

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 09-CV-00309 MSK-KMT

SUZANNE SHELL  
Plaintiff  
v.  
AMERICAN FAMILY RIGHTS ASSOCIATION, et. al.  
Defendants

**FILED**  
UNITED STATES DISTRICT COURT  
DENVER, COLORADO

MAY 23 2009

GREGORY C. LANGHAM  
CLERK

**MOTION TO DISMISS BASED ON PRIOR CALIFORNIA ACTION**

I swear before God all I say is true and factual.

1- I was also one of the named "defendants" in a virtually identical absurd, frivolous and vexatious "**Cross Complaint**" filed by Shell in the **Superior Court of the State of California** on November 14, 2008.

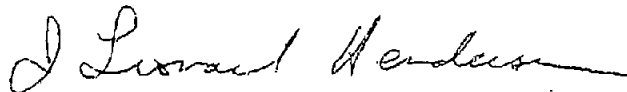
2- That was case titled **WILLIAM O TOWER VS SUZANNE SHELL. ET AL, Case No. 06AS03504.**

3- This absurd "complaint" in Colorado now makes approximately the fourth time Shell has recycled her frivolous and vexatious case on various victims, which your court should be well aware of, considering that Shell has long been infamously known in Colorado courts, as well as being listed on the Colorado Supreme Court website at [http://www.coloradosupremecourt.com/Regulation/UPL\\_Injunction\\_Listing.htm](http://www.coloradosupremecourt.com/Regulation/UPL_Injunction_Listing.htm) under the heading "PERSONS ORDERED TO STOP ENGAGING IN THE UNAUTHORIZED PRACTICE OF LAW".

Therefore, this "Complaint" should be barred by Issue Preclusion.

**All statements herein are truthful, sworn testimony, before God, as stated.**

April 30, 2009



James Leonard Henderson, Sui Juris, Pro Se  
4773 Salmon River Hwy  
Otis, Oregon 97368

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT ON April \_\_\_\_, 2009, I caused a true copy of **MOTION TO DISMISS BASED ON PRIOR CALIFORNIA ACTION** to be served on the following parties.

Donna Suzanne Shell  
14053 Eastonville Rd  
Elbet, Colorado, 80106  
Certified, Receipt Requested Mail Serve

William O. Tower, Anne Tower, AFRA  
7334 Chivalry Way,  
Citrus Heights CA 95621-4333

Dennis Hinger  
5816 Shadow Creek Dr. #3  
Sacramento, CA 95841

Susan Jackson  
40 Orlando Ave. #1A  
Winthrop, MA, 02152

Cletus Kiefer  
1121 Howell  
Saint Charles, MO 63301

Renee Cygan  
329 Cornell Ave., Apt. D  
Villa Park, IL, 60181

Dorothy Kernaghan-Baez  
2208 Highland Avenue, Suite107  
Augusta, Georgia, 30904

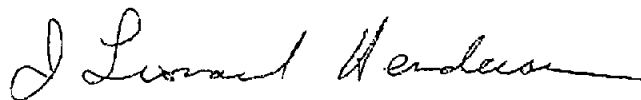
Mark Cygan  
329 Cornell Ave., Apt. D  
Villa Park,IL, 60181

William Wiseman  
1625 Siskiyou St.  
Klamath Falls, OR 97601-2012

Ringo Kamens / Alex D. Bryan  
[ringo@coimc.org](mailto:ringo@coimc.org)  
[2600denver@gmail.com](mailto:2600denver@gmail.com)

Dee Contreras  
7020 Ash Ct.  
Commerce City, CO 80022

**Defendants Agree to receive notices by email or by other means from each other, but not from Plaintiff Donna Suzanne Shell due to her long history of abusive, insolent, and opprobrious conduct.**



James Leonard Henderson, sui juris, pro se  
4773 Salmon River Hwy  
Otis, Oregon 97368

Appendix D

UNITED STATES DISTRICT COURT  
DISTRICT OF COLORADO  
FACSIMILE COVER SHEET

Pursuant to D.C.COLO.LCivR 5.1, this cover sheet must be submitted with any facsimile filing. A pleading ~~or~~ paper not requiring a filing fee and **no longer than ten pages**, including all attachments, may be filed with the clerk by means of facsimile during a business day. Facsimiles received by the clerk after 5:00 p.m. (Mountain Time) will be considered filed as of the next business day.

Clerk's Office facsimile telephone number: 303-335-2714

1. Date of transmission: 5/28/09

2. Name of attorney or *pro se* party making the transmission: Leonard Henderson

Facsimile number: (303) 894-9239 Telephone number: (503) 925-5389

3. Case number, caption, and title of pleading or paper: 1:09-cv-309

Suzanne Shell v. American Family Rights Association  
Motion to Dismiss Based on Prior California Action

4. Number of pages being transmitted, including the facsimile cover sheet: 3  
Instructions, if any: \_\_\_\_\_

(Rev. (12/08))