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**IN THE CIRCUIT COURT, FOURTH JUDICIAL CIRCUIT,
IN AND FOR DUVAL COUNTY, FLORIDA**

ELIAS MAKERE, FSA, MAAA

Case No. _____

*(to be filled in by the Clerk's Office)**Plaintiff(s)*

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

MARTIN FITZPATRICK; CHARLES JF SCHREIBER,
JR; MARK WALKER; US DISTRICT COURT,
FLORIDA, NORTHERN DISTRICT

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: *(check one)* ☒ Yes ☐ No

**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)**

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Elias Makere, FSA, MAAA		
Address	3709 San Pablo Rd S #701		
	Jacksonville	FL	32224
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Duval		
Telephone Number	904.294.0026		
E-Mail Address	Justice.Actuarial@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Martin Fitzpatrick		
Job or Title <i>(if known)</i>	Federal Magistrate (US District Court, Florida, Northern District)		
Address	111 N. Adams St		
	Tallahassee	FL	32301
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Leon		
Telephone Number	850.521.3501		
E-Mail Address <i>(if known)</i>	Martin_Fitzpatrick@FLND.USCourts.gov		
☒ Individual capacity ☒ Official capacity			

Defendant No. 2

Name	Charles J.F. Schreiber, Jr.		
Job or Title <i>(if known)</i>	Assistant Attorney General		
Address	PL 01, The Capitol, Office of the Attorney General		
	Tallahassee	FL	32399
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Leon		
Telephone Number	850.414.3672		
E-Mail Address <i>(if known)</i>	Charles.Schreiber@MyFloridaLegal.com		
☒ Individual capacity ☒ Official capacity			

Defendant No. 3

Name	Mark Walker		
Job or Title <i>(if known)</i>	District Judge		
Address	111 N. Adams St.		
	Tallahassee	FL	32301
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Leon		
Telephone Number	850.521.3501		
E-Mail Address <i>(if known)</i>	Mark_Walker@FLND.USCourts.gov		

☒ Individual capacity ☒ Official capacity

Defendant No. 4

Name	US District Court, Florida, Northern District		
Job or Title <i>(if known)</i>	Federal Court		
Address	111 N. Adams St.		
	Tallahassee	FL	32301
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Leon		
Telephone Number	850.521.3501		
E-Mail Address <i>(if known)</i>			

☐ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:

☒ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

28 USC §455; 28 USC §1343; 28 USC §1346; 42 USC §1981; 42 USC §1983; 42 USC §1985.

1st Amendment - Access to the Courts

7th Amendment - Trial by Jury

14th Amendment - Equal Protection, Due Process

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Fitzpatrick/Walker are federal judges violating the constitution.

Schreiber is an assistant attorney general violating the constitution.

All defendants have been infused with invidious discrimination (on the bases of race & sex).

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Florida.

United States of America.

- B. What date and approximate time did the events giving rise to your claim(s) occur?

Spring 2018 - Spring 2022

continuing violation

- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

--- Background ---

Plaintiff sued his former employer (Allstate) for employment discrimination (race, sex).

All of the material facts of Plaintiff's case were (1) in his favor, (2) clear-cut, and (3) not dependent on interpretation (ie, he had a very strong case). Anti-black propaganda, however, was against him.

--- Violations ---

Judge E. Gary Early (a) destroyed evidence; (b) perjured himself; and (c) engaged in bribery.

Fitzpatrick/Walker (a) engaged in bribery; and (b) discriminated ('unequal protections under the law').

Schreiber (a) engaged in bribery; (b) perjured himself; and (c) interfered with a judicial proceeding.

USFLND enforces a self-made (unlegislated) policy that violates the equal protection clause (14th).

All defendants have been infused with invidious discrimination (on the bases of race & sex).

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

--- Constitutional Injuries ---

- ▶ Lost/impaired chance at accessing the court (1st)
- ▶ Lost/impaired chance at a trial by jury (7th)
- ▶ Lost/impaired chance at a fair trial (due process - 14th)
- ▶ Lost/impaired chance at equal protections under the law (14th)

--- Financial Injuries ---

- ▶ Loss of Income
- ▶ Legal Costs
- ▶ Professional Impairment

--- Non-Pecuniary Injuries ---

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

--- Punitive Damages ---

(deter Defendants' comrades from similar transgressions; combat Defendants' disregard for the law)

--- Declaratory Relief ---

Declare that Defendants violated Plaintiff's constitutional rights

--- Injunctive Relief ---

Enjoin Defendants from further unlawful conduct

Enjoin Defendants from further interference/involvement in the Makere v Early case (4:21-cv-00096)

--- Equitable Relief ---

Plaintiff seeks an award of all other relief that is just, equitable, and proper.

Plaintiff expects damages to exceed \$30,000 (allocated properly).

Thus, Plaintiff asks this Court to permit such a final calculation to await the appropriate time.

VI. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04/25/2022

Signature of Plaintiff /s/ Elias Makere

Printed Name of Plaintiff Elias Makere, FSA, MAAA

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

City *State* *Zip Code*

Telephone Number _____

E-mail Address _____

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