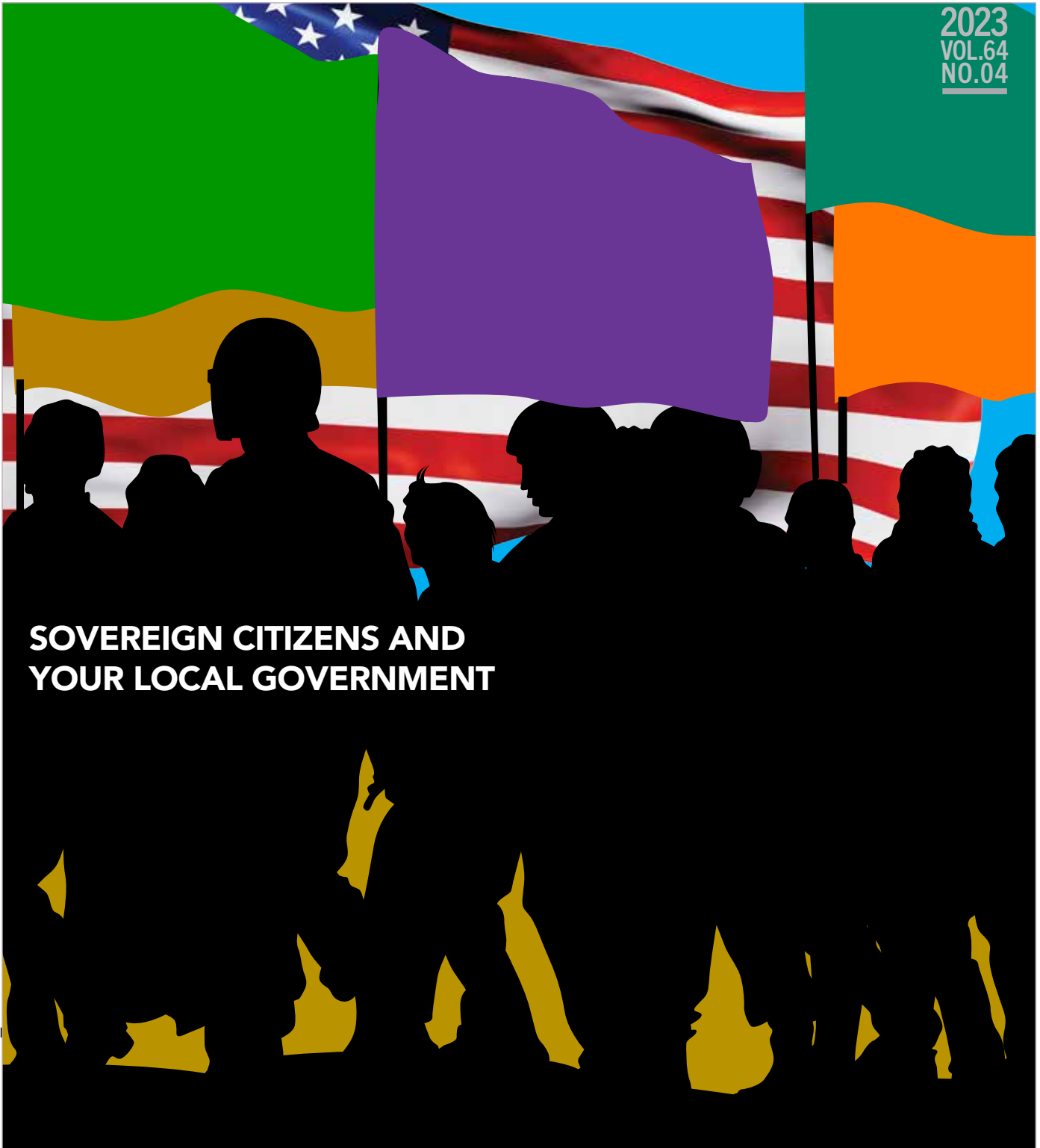




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**SOVEREIGN CITIZENS AND
YOUR LOCAL GOVERNMENT**

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SOVEREIGN CITIZENS AND YOUR LOCAL GOVERNMENT

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As Americans debate the merits of liberal or conservative policies, the proper functioning of legislative, executive, and judicial branches, and the appropriate balancing of state versus federal authority, another faction disavows the very legitimacy of any government. Ignoring authority and challenging laws at every turn, the sovereign citizen presents unique challenges for local government attorneys.

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Sovereign Citizens and Your Local Government

By: JUDITH EL MASRI,
Executive Vice President, The Randle Law Office, Houston, Texas



Editor's Note:

It is no secret that our nation is increasingly fractured by widely differing perspectives regarding a broad range of issues: federal and state preemption, immigration, crime, gun control, women's rights, climate change, and many more. But while Americans may argue vociferously about such issues, implicit for the vast majority is the view that government plays a legitimate role in resolving them. This article is about a different attitude towards government--the proposition that one need not accept governmental authority: enter the sovereign citizen.

1. What is a Sovereign Citizen?

Sovereign citizens are anti-government extremists who believe that even though they physically reside in this country, they are separate or "sovereign" from the United States. As a result, they believe they don't have to answer to any government authority, including courts, taxing entities, motor vehicle departments, or law enforcement.

The FBI defines sovereign citizens as "individuals who openly reject their US citizenship status, believe that most forms of established government, authority, and institutions are illegitimate, and seek, wholly or in part, through unlawful acts of force or violence, to further their claim to be immune from government authority."¹

The current sovereign citizen movement can be traced back to groups that were predominantly tax protestors. The Anti-Defamation League reports that in the 1970's the Posse Comitatus protestors appeared in increasing numbers spread-

ing their belief that the existing U.S. government is illegitimate, and they set out to restore minimalist government ("posse comitatus" power under common law is the power of the Sheriff to summon citizens to aid in law enforcement and currently may be authorized in the U.S. under state law or as a residual power under common law)². 'Posse Comitatus' means 'power of the people within the country. Posse members do not acknowledge State and Federal rights to enact laws.³ They believe that U.S. counties and their sheriffs formed the highest U.S. authority and were responsible for protecting citizens from the wrongdoings of the federal government. Followers believe that 'common law' (based on interpretations of the Bible), as opposed to federal law, provides the only valid laws for Americans. This movement is distinct and unlike earlier movements in the 20th century; specifically, earlier groups attempted to align with the government

or governmental authority, both state and federal-(e.g. Ku Klux Klan of the 1920's to the anticommunist groups of the 1950's and 1960's).

The movement itself originated in the Civil War era when certain individuals held the belief that there had been a conspiracy that the U.S. government had been infiltrated. Sovereign citizens believed at the time (and currently) that the government was infiltrated, and the laws were replaced with tyrannical laws somehow replacing the true government in the 1860's, and that the new (infiltrated government) was designed to enslave people. Thus "Sovereign citizens" declared sovereignty, and they contend the existing government had/has neither authority nor jurisdiction over them.⁴ The Posse Comitatus resurgence in the 1970's and 1980's preceded a warning from the Southern Poverty Law Center (SPLC) to Attorney General Janet Reno in 1994. SPLC warned of the rise of armed groups fueled by hate.

Six months after this warning, the deadliest attack ever by a domestic terrorist was carried out in April 1995 by a man disturbed by the government raid in Waco, Texas, and obsessed with the rhetoric and conspiracy theories of the militias. The bombing in Oklahoma City of the Alfred P. Murrah Federal Building "literally brought home the impact of terrorism for Americans."⁵

Each of these groups subscribe to the beliefs held by sovereign citizens: the

Aware Group, Washitaw Nation, the Republic of United States of America, Freeman, Freemen on the Land, Sons of Liberty, and the Aryan Nation.⁶ In the last few decades the Patriot Movement has grown and fueled the sovereign citizen membership, and they have gained mainstream attention particularly since January 6, 2021. The members of this movement view the federal government as too powerful and overreaching into the lives of Americans, specifically regarding Constitutional liberties, taxation and guns.

In the past three decades there has been an increase in African American sovereign citizens, and many can be traced to the Moorish Science Temple of America (MSTA), a religious sect that has existed since 1913. There have been instances of sovereign citizens claiming to be members of MSTA⁷ in an attempt to disguise criminal activity.⁸

According to the SPLC: “Moorish sovereigns espouse an interpretation of sovereign doctrine that African Americans constitute an elite class within American society with special rights and privileges that convey on them a sovereign immunity placing them beyond federal and state authority.” SPLC quotes MSTA “black Moors were America’s original inhabitants and are therefore entitled to self-governing, nation-within a nation status.”¹⁰ In 2021 there was a standoff between police and 11 members of the group “Rise of the Moors” in which arrests occurred, after a nine-hour standoff. Their website declares Moors “are not sovereign citizens” but Moors are the “original sovereigns” of America and therefore immune to the law.¹¹

Upon the election of President Obama, the militia groups surged. In 2009 the SPLC published a paper titled “The Second Wave Return of the Militias,” arguing that what distinguished the resurgence of political dissenters and anti-government groups was the election of President Obama.¹² During former President Trump’s presidency, a

new wave of militants emerged, further impugning governmental authority. That anti-government sentiment spiked due to Covid-19 measures and restrictions.

The rather amorphous group known as sovereign citizens thus includes those identifying themselves as freeman, freeman of the land, sons of liberty, Aryan nation, constitutionalists, citizens of the universe, and galactic citizens. While the membership of the various groups may be different, they each share the firm stance that they are not subject to laws.

2. The Sovereign Citizen Threat

Question: *Should the sovereign citizen movement cause concern at the municipal level?*

Quick Answer: *Yes, and the Movement is growing due to impetus gained by the pandemic, the current political climate, and fueled by internet access and social media.*

Sovereign Citizens have been watched by the federal government for several decades but in 2010 the FBI disclosed that in addition to monitoring the threat of eco-terrorists, and lone conservative (far right) terrorists, the FBI began referring to sovereign citizens as a third category of domestic terrorists. Increasing violence and the uptick in “paper terrorism” has brought attention to sovereign citizen activity across the country. The extraordinary amount of time (administrative, municipal, judicial, law enforcement), and expense incurred by cities, counties, states due to the sovereign citizen “tactics” continues to grow. Despite the government monitoring, and watch-dog monitoring, it is difficult to determine the exact number of individuals that subscribe to the movement or specifically describe themselves as sovereign citizens; SPLC estimates that there are a half million sovereign citizens.¹³ The prevalence of smart phones and widespread access to the internet has surely fueled the increase in both attention to the move-

ment and the spread of ideology. SPLC lists the sovereign citizen groups they have identified as of 2021; the tally includes thirty groups.¹⁴ In my state they have identified the group “Republic of Texas.” In Canada there is a group called “Freeman-on-the-Land,”¹⁵ a “Natural Persons” movement, and there are sympathizers aligned with “First Nations” in British Columbia; they fly the flag “Sovereign Squamish Government”---interestingly they have no website, as it has been suspended.

There are numerous “self-help” websites and publications guiding would-be sovereign citizens about how to navigate the judicial, municipal, federal and law enforcement systems, including several which are listed later in this article. There is no quantified methodology to determine the numbers with any accuracy, but the ideology is certainly on the rise, and with increasing access to the internet, followers aid other followers with plenty of information on “how to” file fake liens, fake judgments, bring fraudulent legal actions, and more.

While “how to” forms, online

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has worked as an attorney in both corporate and law firm environments, specializing in commercial litigation, commercial and residential real estate, construction law, homeowner association litigation, commercial contracts, oil & gas contracts and litigation, employment law, business acquisitions, and insurance litigation. For a brief period she worked as a prosecutor for The State of Texas Department of Public Safety. Since joining the Randle Law Office where she became Executive Vice President in 2021, Judy has provided legal advice to the following municipal entities: Angleton, Rosenberg, Fulshear, Mont Belvieu, Arcola, Meadows Place, Kendleton, Oak Ridge North, Brazos Country, Plum Grove, the Village of Pleak, the Village of Fairchilds, the Village Fire Department, Mexia EDC, Palestine EDC, Port Freeport, and Williamson County.

videos, and self-help websites exist to aid sovereign citizens, the methodology to combat the paper terrorism or sovereign citizen tactics is difficult to find, despite an abundance of research, writing, and legislative changes across the country. There are notably an increasing number of watchdog groups and members of academia making their findings and research available to the public regarding sovereign citizens, their activities, and their beliefs. The groups include the aforementioned SPLC, the Anti-Defamation League (ADL), the Program on Extremism at George Washington University, and the National Consortium for the Study of Terrorism and Responses to Terrorism (START) at the University of Maryland. There are international entities doing research as well, such as the Institute for Strategic Dialogue¹⁶ (ISD), a think tank which has studied and written about sovereign citizens.¹⁷

3. Interactions with Sovereign Citizens

Growing evidence indicates we are increasingly likely to encounter sovereign citizens, but are encounters with sovereign citizens cause for legitimate concern for the judiciary, courts, and municipal entities?

According to a 2020 START research brief, 30% of all far-right extremists, in their Profiles of Individual Radicalization in the United States (PIRUS) database identify as sovereign citizens. The START brief is easy to find online.¹⁸ The growth in the movement reflects the prevalence of sovereign citizens in society and the increased odds of encountering sovereign citizens in court, in government offices, and in law enforcement encounters.

The growing presence of sovereign citizens is not just an American phenomenon. The ADL has reported sovereign citizens have been tracked in Australia, Canada, United Kingdom, Scotland, Republic of Ireland, Northern Ireland, New Zealand, New South Wales, and South Africa. Countries

around the world are taking notice and examining the sovereign citizen movement and have discovered it is an international phenomenon.¹⁹ According to the ISD, in the United Kingdom sovereign citizens have entered hospitals and vaccination clinics after the Covid-19 pandemic to harass medical staff and politicians. Similarly, in Canada with the rise of anti-government sentiment, sovereign citizens are disrupting court proceedings. Many are members of the group known as the Freeman: they first appeared in 2000, and like many other groups, they have their own Facebook page for their membership.²⁰

The U.S. government has labeled sovereign citizens as domestic terrorists, and an increasing number of federal laws reflect that determination. In 2001 federal law was revised and domestic terrorism was defined in Section 802 of legislation titled “Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism” (USA Patriot Act).²¹ A person engages in domestic terrorism if they commit an act “dangerous to human life” that violates the criminal laws of a state or the United States, if the act appears to be intended to: (i) intimidate or coerce a civilian population; (ii) influence the policy of a government by intimidation or coercion; or (iii) to affect the conduct of a government by mass destruction, assassination, or kidnapping.

Many of the acts taken by extremists, and particularly those that identify as sovereign citizens, clearly fall under this definition. The sole purpose of paper terrorism is intimidation of the courts, court staff, and the judicial system generally. Sovereign citizens attempt to use the forum, whether it be the court room, or in an encounter with law enforcement or any municipal authority, and thereby any proceeding is intentionally drawn out for as long as possible. Filing fake liens, judgments, deeds, and lawsuits are all targeted methods of intimidation in defiance of proper procedure.

The Texas Department of Public Safety (DPS), the State agency responsible for statewide law enforcement and driver license administration, describes sovereign citizens similarly and generalizes that much of their activity involves fraudulent acts, but DPS recognizes that many sovereign citizens are also capable of, and will, resort to violence as a justified response to their perceived abuses by the government.²²

Another group, noticeably on the rise in the U.S. since 2016, that shares many of the ideals of sovereign citizens is the Constitutional Sheriff Movement.²³ The Constitutional Sheriffs and Peace Officers Association (CSPOA) claims to be supported by 400 Sheriffs. CSPOA is an extreme, far-right group that calls itself “the last line of defense standing between the overreaching government and your Constitutionally guaranteed rights.”²⁴ The Constitutional Sheriffs assert that they have the power to determine the constitutionality of the laws they are entrusted with enforcing, and can refuse to enforce any law that they believe is unconstitutional.²⁵ The pandemic and the restrictions imposed on individuals, municipalities and businesses by virtue of a community health disaster provided impetus for the growth of this movement. Certainly, January 6, 2021 and the events of that day support this. CSPOA has a website (cspoa.org) for members containing the byline “*Join & Become Part of the CSPOA Posse.*”

City attorneys, city prosecutors, law enforcement, municipal court staff, elected municipal officials, and municipal staff will likely encounter a sovereign citizen, and it is increasingly possible that some municipal employees may follow the ideology. In municipal court and most other courts, sovereign citizens likely will appear *pro se*. Because a sovereign citizen refutes the authority of the government including municipal government and therefore recognizes no authority in judges, law enforcement officers, attorneys, local municipal government, nor the legal

procedural system, an encounter can be a challenge. At the municipal level an encounter with a sovereign citizen may not appear on its face dangerous, but it can be if unreasonable behavior ensues or the individual retaliates. The pattern of behavior which includes refusing to confirm identity with a driver's license (or some other official identifying document), refusal to pay fees, fines, or recognize any municipal or law enforcement authority may appear benign. But it is an aspect of the same ideology known to be shared by extremists, and it is documented that extremists have resorted to violence in furtherance of those beliefs.

Sovereign citizens believe they alone decide what laws to obey or ignore, leaning heavily towards actively ignoring laws. The immediate consequence of an encounter in court or other governmental interaction is an inordinate expenditure of time, while

the secondary consequence is the inability to complete or progress with the necessary procedural or administrative steps to resolve the issue that brought the sovereign citizen to the attention of the judiciary, municipality, law enforcement or administrative agency. More importantly, many of the tactics are designed to intimidate and frighten their victims. Intimidation is a direct and intended result of filing fake documents such as liens, deeds or court filings. It is a risk for those that work for the government and enforce the laws of the government at every level-state, county, city or municipality, to be targeted.

4. Sovereign Citizen Activities, Schemes, and Strategies

Sovereign citizens use a variety of means to frustrate government:

- Filing of false suits or claims, bogus liens, deeds, conveyances, or other simi-

lar documents in order to encumber the property of their enemies in retaliation for some perceived wrongdoing; The Real Estate Fraud Prosecution Unit of the San Bernardino (California) District Attorney's office, for example, has estimated that their current case load consists of 85% sovereign citizen cases. Common practice includes filing liens against the homes and land of public officials who participated in or were complicit in their legal proceedings. Intentional filings that are based on tactics to delay, complicate, question, rebel, and obstruct.

- Fraudulent UCC filing of financing statements and the majority of all false UCC financing statements also share another important characteristic: They indicate that the debtor is a transmitting utility.²⁶ This term is used to refer to "any person who

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BETH A. MOHR

CFE, CFCS, CAMS, CCCI, MPA, PI

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is primarily engaged in the railroad, street, railway or trolley bus business, the electric or electronic communications transmission of electricity, steam, gas, or water, or the provision of sewer service.” Fraudulent filers, particularly sovereigns, use this designation in an attempt to ensure that their financing statements remain indefinitely on file. Under UCC Section 9, transmitting utility filings do not lapse.

- Filing of legitimate IRS forms to harass officials; fake 1099's that indicate the individual targeted has collected large amounts of money in interest income or payments.²⁷
- Real Estate and mortgage fraud; move into repossessed homes or empty buildings, file fake quick deed transfers or documents conveying a real property interest, and claim the property as their own. Improper or fraudulent liens against the real property owned by the authorities, state, county, city, judicial. Fake deeds are used to apply for subsidized Section 8 Housing assistance through HUD and often will move into vacant housing and change the locks. Judges and public officials have liens filed against their homes when a sovereign citizen has encountered that judge in court (see appendix).²⁸
- Credit repair schemes where sovereign citizens from Texas and California fraudulently open credit repair businesses and then use the identities of credit repair clients to open bank accounts, credit cards, and loans and create real estate portfolios in the clients' names. The illegal credit repair companies have used several names including *KMD Credit*, *KMD Capital* and *Jeff Funding*. Upon arrest, the sovereign citizens sent letters to the court refusing to recognize the court's authority.²⁹

- School boards across the U.S. have recently been targeted with incessant unnecessary filings and parent groups showing up and disrupting meetings to force political or anti-political or religious beliefs. The group “Let Them Breathe” created in part due to mask mandates during the pandemic elected false board members and continually disrupted meetings in Poway, California.³⁰

- Fabricated, false arbitration rulings by some of the following organizations: Sitcomm Arbitration Association and HMP Arbitration Association (also known as the Healing My People Arbitration Association, HMP Dispute Resolution, and Healing My People Ministries, among other names) run by Robert Dale Presley, a California sovereign citizen. In 2021 Tarrant County, Texas judges ruled on a foreclosure and were targeted; Presley was jailed for four months after ignoring the judge's order to appear in court involving one of his fake arbitrations.³¹

- Sovereign Citizens Courts that issue illegal warrants for judges and law enforcement officers and issue fraudulent manufactured judgments. Common law courts, or courts of the Continental United States derive their common law from the American Revolution, which freed the colonists from the British monarchy and made each colonist sovereign over his own property.³² Under this definition of common law, no court ruling, or government statute or regulation can deprive a citizen of his common law rights, particularly with regard to property. The theory followed by sovereign citizens is that common law refers to a separate system of laws, designed to protect individual property rights.³³

- Peace Officer who refuses to recognize the State of Texas or the United States; in order to be sworn in, has to swear to protect the Texas Constitution and enforce laws of the State of Texas. (My

encounter with a sovereign citizen).

- Sovereign citizen stopped by police for traffic violation; let go due to the fact too much time and the annoyance of having to arrest the driver who refuses to identify himself or provide documents that identify driver or reflect insurance or registration regarding Texas Transportation Code violations. (I have encountered this scenario more than once). The time consumed during a traffic stop by local law enforcement across the U.S. quite likely leads to either releasing the driver or an arrest due to the failure to properly identify.

- Refusal to pay taxes (local, state and federal), municipal fees, deposits, to complete necessary municipal permit applications. The IRS has created a department solely to deal with problem filings likely contrived by militia groups and sovereign citizens by design; including misuse of non-profit status.³⁴ IRS is also sharing information and processes regarding tax filings with the FBI and other federal agencies.³⁵

5. Solutions

Traditional methods of dealing with sovereign citizens, such as sanctions, criminal charges, contempt, and general penalties are the solutions that serve as effective deterrents for individuals that recognize the legitimacy of the legal system. Sovereign citizens do not possess this recognition and therefore traditional solutions are not successful. An exponentially increasing number of court opinions are written that include rulings or definitions referencing sovereign citizen theories. Court rulings and dicta provide the precedence necessary to guide new rulings or determinations involving sovereign citizens, but also provide valuable guidance for judicial and municipal policy creation. For example, U.S. Magistrate Judge David L. Horan in *Wright v. United States*, no. 3:20-cv-03299 (N.D. Tex. Nov.

9, 2020) cites the following from *Westfall v. Davis*, no. 7:18-cv-23, 2018 WL 2422058, at *2 (N.D. Tex. May 4, 2018):

So-called sovereign citizens argue that, though they are born and reside in the United States, they are their own sovereigns and are not United States citizens. They claim as grounds for this belief the Uniform Commercial Code, maritime and admiralty law, the idea of strawman trusts, and Bible verses. Sovereign citizens often attempt to use these beliefs to ‘avoid paying taxes, extinguish debts, and derail criminal proceedings.’ However, these citizens cannot claim to be sovereigns independent of governmental authority while they simultaneously ask the judicial system to grant them recourse.

Many states are passing harsher laws and civil and criminal penalties to address a major tool used by sovereign citizens, paper terrorism. These include pre-filing remedies and post-filing judicial relief. But what about remedies and solutions to achieve cooperation from the sovereign citizen for the period of time he or she is in front of you and any department or individual in your municipality? Keep in mind there is no typical “sovereign citizen,” nor do they identify explicitly as a sovereign, but what does become evident is the expression of a core theme of beliefs that individuals share and it principally centers on the view they are not subject to the law or subject to a higher set of laws.

Since writing about sovereign citizens in a 2022 blog, our office receives, on average, one phone call a day from individuals seeking guidance on how to become a sovereign citizen, a citizen of the universe or simply seeking information regarding the sovereign citizen views and tactics.

Legal and psychological experts emphasize the importance of fair processes and fair treatment when sovereign citizens encounter the “system.” Ideally no additional effort is necessary to illustrate

the inherent fairness of any process, but when explaining how the “system” is fair as sovereign citizens encounter the municipal, judicial or any administrative system, the belief that the court or municipality or system is illegitimate must be overcome. Municipal Court and law enforcement training materials emphasize staying calm, avoiding escalation and some go as far to include anger management guidelines.

The recommended approach for encounters with sovereign citizens must not include the loss of patience, or ridicule of their beliefs; despite their purposeful intent to be difficult and argumentative and to generally “push back.” “Fair processes and treatment may provide the necessary incentive to not reoffend and may even signal the legitimacy of the judiciary—at least to the extent that sovereigns believe that courts will not summarily strip citizens’ rights as a matter of course.”

Even when sovereign citizens achieve no success when arguing their position and essentially lose in court, or fail to gain a favorable ruling or result, if treated without bias the sovereign citizen may feel the outcome was fair. Essentially fair treatment on its face will act as a deterrent. Indeed, if a judge is reasonably fair with a sovereign citizen and ultimately decides that she should be barred from filing with the court in the future, this outcome, though unfavorable for the sovereign, may be accepted as fair.

Sovereign citizens believe in anti-government conspiracy theories and these conspiracies are historically rooted in racism. Sovereign citizens intentionally frustrate law enforcement agencies, judges, judicial staff, and elected officials as well as municipal employees. In addition, sovereign citizens have proven to be capable of terrible violence and no person that purports to be a sovereign citizen should be underestimated regarding such capability or simply the possibility of violence. A key element of paper terrorism is most commonly the ability of sovereign citizens to intentionally hold up court proceedings and

public meetings with incomprehensible jargon, theories, and argument and when attempts to manipulate the system fail they resort to harassing public officials with the same tactics; including filing suit, fake liens, or fake deeds. As early as 1995 the Central Texas Counterterrorism Group began writing articles on domestic terrorists and paper terrorism following events in Waco, Texas and Oklahoma City and a key purpose of the group is to partner with high-technology communities as Texas is particularly vulnerable to domestic terrorist groups.

U.S. courts are employing pre-emptive and preventative measures such as pre-filing injunctions, also known as “gatekeeper orders,” to prevent litigants from filing new lawsuits or other filings without leave of court. Federal courts have the inherent authority to issue these injunctions to prevent abuse of the judicial system and to protect other parties from frivolous or malicious lawsuits. The All Writs Act (28 U.S.C. § 1651(a)) authorizes federal district courts to withhold judicial access from parties who repeatedly file frivolous suits.

APPENDIX - Practical Tools to Aid in Sovereign Citizen Encounters and Understanding Sovereign Citizens

Understanding the mindset and theories behind the sovereign citizen movement will help in any encounter with sovereign citizens. In other words, if you can’t beat them, at least try to understand them. This is certainly not a complete list, but it provides sources of general information to gain an understanding of the ideology. Suggested reading to gain an understanding of the militia and sovereign citizen mindset and to prepare for methods and tactics used by both:

1. The Citizens Rule Handbook which includes “The Unanimous Declaration” <https://famguardian.org/Publications/CitRulebook/rulebook.htm#anchor14>
2. “Title 4 Flag Says You’re Schwag!

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The Sovereign Citizen's Handbook: Version 3.2 (November 11, 2013), by H.I.R.M. J.M. Sovereign: Godsent™, published by CreateSpace Independent Publishing Platform; available on Amazon.com.

3. Discharge-Debt.com. Sections on how to use sovereign citizen methods to counter financial responsibilities; "You can Get out of Debt & it May Even be Free;" "MANS Law vs. Gods Law" (www.newenergybooks.com); "Once Upon a Time There Was No Money" website that offers training packets and a Sovereign Citizen Preparatory Course. Sovereign-Citizen.net.

4. Continental United States of America Marshalls, <https://afreecountry.com/?q=cusa-marshals>. "The sheriff is the highest law enforcement officer elected by the people in each county. No other law enforcement officer is permitted to operate within the county without the authority of the sheriff. This applies to city, state and federal law enforcement agents."

5. National Liberty Alliance, a national sovereign citizen movement and their website includes a "how to" on how to "win in court" <https://www.nationallibertyalliance.org/how-we-people-will-win>.³⁴

6. "Rise of the Moors" a group based in Rhode Island recently involved in a Massachusetts standoff with law enforcement and arrests when a heavily armed group of men travelled to Maine for "training." www.riseofthemoors.org.

7. Amazon.com: Nearly every item a sovereign citizen desires or needs may be purchased on Amazon, including, fake license plates,⁴³ sovereign citizen kit ("as seen on T.V."),⁴⁴ sovereign citizen pocket constitution,⁴⁵ and countless publications.

Other Resources:

U.S. Department Homeland Security Digital Library (HSDL) provides public access to numerous documents and bulletins related to homeland security policy and

strategy. (www.hsdl.org)

These documents include:

- U.S. Department of Housing and Urban Development Office of Inspector General: "Attention HUD REO Contractors, Property Inspectors, Section 8 Administrators, and Realtors: Watch out: Sovereign Citizen Scams."
- Naval Postgraduate School, 2016; "Uncommon Law: Understanding and Quantifying the Sovereign Citizen Movement."
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Notes

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2. A separate 1956 federal law exists known as the federal *Posse Comitatus Act*, 18 U.S.C. § 1385 (2021), which prohibits any part of the U.S. military from being used as a posse or called to the aid of local law enforcement unless specifically authorized by law.
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5. U.S. Department of Justice, *Responding to Terrorism Victims* (October 2000).
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7. U.S. District Court, Northern District of Texas, Dallas Division, *Case No. 3:20-mc-53-E-BN*, Moorish Science Temple of America Asiatic Nation of America v. United States, et al., August 11, 2020.
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11. *Rise of the Moors*, July 10, 2021, ABC News, <https://abcnews.go.com/US/rise-moors-group-affiliated-11-men-arrested-massachusetts/story?id=78731313>.

12. Southern Poverty Law Center, *The Second Wave* (Aug. 1, 2009).

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14. *Id.*

15. *FreeMan Society of Canada*, "Freedom is just a word unless you have control of yours!?!?"

16. The ISD focuses on examining and forging solutions in 3 key areas; disinformation; extremism and polarization & hate.

17. In addition to research from these groups, in writing this article I was able to find information regarding sovereign citizens from law journal articles written at the following schools: Georgetown Law School, University of North Carolina Law School, University of South Carolina Law School, Penn State, University of Maryland, and University of Montana, and I was fortunate to communicate with, and read numerous articles written by Associate Professor of Social Work and Criminology, Christine M. Sarteschi, PhD, LCSW at Chatham University.

18. National Institute of Justice sponsored study, *Profiles of Individual Radicalization in the United States (PIRUS): An Empirical Assessment of Domestic Radicalization*, authored by START at University of Maryland (May 2020), available at: https://www.start.umd.edu/pubs/START_PIRUS_ResearchBrief_May2020.pdf.

19. BBC News, August 5, 2020, *What is a sovereign Citizen?*.

20. Stephen A.Kent, *Freemen, Sovereign Citizens, and the Challenge to Public Order in British Heritage Countries*, INT'L J. CULTIC STUDIES, vol. 6 (2015).21. 18 U.S.C. § 1 (2021).

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AFFIDAVIT OF STATUS
of [REDACTED]

TEXAS STATE)
)ss
HARRIS, COUNTY)

Comes now, [REDACTED]
your Affiant, being competent to testify and being over 18 years of age, after first being duly sworn accordingly to law to tell the truth to the facts related herein states that she has firsthand knowledge of the facts stated herein and believes these facts to be true to the best of my knowledge.

1. I [REDACTED] Affiant is a living breathing Natural Private people created by God who reserve all her Natural rights a living Soul born on the land and not the sea who's domicile is TEXAS STATE

2. I [REDACTED] is a Natural Private Soul created by God therefore is not and cannot be any ARTIFICIAL PERSON and, therefore, cannot be assumed or presumed to be a STATUTORY CITIZEN who domicile is in the DISTRICT OF COLUMBIA Washington D.C. and therefore, cannot be LITIGATED, PROSECUTE or EXECUTED and FALSELY IMPRISONED under the COLOR OF LAW codes, statute, policies or given a STATUTORY CITIZEN IDENTIFICATION STATUS.

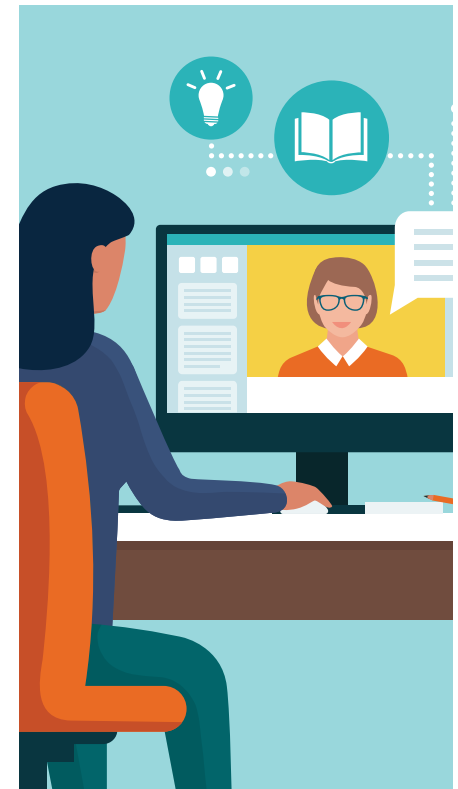
3. I [REDACTED] are born of the People of the land and reserve all my NATURAL PRIVATE RIGHTS and DO NOT CONSENT for my NATURAL PRIVATE RIGHTS TO BE CONVERTED TO STATUTORY RIGHTS.

4. I [REDACTED] am not an ARTIFICIAL FICTION created by the Government therefore I DO NOT CONSENT for my NATURAL PRIVATE NAME to be CONVERTED into the all cap name [REDACTED] this a ARTIFICIAL FICTIONAL NAME that is not my NATURAL PRIVATE NAME [REDACTED]

5. I [REDACTED] is a creation of God and who's domicile is the Natural Land created by God in which I was born on the soil of the Constitutional TEXAS STATE.

6. I [REDACTED] under my Natural Private Universal Rights given by my God the creator under a SWORN OATH OF OFFICE All courts and Judges in every state shall be bound thereby any Thing in the Constitution or Laws of any State

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