



VOLUSIA SHERIFF'S OFFICE  
Citizen's Complaint

Case #: 2021-102073-CFDL  
2022-102904-CFDL

**COMPLAINANT:**

Name Adam Macker Date of Birth 08/15/1978 Sex M  
Residence Address 313 Dirksen Dr. Debary C3 Phone 386-898-4700  
Business Address \_\_\_\_\_ Phone \_\_\_\_\_

**VSO PERSONNEL INVOLVED:**

Name Deputy Meshelle Naylor I.D. Number 8915  
Name Deputy Igo I.D. Number 7746

**WITNESSES:**

Name Jacob Macker Phone 386-318-4150  
Address Palm Coast, FL  
Name Jordan Macker Phone 386-500-8549  
Address 75 N. Woodward Ave., U-box # 0623 Tallahassee, FL 32313-7500

Additional witness information to be entered in the complaint details section on page two (2).

**COMPLAINT:**

Nature of Complaint Stalking, Assault, Coercion, Unlawful Search and Seizure  
Date and Time of Incident 10/13/2021; 4/6/2023 (3/19/23 unlawful seizure of motorcycle)  
Location 169 Community Dr. Debary, FL 32713

A person who knowingly makes a false declaration in this verified citizen complaint is guilty of the crime of perjury by false written declaration, a felony of the third degree, per Section 92.525(3), Fla. Stat. Also, whoever knowingly makes a false statement in writing with intent to mislead a public servant in the performance of their official duty shall be guilty of a misdemeanor of the second degree, per 837.06 Fla. Stat. Pursuant to section 112.532(3), Fla. Stat., if a person filing a complaint against a deputy knew the charges to be false at the time of filing the complaint, the falsely accused deputy has the right to pursue civil damages against you, the complainant.

Under penalty of perjury, I declare that I have read the foregoing verified citizen complaint and that the facts stated in it are true.

*Adam Macker*

(Complainant's Signature)

STATE OF FLORIDA  
COUNTY OF VOLUSIA

Sworn to (or affirmed) and subscribed before me by means of ☒ Physical presence or ☐ Online notarization,

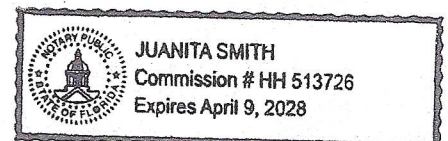
this 8 day of Jan, 2026, by Adam Macker  
Affiant's Name

Signature of (Circle One) Notary Public State of Florida or Law Enforcement Officer

*Juanita Smith*  
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally known OR Produced Identification

FL PL# M395-075-20-000-0  
(Type of Identification Produced)







**VOLUSIA SHERIFF'S OFFICE**  
**Citizen's Complaint**

**COMPLAINT DETAILS** **SEE ATTACHED:** Exhibit A; "Motion to Quash." Exhibit B; "Opposition to Motion."

Rachel Macker committed perjury on a Federal Motion to Quash. Doc #115 concerning Case: 6:23-CV-01963-JSS-DCI. Attempting to conceal phone records from federal proceedings. On those records, you will find evidence of a conspiracy against rights concerning the victim, Adam Macker. Rachel partnered with several corrupt Volusia officials, officers and family members of the victim, including but not limited to Richard Macker.

Evidence of Sgt. "Jason Stickels" known alias "Jason Stickles" &  
Deputy Meshelle Naylor coordinated attack of Adam Macker  
<https://youtu.be/3OAmGANKFLk?si=WZyzv7I4oPmWyxQZ>

Evidence of Unlawful Search & Seizure! Deputies Igo & King, without a search warrant, sneaking onto a 1.5 acre lot at midnight, busting down doors and assaulting Adam Macker  
<https://youtube.com/playlist?list=PLFAcGcqPF-7neU5Dzc8PjSZCANmk4cXS&si=EXdv1AO0djeapN2R>

Evidence of Rachel Macker committing perjury.  
Concerning federal case: 6:23-CV-01963-JSS-DCI  
<https://youtube.com/shorts/WyOU5Cg45L8?si=yVggEI06W6U3BIQn>

The 14th Amendment's Equal Protection Clause mandates that states provide equal protection of the laws to all individuals, meaning similarly situated people must be treated alike, prohibiting unfair discrimination. **DO YOUR JOB LIEUTENANT GORDON! I will sue you..**

A person who knowingly makes a false declaration in this verified citizen complaint is guilty of the crime of perjury by false written declaration, a felony of the third degree, per Section 92.525(3), Fla. Stat. Also, whoever knowingly makes a false statement in writing with intent to mislead a public servant in the performance of their official duty shall be guilty of a misdemeanor of the second degree, per 837.06 Fla. Stat. Pursuant to section 112.532(3), Fla. Stat., if a person filing a complaint against a deputy knew the charges to be false at the time of filing the complaint, the falsely accused deputy has the right to pursue civil damages against you, the complainant.

Under penalty of perjury, I declare that I have read the foregoing verified citizen complaint and that the facts stated in it are true.

\_\_\_\_\_  
(Complainant's Signature)

STATE OF FLORIDA  
COUNTY OF VOLUSIA

Sworn to (or affirmed) and subscribed before me by means of ☐ Physical presence or ☐ Online notarization,  
this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, by \_\_\_\_\_

\_\_\_\_\_  
Affiant's Name

\_\_\_\_\_  
Signature of (Circle One: Notary Public-State of Florida or Law Enforcement Officer)

\_\_\_\_\_  
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally known OR Produced Identification

\_\_\_\_\_  
(Type of Identification Produced)

Supervisor \_\_\_\_\_ ID# \_\_\_\_\_ Date and Time \_\_\_\_\_



Rachel Smolinsky  
966 North Dean Circle  
Deltona, FL 32738  
(386) 216-7169  
rachel.smolinsky@gmail.com

November 4, 2024

United States District Court  
Middle District of Florida  
401 West Central Boulevard  
Orlando, FL 32801

Re: Case Number 6:23-CV-01963-ISS-DCI

**Motion to Quash**

Rachel Smolinsky (formerly Macker), witness, respectfully moves this Court to quash the subpoena served by Adam Joshua Macker on the grounds that it is undue burden, irrelevant and privileged. This motion is brought under Rule 45 of the Federal Rules of Civil Procedure.

This document request does not target specific interactions or communications relevant to this case. Complying with the subpoena creates an undue burden due to the significant time, cost, and resources required to gather records which are inaccessible. Rachel Smolinsky does not have custody of these phone records in question. Rachel Smolinsky was not the owner of 386-216-7169 until August 2023.

Without clear limits, the request encompasses a vast range of information irrelevant to the specific issues being litigated. The need to protect sensitive information further complicates compliance. The request for phone/e-mail/text records may include correspondence with health providers as well as privileged information protected by Non-Disclosure Agreements with accounting and tax clients. Disclosing such information would violate established protections.

For the foregoing reasons, Rachel Smolinsky respectfully requests that this Court quash the subpoena issued by Adam Macker and grant any further relief deemed just and proper.

Respectfully,



Rachel Smolinsky

Exhibit B

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

ADAM JOSHUA MACKER,

Plaintiffs,

v.

Case No. 6:23-CV-01963-JSS-DCI

PERDUE, BRANDON, FIELDER, COLLINS & MOTT, LLP, ET. AL.,

Defendants,

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**PLAINTIFF'S OPPOSITION TO MOTION TO QUASH**

The Plaintiff Adam J. Macker adamantly opposes the Motion to Quash, Pursuant to Federal Rule 45 of Civil Procedure and for the reasons listed herein.

The individual subpoenaed Rachel Smolinsky (formerly Macker), is my younger sister and contrary to the fabrications initiated. The requested information is highly relevant to this case. I've stated on many occasions, all of the police officers cited in this case did not agree to repeatedly violate federal law for no reason. Please take into consideration, we have both predominantly lived in this community since 1988. My younger sister is a deeply damaged individual who has unfortunately used the Volusia County Justice system to initiate a false agenda. Consistently lying about my character to individuals within Volusia County and has now flagrantly fabricated information while Under Oath on a Federal Motion. Please



refer to document number 115 filed 11/06/24. The last sentence of paragraph number two; "Rachel Smolinsky was not the owner of 386-216-7169 until August 2023". Rachel Smolinsky (formerly Macker) has been in possession of this phone number for approximately 10 years. Your Honor, there is no excuse for this type of behavior. This is an outright fabrication to a well respected Federal Judge Under Oath and I pray she is held accountable to the fullest extent of the Law. Please refer to the following link for irrefutable proof that Rachel Smolinsky (formerly Macker) just lied Under Oath on a Federal Motion.

<https://youtu.be/WyOU5Cg45L8?si=dnjtB4hKAamlvDpM>

### Conclusion

The fabrications sited in this Motion are just a couple of many. Rachel Smolinsky (formerly Macker) fabricated the information because she is doing her best to hide some very dark secrets that are extremely relevant to this case. Your Honor, I also wanted to take this opportunity to bring to your attention; my website [www.volusiacorrupt.com](http://www.volusiacorrupt.com) previously provided to this Honorable Court in document number 112 is completely blocked from FDLE servers. For this reason I have recently established [www.volusiatruth.com](http://www.volusiatruth.com) which contains essentially the same information and has been provided to an FDLE field agent whom I believe is now investigating this case. Out of fear of disrupting the results of their investigation, I'm electing not to disclose their personal contact information at this time. Pursuant to Federal Rule 45 of Civil Procedure, I expect this Honorable Court to deny the Motion to Quash. I pray that Rachel Smolinsky (formerly Macker) is held accountable for fabricating information Under Oath in Federal Court.

CERTIFICATE OF SERVICE I HEREBY CERTIFY that the foregoing has been electronically filed with the Clerk of Court via CM/ECF e-filing system.

*Adam J. Macker*

ADAM J MACKER  
313 Dirksen Dr. Apt. C3  
Debary, FL 32713  
386-898-4700