falsified information that had not taken place. She was rebuffed by the supervisor she reported it to and continued to be overly scrutinized from the day she received that caseload. It is also my understanding that she ultimately needed to take FMLA leave as a result. This same Hispanic Officer along with another officer were also told that they are not to leave the office (by the same supervisors who told me) again even though this is an integral part of the job of a Probation Officer and is so ever crucial to Public Safety. The egregious abuse of authority by supervisors and management really needs to be investigated and oversight taken as it not only has a devastating effect on the Probation Officers who are a victim of it but a devastating role on public safety.

17. This institutionalized racism and/or bullying under the color of law is in fact carried out through upper management, by further creating defamatory statements against anyone who opposes the violation of basic human dignity.

18. For example, my (White) co-workers created a false image of me by claiming that I was using the "race card" after I had made a verbal

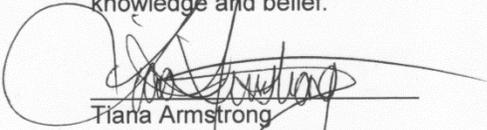
complaint how they were abusing their authority and/or bullying people under the color of law, as probation officers.

19. As an APO, I observed Probation Officers who would degrade people from the general public by yelling at them and using disparaging treatment knowing that they had no other recourse to law for protection. I believe that the individuals on probation still had rights despite being on probation. However, as a result of my standing up for the rights of others, I suffered the emotional distress of racism and retaliation by management.

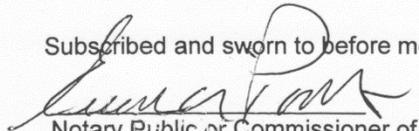
In Conclusion

20. Once again, I hereby join and support the efforts of the NAACP and Sylvester Traylor's fight to eradicate all forms of discrimination which I have personally witnessed in many courts and offices, including the Connecticut Judicial Branch in its entirety. I also feel that there is a definite need for the creation of a healthy workplace environment, oversight of the agency, as well as the need to improve services to the general public, minus the public bullying based on race and economic status.

I, Tiana Armstrong, being first duly sworn under oath according to the law, deposes and says that I, Tiana Armstrong, have read the foregoing Affidavit which I have subscribed, that the matters stated herein are true to the best of my knowledge and belief.


Tiana Armstrong
110 Benjamin Court
Windsor, CT. 06095

Subscribed and sworn to before me


Notary Public or Commissioner of
the Superior Court
My Commission

Eileen A. Powers
NOTARY PUBLIC
Commission Expires
March 31, 2016

Thomas S. Lloyd
49 Chappell St.
New London, CT. 06320
(860) 447-1087

July 31, 2009

To the Statewide Bar Counsel
287 Main St. 2nd. Fl.
East Hartford, CT. 06118

RE: Unbecoming of an Attorney.

Dear Bar Counsel,

On July 31, 2009 while I was in the lobby of the Superior Court clerk's office, Attorney Donald Leone was talking with the acting Chief Clerk in the lobby area. Mr. Traylor walked in and immediately Attorney Leone became loud and confrontational with Mr. Traylor. Upon asking him, "What do you want?" Mr. Traylor's response was, "I'm not here to talk with you." Attorney Leone's response was; "This is my office NOW! And What do you want!!!" Mr. Traylor's response: "I am not here to speak with you or get into any confrontations."

There was another witness in the lobby as well and she will be giving her statement concerning Attorney Leone's rude and confrontational attitude towards Mr. Traylor. Furthermore, at no time did the acting Chief clerk correct Attorney Leone concerning his rude behavior towards Mr. Traylor.

Yours truly,



Thomas S. Lloyd

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Exhibit 4

Sylvester Traylor
881 Vauxhall St. Ext.
Quaker Hill, CT. 06375
(860) 331-4436

October 19, 2009

Richard Zaharek
61 Woodland St.
Hartford, CT. 06105
(860) 722-5868

RE: Retaliation for making a "Racial Profiling Complaint"

Dear Sir,

On May 27, 2009 I wrote to your office concerning racial profiling by the Judicial Marshals in the New London Court.

As you know since, I've received a response from your office regarding my complaint against the New London Marshals I have not made any additional complaint against the New London Marshals. Thank you for resolving that complaint.

However, one of the New London Marshals was transferred to Norwich, and it is my belief that he did not get your memo concerning to ceasing the harassment and racial profiling.

On October 16, 2009 I was forced to contact the Norwich Police Department concerning Marshal Zeimet and Marshal Winski. Marshal Winski instructed Marshal Zeimet to single me out as I was approaching a metal detector. There were people ahead of me, all who were white, but their wallets were not opened and inspected. When I questioned both Marshals why I was the only one singled out. Also see attached Norwich Police 911 report hereto marked Exhibit "A".

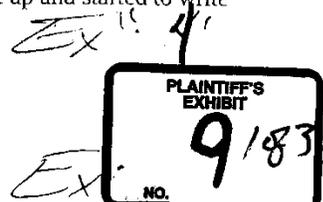
- They said that: *"We can single out who ever we want too."*
- My response was that: *"That does not give you the power to harass and/or racially profile a person."* Needless to say, when I went through the metal detector with NO ringing sounds going off.

I then proceeded to go down to the Law Library which I discovered was closed. As I was leaving the building, I asked for the two Marshals names, so that I may write to you again, but they refused to give me their names.

- Instead they questioned me, **"Why do you need our names?"**

I saw an ink pen on top of "the large metal scanner", so I picked it up and started to write down their names.

4 . 16



Suddenly Marshal Zeimet , came over from behind his counter, and then pulled out his baton started to strike at my legs in a provoking manner while clutching my writing hand.

- Marshal Zeimet then said, ***“Put the Ink pen back.”***

I was ***ONLY*** writing down his name. Needless to say, I had the time to write down both Marshals names.

- I said in a very loud voice: ***“Don’t touch me!”***

Marshal Zeimet, looked back towards Marshal Winski, and then Marshal Winski motioned his head to say, No.

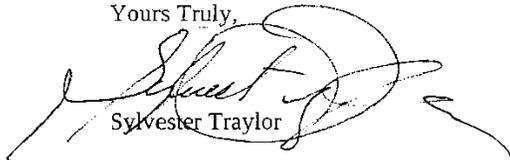
After I finished writing down their names, I put the ink-pen back on top of “the large metal scanner”, where I got it from. Refer back to the attached Norwich Police 911 report hereto marked Exhibit “A”.

- I then said to Marshal Winski, ***“This guy is out of control, and over reacting. Did you see him strike at my legs.”***
- Suddenly, Marshal Zeimet, looks back towards to Marshal Winski and said, ***“He took a defense stands.”***

Needless to say, all I was doing was writing down his name. There was no reason for Marshal Zeimet to come from behind his counter and approached me, or swinging at my legs in a provoking manner.

I have not given anyone the reason to provoke me. I am a law abiding citizen of the United States. I do not want to feel intimidated or provoked each and every time that I enter the Superior Court. I only go to the Superior Court to conduct official business. I am hereby requesting that the discrimination towards me because of my race, African -American and Pro-Se status be eradicated.

Yours Truly,


Sylvester Traylor

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Exhibit A

FACTUAL BACKGROUND

This Writ of Mandamus aroused out of the fact that the Honorable Judge Thomas F. Parker allowed his personal bias towards the Plaintiff, an African-American who is Pro Se effect his philosophical approach to law. Judge Parker even made a derogatory comment about the Plaintiff, African-American being Pro Se by stating: "**Judge Hurley was "smitten" by the Pro Se litigant.**"

The Honorable Judge Thomas F. Parker has showed blatant disregard to the LAW OF THE CASE DOCTRINE and the orders set out by the late Honorable Judge Michael Hurley in case number 06CV5001159-S i.e:

The Honorable Judge Hurley had DENIED the Defendants first Motion to Dismiss which was properly adjudicated before the court. However, three 3 years later Judge Parker overturned Judge Hurley's earlier decision and GRANTED the Defendants Motion to Dismiss in retaliation against the Plaintiff for bring a Writ of Mandamus against the Court. Refer back to **KNL-CV09-4009523-S**.

Judge Parker have showed blatant disregard to the Plaintiff's Motion for Default Judgment against the Defendants in 06CV5001159-S for their failure to comply with Judge Hurley's discovery orders, and sanctions to be imposed on the said Defendants because of the their counsel's statement in open court that his client has destroyed medical records during a legal proceeding. **MR. LEONE:** I'm only obligated and I've done what I can to produce that which he has asked. If I'm told by the company and by the client that they don't have them, **they destroyed them**, they're not available, I don't know what else I can do, Your Honor.

It is the Plaintiff's contention that the Honorable Judge Parker, as a State Actors have in fact conspired with "private parties" in retaliation and/or discriminate against the Plaintiff with the intent to deprive the Plaintiff of his due process and equal protection rights because of the Plaintiff's race and his color (Black), and his interracial marriage to Roberta Mae Traylor, a White-American.

INSTITUTIONALIZED RACISM

AN OVERVIEW OF THIS WRIT OF MANDAMUS, DECLARATORY AND INJUNCTIVE RELIEF:

The Honorable Justice Thurgood Marshall would have met this unconstitutional question as applied

to the Plaintiff head on: *“Three hundred and fifty years ago, the Negro was dragged to this country in chains to be sold into slavery. Uprooted from his homeland and thrust into bondage for forced labor, the slave was deprived of all legal rights. It was unlawful to teach him to read; he could be sold away from his family and friends at the whim of his master; and killing or maiming him was not a crime. The system of slavery brutalized and dehumanized both master and slave.”*

3. **On December 21, 2009**, the Plaintiff, an African-American, was ordered to obtain an attorney in his OWN NAME, during a scheduled hearing without all parties present after an Ex Parte communications with the missing party. See **Exhibit “1”**. The Plaintiff was placed in an isolated courtroom, so that the public could not view and/or hear the abuse of a judicial official.
4. To be in contact with the missing party without all persons including the Plaintiff present constitutes a conspiracy against the Plaintiff. A conspires to defraud and to deprive the Plaintiff of his civil rights did in fact take place because the Plaintiff was legally absent from the negotiations prior to the hearing on December 21, 2009. The Plaintiff was denied both knowledge and access to those negotiations of which played such a substantial part in his case against the defendant, effectively denying him the substantial time and resources necessary for a hearing which the Defendants had failed to articulate in writing any request that the Plaintiff’s appearance should be stricken.

An example, of the present **INSTITUTIONALIZED RACISM**: The Plaintiff goes to a store and see the price of an item which is one dollar \$1.00, but the cashier, tells him that the price for that same item is two dollars \$2.00, “for him” because he’s an African-American and Pro Se. The Connecticut General Statutes and the Connecticut Practice Book regarding the rules of the court should NOT change just because the Plaintiff is a Pro-Se, African-American. It would appear that since the death of the late Hon. Judge Hurley the New London Superior Court has not applied the rules of the court equally to all parties.

ABUSE OF CONTEMPT POWER

6. Once the Plaintiff, an African-American, obtained an attorney. His attorney was held in contempt of court for six (6) hours, without being fined for any wrongful actions. See **Exhibit “2”**. Once again, the Plaintiff was placed in an isolated courtroom, so that the public could not view and/or hear the abuse of a judicial official.

On January 20, 2011 the hearing before the Honorable Judge Thomas F. Parker was tantamount to a **LYNCHING PARTY** than a courtroom. For example: The Plaintiff was obligated to appear in both his personal capacity and his administrator’s capacity before the Honorable Judge Thomas F. Parker after he had removed the Plaintiff’s attorney from the

court room without just cause, and **“after”** his December 21, 2009 order, ordering the Plaintiff to obtain an attorney only in his administrator’s capacity.

JUDICIAL DEMEANOR AND COMPETENCE. See Judicial Conduct and Ethics Fourth Edition Sec. 3.01, 3.02^a, and 3.02B. See page 3-13 *“We take this opportunity to remind ourselves as judges that tyranny is nothing more than ill used power. We recognize that it is easy . . . to lose one’s judicial temper, but judges must recognize the gross unfairness of becoming a combatant with a party. A litigant, already nervous, emotionally charged, and perhaps fearful, not only risk losing the case, but also contempt and a jail sentence by responding to a judge’s rudeness in kind. The disparity in power between a judge and a litigant requires that a judge treat a litigant with courtesy, patience and understanding. Conduct reminiscent of the **playground bully** of our childhood is improper and unnecessary.”*

ABUSE OF CONTEMPT POWER. See Judicial Conduct and Ethics Fourth Edition Sec. 2.03A and 2.03B *“Individuals were denied fair treatment and often denied personal freedom in violation of their rights.”*

On January 20, 2011, the Plaintiff’s attorney and Plaintiff appeared before Judge Parker, immediately Judge Parker’s behavior became off color by pointing his finger in a scolding manner saying that the Plaintiff could not represent himself even though the Plaintiff had a right to represent himself in his personal capacity. Judge Parker went on to say to Attorney Berdick that he had to represent the Plaintiff in his personal capacity. Attorney Berdick told Judge Parker that he did not have to represent the Plaintiff in his personal capacity. Judge Parker then ordered Attorney Berdick to represent the Plaintiff in his personal capacity. Attorney Berdick refused because it was his belief that the Plaintiff had a right to represent himself in his own personal capacity. Judge Parker then directed the marshal to handcuff and shackle Attorney Berdick with the full knowledge that Attorney Berdick had just been released from the hospital and was under medication due to a major surgery. Attorney Berdick was escorted to a jail cell where he was then exposed to the risk of TB or other infectious diseases due to the freshly open wound due to the surgery.

At 3:30pm, the Plaintiff was under duress so the Plaintiff withdrew his Pro-Se appearance so that Attorney Berdick would not go to jail. The Plaintiff felt that the judges mental mind state was prejudicial and incompetence. The Plaintiff also believed that Attorney Berdick

mental status was altered due to the medication he was under.

Needless to say, once the Plaintiff obtained an attorney in his own name SYLVESTER TRAYLOR “as administrator,” the New London Court still denied the Plaintiff access to the same court through holding his attorney in “contempt” for refusing to represent the Plaintiff in his “individual capacity” which constitutes a violation of the Plaintiff’s 7th, & 14th, Amendment rights to the United States Constitution. The Plaintiff’s attorney viewed this “contempt” in relationship to the silent “Gentleman’s Agreement Society” and “Joining the Club Society” written by Dan A. Oren concerning the Race, Politics, and Citizenship in the “**Jim Crow**” of the north which would be calling him a **nigger lover** for filing an appearance on behalf of the Plaintiff, an African –American who was interracially married. Wikipedia, the free encyclopedia: In American English: **nigger lover** initially applied to abolitionists, then to white folk sympathetic towards black Americans.

INTIMIDATION OF A WITNESS

What would have been the consequences for an African-American Plaintiff if the roles had been reversed, and he had reached into the judge’s bench to touch a judge? See Exhibit “3”. Once again, the Plaintiff was placed in an isolated courtroom, so that the public could not view and/or hear the abuse of a judicial official.

The intimidation of a witness by a Judge is undeniably a felony under any and all circumstances. A judge should not attempt to intimidate a witness under any circumstance. Even under the worst of trials the judge must always remain neutral so as to remain receptive and critical of all the evidence and circumstances provided by both parties at all times.

Had anyone, particularly an African-American man reached out and touched a Judge under any circumstances during, before or after trial it would be conceived immediately as a threat and he would have been immediately detained. While his legal case and likewise all his credibility would immediately and permanently be undone. As in this case, for a Judge to intimidate a witness in such a blatant fashion not only proclaims his bias towards the Plaintiff, but as a member and conspirator of the defending party as well.

8. On January 19, 2011, the Honorable Judge Thomas F. Parker asked the Plaintiff’s attorney, Attorney Berdick which office he was E-filing from. Attorney Berdick expressed that he didn’t feel as though he needed to provide such information as it wasn’t irrelevant. Judge Parker ordered him to

tell him where he e-filed from and Attorney Berdick stated it was from Attorney Anne P. Hatfield's office. Attorney Hatfield had once worked under Judge Parker as a case flow coordinator while he served as Chief Administrative Judge for New London County. In addition, Attorney Hatefield is a personal friend of **Judge Parker's "SON"**. They participate in **REPUBLICAN** campaigning and social networking. When Judge Parker whom also is **REPUBLICAN** learned that Attorney Berdick was using Attorney Hatefields office to E-file, Judge Parker displayed signs of concern by leaning back in his chair while taking off his glasses off, while realizing the distinct connection. At that point Judge Parker should have recused himself from the case just as when jurors are excused from jury duty as part of the judicial process when a juror have a relationship with one of the attorneys, the judge, or a party to the case.

9. **On February 3, 2011**, the Plaintiff brought it to the Honorable Judge Thomas F. Parker's attention that he had appealed to the Connecticut Judiciary Committee regarding the unconstitutionality of 52-190a.
10. **On February 15, 2011**, the Honorable Judge Thomas F. Parker retaliated against the Plaintiff and dismissed his case and sent it to the Connecticut Appellate Court after the Defendant's filed a second (2sd.) Motion to Dismiss for the same reasons concerning 52-190a, three (3) years earlier which was DENIED by the Honorable Judge Hurley.
11. **On March 1, 2011**, the Plaintiff received a letter from State Representative Gerald Fox offering his condolences regarding the wrongful death of the Plaintiff's wife's and inviting the Plaintiff to testify before the Judiciary Committee on March 4, 2011 concerning HB-6487. Chr. Rep. Fox's letter came to the Plaintiff on the anniversary of my wife's death.
12. **On March 30, 2011** at 10:00am. The Judiciary Committee has passed House Bill HB-6487 (30-11 votes).
13. **On May 26, 2011** at 6:23pm. The House of Representatives passed House Bill HB-6487. (87-51).
14. **On June 8, 2011**, House Bill HB-6487 was temporary passed over until next session because of the **following** Defendants "State Actors" were attempting to derail House Bill HB-6487 because of their personal gain and enrichment in seeing House Bill HB-6487 not getting passed.

BLAMING VICTIMS TO MEDICAL MALPRACTICE

15. This Court should take Judicial Notice that **CONNECTICUT MEDICAL INSURANCE COMPANY** was one of the state's insurance companies who were one of the lobbyists that were instrumental in the drafting and marshaling of sufficient legislators to enact Conn. Gen. Statute 52-190a, to deprive the underprivileged people of Connecticut to seek a Wrongful Death Claim and/or Medical Malpractice Claims which is unconstitutional.

COUNT EIGHT: (42 U.S.C. §1983 DUE PROCESS VIOLATION)

The said above mentioned State Actor has violated the Plaintiff's civil rights through **retaliation, negligence and the misrepresentation** through their offices and employees in one or more of the following ways in that they:

IN THAT: On February 3, 2011, the Plaintiff brought it to the Honorable Judge Thomas F.

Parker's attention that he had appealed to the Connecticut Judiciary Committee regarding the unconstitutionality of Conn. Gen. Stat. Sec. 52-190a.

IN THAT: On February 15, 2011, the Honorable Judge Thomas F. Parker retaliated against the Plaintiff and dismissed his case and sent it to the Connecticut Appellate Court after the Defendant's had filed a second (2sd.) Motion to Dismiss for the same reasons concerning Conn. Gen. Stat. Sec.52-190a, three (3) years earlier which was DENIED by the Honorable Judge Hurley.

On March 1, 2011, the Plaintiff received a letter from State Representative Gerald Fox offering his condolences regarding the wrongful death of the Plaintiff's wife's and inviting the Plaintiff to testify before the Judiciary Committee on March 4, 2011 concerning HB-6487. Chr. Rep. Fox's letter came to the Plaintiff on the anniversary of my wife's death.

On March 4, 2011, the Plaintiff testified before the Connecticut Judiciary Committee in support of House Bill HB-6487

On March 30, 2011 at 10:00am. The Judiciary Committee passed House Bill HB-6487 (30-11 votes).

On May 26, 2011 at 6:23pm. The House of Representatives passed House Bill HB-6487. (87-51).

On June 8, 2011, House Bill HB-6487 was temporary passed over until next session by the Connecticut State Senate because of the above "State Actors" were attempting to derail House Bill HB-6487 because of their personal gain and enrichment in seeing House Bill HB-6487 not getting passed.

Dated this: January 16, 2015

THE PLAINTIFF

/Sylvester Traylor-
Sylvester Traylor
881 Vauxhall St. Ext.
Quaker Hill, CT. 06375
(860) 331-4436
Email: syltr02@gmail.com