

October 30, 2001

John Gregory Lambros
Reg. No. 00436-124
U.S. Penitentiary Leavenworth
P.O. Box 1000
Leavenworth, Kansas 66048-1000 USA
Web site: www.brazilboycott.org

Edward J. Cleary, Director
Office of Lawyers Professional Responsibility
Minnesota Judicial Center
25 Constitution Avenue
Suite 105
St. Paul, Minnesota 55155-1500
Tel. (651) 296-3952
U.S. CERTIFIED MAIL NO. 7001-0320-0003-3596-6667

RE: FILING OF COMPLAINT AGAINST MINNESOTA ATTORNEYS:

- a. Colia F. Ceisel; (Attorney Registration No. 15891)
- b. Douglas Peterson; (Attorney Registration No. 14437)
- c. David L. Lillehaug;

Dear Mr. Cleary:

On February 10, 1997, a resentencing hearing was held before the HONORABLE ROBERT G. RENNER, Senior United States District Judge, District of Minnesota, in the criminal matter entitled United States vs. John Gregory Lambros, 4-89-82(05)(D. Minn. 1994), as to the September 8, 1995, Eighth Circuit Court of Appeals decision vacating the life sentence imposed on John Gregory Lambros. See, U.S. vs. LAMBROS, 65 F.3d 698 (8th Cir. 1995).

Attorney Colia F. Ceisel represented John G. Lambros at the February 10, 1997, hearing and Assistant U.S. Attorney Douglas Peterson and U.S. Attorney David L. Lillehaug represented the U.S. Government.

On April 20, 2001, I served a motion in U.S. vs. LAMBROS, Civil No. 99-28(MCE) as to Criminal File No. 4-89-82(05) entitled "NOTION TO VACATE ALL JUDGMENTS AND ORDERS BY UNITED STATES DISTRICT COURT JUDGE ROBERT G. RENNER PURSUANT TO RULE 60(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE FOR VIOLATIONS OF TITLE 28 U.S.C.A. § 455." Dated April 13, 2001.

As you know, Title 28 U.S.C. § 455 does not allow an United States District Court Judge to adjudicate a case that he or she as United States Attorney began. See, U.S. vs. ARNPRESTER, 37 F.3d 466 (9th Cir. 1994); KENDRICK vs. CARLSON, 995 F.2d 1440, 1441, Head Note 3 (8th Cir. 1993), "United States Attorney serves as counsel to government in ALL PROSECUTIONS brought in his district while he is in office and, therefore, he is PROHIBITED FROM LATER PRESIDING OVER THOSE PROSECUTIONS AS JUDGE. 28 U.S.C.A. § 455(b)(3)."

Robert G. Renner was the United States Attorney for Minneapolis, Minnesota from 1969 to 1977, thus responsible in the indictment of JOHN G. LAMBROS in the following

October 30, 2001

Lambros' letter to E.J. Cleary, Office of Lawyers Professional Responsibility
RE: FILING OF COMPLAINT - Attorneys Caisel, Peterson, & Lillehaug.

criminal proceedings in the District of Minnesota, Minneapolis/St. Paul:

- a. CR-3-75-128, with judgment entered on June 21, 1976;
- b. CR-3-76-17, with judgment entered on June 21, 1976;
- c. CR-3-76-54, with judgment entered on March 7, 1977.

United States District Court Judge Robert G. Renner used the above 1975 and 1976 criminal convictions to **INCREASE** John Gregory Lambros' sentence on February 10, 1997, based on technical applications of the U.S. Sentencing Guidelines and the statute LAMBROS was sentenced under. The same crimes that Judge Renner investigated and prosecuted LAMBROS on in 1976 and 1977.

ATTORNEYS CEISEL, PETERSON, & LILLEHAUG KNEW JUDGE RENNER PROSECUTED LAMBROS IN 1976:

Due to the fact that Lambros' sentence was increased due to his 1975 and 1976 indictments and convictions and the governments' filing of Title 21 U.S.C.A. Section 851, **PROCEEDINGS TO ESTABLISH PRIOR CONVICTIONS**, the law states that the Government **BEARS THE BURDEN** of proving **BEYOND REASONABLE DOUBT THAT DEFENDANT [Lambros] WAS IN FACT CONVICTED OF THE OFFENSE**. See, U.S. vs. LUNA, 768 F.Supp. 705 (N.D.Cal. 1991). Therefore, Attorneys CEISEL, PETERSON, and LILLEHAUG reviewed the indictments, docket sheets and judgment orders in Lambros' 1975 and 1976 prior federal convictions.

Attached for your review is the March 24, 1976 INDICTMENT in CR-3-76-17 which is **SIGNED** by United States Attorney **ROBERT G. RENNER** and the first page of the docket sheet in CR-3-76-17 which clearly states that **ROBERT G. RENNER** was the U.S. Attorney.

I am also offering for your review and file "via the internet" a copy of the April 13, 2001, served April 20, 2001 "MOTION TO VACATE ALL JUDGMENTS AND ORDERS BY UNITED STATES DISTRICT COURT JUDGE **ROBERT G. RENNER** PURSUANT TO RULE 60(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE FOR VIOLATIONS OF TITLE 28 U.S.C.A. § 455." This motion is available in PDF FORMAT (exact copy as submitted to the court) through my BOYCOTT BRAZIL web site: www.brazilboycott.org I've attached page 25 of the BOYCOTT BRAZIL index homepage to assist you in locating the motion. Also note that I have a search engine built into the BOYCOTT BRAZIL web site on the first or second page to assist you in going straight to the motion by entering April 13, 2001 and/or the title of the motion.

LAMBROS RAISES A SUBSTANTIAL QUESTION AS TO ATTORNEYS FITNESS AS A LAWYER:

I John Gregory Lambros believe that a substantial likelihood existed as to Minnesota Attorneys CEISEL, PETERSON, and LILLEHAUG conspired and/or committed a violation of the Rules of Professional Conduct as to the lawyer's honesty, trustworthiness or fitness as a lawyer, in not requesting **JUDGE RENNER TO DISQUALIFY HIMSELF IN THE FEBRUARY 10, 1997, RESENTENCING OF LAMBROS**.

Thanking you in advance for your investigation into the above matter. I declare under penalty of perjury that the foregoing is true and correct. Title 28 USCA §1746.

Executed on: October 30, 2001


John Gregory Lambros

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
THIRD DIVISION

UNITED STATES OF AMERICA

v.

JOHN G. LAMENOS

CR 3-76-17
INDICTMENT
(18 U.S.C. §§1111 and 114)

THE UNITED STATES GRAND JURY CHARGES THAT:

COURT I

On or about the 24th day of February, 1976, in the State and District of Minnesota, the defendant,

JOHN G. LAMENOS,

knowingly, intentionally, and by means and use of a deadly and dangerous weapon, that is, a Browning .9 mm semi-automatic pistol, did forcibly assault, resist, oppose, impede and interfere with Deputy United States Marshall James I. Propotnick, and Special Agents Donald E. Nelson and James F. Brueseth of the Federal Drug Enforcement Administration while the said officers were engaged in the performance of their official duties; in violation of Title 18, United States Code, Sections 111 and 114.

COURT II

On or about the 24th day of February, 1976, in the State and District of Minnesota, the defendant,

JOHN G. LAMENOS,

knowingly, intentionally, and by means and use of a deadly and dangerous weapon, that is, a Browning .9 mm semi-automatic pistol, did forcibly assault, resist, oppose, impede and interfere with Deputy United States Marshall Leon A. Cheney while the said officer was engaged in the performance of his official duty; in violation of Title 18, United States Code, Sections 111 and 114.

MAR 24 1976

Filed _____
Harry A. Steben, Clerk

THIS BILL

[Signature]
United States Attorney

[Signature]
Foreman

A true copy in 2 sheet (s)

of the record in my custody

CERTIFIED

Richard D. Steben, Clerk

BY *[Signature]*
Deputy Clerk

EOB CR. 158 ①

OFFENSE NO. JUDGE/MAGISTRATE Assigned U.S.
 OFFENSE NO. 6406
 REPLEASOR Charge/Balance
 RELONY

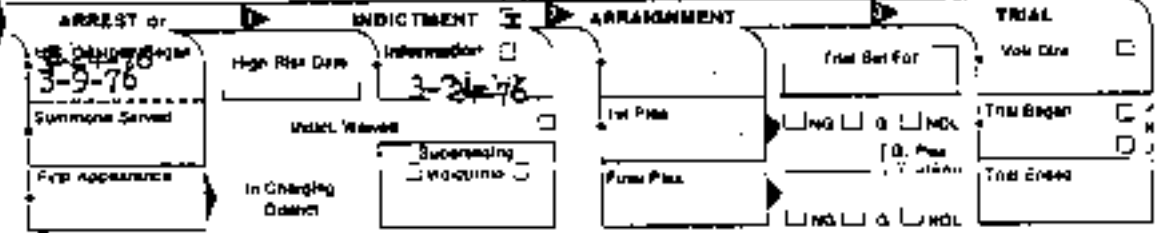
LAMBRIS, John G.

Case Filed No. **09 24** 76 - 178 - 1
 No. of Lists **1**
 Yr. **76** Docum. No. **1**

U.S. TITLE/SECTION **18 USC 111 and 114**
 OFFENSES CHARGED **Knowingly, intentionally, and by means and use of a deadly and dangerous weapon, that is Browning .9 mm semi-automatic pistol, did forcibly assault resist, oppose, impede and interfere with officers engaged in performance of their official duties**
 ORIGINAL COUNTS **2**
 SUPERSEDING COUNTS

U.S. MAG. CASE NO.
 BAIL - RELEASE
 AMT Forfeits
 Served Part. Recog.
 PDA
\$25,000
 Conditions
 Bail Not Made
 Status Changed (See Docket)
 Collateral
 Pfy Cust. Other

M. KEY DATES & INTERVALS



5-76

		DATE	INITIAL/NO.	MAGISTRATE	INITIALING	OUTCOME
Search Warrant	Issued			INITIAL APPEARANCE DATE		<input type="checkbox"/> DISMISSED
	Returned			PRELIMINARY EXAMINATION OR REMOVAL HEARING	Date Scheduled Date Held	<input type="checkbox"/> HELD FOR CL OR OTHER PROCEEDING IN THIS DISTRICT
Summons	Wanted			<input type="checkbox"/> WAIVED <input type="checkbox"/> NOT WAIVED	Page Number	<input type="checkbox"/> HELD FOR CL OR OTHER PROCEEDING IN DISTRICT BELOW:
Arrest Warrant (Issue)	Served			<input type="checkbox"/> INTERVENING INDICTMENT		
COMPLAINT						
OFFENSE (in Complaint)						

U.S. Attorney at Large
Robert G. Hennar, U. S. Attorney
Joseph T. Walbran, A.U.S.D.A.

ATTORNEYS Deft. Co-Def. Ret. Forfeited Sett. Other P.D. C.D.

A true copy of this record in my custody
CERTIFIED
 Richard D. [Signature]
 Deputy Clerk

* Show case names and serial numbers of other defendants on same indictment/information

DATE	DOCUMENT NO.	PROCEEDINGS	EXCLUDABLE DELAY (a) (b) (c) (d)
3-24-76	1.	INDICTMENT (Devitt-J CR. 188)	
	2.	TRANSMITTAL ORDER directing that deft. be cont. on \$25,000 C/S JEC. Also has \$25,000 C/S bond in CR. 395-128 (lodged in CR. 3-75-16)	
3-31-76	3.	Placed ORDER REDUCING BAIL filed 3-9-76 at Minneapolis in JEC 76 49M in file reducing bail to \$25,000 cash or surety which is in addition to bail previously set in narcotics case 2. Condition of bail that deft. report in person at the office of the U. S. Marshal every weekday no later than 9 A.M., that he not possess firearms and that he turn in his passport to the U. S. Marshal. (J. Earl Cudd, U. S. Mag. 3-9-76)	
	4.	APPEARANCE BOND \$25,000 CASH executed 3-9-76 at Minneapolis. On 3-10-76 placed \$25,000.00 cash Bail in Registry of Court JEC 76-49M 4th Div.	
4-22-76	5.	REPORTER'S TRANSCRIPT OF PRELIMINARY HEARING MARCH 3, 1976 at Minneapolis	
	6.	MINUTES OF PROCEEDINGS: Deft. arraigned on Ct. I and Plea of Guilty entered Bond cont'd. Imp. of sent. of impr. deferred and matter is referred to the prob. Office for pre-sent. invest. and report. Court II to be dismissed at time of sentencing. (Devitt-J) (Anderson-Reporter)	
6-21-76	7.	DEFENDANT'S MOTION TO WITHDRAW GUILTY PLEAS (copy-original in CR. 3-75-128)	

November 20, 1996 letter from Lambros to Federal Judge Renner and Lambros's attorney requesting that Dr. Criqui be subpoenaed to testify at the re-sentencing, and that he be paid by the government.

▶ ROBERT G. RENNER, UNITED STATES DISTRICT COURT JUDGE, AS TO VIOLATIONS OF TITLE 28 U.S.C. § 455(a) AND § 455(b) (3). DISTRICT OF MINNESOTA.

April 13, 2001, "MOTION TO VACATE ALL JUDGMENTS AND ORDERS BY UNITED STATES DISTRICT COURT JUDGE ROBERT G. RENNER PURSUANT TO RULE 60(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE FOR VIOLATIONS OF TITLE 28 U.S.C.A. § 455." This document was filed in U.S. vs. LAMBROS, Civil File No. 99-28 (ROR), Criminal File No. 4-89-82(05) and is a **TOTAL OF 57 PAGES** with some of the exhibit pages containing two (2) pages that have been reduced to assist in lowering copying costs to the courts. Therefore, what you are reviewing in PDF format is an exact copy of the document as presented to the court on April 20, 2001 via U.S. Certified Mail with Return Receipt Requested. Please note that Lambros has numbered each page, in longhand, in the lower right hand corner so his readers are insured that they don't mix-up exhibit order as they maybe confusing. **CLICK HERE** to view these pages in PDF format. **THE FREE ADOBE READER MAY BE DOWNLOADED FROM ADOBE SYSTEMS BY CLICKING HERE.**

▶ DOWNLOAD APRIL 13, 2001 JUDGE RENNER DOCUMENT HERE IN PDF

The above April 13, 2001, "MOTION TO VACATE ALL JUDGMENTS AND ORDERS BY U.S. DISTRICT COURT JUDGE ROBERT G. RENNER PURSUANT TO RULE 60(b)(6) OF FEDERAL RULES OF CIVIL PROCEDURE FOR VIOLATIONS OF TITLE 28 U.S.C.A. §455" proves, as per Section §455, that the average person on the street "MIGHT" harbor doubts and reasonably question U.S. District Court Judge Robert G. Renner's impartiality toward JOHN GREGORY LAMBROS during all proceedings when Judge Renner was the United States Attorney for Minnesota that investigated and prosecuted LAMBROS in 1975 and 1976. Title 28 U.S.C. §455(a) states, "[A]ny justice, JUDGE, or magistrate of the United States shall **DISQUALIFY** himself in ANY proceeding in which his **IMPARTIALITY MIGHT REASONABLY BE QUESTIONED**." Title 28 U.S.C. §455(b)(3) states, "[b] He shall also **DISQUALIFY** himself in the following circumstances: (3) Where he has served in governmental employment and in such capacity participated as counsel, adviser or material witness concerning the proceeding or expressed an opinion concerning the merits of the particular case in controversy." The following facts are exposed within the April 13, 2001, MOTION:

a. U.S. Attorney Robert G. Renner **ILLEGALLY** indicted LAMBROS on March 24, 1976 and assisted in the illegal sentencing of LAMBROS on June 21, 1976, as to violations of law that did not occur on federal property. Title 18 U.S.C. Sections 111 and 114. See, **EXHIBIT A**, (as to Criminal File Number CR-3-76-17, District of Minnesota).

b. The U.S. Attorney's Office in Minneapolis **FALSIFIED** documents to the U.S. Court of Appeals as to the March 24, 1976 **INDICTMENT**, as the Eighth Circuit stated LAMBROS was indicted on violations of Title 18 U.S.C. H 111 and 114, not 114 as stated on the indictment and judgment order signed by Judge Devit. See, U.S. vs. LAMBROS, 614 F.2d 179, 180 (8th Cir. 1980).

c. The U.S. Attorney Robert G. Renner and his employees in 1976 used an **ILLEGAL** indictment to leverage a negotiated plea of guilty from LAMBROS on charges unrelated. See, U.S. vs. LAMBROS, 544 F.2d 962 (8th Cir. 1976).

d. Warden Mickey Ray is requested to investigate why two (2) **JUDGMENT AND PROBATION/COMMITMENT ORDERS** appear within Lambros' U.S. Bureau of Prisons file at Leavenworth Penitentiary, as to U.S. vs. LAMBROS., Docket Number CR-3-76-17, District of Minnesota. This is the same criminal case U.S. Attorney Robert G. Renner, now U.S. Judge Renner, indicted Lambros on March 24, 1976, for **ASSAULT** and changed the charges to **MURDER** after Lambros plead to an illegal indictment for assault. Lambros' August 20, 2001 letter to Warden Mickey Ray is a **TOTAL OF 9 PAGES** including exhibits. **CLICK HERE** to view these pages in PDF format. **THE FREE ADOBE READER MAY BE DOWNLOADED FROM ADOBE SYSTEMS BY CLICKING HERE.**

▶ DOWNLOAD AUGUST 20, 2001, WARDEN MICKEY RAY LETTER HERE IN PDF

▶ SECOND AND SUCCESSIVE MOTIONS TO VACATE, SET ASIDE, OR CORRECT SENTENCES UNDER TITLE 28 U.S.C. §2255 BY JOHN GREGORY LAMBROS.

The following second or successive motions filed under Title 28 U.S.C. §2255 are directly or indirectly due to the actions of United States Attorney **ROBERT G. RENNER** in 1975 and 1976, now United States District Court Judge **ROBERT G. RENNER** who resentenced LAMBROS in 1996. You be the judge if "**IMPARTIALITY MIGHT BE QUESTIONED**" as to the actions of **ROBERT G. RENNER**, and then review LAMBROS' April 13, 2001, "MOTION TO VACATE ALL JUDGMENTS AND ORDERS BY UNITED STATES DISTRICT COURT JUDGE ROBERT G. RENNER PURSUANT TO RULE 60(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE FOR VIOLATIONS OF TITLE 28 U.S.C.A. §455."