

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

RAISSA DJUISSI KENGNE
Plaintiff,

Case File No.: 1:22-CV-2237

v.

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

I.D. ME, INC.

JAN 05 2024

Defendant.

KEVIN P. WEIMER, Clerk
Kevin P. Weimer
Deputy Clerk

NOTICE TO THE COURT THAT THE FULTON COUNTY JAIL, THE ATLANTA CITY DETENTION CENTER, AND THE CENTRAL STATE FACILITY ARE PREVENTING PLAINTIFF FROM ACCESSING THE COURTS AND ARE WITHHOLDING PLAINTIFF'S LEGAL DOCUMENTS FROM HER

To The Honorable Judge of Said Court:

Comes Now, Plaintiff Raissa Kengne who hereby notifies this Honorable Court that the Fulton County Jail (FCJ), the Atlanta City Detention Center (ACDC), and the Central State Facility - Georgia Corrections (the "Facility") are preventing Plaintiff from accessing the courts and are withholding Plaintiff's legal documents from her, including evidence and already written motions. Thereby, making it impossible for Plaintiff to file her already written motions and evidence with the courts.

1.0. Plaintiff Raissa Kengne was illegally detained by the FCJ since August 22nd, 2022 after a burglary at her home orchestrated and planned by the

following individuals:

Group 1: BDO USA, LLP and its partners and agents comprised of Scott Meier, Jason Cuda, Peter Poggio, Mark Davenport, Paul Davidson, Anthony Reh, Johnson Wong, Justin Wilkes, Wesley Freeman, and Justin Mungall.

Group 2: BDO USA, LLP's clients including Kavo Naderi (CIO of Atlanticus Holdings Corporation)

Group 3: Finch McCrane Law firm and its agents comprised of Michael Sullivan and Walter Tospin

Group 4: The 1280 West Condominium Board members comprised of Brett Dettmering, Ronnie Bridges, Michael Shaffer, Rohan Rupani, and Micah Kurtzberg

Group 5: Beacon Management Services, LLC (the management company for the 1280 West Condominium building where Plaintiff lives) and its agents comprised of Liza Simmons, Steven Weibel, and Michael Shaffer.

2.0. Plaintiff Raizsa Kenne was transferred INVOLUNTARILY from the FCS operating out of the ACAC building located at 254 Peachtree St. SW, Atlanta, GA 30303 to the Central State Facility located at 2450 Vinson Hwy SE, Milledgeville, GA 31062 on November 27th, 2023.

3.0. Upon her arrival at the Central State Facility, Plaintiff Raizsa Kenne was prevented from retaining her legal documents, which contained several motions and evidence to be filed with the Superior Court of Fulton County, the United States (U.S.) District Court, and the U.S. Court of Appeals on her cases, including this case.

4.0. Prior to her involuntary arrival at the Central State

Facility, Plaintiff Raissa Kenne was prevented from accessing the courts by the FCI and ACBC since May 2023.

- 5.0. The Fulton County Sheriff's Office Inmate Handbook (the "Inmate Handbook") states on page 23 and the laws of the state of Georgia require that indigent detainees be provided with indigent "privileged or legal" envelopes and stamps every month.

Despite submitting several Inmate Request Forms and Grievance Forms, having a discussion with Captain Youmans, and sending a letter to the Chief Jailor with supporting evidence after Plaintiff's discussion with Captain Youmans, the FCI and ACBC still refused and failed to provide Plaintiff with indigent envelopes and stamps.

Because Plaintiff's assets were stolen with the complicity of the individuals listed in paragraph numbered 1.0. herein, Plaintiff was unable to access her funds. Plaintiff previously notified this Court that her assets had been stolen using information obtained during the burglaries at her home.

- 6.0. In addition, the FCI and the ACBC had blocked all the phone numbers that Plaintiff Raissa Kenne was trying to call, including the phone numbers to her banks to resolve the fraud on her bank accounts, the Atlanta Police Department (APD) Information Line, APD Property, the U.S. District Court Clerk's office, etc... since May 2023 (at least).

- 7.0. Without envelopes and stamps, Plaintiff Raissa Kenne was unable to file her motions with the U.S. District Court and the U.S. Court of Appeals. The FCI and ACBC have prevented Plaintiff from mailing her already written motions to the courts since May 1st, 2023 by unlawfully denying her indigent envelopes and stamps as mandated by the laws of the state of Georgia and by unlawfully blocking all the numbers she was trying to call.

8.0. Without her legal documents, including already written motions and important contact information, Plaintiff Raizsa Kenane is also unable to file the said motions with the U.S. District Court and the U.S. Court of Appeals.

The FCS, ACDC, and the Central State Facility are preventing Plaintiff from sending her already written motions to the courts by withholding her legal documents since November 27th, 2023.

For the foregoing reasons, Plaintiff Raizsa Kenane is hereby notifying this Court that the Fulton County Jail, the Atlanta City Detention Center, and the Central State Facility have been and are preventing Plaintiff from accessing the courts and are withholding her legal documents from her including evidence and motions to be filed with this Court.

They are, therefore, together significantly responsible for the delay in Plaintiff responding to the Court in a timely manner.

Plaintiff is hereby respectfully requesting an extension of time to present her case to the Court and have a fair trial.

Respectfully Submitted,

 12/25/2023

Raizsa D. Kenane, CFE, CISM,
CIA, CISA, CRISC

Pro Se

Central State Facility

2450 Vinson Hwy SE, Red 2 Unit
Milledgeville, GA 31062

Notary Public Not
available at
Central State Facility

CERTIFICATE OF SERVICE

This is to certify that on this 28th day of December 2023, I sent the foregoing to be filed with the Clerk of Court using the ECF System, which will automatically send a notification of such filing to all counsel of record.

Respectfully Submitted,

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Raizaa D. Kenane, CFE, CISM,
CIA, CISA, CRISC

Pro Se

Central State Facility
2450 Vinson Hwy SE, Red 2 Unit
Milledgeville, GA 31062