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App. 1

STATE OF NEBRASKA)
) SS
COUNTY OF DOUGLAS)

I, T. Michael Williams, being first duly sworn on oath under penalty of perjury, deposes and states:

1. I am competent to testify to and have personal knowledge of the facts in this affidavit. I am over the age of 21. I am a community activist in the Omaha, Nebraska area. I am familiar with the cases involving Timothy Ashford.
2. I am president of the Omaha Chapter of the NAACP.
3. African American Attorney Timothy L. Ashford has filed racial discrimination lawsuits against Douglas County to appoint black attorneys to represent poor people in misdemeanor, felony and murder cases.
4. The Office of Donald Kleine is the attorney opposing Timothy L. Ashford in all of the racial discrimination lawsuits filed by Attorney Ashford.
5. Donald Kleine is the elected Douglas County Attorney and Douglas County is Kleine's client.
6. Attorney Ashford was the victim of an extortion and Attorney Ashford requested the Office of the Douglas County Attorney and Donald Kleine prosecute the extortion case.
7. The Douglas County Attorney has a conflict of interest in prosecuting an extortion case

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involving Attorney Ashford who has sued Douglas County for racial discrimination.

8. The failure of Donald Kleine to reeuse himself does not avoid the appearance of impropriety, does not promote judicial fairness and independence,
9. As a member of the community the failure of Donald Kleine to recuse himself appears improper. A special prosecutor should be appointed just as Kleine appointed a special prosecutor in the James Scurlock case.
10. In the case of Ashford v. Kleine CI 21 9062 the entire Douglas County District Court Fourth Judicial Panel was recused.
11. I have received nothing of value for signing this affidavit.
12. This affidavit is based on my personal knowledge of the facts as I know them that the failure of Donald Kleine to recuse himself creates a strong appearance of impropriety and a special prosecutor should be appointed in the case to promote confidence in the judicial court system.

Further Affiant Sayeth Not

/s/ T. Michael Williams
T. Michael Williams

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SUBSCRIBED AND SWORN to before me this 1st day of August, 2022.

[Notary Stamp] /s/ Kyle Bushon
Notary Public

Prepared by:
Timothy L. Ashford

STATE OF NEBRASKA)
) SS
COUNTY OF DOUGLAS)

I, Paul Feilmann, being first duly sworn on oath under penalty of perjury, deposes and states:

1. I am competent to testify to and have personal knowledge of the facts in this affidavit. I am over the age of 21. I am a citizen concerned with the justice system in the United States. I am a community activist in the Omaha, Nebraska area. I am familiar with the cases involving Timothy Ashford.
2. African American Attorney Timothy L. Ashford has filed racial discrimination lawsuits against Douglas County to appoint black attorneys to represent poor people in misdemeanor, felony and murder cases. Ashford v. Douglas County Eighth Circuit Court of Appeals 16-3366
3. Prosecutors should uphold the law. Prosecutors should not violate the law. Prosecutors should not violate any constitutional or human rights of citizens.
4. Judges should uphold the law. Judges should not violate the law. Judges should not violate any constitutional or human rights of citizens.
5. The Office of Donald Kleine is the attorney opposing Timothy L. Ashford in all of the racial discrimination lawsuits filed by Attorney Ashford.

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6. Donald Kleine is the elected Douglas County Attorney and Douglas County is Donald Kleine's client in court cases.
7. Attorney Ashford was the victim of an extortion. Attorney Ashford requested the Office of the Douglas County Attorney and Donald Kleine prosecute the extortion case.
8. The Office of the Douglas County Attorney has a conflict of interest in prosecuting an extortion case involving Attorney Ashford who has sued Douglas County for racial discrimination.
9. The failure of the Donald Kleine to recuse himself in Ashford v. Kleine does not avoid the appearance of impropriety, does not promote judicial fairness and independence.
10. As a member of the community the failure of Donald Kleine to recuse himself appears improper. A special prosecutor should be appointed in the Ashford case just as Kleine appointed a special prosecutor in the James Scurlock case.
11. In the case of Ashford v. Kleine CI 21 9062 the entire Douglas County District Court Fourth Judicial Panel was recused.
12. I have received nothing of value for signing this affidavit.
13. This affidavit is based on my personal knowledge of the facts as I know them that the failure of Donald Kleine to recuse himself creates a strong appearance of impropriety and a

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special prosecutor should be appointed in the case to promote confidence in the judicial court system.

Further Affiant Sayeth Not

/s/ Paul Feilmann
Paul Feilmann

SUBSCRIBED AND SWORN to before me this 29th day of July, 2022.

[Notary Stamp] /s/ Kyle Bushon
Notary Public

Prepared by:
Timothy L. Ashford

STATE OF NEBRASKA)
) SS
COUNTY OF DOUGLAS)

I, William Perkins, being first duly sworn on oath under penalty of perjury, deposes and states:

1. I am competent to testify to and have personal knowledge of the facts in this affidavit. I am over the age of 21. I am a citizen concerned with the justice system in the United States. I am a community activist in the Omaha, Nebraska area. I am familiar with the cases involving Timothy Ashford.
2. Attorney Ashford is representing me in my case CI 19 9273 in the Douglas County District Court.
3. African American Attorney Timothy L. Ashford has filed racial discrimination lawsuits against Douglas County to appoint black attorneys to represent poor people in misdemeanor, felony and murder cases.
4. The Office of Donald Kleine is the attorney opposing Timothy L. Ashford in all of the racial discrimination lawsuits filed by Attorney Ashford.
5. Donald Kleine is the elected Douglas County Attorney and Douglas County is his client in court cases.
6. Prosecutors should uphold the law. Prosecutors should not violate the law. Prosecutors should not violate any constitutional or human rights of citizens.

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7. Attorney Ashford was the victim of an extortion. Attorney Ashford requested the Office of the Douglas County Attorney and Donald Kleine prosecute the extortion case.
8. Douglas County Attorney has a conflict of interest in prosecuting an extortion case involving Attorney Ashford who has sued Douglas County for racial discrimination.
9. The failure of the Donald Kleine to recuse himself in Ashford v. Kleine does not avoid the appearance of impropriety, does not promote judicial fairness and independence.
10. As a member of the community the failure of Donald Kleine to recuse himself appears improper. A special prosecutor should be appointed in the Ashford case just as Kleine appointed a special prosecutor in the James Scurlock case.
11. In the case of Ashford v. Kleine CI 21 9062 the entire Douglas County District Court Fourth Judicial Panel was recused.
12. Judges should uphold the law. Judges should not violate the law. Judges should not violate any constitutional or human rights of citizens.
13. I have received nothing of value for signing this affidavit,
14. This affidavit is based on my personal knowledge of the facts as I know them that the failure of Donald Kleine to recuse himself creates a strong appearance of impropriety and a special prosecutor should be appointed in the

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case to promote confidence in the judicial court system.

Further Affiant Sayeth Not

/s/ William Perkins
William Perkins

SUBSCRIBED AND SWORN to before me this 1st day of August, 2022.

/s/ Esmeralda Ramos
Notary Public

Prepared by:
Timothy L. Ashford

[Notary Stamp]
