

Ron Glick
40 1st Avenue West #2
Kalispell, MT 59901
(406) 257-0479
ron_glick@yahoo.com

IN THE ELEVENTH DISTRICT COURT OF MONTANA
IN AND FOR FLATHEAD COUNTY

IN RE: The Estate of
SCOTT LAWRENCE
ANDERSON

Cause No. DE-15-195B

AFFIDAVIT IN SUPPORT OF MOTION TO
RECUSE

Ron Glick,
Claimant.

Comes now Ron Glick, Claimant to the above-entitled estate, to attest as follows:

- 1) I am the Claimant against the estate of Scott Lawrence Anderson, the Decedent above-named, and I have a valid claim against the Estate based upon pending civil and malpractice liability that had been pending at the time of Decedent's death;
- 2) Decedent was previously the City Attorney for Columbia Falls, Montana, and did maintain a close working relationship with the Eleventh District Court, Flathead County Prosecutor's Office and Public Defender's Office in the course of his duties, and was additionally Claimant's counsel on two separate cases prior to acting against his interests and incurring liability;
- 3) Robert Allison, current presiding judge over this cause, was the Head Public

Defender for Flathead County prior to the state's creation of the Office of Public Defender in or around 2006, and worked with Decedent in the course of his duties thereof;

4) Due to the personal association between Robert Allison and Decedent, Allison has inherited an impermissible personal interest in this Estate, presumably in defense of a former colleague, and this creates an inherent conflict of interest for Robert Allison to preside over Decedent's estate;

5) In or around September, 2014, I published a scathing autobiographical expose entitled U.S. Political Prisoner Since 2004 – The True Story of an Innocent Man Detained As a Political Dissident In Kalispell, Montana (ISBN# 1502340364);

6) Said expose was based upon my personal experience of suing the City of Kalispell and the corrupt officials of both said City and Flathead County who acted feloniously in imprisoning him as consequence;

7) Robert Allison was named and identified within said expose as a corrupt official operating in Flathead County through his occupation as Head Public Defender;

8) Robert Allison's identification as a corrupt official operating within Flathead County has created a clear and blatant animosity against me, creating an impermissible conflict in Allison retaining jurisdiction over any cause of which I am a party;

9) In or around February, 2015, I became the victim of intellectual property theft by one Angela Townsend and filed a federal trademark claim in defense thereof (Cause No.

15-21-M-DLC-JCL, District of Montana; Presently on appeal as Cause No. 15-35587, 9th Cir);

10) As one of several methods of retaliation, Ms. Townsend filed an alleged claim of stalking and intimidation against me (DR 1-5-2015-174; presently on appeal as DA 15-0313, Montana Supreme Court), which Robert Allison presided over and which Decedent appeared as counsel for Ms. Townsend in clear violation of the Montana Rules of Professional Conduct;

11) In spite of a clear determination from the bench that Allison could find no fault of mine, Allison nevertheless imposed a civil no contact order over me, including an unrelated injunction against the use of my intellectual property;

12) In a separate letter to the Office of Disciplinary Counsel relating my complaints against him, Decedent made a declaration suggesting that there had been complicity between himself and Robert Allison prior to the hearing to secure the injunction and order against me;

13) Most recently, Robert Allison in acting as presiding judge over this cause demonstrated a clear and deliberate prejudice against me when he denied my application to proceed as a poor person without prepayment of fees, in spite of the fact that my income is nearly half Montana's level of qualifying indigency;

14) It is abundantly clear to me that between Robert Allison's personal association with the Decedent and his animosity towards me personally, that he cannot be an

impartial administrator of justice in this cause, that he has already abused his authority to create unlawful and unconstitutional obstructions against me, and that should he remain as judge, he will only continue to abuse his station; and

15) As a consequence of all of the above, I believe that Robert Allison's personal bias and prejudice against me prohibit me from receiving a fair hearing, and that he should be recused before he can cause further harm.

I do hereby attest under penalty of perjury that the foregoing is true and correct to the best of my ability to present, and that this is signed on or about the 23rd day of November, 2015.

Ron Glick, Claimant

CERTIFICATE OF SERVICE

I do hereby attest under penalty of perjury that a true and correct copy of the forgoing Document was deposited in the US Mail, postage prepaid, and addressed as follows:

Santana N. Caballero
1382 Airport Road
Kalispell, MT 59901

Dated this 23rd day of November, 2015

Ron Glick, Claimant