

IN THE SUPREME COURT OF THE UNITED STATES

No. 20-6503

FEBRUARY 12, 2021

GEORGE J RAUDENBUSH III  
PETITIONER

v.

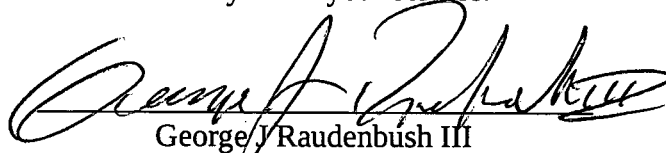
BRAIN MILLSAPS, MONROE COUNTY et al.,  
RESPONDANTS

**ATTENTION CLERK OF THE COURT**

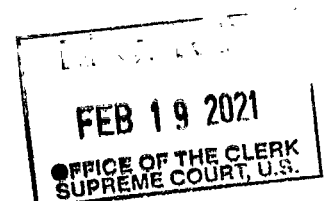
Enclosed you will find an Affidavit of Good Faith and New Evidence with attached exhibits A through H and a Petition for Rehearing with a certificate of service.

Please file the originals with the pink post it notes with the court and time date stamp the copy's with the green post it notes to be returned in the self addressed and pre-paid postage envelope provided.

Thank you for your service.



George J Raudenbush III  
2545 Woodbine Avenue  
Knoxville, Tennessee 37914  
standfast4truth@yahoo.com  
(865) 228-9170



**AFFIDAVIT OF GOOD FAITH AND NEW EVIDENCE**  
IN SUPPORT OF PETITION FOR REHEARING

I George J Raudenbush III, affirm the following statements to be true, correct and accurate on this 12<sup>th</sup> day of February 2021

**GOOD FAITH**

My christian faith, spiritual training and good conscious prohibits me from any acts and or behavior that would harm or injure another intentionally or unintentionally. My being is centered around honesty, fairness, and lawfulness of purpose. I have spent tens of thousands of hours volunteering since my youth in helping others, serving the Supreme Court of Florida as a Guardian Ad Litem, the Catholic Church as a volunteer (host dinners) and working for the State of Florida in numerous child advocacy programs, see attached documents:

- A). Supreme Court of Florida Guardian Ad Litem Certificate.
- B). Letter from John Royce.
- C). Speaking Up For Children Certificate.
- D). Juvenile Services Program Certificate.

The following individuals have attested to my character:  
(a matter is established by two or three witnesses 2 Corinthians 13:1)

- E). Letter from landlord Gene Forrest
- F). Clemency letter from Frank and Debra Smith
- G). Affidavit of Grover D. Cowart

**NEW EVIDENCE**

On February 2, 2021 at 3:07 pm Attorney Landon M Hickey (BPR # 037143) did contact the petitioner via phone and then by e-mail. Attorney Landon M. Hickey from the law offices of Banks and Jones did disclose to the petitioner that his firm represents Sierra Moses, who has a civil case against officer Mill saps and Monroe County. The same defendants/respondents in the petitioners case In Raudenbush v. Monroe County et al. 3:2011cv00625. Attorney Hickey further explained that the reckless misconduct and actions of Brian Millsaps resulted in the death of Joe Moses and the maiming and disabling of his Wife Sierra Moses, Mr. Hickeys clients. A copy of Attorney Hickey e-mail is attached for the courts re

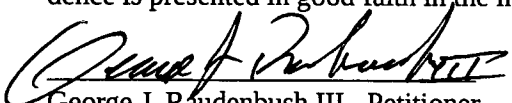
view, see exhibit (H).

Brian Millsaps has had three civil actions brought against him as a result of misconduct and the use of excessive force in a 12 year period. In Dillingham v. Millsaps et al. 3:2007cv00214, Raudenbush v. Monroe County et al. 3:2011cv00625, and the most recent case brought by Banks & Jones, Sierra Moses and Joe Moses deceased v. Brian Millsaps, Monroe County et al, V2100S Civil Circuit Court Monroe County. The above complaints verify four individuals being severely maimed and injured and a fifth innocent bystander died by the intentional actions of Millsaps in his official capacity.

Officer Millsaps has been disciplined, suspended and terminated for misconduct by three separate employers; the Vonore Police Department, the Tellico Plains Police Department and the Monroe County Sheriffs Department. This court has the power and authority to hear and investigate these facts, and has a compelling interest and responsibility to protect the public from government abuses.

Respectfully submitted by George J. Raudenbush III.

CERTIFICATE OF PRO SE PETITIONER, I hereby certify that this affidavit of good faith and new evidence is presented in good faith in the interest of justice and not for delay.

  
George J. Raudenbush III, Petitioner  
2545 Woodbine Avenue  
Knoxville, TN 37914  
(865) 228-9170

#### ACKNOWLEDGMENT

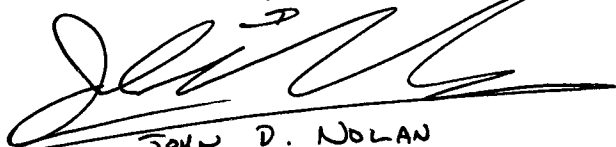
State of Tennessee

County of Knox

On this 12<sup>th</sup> day of FEBRUARY, 2021, before me personally appeared  
JOHN D. NOLAN, NOTARY PUBLIC,

to me known to be the person described herein and who executed the foregoing instrument and acknowledged that he/she executed the same as his/her free act and deed, for the purposes therein set forth.

SWORN TO AND SUBSCRIBED THIS 12<sup>th</sup> OF FEBRUARY, 2021

  
JOHN D. NOLAN

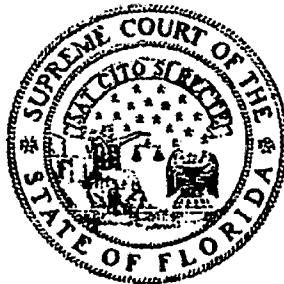
COMMISSION EXPIRES: 9.5.2022



I CERTIFY THIS TO BE A TRUE  
AND ACCURATE COPY OF THE ORIGINAL

BY: 622

# Supreme Court of Florida




Be It Known That

**George Raudenbusch III**

has completed the minimum training requirements of the State of Florida  
Guardian Ad Litem Program and is hereby certified to represent the  
best interest of abused and neglected children in judicial court proceedings.

In witness whereof, this certificate has been issued by the Office of the State Courts  
Administrator and duly signed this **1<sup>st</sup>** day of **February**, 1991

  
Trial Court Administrator



  
Circuit Judge

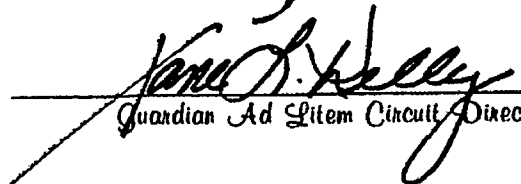
  
Guardian Ad Litem Circuit Director

EXHIBIT A

I CERTIFY THIS TO BE A TRUE  
AND ACCURATE COPY OF THE ORIGINAL

BY: 672

Protecting the



Citizen-Consumer

JOHN D. ROYSE -

CONSUMER ADVOCATE

April 6, 1986

Member -

AARP  
Public Citizen  
Common Cause  
ACLU Found Assoc.  
S. F. Consumer Action  
Oregon Consumer League  
Oregon Lung Assoc. - ANSR  
League of Women Voters

To: Whom It May Concern

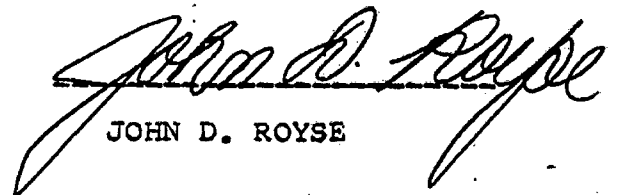
Consumer Surveys  
Consumer Investigations

This is to state that I have known George Raudenbush III for the better part of the last half-year and had the pleasure of working with him at the Host Dinners, a charitable volunteer project to feed the poor and elderly of downtown St. Petersburg, FL.

During this time I have found Mr. Raudenbush creative, friendly and energetic and his efforts and personality made a strong impression on the volunteers at the Host Dinners. His moral character is unusual among many of today's youth.

The employer who can best utilize Mr. Raudenbush's talents and experience will find himself well rewarded for the effort.

Sincerely,

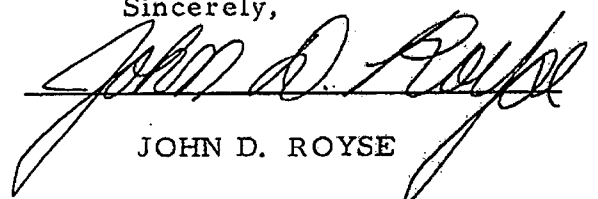
  
JOHN D. ROYSE

October 10, 1986

I am happy to renew my assessment of Mr. Raudenbush's potential.

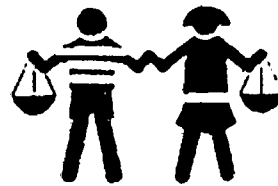
EXHIBIT B

Sincerely,

  
JOHN D. ROYSE

I CERTIFY THIS TO BE A TRUE  
AND ACCURATE COPY OF THE ORIGINAL

BY: GJR



## Speaking Up For Children

presents

# George Raudenbusch

this Certificate of Appreciation for outstanding Volunteer Service

to abused children through the Guardian ad Litem Program.

December 6, 1991

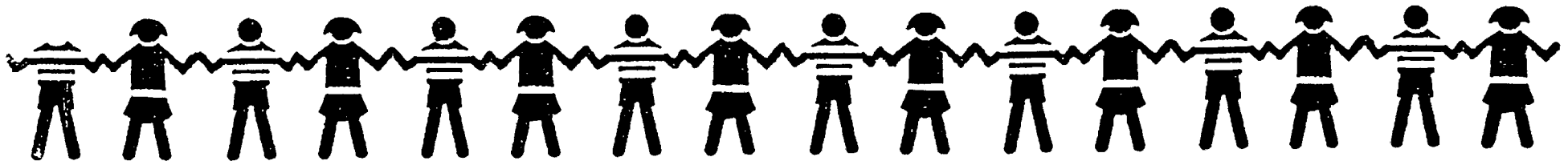
V.G. McAllister

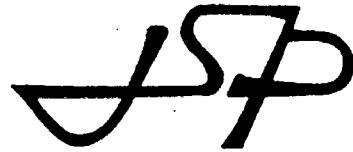
Speaking Up For Children



[Signature]  
Guardian ad Litem

EXHIBIT C





# Certificate Of Appreciation

from the  
JUVENILE SERVICES PROGRAM, INC.

Presented to

GEORGE RAUDENBUSH III

THIS 28th DAY OF APRIL, 19 87

It is a privilege to present this certificate in acknowledgment of your contribution to the  
betterment of our community.

EXECUTIVE DIRECTOR

CHAIRMAN OF THE BOARD

I CERTIFY THIS TO BE A TRUE  
AND ACCURATE COPY OF THE ORIGINAL

BY:

632

D

EXHIBIT

October 16, 2017

# EXHIBIT E

To Whom It May Concern,

I am George Raudenbush's landlord, but also a friend of his for the last three and a half years.

Due to circumstances that I think were created through a miscarriage of justice in the Tennessee legal system going back to December, 2010, George Raudenbush came to live with me in 2014. Although I did not know George before 2010, I have reason to believe that the things that happened to him through the legal system left him partly disabled physically and mentally. It has kept George from being as productive a citizen as he would like to be due to pain and memory problems.

Many people in our church have helped George since I have known him. George has been a great help to me in helping make my home a better place to live and to help bring it up to code. George has put in considerably more than a thousand hours into restoring my home. He asks for nothing and gives so much back to others, even though he has very little. He often gives what he has to others in need without expecting anything in return. However his encouragement and love of helping others is limitless.

George is limited physically due to the head and back trauma he experienced. However, he continues helping others and volunteering, expecting nothing in return. George often forgets my name, or calls me by another name, and he forgets the names of other people he has known for many years. I believe this was caused as the result of the head trauma he suffered back in 2010 to 2013. George is limited in his abilities to perform many tasks. For example, he has problems riding a bicycle due to lower back pain. Sometimes, he cannot sleep due to back pain

George lives very modestly, eating beans, rice, potatoes and vegetables. He has refused food stamps and government assistance many times because he wants to be a productive citizen in our community. Many Christians have seen how modest George lives and have often given him things in kindness out of love and respect for his service to others.

I take George to the grocery store after church on Sunday and have on occasion helped him buy groceries, but he always pays me back, and is always willing to share his food. Monday through Friday, George participates in physical therapy by medical recommendation.

Recently, George has been advised legally to apply for disability due to his deteriorating condition. I am 65 years old and have gone through open heart surgery. I am not in a position to take care of George if his condition becomes worse, and he loses more of his mobility. But I will always be there to help George as long as I am able and of sound mind, God willing.

*Gene W. Forrest*

Gene Forrest  
2545 Woodbine Ave  
Knoxville, Tn 37914  
(865) 386-6109





## Washing Equipment of Tennessee

2100 Middlebrook Pike Knoxville, TN 37921 865-525-1515 Fax 865-525-4257 1-800-333-2146

November 28, 2017

EXHIBIT F

Bill Haslam, Governor  
State Capitol, 1<sup>st</sup> Floor  
600 Charlotte Ave.  
Nashville, TN 37243

**Re: Clemency for exoneration of George J Raudenbush III**

Dear Governor Haslam,

My wife, Debra, and I just celebrated 40 years of business as a leading distributor of commercial pressure cleaning equipment here in Knoxville, which is our home. We have enjoyed community service in addition to our business efforts, mostly in Christian outreach and service. I serve on the board at KARM, am deeply involved in the CLC Leadership training, and have a rich church life at Cedar Springs, which is where we came to know George Raudenbush.

We were introduced by a long-time friend, Gene Forest, when he joined our Sunday School class, about four years ago. Since that time, we have consistently worshiped and studied together, and have also worked together on many service and outreach projects, for our refugee support efforts, and several other opportunities to help the poor. George has been right there, often in a leading role, and often recruiting the help and resources necessary to make it happen.

Debra and I know George to be a reliable man, and trustworthy with important things. We feel that we know his character very well, as portrayed by his words and actions. We are greatly concerned by the apparent inconsistencies of his case. In fact, we find it very difficult to believe that he is guilty based upon the evidence which contradicts the testimony of the officer.

We therefore respectfully ask you to consider fully exonerating George Raudenbush of all charges, which has caused him to suffer under the court system.

*W. Frank Smith & Debra E. Smith*

Frank and Debra Smith



### AFFIDAVIT

State of Tennessee  
Knox County

Comes the Affiant, Grover D. Cowart, under penalties of perjury who, being duly sworn and competent, affirms to wit as follows:

I was not allowed to give this information at either of George Raudenbush's trials.

I am a Black American male 51 years old. I met George at the Northeast Correctional Complex Annex around January 27, 2012 we were cell mates and lived in the same pod in the old B section of the annex until a judge signed an order overturning Georges charges sometime in December 2013. George was supposed to be released after the judge signed the order but the state held him until January 13, 2014 before releasing him. I had never seen anyone not get released after the judge signs for that person to be released and says they are innocent, there is something wrong with that.

When George first came to the Annex, the correctional officer on duty asked George if he wanted a cell change because I am black and George is white. George said he had no prejudices against black people. In prison, if your white you cell with a white person and if your Mexican you cell with a Mexican. I resented that a white person wanted to cell with me because it can create a lot of problems in the prison population. I couldn't get the Correctional officer on duty to have George moved to another cell, so we became cell mates.

George turned out to be the nicest guy that I had ever met in prison and celled with. The warden created a special G.E.D position for George so he could teach and help the men at the annex get their GED diplomas. George was trusted by the Warden and the inmates, that never happens in prison. George was very well respected by the inmates and convicts because he did not play games or run games on people like most convicts do. That's why the predators did not prey on George in the Annex, he was genuine in his faith as a Christian and helped many guys who had been locked up for many years. George was for real. He encouraged and helped as many people as he could, that's why people respected him.

Everyone in population knew George was not supposed to be there, George definitely is not the criminal type believe me I have been around criminals most of my life, George stood out. When someone would challenge George he always shared his faith and talked to that person and they would always back down. I knew George was innocent by his actions. I had been locked up for 25 years and had seen all the messed up games people play in prison, George was not that kind of guy he did not deserve to be in prison like most of us were for crimes we had committed.

I had been incarcerated for the past 25 years for a crime I committed, have paid my debt to society for and am a much better person today. George was one of the reasons I got released. He always was positive and told me I would be released soon, if I just kept my eyes on God. I had a lot of years to go on my sentence, George was right, I got released.

George did two things in prison, he helped and encouraged many men who had no hope and he worked on his legal (appeal).

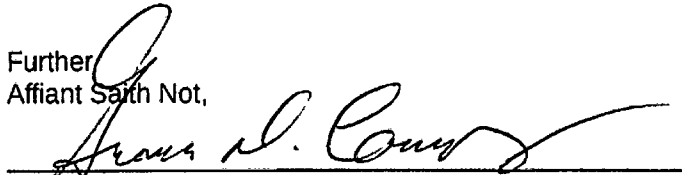
A young black gang banger named magic attacked George in the chow hall, Magic was sent back to his pod. I know this young punk, he was always ready to fight to make a name for himself. George was sent to "Unit 7" a notorious gang unit where guys got stabbed and killed every week. "Unit 7" was known as a very active and violent Gang unit at that time. George was a minimum security inmate who had an approved trustee status at the annex (could leave the prison during the day to work in the community).

Ms. Wills our RFS Instructor and Mr. Smith the Mental Health Counselor Called the captain and told him George could not be placed in "Unit 7". George was put in "unit 7" and was brutally beaten and almost killed by gang members. When the warden found out George had been attacked she had George sent back to the annex. When I first saw George his face was swollen like a basketball and disfigured and I did not recognize him at all. All the inmates knew Correctional officer Hardin sent George to "Unit 7" to be punished or gotten rid of. George did not deserve this, everyone in our pod knew if you were sent to "unit 7" you would have to fight or die. George did not fight because he doesn't believe in violence, the gangs nearly killed him. Correctional officers are in constant fear of the gangs and their safety around them. Why would they intentionally put George in a unit where they knew he would get attacked and might be killed?

A lot of us bigger guys looked out for George because if you didn't fight you appeared weak and there are lots of guys in prison who will take advantage of guys who don't fight. I have never seen George start trouble with anyone. George was always true to his faith. George was one of the very few people in prison who I believed was innocent. Who gets sentenced to prison for four years (a maximum sentence) for a simple traffic violation (no weapons or drugs were involved)? There is something really wrong with that. I have spent time with guys in prison who committed murder and only got 6 years and were out in 2 ½ for good behavior. I have met thousands of guys in prison who have committed crimes, really bad crimes and some of them did less time than George. Something is really wrong with a system that puts guys like George in prison who have not committed crimes, who are innocent.

I am available to talk to the Governor or the Board reviewing Georges Petition for Exoneration.

Further  
Affiant Saith Not,

  
Grover D. Cowart  
(423) 213-0930

#### ACKNOWLEDGMENT

State of Tennessee

County of KNOX

On this 13th day of June, 2018, before me personally  
appeared Grover D. Cowart

to me known to be the person described in and who executed the foregoing instrument, and  
acknowledged that he/she executed the same as his/her free act and deed, for the purposes therein  
set forth.



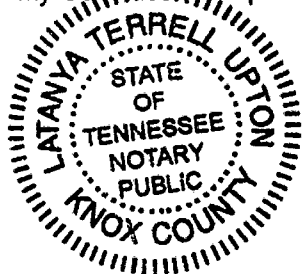
(Notary Public)

My Commission Expires

MY COMMISSION EXPIRES

JANUARY 29, 2022

, 20



**CONFIDENTIAL DOCUMENT**

Brian Millsaps

From: landonhickey@banksandjones.com

To: standfast4truth@yahoo.com

Date: Tuesday, February 2, 2021, 3:07 PM EST

EXHIBIT H

Dear George:

It was great speaking with you earlier today. I had attempted to contact your attorney Steve Merritt prior to contacting you but got no response. If your attorney agrees, I would appreciate you all providing me with any and all official reports, court filings, news articles, disciplinary reports, etc. that reflect the character and/or prior bad acts by Brian Millsaps. Such evidence may greatly help our civil case against him and the Monroe Co. Sheriff's Office regarding the accident he caused last summer while leading a high speed case at speeds of 128 MPH all to stop someone for a misdemeanor moving violation. This accident resulted in the death of Joseph Moses and the maiming of his wife, Sierra Moses. I greatly appreciate your assistance in this matter. If you have any questions, concerns, or need to coordinate the delivery of such documentation, please do not hesitate to contact me.

Very truly yours,

Landon M. Hickey (BPR# 037143)

LAW OFFICES OF BANKS & JONES

2125 Middlebrook Pike

Knoxville, TN 37921

Ph: (865) 546-2141

Fax: (865) 546-5777



Virus-free. [www.avast.com](http://www.avast.com)