WISCONSIN COURT OF APPEALS DISTRICT IV

IAN HUMPHREY,

Appellant, Petitioner

v.

County of Lafayette

Appellee, Respondent.

Case No.: 2018AP481

APPELLANT'S ~~RESPONSE~~ Reply Brief

The response by the County's attorney is a regurgitation of her broad, inclusive, and completely devoid of substance, assertion she made in 2016AP966. In addition, she goes on to produce a half-hearted estoppel claim in bad faith. Finally, she outright lies and claims there is no support in the record for what I am appealing.

The estoppel claim here is in bad faith and professional misconduct. The respondent argues that case 2016AP1579, an appeal of the Trial Court's denial of a fee waiver in order for me to obtain transcripts for 2016AP966, is somehow related to the instant appeal: challenging the Trial Court's ability to impose a suspension for failure to pay a fine. These 3 separate orders are clearly distinguishable from each other, and all appealable. Further, the Respondent argues that transcripts are necessary to decide the instant issue, which they are not, and instead, this is an example of the Respondent plagiarizing the Court of Appeals.

My ghost-writers don't believe this is incompetence. The Respondent is deliberately trying to prejudice the Court of Appeals with butchered decisions that came from separate orders appealed from the Trial Court the Respondent now defends. More to the point, the Respondent, who is either clearly incompetent or deliberately feigning ignorance, is contemporaneously claiming that there is no support for my arguments while it is on record for this specific appeal, at the same time she is arguing that I am litigating frivolously. This could have the effect of tricking an adjudicator into skimming, and thus perfunctorily deciding the case, and knowledge of this reality is a perk/byproduct of working in the environment she does. To take advantages of natural weaknesses in the system of review is repugnant, and punishable.

To the meat: This respondent claims nothing supports my arguments so here goes: R. 39 was the first order of suspension, and R. 53 was when the Trial Court withdrew that suspension, see also R. 56. This proves that there was an initial period of suspension. R.66 and the appendix filed with my appeal brief proves that the Trial Court then ordered another suspension, which failed to include the time my license was previously suspended for. The Respondent's inclusive claim of no facts or law supporting my arguments is nonsense, because the particular law: WI STAT 800.095(1)(a)3m - unequivocally spells out the requirement to count the time for previous suspensions.

As for the other arguments, I feel I briefed sufficiently on the issues. From my research, Courts appear to differ on waiver issues regarding arguments and attachment to precedent. I for one, am not a believer that I need to offer a latin term or codified annotation to be heard, reviewed, and have the law fairly applied to my case. The fundamental issues do not become non-existent simply because I did not use the "magic words". So in retort to the Respondent's bridge to her conclusion:

1. I challenged the Trial Court's unfair denial of my request for telephone conference. I would concur that saying "local rules" doesn't opt the Court out

of the obligation to reasonably afford people due process, but I'm sure that's NOT what the respondent meant.

2. I challenged the Trial Court's ability to both summon me, from another State, to be deposed regarding my finances because I said I was poor, when the Trial Court was in possession of a notarized, Wisconsin-regulated form, which provided them with sufficient information, and to do this by means of a HYPOTHETICAL INFERENCE of a subsection of law. In the totality of this case, it is professional misconduct. It is professional misconduct when a Trial Court bends the law to benefit its' debt collection efforts, after unforgivingly and arbitrarily denying me a jury trial, transcripts, and even an opportunity to close this case out with community service.

3. The Respondent points out that the community service denial is discretionary, touché', but I have the right to challenge any discretionary decision, and the response from the Trial Court and the Respondent is ridiculous. Somehow, the County of Lafayette is special, and takes only cash. Contemporaneously, it doesn't offer telephonic hearings because it doesn't want to hold those hearings anywhere other than the cathedral style Courtroom I visited. The Circuit Court of Lafayette is living in a fantasy world, and needs to be brought back in line.

4. I've pointed out that both the suspensions exist in the record, and this Respondent is either not really working on this case, or lying and feigning ignorance in the hopes an impatient adjudicator will blow me off.

To that effect and as a bridge to my conclusion, she may succeed. It no longer surprises me to have bureaucrats tell me words don't exist or mean what Oxford/Merriam Webster/Black's Law Dictionary says they do. It is simply a byproduct of so many variables that I decline to call it outright corruption, because many of the actors: officials and employees within the working environment, don't believe in the system itself.

I remember my first time researching the corroborative evidence standard, frustrated on what a low threshold it was, only to find an incident so horrible, and real, that it quelled the animosity I held for a Trial judge who clearly was retaliating against me for suing him. The pretext decisions, the prejudice... I came to understand it all and realize that perfect human beings do not exist, and to ask someone to remain impartial in all instances, or in petty instances, whilst those soul-wrenching tragedies/atrocities lurked in the next stack of papers, was an injustice itself (I never personally resolved the case in my mind against the woman who, probably suffering from post-partum, killed her own child in a manner I refuse to reiterate here, and caution against researching).

Multiple times I have alleged professional misconduct. I find it unacceptable that the Respondent either did not either produce an adequate, relevant response, or move to/weigh in with the Circuit Court their intent to abandon the case. My experience in Wisconsin has been that prosecutors push even the weakest cases all the way to trial. That may very well be because prosecutorial misconduct requires a showing of special damages in this State, allowing something similar to judicial immunity to one side of the adversarial system, which is alarming when considering the resources of the State against an individual.

So issue whatever decision you will. If it's a railroad, I'll add it to the stack I'm building to prove Wisconsin's Court System is an image designed to camouflage its' neo-slavery work camp system. If it's lawful, that will be interesting, and go in the stack of cases that remind me that there is a point to participating in what I consider to be a civic duty.

CONCLUSION

For the reasons stated in this brief, I ask that the Court remedy the suspension in whatever manner it deems fit.

Dated: October 12, 2018

Ian Humphrey

s/ Ian Humphrey