

### **Attorneys Deceit Runs Rampant in his Personal Vexatious Statements**

165. Page 55 Line 13 question by Pagel to Hansen: “The fact is that you are manipulating your daughter to try to get her upset and keep her upset during the exchanges, aren’t you?” Hansen “Absolutely Not.” Questioning by Pagel: “If you weren’t doing that, she wouldn’t be crying for 45 minutes, would she?” Hansen replies: “Incorrect.” This is the typical abuse from Pagel towards Hansen throughout each hearing and is allowed time and again by Jorgensen and Reich. However, the reports of Mr. Ascano and Ms. Autumn Ascano which Hansen filed, in fact any of which, had they not been intentionally concealed by Pagel, Jorgensen and Reich would have quickly and completely disposed of these intentional malicious statements by Dieterle and Pagel.

166. Pagel would ask Hansen a question and if Hansen stated she did not remember, he would bully her over and over. Over 90% of the questioning by Pagel to Hansen is abusive, bullying, intentionally and knowingly twisting facts and statements of facts, all in an effort to further their conspiracy to cause harm to Hansen and keep the court manipulated against her for their benefit. Pagel routinely ridicule’s Hansen as a mother and as woman it is clear that he has no respect for Hansen or women in general, and this is aided by Reich towards both Hansen and Hansen’s attorney Ms. Chisholm, in fact, Pagel and the court forced to refer to Hansen as Ms. Dieterle for years after the divorce and Pagel and Mr. Dieterle even forced Hansen to remain with the last name of Dieterle for a year after divorce, causing Hansen to bring forth yet another motion and to spend even more money in attorney’s fees to do a legal name change, since they refused to put this into the initial divorce decree.

### **Judges Rude Behavior & Impatience of Litigant Continues**

167. When Pagel states he is finished questioning Hansen, Judge Reich drips with intentional impatience and disregard for Hansen. Page 71 lines 1 – 7, THE COURT: “I’m not sure where we started this the last time; I didn’t bring my notes from the last hearing. I don’t know if we are on redirect or recross. I do have a meeting at noon and I know there are a number of people here. I don’t know what you plan to get through today. All I know is that you will be done by noon. I’ll leave it up to you how you want to spend your time.” Hansen’s attorney states she has a few redirect questions for Hansen.

168. During this hearing, Judge Reich allowed only one of Hansen’s witnesses to present testimony wherein Reich took to direct examination of this witness. According to the docket, Hansen’s Exhibits offered as evidence during this hearing were concealed and Pagel instead provided his exhibits with the same lettering as Hansen’s, these appear to be on the record and Hansen’s were concealed. This was only the second hearing in front of Judge Reich, and his disdain towards Hansen was palpable, and his willingness to enter into conspiracy with attorney Pagel was more than obvious by his overall tone, tenor and candor towards Hansen.

169. Page 83 lines 7-8: THE COURT: to expert witness “Thank you. You may step down. Thank you, Mr. Chapman. We have about five minutes left.” Pagel calls another witness, wherein Hansen and her attorney learn that Dieterle had made another malicious report to the sheriff asking that a report or abuse/ neglect be filed against her. Which he did a multitude of times in an effort to further his scheme against Hansen. The officer admits that Dieterle asked him to do a report, however minus any evidence to substantiate it.

170. Page 74 line 8, THE COURT: “I didn’t bring my notes and that’s why--” Hansen’s attorney to the court: “Your honor, I do have a clear recollection of what happened at the last

hearing. Mr. Pagel used approximately an hour and 50 minutes of the two hours that were scheduled to put his case which included approximately eight different witnesses (Not all were called-however), including his client, deputies, and various other parties, and I did not get any time to put my client on the stand which is why I rescheduled the hearing for today.”

171. Page 74, Lines 23 -24, THE COURT: “Well, we have 15 minutes so, MR. Chapman. If you would come forward and raise your right hand, please.” At onset of Ms. Chisholm calling Mr. Chapman to testify, Pagel intentionally and willfully attempts to interfere with this witness, interrupts Judge Reich as Reich asks Mr. Chapman to come forward. Pagel knowingly and intentionally tried to conceal Hansen’s witness, once again. Once again, like in the hearing on May 13, 2014, Reich states that there is only so many minutes left and pressures Hansen’s attorney again with this time limitation.

#### **Attorney is Guilty of Witness Tampering, Again**

172. Attorney for Hansen, Ms. Chisholm, discovered in questioning that Pagel had met and talked deputy Hulm prior to the hearing, thus infecting him once again against Hansen and tainting his testimony. This is the same deputy whom admitted that Dieterle asked him to draft and file a malicious report of abuse / neglect against Hansen, just because the child cried and refused to let go of Hansen during an exchange from Hansen to Dieterle. This coupled with the instances of Pagel tampering and interfering with Hansen’s testimony is further proof of such malicious attacks against Hansen to further the scheme of Dieterle and Pagel.

173. Page 91 lines 10-12, THE COURT: “Okay. Thank you. You may step down. We’re out of time. That’s all for today. I’ll take this under advisement; I’ll issue a ruling as soon as I can.”  
Adjourned at 12:03 p.m.

174. During this hearing held on September 4, 2014, Hansen stated she wished to purchase the ranch property, and asked to write a check for such right then and there, and if this was not acceptable that she requested an appraisal of the property to be done so that it may be sold for its current market value, which was supported by Mr. Chapman's testimony. Instead of providing Hansen to purchase the ranch property at the agreed upon price and instead of accepting her offer to have a current appraisal to establish fair market value, Reich intentionally deprived Hansen of any of her rights to the property and to any say in the property. He willfully and maliciously granted all rights of the property and decision making for this marital property to Dieterle and completely violating Hansen's rights to the property, violations of 42 U.S.C. 1982. Reich intentionally and knowingly ignored Hansen and her testimony and that of her expert witness who testified that Hansen did desire to purchase the ranch and had worked with Mr. Chapman to create a fair offer of the prices which was agreed to upon by the parties in the original divorce decree. Instead Reich unjustly punished Hansen. Reich interrupted Hansen during this hearing on more than one occasion, and took to questioning her on his own account, interrupting her as to even limit her ability to reply to questioning of Pagel.

#### **Multiple Acts of Conspiracy to Violate Hansen's Rights**

175. Reich used force, coercion and intimidation towards Hansen and even towards Hansen's attorney, denying Hansen of her rightful interest in the property. Reich granted Dieterle rights to the property say in its value or how to proceed forward with the sale of it and deprived Hansen of these same and equal rights to the property and the right to be secure in her property and possession and the right to operate and control her home based business. Time and again Pagel sought to cause harm to Hansen with his belligerent bullying tactics, of which Hansen's attorney responded to him regarding this. Dieterle and Pagel conspired to extort what should have rightly

been Hansen's percentage of profit from the theft and subsequent sale of the ranch, where she conducted her business. This behavior towards Hansen by Pagel and Reich was typical in an attempt to extort from Hansen, cause her fear, intimidation and subject her to bias and coercion.

176. Due to the conspiracy of abuses by Dieterle and Pagel to Hansen, Hansen had met with a county commissioner who was also a long time (18 years) board member of social services in late September or early October of 2014. She shared with him her concerns and the fact that Dieterle had involved Social Services in his quest to cause harm to Hansen. This corruption went to far as to attempt to have Mr. Lee unjustly removed from the board because he spoke up to the director in support of Hansen, this director, Steve Reiser, then addressed McLean County State's attorney, Ladd Erickson, who wanted to then have Mr. Lee removed from his long standing position on the board for attempting to defend Hansen.

#### **Retaliation and Bias by State's Attorney to Further the Scheme of Dieterle**

177. This is clear retaliation by Ladd Erickson against Hansen, acting in obvious favor of Dieterle and showing intentional bias against Hansen. There have been multiple attempts to deprive Hansen of her rights and to shut her up. In fact, Mr. Lee has filed on the record affidavits in support of Hansen, and collectively Pagel and Reich have successfully concealed these to benefit Dieterle and to continue deprivations of rights to Hansen. Ladd Erickson implicated himself as a RICO Defendant on more than one occasion. The transcripts from the September 4, 2014 hearing Page 17 line 23, testimony of Sheridan County Sheriff, Trent Naser: "The initial contact was from our State's attorney, stating that he had been contacted by the Dieterle'," Myron Dieterle, Mr. Dieterles' father, herein, Mr. Naser states under oath that it was the Dieterle family who sought out Ladd Erickson directly for assistance. Ladd Erickson aided and abetted acts of conspiracy and other harms to Hansen.

178. Any affidavit and or witness in support of Hansen were routinely ignored and concealed by Pagel and Reich. Not once are any of Hansen's witnesses allowed to provide defense, testimony or evidence for Hansen. Not once in all of the proceedings were any of Hansen's witnesses allowed to testify and not once in any order issued by Reich, does he refer to any of Hansen's witnesses, evidence, affidavits, etc.

179. Time and again Dieterle and Pagel enlisted the unjust assistance of the Sheridan County Sheriff's department and their states attorney, Ladd Erickson, against Hansen. On one such instance, Hansen accompanied by Ms. D. Ryan, went to the Sheriff's department in which to exchange the child from Dieterle to Hansen. Hansen was told by the deputy that Dieterle refused to provide Hansen her child, which was against the court order. At this time, one of the deputies called Ladd Erickson and asked what to do; time and time again, the deputies were instructed to contact Mr. Erickson instead of doing their duty. In fact, Mr. Erickson refused to allow the necessary arrest of Dieterle for his violation of a protection order and told the deputy to contact him before any arrest was made. Mr. Erickson had talked to Mr. Dieterle and bought into his story and intentionally sided with Dieterle, yet, Mr. Erickson refused to speak to Hansen. Dieterle was in fact arrested twice for violations of the order, once was in Burleigh County.

180. Mr. Erickson refused to have the deputies enforce the court order which Hansen had provided them, and Dieterle, once again was allowed to conceal the child from Hansen on her regularly scheduled parenting time. The sheriff's department was clearly instructed by Ladd Erickson to assist Dieterle and to continue to deny aid to Hansen.

181. Dieterle with the assistance of Pagel have played a sick game of keep-a-way with using Hansen's daughter as a pawn in their game and depriving Hansen her parental rights and causing

maternal deprivation to mother and child. Time and again Dieterle and Pagel submitted fraudulent motions, briefs and affidavits in an attempt to conceal this child from Hansen. First going so far as to state that Hansen was not cooperating with parenting time, and then to state that there wasn't any schedule, these two clearly wanted their cake and eat it too.

### **Intentional Concealment of Evidence by Dieterle and Attorney**

182. By December 4, 2014, together Dieterle and Pagel aided and abetted directly by Reich, intentionally concealed roughly a minimum of a dozen of Hansen's exhibits, affidavits, expert reports, etc, had brought numerous frivolous, malicious and fraudulent motions against Hansen, several of which were Ex Parte motions, these motions exploited to hijack due process, repetitively asking for monetary sanctions and to further limit Hansen's rights as a parent. Pagel filed many objections to Hansen's affidavits and even motions, filed objections to her expert witnesses and expert witness reports in his intentional scheme to conceal and conspiracy to conceal them and deprive Hansen of proper due process. Dieterle and Pagel intentionally, knowingly and willfully persecuted Hansen again and again. The record and transcripts clearly indicates this as fact. Dieterle and Pagel fought tooth and nail to conceal Hansen's material evidence.

183. Due process of law requires notice and an opportunity for some kind of hearing prior to the deprivation of a significant property interest, yet, time and again, Dieterle and Pagel led Reich through wrongful misstatements and influence due to these malicious misstatements all the while Hansen was deprived proper due process of law in their conspiracy.

### **State's attorney Abuses his Position, Intentionally Violates Rights to Aid Dieterle in Conspiracy**

184. Hansen had sought out assistance to enforce the parenting plan from the Sheridan County Sheriff's office during December, to enforce the order of parenting time, and the sheriff, Trent Naser once again contacted Ladd Erickson, the McLean County State's attorney for advice as to what to do. Ladd Erickson, time and again refused to enforce anything if it was at the request or need of Hansen, but continually enforced any request of Dieterle/Pagel and even threatened Hansen on behalf of Dieterle and Pagel.

**Judge Reich Conceals Facts of Evidence to Further the Conspiracy, Produces another Fraudulent Judgment**

185. On December 22, 2014 while in yet another game play of Dieterle and Pagel, to intentionally kidnap and conceal Hansen's minor child, Hansen sought the lawful assistance of Reich by submitting a letter to Reich via email, which is also on record. This letter stated that Dieterle was refusing to grant Hansen's regularly scheduled parenting time with the child. Hansen stated that Dieterle with the assistance of Pagel was once again wrongly concealing the child from Hansen. This letter was ignored by Reich, just like her motions were. Reich responded via email to address parenting time, Hansen did submit her proposed parenting plan on record and in an email as she was instructed to do. On December 29, 2014 Reich retaliated against Hansen for her trying to defend her rights. Reich once again, aided the conspiracy of Dieterle and Pagel and issued an order to change Hansen's parenting time, based upon the whims and deceit of Dieterle and Pagel. Reich sought out and addressed only Dieterle's proposed plan, making unwarranted changes and deprivations against Hansen, this was done without any hearing, only done via email message, which was committing egregious violations of Due process against Hansen in his decision which was based purely on fraud and deceit brought forth by Dieterle and Pagel. In this instance, as with the other instances, Dieterle, Pagel and Reich used wire fraud to advance their conspiracy.



186. The fraudulent judgments, procured by the RICO Defendants and their co-conspirators' fraud, in addition to related attachment and enforcement efforts and the lost money taken from Hansen has severely disrupted Hansen's business operations, more than sully her reputation and otherwise has caused her to suffer irreparable harm. The RICO Defendants Dieterle and Pagel have continued to seek out and obtain unlawful judgments, even ex parte judgments, largely as a means of attaining a favorable settlement at an early stage and minus due process.

187. Reich blatantly, knowingly allowed Pagel and Dieterle to work in concert to deprive Hansen the month of December with her daughter, including Christmas, a violation of the Courts order, yet, Reich failed to hold Dieterle accountable for yet another deprivation to Hansen. Reich openly allowed Pagel his continued abuse of process and malicious prosecution and malicious persecution against Hansen, this has run unchecked since 2011 with first Jorgensen and even worse with Reich after Jorgensen recused himself. Due process requires that the procedures by which laws are applied must be evenhanded, so that individuals are not subjected to the arbitrary exercise of government power. A litigant is not to be deprived of life, liberty or property without due process of law, yet, once again, Reich aided and abetted his fellow conspirators in yet another attempt to remove Hansen wrongly and unjustly from the life of her youngest daughter.

188. Procedural due process rules are meant to protect persons not from the deprivation, but from the mistaken or unjustified deprivation of life, liberty, or property. The core of these requirements is notice and hearing before an impartial tribunal. Due process may also require an opportunity for confrontation and cross-examination, and for discovery; that a decision be made based on the record, and that a party be allowed to be represented by counsel. Once again, Pagel proved to have Reich influenced for his own benefit and involved in his scheme against Hansen,

and Reich gave to Pagel what he asked for, again and in so doing totally deprived Hansen of her right to due process, but also aided and abetted in violations of her rights.

189. Time and time again Reich parroted the derogatory words of Pagel against Hansen in his unenforceable judgments and in hearings granted to Pagel, this is adequate proof of Pagels negative influence over Reich. Reich makes vague statements and supposed claims of so called evidence, however, does not specifically state any evidence which he bases his judgments upon, this is because none exists, and instead Hansen provided more than ample evidence to support her statements, however, Reich blatantly refuses to allow Hansen any justice. Again and again Dieterle deprived Hansen of her right to parent her youngest daughter, all the while aided and assisted by Pagel. Pagel had sought yet another of his typical motions to hold Hansen in contempt, he was granted a hearing, yet when Hansen would request a hearing, she was denied or just flat ignored.

### **Conspiracy to Commit Mail and Wire Fraud by an Attorney**

190. On February 20, 2015 Pagel files a Subpoena Duces Tecum and serves this to Hansen. On February 27, 2015 Hansen files with the court her response to subpoena and two (2) exhibits, plus a certificate of service, which are on the record. Also on February 27, 2015, Hansen files a motion for continuance, as she does not have legal counsel. Dieterle and Pagel are guilty of mail fraud and wire fraud to continue their scheme against Hansen. On March 3, 2015, as is listed on the docket, however, service upon Hansen was not made; Reich issues an Order denying the request for a continuance. However, Pagel responded to the Notice for hearing, and stated he needed a continuance due to a conflict on his schedule, and he was granted a change of date. Once again, Reich proves his favoritism for Pagel and his open hostility towards Hansen and continual deprivations of her rights, violations of full faith and credit and violations of her right

to due process and to an equal access to the court. This in itself provides evidence of conspiracy between Pagel and Reich.

**Attorney and Judge Conspire to Use Trickery & Concealment, in an Official Hearing**

191. On 3/05/2015 once again Pagel and Dieterle fraudulently and maliciously sought out to destroy Hansen with their lies in their motion for Order to Show Cause. A hearing was held in front of David E. Reich who acted in his individual capacity. Hansen had requested a continuance to retain counsel and to have witnesses present in her defense, however he refused. Again, at the onset of the hearing, Hansen stated that she required a continuance so that she was able to obtain legal counsel and that due to the short notice of this hearing she was not able to have her witnesses attend, and Reich refused.

**Judge uses force, coercion, intimidation against Hansen in an official proceeding**

192. Reich then forced, coerced and intimidated Hansen into and through a hearing without legal counsel and wherein he refused to allow her to have witnesses provide testimony and denied Hansen from presenting testimony. Reich stated to Hansen that Dieterle needed to show a basis for his application for Order to Show Cause and to give testimony to show what Hansen wasn't complying with. He did not allow a full, fair, meaningful hearing for Hansen to defend against even more malicious prosecution and malicious persecution. Once again, Pagel twisted facts, concealed evidence and wrongly influenced Reich in his favor. Pagel went through this sham of a hearing, one of which only one hour had been established by Pagel. Pagel using leading questions for his client every step of the way. Pagel made statements such as "we", Pagel made intentional misleading misstatements in an attempt to have the judge side with him.

**Extreme and detrimental conduct by an attorney to a litigant during an official proceeding**

193. Pagel used leading statements/ questions for his client, fraudulently concealed material evidence, made disparaging remarks against Hansen, acted as a witness and conspired with Reich to deprive Hansen of rightful due process. Due to Reich's conspiracy with Pagel against Hansen Pagels behavior and conduct runs rampant and unchecked by Reich. Pagel is aware of the multitude of violations and the misconduct within the court room and yet, he continues to take advantage of this, because Reich fails to behave in an unbiased manner and fails to ever make any attempt to correct this behavior and conduct, the embroilment of Reich with Dieterle and Pagel is glaringly obvious. Please see the transcript index below.

**Judge via Transcript claims to be "THE COURT," and denies litigant to provide opening statement in an official proceeding**

194. On page 24 line 20 of the transcripts for this hearing, Hansen asks "Can I open with my opening statement perhaps before I question him?" Line 22 THE COURT: "No." However, this is abuse of position. As is stated in People v. Zajic, a judge is not the court. People v. Zajic, 88 Ill.App.3d 477, 410 N.E.2d 626 (1980).

**Judge Commits Criminal Coercion against Litigant in an official proceeding**

195. Hansen was forced, coerced and intimidated into presenting herself without an attorney during this hearing in violation of 42 U.S.C. 12203.25 CFR 11.406 Criminal Coercion, 42 U.S.C. 3617 Interference, coercion, or intimidation. Hansen was forced into this hearing and not allowed to provide any witnesses, testimony or evidence in her defense. According to the sixth Amendment Hansen has the right to counsel. Here, Dieterle and Pagel were attempting to find Hansen in contempt, thus Hansen should have had the right to counsel. Furthermore, Dieterle and Pagel were working in concert to deprive Hansen of her property and of rights to her

youngest child, thus, the right to counsel is protected. Hansen never stated that she expected anyone to pay for this merely that she desired to retain counsel.

196. Violations of First Amendment right, in telling Hansen “No,” when she asked to provide an opening statement. Further violations of Hansen’s Fourth Amendment rights, Furthermore, Hansen’s right to the seventh amendment was also violated, for clearly, if it was the intent of Dieterle to deprive Hansen of her home and her business, this is a violation of the seventh amendment, for clearly, the home was worth more than \$ 20.00. Also, Dieterle, Pagel and aided by their co-conspirator in their association-in-fact, Reich, violated Hansen’s right of the Eighth Amendment which prohibits cruel and unusual punishments and also, violations of Hansen’s Fourteenth Amendment rights.

**Judge and Attorney conspire to use Trickery and Deceit and intentional concealment of evidence in an official proceeding**

197. During this hearing and in review of the transcripts of this hearing, the obvious bias of Reich against Hansen is palpable. During Hansen’s questioning of Dieterle, Hansen asks Dieterle if Pagel served her with a subpoena, he answers, yes, Hansen asks if he received her response to this subpoena, with its’ two attached exhibits. As the transcripts read, “THE COURT” interrupts Hansen, again, as was customary in prior hearings as well, asking if Hansen has provided copies to Pagel, Hansen responds, “Yes.” THE COURT cuts off Hansen and fails to allow her to finish speaking. THE COURT: Page 27, line 10- 11, of transcript “And were these filed with the Court with your response?” Hansen “yes.” Line 13 THE COURT “And what’s the exhibit number?” line 14 Hansen speaking “I guess I’m not certain. I supplied them to him as a response to his subpoena. So I don’t’ know what ---“ Hansen interrupted by the judge, again, THE COURT “Well, a response to a subpoena wouldn’t be filed with the court, but you put that in your

affidavit in opposition to his order to show cause?” Line 20 Hansen “Yes” Hansen even stating providing a Certificate of Service, This is trickery by Reich. Violations of 18 U.S.C. 1962 (c) & (d). Open retaliation in violation of 42 U.S.C. 12203. Here Reich’s own admission that he had decided against Hansen prior to even allowing her proper due process and to reply in defense.

**Judge continues to interrupt, obviously ignores and hurries Litigant, in an official proceeding**

198. Reich stated on the record “I have another hearing at 3:30 so you can spend your time however you want it. Then on page 37, the judge states “We’ve got five minutes left.” Page 42 Line 8 - 13, Hansen, “I would offer today to write a check for him and let’s be done with this.” “You know, his own papers here, Exhibit K gives me first option to purchase the property whatever price the parties can agree to. He does not respond to any of my offers.” Hansen asks to purchase the home ranch, which was also her business, and instead of a proper reply, Page 42 line 14 again interrupted by the judge: “Okay. You’re just about out of time.” Clearly, Reich has ignored Hansen during this hearing, had already made up his mind about her and interfered more than once with her defense against the allegations against her.

199. Here, as times prior, Reich clearly shows his intentional and knowing collusion with Pagel Violation of 42 U.S.C. 1982. Hansen was a property owner in the ranch home property and had equal rights to it, Dieterle, Pagel and Reich intentionally violated this right in their conspiracy against Hansen

**Multiple interruptions of Judge, open bias against Litigant, conspiracy to commit fraud**

200. Page 43 Line 14, after Reich interrupts Hansen and rudely cuts her off, again, he then says “Mr. Pagel, Do you have any closing?” Reich allows Pagel to take up time yet just cut off Hansen more than twice in this hearing. Clearly Reich made it known his disdain for Hansen and

was clearly acting in his individual capacity. A judge is an officer of the court, as well as are all attorneys. A state judge is a state judicial officer, paid by the State to act impartially and lawfully. A federal judge is a federal judicial officer, paid by the federal government to act impartially and lawfully. Whenever any officer of the court commits fraud during a proceeding in the court, he/she is engaged in "fraud upon the court." In *Bulloch v. United States*, 763 F.2d 1115, 1121 (10th Cir. 1985), the court stated "Fraud upon the court is fraud which is directed to the judicial machinery itself and is not fraud between the parties or fraudulent documents, false statements or perjury. ... It is where the court or a member is corrupted or influenced or influence is attempted or where the judge has not performed his judicial function --- thus where the impartial functions of the court have been directly corrupted."

#### **Fraud upon the court by an officer of the court**

201. "Fraud upon the court" has been defined by the 7th Circuit Court of Appeals to "embrace that species of fraud which does, or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases that are presented for adjudication." *Kenner v. C.I.R.*, 387 F.3d 689 (1968); 7 Moore's Federal Practice, 2d ed., p. 512, ¶ 60.23. The 7th Circuit further stated "a decision produced by fraud upon the court is not in essence a decision at all, and never becomes final."

#### **Attorney and Judge Commit Acts of Conspiracy and Fraud in an Official Proceeding**

202. Page 46 by Pagel "I'm not interested in negotiating," additional utterances by Pagel "We said we would do that," "I've," statements, "She's in contempt," and she will continue to be in contempt." "we" meaning Dieterle and Pagel, over and over, in this hearing alone, Pagel implicated himself as a witness, "we said we would," Dieterle, Pagel and Reich conspired to the

intentional concealment of material evidence in favor of Hansen, intentional deprivation of Hansen’s right to due process. Making discourteous and disparaging remarks against Hansen, intentionally twisting the facts, trying again to improperly reduce Hansen’s parenting time in an Order to show cause hearing, of which Hansen was forced into by Reich, without counsel. Page 49 line 18, Ms. Hansen: “May I close?” Line 19 the judge: “No,” “No, we are already almost 15 minutes over the time allotted for the hearing, then the judge leads by stating that an item should be included in relief... stating “grant the relief requested in the application I guess for part one. I don’t know if you included the tractor in there, but that should be included as well.” Here he entered further and again as a settlement negotiator for one party and therefore abandoned his role as neutral arbitrator. At any given time he seemed to fill the role of judge, jury, defense counsel, prosecutor, psychiatrist, social worker and Dieterle’s personal advocate.

203. At this hearing, Dieterle, Pagel and Reich extorted thousands of dollars from Hansen and wrongly deprived her and her family of their home forcing them to be homeless and without proper due process. Violations of 42 U.S.C. 1982, and all stated above. Hansen re-alleges all violations as stated above apply here.

The index of this hearing reads as follows:

204.	<b>INDEX</b>	
	WITNESS:	PAGE
	Shannon Dieterle	
	Direct Examination by Mr. Pagel .....	3
	Cross-Examination by Ms. Hansen .....	25

EXHIBITS

EXHIBIT	DESCRIPTION	RECEIVED
---------	-------------	----------



A	Letter from Pagel Weikum.....	9
B.	etc through H , J , K, M,N.	9, 12,15,20, 22

205. This is the entire information as is listed on the transcript Index page. This shows that Hansen was not allowed the right to provide testimony, was not under oath, was deprived the right to present evidence and witnesses, and was deprived a full, fair and meaningful hearing.

206. Reich acted out in his individual capacity once again against Hansen in violation of and lack of due process violated Hansen's fourteenth amendment rights and subjected her to cruel and unusual punishment as a means of retaliation against her.

#### **Judge Issues Fraudulent Unenforceable Order in Spite of Multiple & Severe Due Process Violations**

207. On March 10, 2015, Reich issued an order based upon the fraud committed by him, Dieterle and Pagel, unlawfully removing Hansen from her home and her place of business, by the threat of force. This order gave Hansen and her three children only twenty one days to vacate the home ranch property and her business. Reich made disparaging and discourteous remarks against Hansen, yet did not allow Hansen to provide witnesses, testimony, nor evidence. Reich knowingly and intentionally used coercion, fear, intimidation and retaliation against Hansen for her standing up for her lawful rights. This void order left Hansen and her three children homeless and all was brought on by the acts of conspiracy of Dieterle and Pagel.

#### **Unlawful Coercion & Force and Threat of Force by Attorney**

208. In early April 2015, Pagel forced Hansen into a position that if she wanted any of her personal property which she was not able to retrieve before being grossly thrown off of the ranch, Pagel demanded that she was sign the paper provided by Pagel, wherein she agreed to walk away from anything that she was not able to get at that time. Pagel gave this paperwork to

Sheridan County Sheriff's department to give to Hansen, and demanded that if Hansen refused to sign it, then they would not allow her onto her own property.

### **Additional Failures by Local Sheriff Due to Unlawful Interference of State's Attorney**

209. Time and time again, Dieterle and Pagel would run to the Sheridan County Sheriff's department and demand their assistance to help with their unlawful activities against Hansen. Dieterle and Pagel enjoyed instilling fear and intimidation tactics against Hansen and employing the aid of the Sheriff and deputies to carry out their own dirty work. In fact, Hansen has multiple audio and video recordings to show the open hostility of the sheriff and deputies against Hansen due to the incessant lies by Dieterle and Pagel against her. The Sheridan County Sheriff's department would routinely answer and assist Dieterle in his malicious acts, yet, they failed time and again to assist Hansen in enforcing her rights. Hansen does have affidavits of witnesses to this and is able to provide specific dates of these acts and reports.

210. On one particular instance, Ms. Ryan accompanied Hansen to the Sheriff's department to exchange the child from Dieterle to Hansen, however, Dieterle refused to allow Hansen her parenting time with the child even though it was her regularly scheduled time. Hansen asked the sheriff/ deputy to enforce this and instead he called Dieterle's mother, who said she would have Hansen arrested for trespassing if she came to the property to pick-up her child for her regularly scheduled parenting time. Deputy Delbert Hoffman refused to enforce the order. Instead a call was placed to additional co-conspirator Ladd Erickson, the McLean County State's attorney and he would tell the sheriff or his deputy to not help Hansen. His bias against Hansen was palpable and evident by his statements against Hansen including an email which he sent to Hansen stating that if Hansen contacted him again, it would go to his junk email folder, yet, time and again, he

would do the bidding of Dieterle against Hansen, including but not limited to dispatching the sheriff to invade the privacy of Hansen and her family and home on Dieterle's whim.

211. Furthermore, Hansen has in her possession the actual Sheriff's departments own in car audio/ videos showing their bias against Hansen, with rude derogatory statements made by deputy Daniel Reich against Hansen, and in fact, one such video proves the nature of embroilment between Dieterle and the Sheridan county Sheriff's department in their close long standing friendships with one another individually. As well as other known violations of a protection order against Dieterle, yet, the Sheridan county sheriff's department was forced to follow the lead of Ladd Erickson, who is close in with the Dieterle family and continued to work in concert against Hansen for the benefit of Dieterle.

**Litigant Motions to Recuse Judge Due to Bias, Impropriety and Judicial  
Misconduct and Motion to Vacate Order due to Fraud**

212. On July 10, 2015 due to the many above stated abuses against Hansen by Dieterle, Pagel and Reich and because not one of Hansen's attorneys would properly defend against this abuse, Hansen filed a Motion to Recuse and Affidavit in support of Motion to Recuse, with an Affidavit of Certificate of Service. Along with a Notice of Motion and Rule 60(b) Motion to set aside/ Vacate order due to fraud/unclean hands and Rule 62(b) Motion to stay/ reverse execution of order pending hearing. With this Hansen provided a proposed order to set aside/ vacate/ reverse order. On July 14, 2015 Reich responded by filing a "Demand Not Granted." The fraud was not even objected to by Dieterle or Pagel, they did not provide a reply, yet, Reich took it upon himself and just flat denied Hansen's motions.

213. On July 22, 2015 Hansen filed a Motion to Recuse judge Reich due to appearance of impropriety and judicial misconduct, Motion to correct error, with a proper certificate of service.

On July 23, 2015, Dieterle and Pagel file a Notice of Motion seeking summary real estate disposition judgment and sanctions, Pagel files a brief in support of; with another motion to hold Hansen in contempt/ Motion to enforce modify parenting time, to continue to lessen Hansen's parenting time with her child and he attempts to do so in total violation of due process. Once again, Pagel's brief full of discourteous and disparaging remarks against Hansen. Also, he brought forth more malicious motions to hold Hansen in contempt and to deprive Hansen of her parenting time. Pagel knowingly and maliciously twisted facts and concealed evidence in order to support his desires.

#### **Hansen Files Demand for Change of Judge due to Appearance of Impropriety & Fraud**

214. On August 14, 2015 Hansen files for a demand for change of judge/ disqualification of judge due to the appearance of impropriety. On August 31, 2015 Hansen files a Motion to vacate an unenforceable order based on fraud of the Plaintiff. Reich intentionally, knowingly and willfully ignores Hansen's motions. Dieterle and Pagel file motions against Hansen, and they are summarily and instantly ruled on, again, without a full, fair, meaningful hearing, time and again without any hearing at all. There is no doubt as to Reich's involvement in their conspiracy of harm against Hansen. Time and time again Dieterle's attorney devises baseless litigation against Hansen. Dieterle, Pagel and their co-conspirator Reich's scheme to defraud and extort Hansen is the fact that the North Dakota district and Supreme Court judiciaries have developed systemic weaknesses and corruption.

#### **Judge Retaliates against Hansen, Again**

215. On August 25 and 26, 2015 Reich once again, grants the motions brought fraudulently by Dieterle and Pagel, and in violation of due process. These orders were issued without a hearing,

again. Yet, Hansen's motions to vacate and to demand recusal of Reich for obvious impropriety were either ignored or denied, every time. These motions brought forth against Hansen, forced her to lose her home, her business, additional personal property and pay thousands of dollars in fraudulent contempt fees as well as to lose nearly all equity in the property by forcing Hansen to grant all to Dieterle. Reich forced Hansen to allow Dieterle and Pagel to do with it as they wished and all was done minus a proper hearing in front of an unbiased tribunal. These orders issued at this time extorted several thousand dollars from Hansen, Hansen was coerced, forced and intimidated to pay Dieterle's attorneys fees and additional costs as directed by Dieterle, Pagel and knowingly conspired to by Reich.

#### **Dieterle and Pagel make False Report to Sheriff's Departments**

216. Approximately, on or about August 26, 2015 Shannon and or Pagel made a false report to both Sheridan and McHenry County Sheriff's departments regarding Hansen, thereby causing the Sheriff's deputy to come and invade the privacy of Hansen, and without probable cause, when he came to the house due to Dieterle/ Pagel's false statements to cause Hansen harm. Dieterle claimed he was not aware of our daughters where-about, which is an intentional misstatement in an attempt to cause Reich to side for him, yet again, in his next deceitful motion. Hansen has in her possession numerous text messages between herself and Dieterle to prove his fraud, and thus even wire fraud. Hansen is able to provide the sheriff's reports that the child was just fine. Dieterle made intentional false reports to law enforcement to cause Hansen harm.

#### **Fraudulent Ex Parte Motion Sought by Conspirators to Hijack Due Process**

217. This act was further intentionally and knowingly aggravated malicious conduct by Dieterle and Pagel for their use and support to intentionally mislead the court and to support Dieterle's next move against Hansen. Wherein on September 2, 2015 Dieterle brought forth yet

another of his baseless, fraudulent and malicious ex parte motions and supported only by his perjured affidavit, in a contrived “emergency” exploited to hijack due process yet again. This motion and malicious affidavit were void of any evidence or specific facts along with the fraudulent and meritless, baseless motion by Pagel in support of Dieterles’ affidavit. There false and misleading statements were done in an attempt to justify and excuse their obvious misconduct. Pagel acted as an attorney in judicial proceedings, yet spoke as a witness and prosecutor of Hansen time and again, to which, Reich parroted the discourteous statements of Pagel against Hansen. This ex parte motion was to effectively terminate Hansen’s parental rights, and so done by a fraudulent ex parte motion and its subsequent unenforceable judgment and all done in violation of due process.

218. Hansen responded to Dieterle’s ex parte motion on September 4, 2015, later Hansen would learn that Reich issued yet another knowingly void order and this time as an ex parte order on September 4, 2015 for the benefit of Dieterle. There was no notice of hearing and Hansen was not served this order. With an ex parte order there is to be a hearing within thirty (30) days, however, Pagel intentionally failed to do so.

**Invasion of Privacy, Trespassing, Unlawful Search and Seizure, Without Warrant  
or Probable Cause Due to Fraudulent Order**

219. Late in the evening on September 4, 2015, while on vacation with her three (3) daughters, for the weekend, the Jerauld County, South Dakota Sheriff’s Department trespassed on private property, without probable cause and without a warrant and demanded to take the five year old child from Hansen on her regularly scheduled weekend with the child. The Jerauld County Sheriff’s department used the threat of force, coercion, intimidation and threat of arrest by armed deputies against Hansen if she did not give them the child. Hansen and her children were the

victims of unlawful, search and seizure, invasion of privacy and all without probable cause and without warrant or enforceable order. The Jane and John Doe's of Jerauld County Sheriff's department handed to Hansen an ex parte order by Reich, of which Hansen had no knowledge of this order. Further, she was handed a paper that led to the unlawful tracking of her cellular phone without probable cause and without warrant and was not signed by any court, but was signed only by Delbert Hoffman of Sheridan County Sheriff's department in North Dakota.

220. Late that night during this invasion against Hansen, Hansen called the Sheridan County Sheriff's department and in talking with a deputy, learned that Dieterle demanded that they enforce the ex parte order, demanded that they assist him by aiding and abetting in the continued violations against Hansen's rights. Hansen was not served this ex parte order until the Jerauld County Sheriff department showed up to take her child and gave her a copy. Hansen's then five (5) year old daughter was taken into the custody of the Jerauld County South Dakota Sheriff's department at the demand of Dieterle and Pagel. There were absolutely no grounds to support this malicious ex parte motion and order.

221. Dieterle intentionally brought malicious prosecution against Hansen and made false unsubstantiated reports to law enforcement in two states to enforce his premeditated scheme against Hansen. Dieterle and Pagel conspired to kidnap this child from Hansen and used North Dakota Sheriff's departments and a South Dakota Sheriff's department to enforce this conspiracy along with the child protective agencies. No hearing was provided no right to address her accuser and no due process was provided prior to maliciously stripping Hansen's child from her. This ex parte order was issued knowingly and fraudulently by Reich working in conspiracy with Pagel and Dieterle to deprive Hansen her rights.

## **Violations of Civil & Human Rights & Due Process Cause Termination of Parental Rights by Conspirators**

222. The sweeping orders equated to the termination of parental rights; however, absent of proper notice of hearing, proper evidentiary hearing and adequate legal counsel or due process. The ex parte order violated due process infringing on Hansen's Fourth Amendment seizure and through conspiracy with Dieterle's attorney and Reich. The repeated violations of due process for four years at this point, provide no hope of justice or a fair trial. Without the required evidentiary hearing, attorney's hearsay evidence calling Hansen a "manipulator" was used to defame Hansen. All these defamatory, cut-and-paste psychiatric-want-to-be statements of Dieterle and Pagel contradicted fact, available evidence and would be witness testimony. Defendant's conspiracies to contrive these "emergencies" without basis in fact or law, under color of law as a phony "emergency" resulted in continuing mental distress and "irreparable injury" to children and Hansen.

223. The conspiracy to take and conceal this child from Hansen is evident from onset of the case proven by the numerous times which this duo brought forth numerous malicious fraudulent motions against Hansen to deprive her of parenting time, and all the while, minus any evidence. Time and again, Hansen was denied to provide testimony, evidence or witnesses to defend against the allegations. Dieterle and Pagel continued vexatious litigation against Hansen in the form of many Ex Parte motions and motions for sanctions, all of which were generated to deny Hansen her rightful parenting time. This is outrageous intentionally malicious conduct by these individuals. Dieterle, Pagel and Reich have continued to conceal this child since the above stated date from Hansen. And have in essence with the aid of Reich unlawfully and unjustly and without cause terminated Hansen's parental rights to this child.



### **Violations of Due Process, Civil Rights and the Hobbs Act**

224. The due process violations give appropriate grounds for relief for civil rights damages as well as for RICO damages and violations of the Hobbs Act. All of this was done without proper service or knowledge and without warrant and the unlawful trespass, search and then the seizure of her minor five (5) year old daughter of Hansen while on her weekend and in front of her other minor daughters. This is extreme outrageous behavior by Dieterle and Pagel against Hansen.

225. Hansen tried to no avail to secure a hearing to defend against the malicious defamatory ex parte motion and order issued on September 4, 2015, however, she did not stand a chance in front of Reich. Hansen had filed motions in August to disqualify Reich due to bias and impropriety and to vacate fraudulent orders; each and all of Hansen's motions were again ignored by Reich. Hansen believes that Reich knowingly issued this ex parte order as a mechanism of open retaliation against Hansen for her filing to have him recused and for filing to vacate the unenforceable void orders due to the fraud committed by Dieterle and Reich upon Hansen and upon the court. Reich refused time and again to recuse himself. Hansen sought out assistance by sending her motions to recuse to presiding judge Gail Hagerty, who ignored Hansen's motions to recuse Reich.

226. Hansen was forced to retain legal counsel to represent her in an attempt to seek justice and have her parental rights to her child. This cost Hansen thousands of dollars to do so. A condensed sick excuse of a hearing was finally held roughly ten (10) weeks after imposition of the ex parte order. Only moments prior to the hearing, Hansen's attorney, Mr. Hill, elects to meet with Pagel without Hansen and against Hansen's wishes. Upon his return to Hansen he tries to coerce and force Hansen to agree to the terms that Pagel has offered, which was to keep this ex parte order in effect. Hansen tells Mr. Hill, no, that she is here for a hearing to defend against the

malicious harmful allegations against her by Dieterle and Pagel, of which she is able to prove that they are lies. Again Mr. Hill, against the wishes of Hansen, meets with Pagel and continues to try to coerce Hansen to go along with the terms Pagel offers. The meaning of the term “Liberty” is that governments and public officials should deploy their coercive powers according to rules and reason rather than passion and whim.

227. During this sham of a hearing ten weeks from the date that Dieterle, Pagel and Reich acted to unjustly kidnap and conceal the child from Hansen minus any and all due process, Pagel has once again ambushed and bullies Hansen, intentionally interferes with and runs this hearing in an attempt to deprive Hansen the right to defend against the bogus allegations of the ex parte motion. Once Pagel again, runs over the top of Hansen and her attorney and states that Hansen agrees to his terms. There is more evidence of the wrongs committed in Hansen’s First Claim for Relief below.

**Obstructing Judicial Proceedings by Witness Pampering, Withholding Documents  
and making False Statements to the Court**

228. Reich was obviously frustrated at the onset of this hearing, he was short tempered with Hansen’s attorney and spoke of the fact that Hansen’s attorney had met with Pagel prior to the hearing commencing. Pagel had allotted only one hour of time for this hearing, which is ridiculous and was intentional to continue to force drug out malicious prosecution of Hansen. This allotment of time is in violation of due process, wherein this time frame clearly would not permit a proper amount of time for Hansen to defend against the allegations. Hansen was forced and coerced into accepting Pagel’s terms by her attorney, Pagel further committed conspiracy to obstruct justice with Hansen’s attorney, to continue the deprivation of Hansen’s right as a parent.

### **Witness Tampering and Intentional Concealment of Evidence**

229. Hansen's attorney whom Hansen relied upon to her detriment, states that accepting Pagels' offer is the only way Hansen will get her daughter back. However, Hansen wanted to have the proper due process hearing to defend against the malicious fraudulent allegations against her by Dieterle and Pagel in their Ex Parte Motion. She wanted the right to cross-examine, to provide testimony, evidence and witnesses in her defense, however, Pagel and Reich denied Hansen of this right. Hansen had submitted a forensic expert report on the record along with her truthful affidavit, and disclosure of expert. Pagel and Reich intentionally and knowingly interfered with an expert witness and his testimony, committed conspiracy of witness tampering with a Forensic Expert witness, Mr. R.P. Ascano. Mr. Ascano was in attendance of the hearing, and his reports were on file, however, the trio of conspirators, led by the instruction of Dieterle, and aided by Pagel and Reich, once again worked in concert to conceal the expert reports and expert testimony and to deprive Hansen of due process.

### **Conspiracy to Commit Deprivations of Rights to Defend against Allegations**

230. Dieterle, Pagel and Reich intentionally and knowingly interfered with a judicial proceeding and deprived Hansen of proper due process and committed acts of fraud upon Hansen and fraud upon the court. Pagel and Reich collectively conspired to use force, coercion and acts of intimidation against Hansen to deprive her of her rights. All was done for the gain and benefit of Dieterle, Pagel and Reich. Rico Defendants deprived Hansen her right to a full, fair and meaningful hearing to defend against the malicious allegations against her.

231. Anything that Hansen filed as evidence, Pagel replied to with an objection of it, he even went so far as to object to Hansen providing testimony in her defense, evidence and to cross examine and to provide expert testimony and expert reports. Hansen attempted to provide

defense against the intentional malicious lies of Dieterle and Pagel in their obtaining of the ex parte order. Pagel and Reich used unlawful strong arm evil-eyed tactics to force Hansen into accepting their terms, using a child as a pawn in their scheme against Hansen. Convincing Hansen that the only option to be reunited with her child was to accept Pagel's terms which continued violations of Hansen's rights and deprived her of a hearing prior to being deprived of her rights. Pagel forced, coerced and intimidated Hansen into continued removal from the life of her daughter unless she followed his specific unjust and unlawful terms to reunify with her daughter.

232. Hansen, in light of Dieterle's malicious unsubstantiated allegations had willingly undergone a full forensic expert evaluation and full scope testing and provided it to the court; however, Dieterle, Pagel and Reich concealed this fact and prevented the expert witness from testifying. Loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury. This hearing was wrapped up by force and coercion within mere minutes and in contrary to Hansen's comprehension of the situation. Hansen has provided this court with an affidavit of a witness who states that clearly Reich acted in ways of bias against Hansen, this Exhibit has been provided to the court as **Exhibit F**. During this sham of a hearing Defendants Dieterle, attorney Pagel and Judge Reich knowingly engaged in intimidation, misleading conduct and corrupt persuasion of Reich. Dieterle and Pagel intentionally blocking Hansen's rightful access to an unbiased tribunal, concealing records, evidence, witness tampering, forced and coerced Hansen from her right to a full, fair and meaningful hearing. This hearing was a mere few minutes only due to the conspiracy to force and coerce Hansen by Pagel and Reich. Pagel and Reich worked in concert and refused Hansen the right to present testimony,

evidence, reports, etc and refused to allow the forensic expert to provide testimony in Hansen's defense.

233. The motion for Ex Parte order was and is based solely upon fraud and deceit of Dieterle, conspired to by his attorney Pagel and co-conspired to by Reich. Pagel and Reich collectively worked to deceive Hansen and to continue the deprivation of rights of Hansen to further their conspiracy in their favor. Pagel and Reich worked in concert at the instruction of Dieterle to coerce and force Hansen into agreeing to the deprivation of her rights, which Hansen does not agree to. Hansen did not understand the proceedings and immediately following this hearing Hansen met with her attorney and told him again, she did not understand what just took place and did not agree to the terms forced upon her.

#### **Judge Refuses the Right to a Fair Hearing to Defend Against Malicious Ex Parte Motion**

234. Due to the ineffective assistance of counsel and Hansen's detrimental reliance on Mr. Hill and a fair tribunal, Hansen was forced to write a letter stating she did not understand what just took place and did not agree to the terms as set out by Pagel to continue the deprivation of Hansen's rights to her child. Hansen provided this letter of fact to Reich and Pagel, explaining she felt forced and coerced into accepting the terms of continued deprivation of relationship with her daughter in order to later gain time to see her daughter. Hansen stated she required a full and fair hearing to present her defense, with expert witness and with other witnesses in her defense to the malicious allegations made against her by Dieterle in his Ex Parte motion. However, Reich refused to provide a hearing for her to defend against the ex parte motion. Instead Reich responded with another fraudulent judgment, fraudulently claiming that Hansen was refusing to cooperate and that she would not get "reunified" with her child until she chose to cooperate with the demands of Pagel. This is clear coercion, force and intimidation exerted by Reich upon

Hansen. Judge Reich to this day, has not allowed Hansen the right to defend against the malicious ex parte order he issued on September 4, 2015. Reich issued this judgment just days after Hansen had filed another motion to recuse/disqualify Reich and motions to vacate motion due to fraud. Clearly this is another blatant retaliation by Reich against Hansen. The abuse from attorney Pagel and Judge Reich to Hansen never does quit.

235. Judge Reich failed to maintain the required high standard of judicial performance with particular emphasis upon conducting litigation with scrupulous fairness and impartiality. Reich became embroiled in the case early on and continued this behavior and failed to uphold the integrity of the judiciary. State's power to legislate, adjudicate and administer all aspects of family law, including determinations of custodial; and visitation rights, is subject to scrutiny by federal judiciary within reach of due process and/ or equal protection clauses of 14<sup>th</sup> Amendment...Wise v. Bravo, 666, F.2d 1328, (1981).

236. Hansen, to this day has not been allowed her rights as a parent, and has only been allotted Dieterle's sick twisted wishes that Hansen only have one, two hour supervised visit with her daughter per month and never having the required due process evidentiary hearing. "A parent who is deprived of custody of his or her child, even though temporarily, suffers thereby grievous loss and such loss deserves extensive due process protection." In re Cooper, 621 P.2d 437; 5 Kansan App Div. 2d 584, (1980). There is a plethora of examples where federal courts have jurisdiction of family law cases, and especially when this also extends to conspiracy and intent to commit conspiracy, and based on the preponderance of evidence of malfeasance and fraud on the part of the RICO Defendants apply in this case. Making knowingly false statements pertaining to child abuse or neglect violates clearly established constitutional right to familial relations.