(dkt. rev5.16.20)

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

KENT E. HOVIND, an individual*,

PAUL JOHN HANSEN, as trustee for Creation Science Evangelism (CSE), a non-statutory trust,

Plaintiffs,

Case No. 3:20cv5484-TKW-HTC

vs.

UNITED STATES OF AMERICA, (USA) an entity,
MARGARET CATHARINE RODGERS, an individual,
THE ESTATE OF JOHN DAVID ROY ATCHISON, an individual,
MICHELLE HELDMYER, an individual,
SCOTT SCHNEIDER, an individual,
ALAN STUART RICHEY, an individual,

Defendants.

_____/

CIVIL RIGHTS COMPLAINT – 42 U.S.C. § 1983

FIRST, FOURTH, FIFTH, SIXTH, NINTH, TENTH, THIRTEENTH, and FOURTEENTH AMENDMENTS

FLORIDA CONSTITUTION ART I SEC 9, SEC 11, SEC 12, SEC 17, SEC 21, SEC 23, and SEC 25 and COMMON LAW TORT CLAIMS

COME NOW PLAINTIFFS, **KENT E. HOVIND**, an individual, and **PAUL JOHN HANSEN**, as trustee of **CREATION SCIENCE EVANGELISM (CSE)**, a non-statutory trust, bring this action pursuant to 42 U.S.C. §1983[1], seeking damages to remedy violations of their rights secured (Bill of Rights) by the following:

1a. Amendment I - Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press;

[1] 42 U.S. Code § 1983.Civil action for deprivation of rights

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.

4a. Amendment IV - The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

5a. Amendment V - No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a grand jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

6a. Amendment VI - In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

9a. Amendment IX - The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.

10a. Amendment X - The powers not delegated to the United States by the Constitution, nor prohibited by it to the states, are reserved to the states respectively, or to the people.

13a. Amendment XIII - Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.

14a. Amendment XIV - No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

HOVIND and **HANSEN** also seek damages for civil conspiracy state constitutional violations pursuant to Florida common law.

NOTICE - Though there are sixty (60) counts most all are the same acts participated in by all Defendants. Very much it is liken to ten counts against the six Defendants.
NOTICE - This action, complaint, is brought to the jury, by the Plaintiffs, by sworn affidavit, and all statements herein are deemed to be true until otherwise refuted by the Defendant's individually

point for point. Nothing in this document shall be used to diminish the truthfulness of any statement.
NOTICE - That the attached Amebum 1, 2, and 3, are sworn to be true, each bearing Affiant's signatures.

1. PAUL JOHN HANSEN, as Trustee for **CSE**, and Plaintiff **KENT E. HOVIND**, hereby sue the Defendants, jointly and severally.

NATURE OF THE ACTION

2. This is a 42 U.S. Code § 1983 federal civil rights case under the organic FOURTH, FIFTH, SIXTH, NINTH, TENTH, THIRTEENTH, and FOURTEENTH AMENDMENTS of the 'Bill of Rights', of the Constitution for the United States of America, as applied to the States and Federal Governments, against the Defendants for individual and collective personal, malicious, and unlawful violations under color of state, and federal law of Plaintiffs individual and collective rights.

3. Defendants committed these unlawful violations of Plaintiffs' constitutional and state rights under color of state law, in bad faith, and with malicious purpose in reckless, wanton, and willful disregard of Plaintiffs rights.

JURISDICTION AND VENUE

4. Plaintiffs bring this action pursuant 42 U.S.C. § 1983 for violations of civil rights under the 4th,5th,6th,9th,10th,13th,14th (Bill of Rights) Amendments, as enumerated in the Constitution for the United States of America.

5. This Court has subject-matter jurisdiction over this matter pursuant to 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1343(a)(3) (civil rights*); 28 U.S.C. § 1367 provides supplemental jurisdiction over the state law tort claims that arose from the same common nuclei of facts.

6. Venue is proper in this judicial district and division pursuant to 28 U.S.C. § 1391(b) and M.D. Fla. Loc. R. 3.1(B). Defendants' primary business being in this district and division, and Defendants' independent and collective malicious and unlawful violations under color of state law of Plaintiff's constitutional rights giving rise to the claims herein accrued proceeded within this district and division. Yet Affiants state that none of Plaintiff's business was conducted in land of the United States as such land is described in Article 1, Section 8, Paragraph 17 in the Constitution for the United States of America.

7. At all material times, Defendants committed these unlawful violations under color of state, and federal law, in bad faith and with malicious purpose in reckless, wanton, and willful disregard of Plaintiffs' rights.

PRELIMINARY STATEMENT – INTRODUCTION

8. This is an action for money damages, declaratory, and injunctive relief brought pursuant to 42 U.S.C. §§ 1983 and the FOURTH, FIFTH, SIXTH, NINTH, TENTH, THIRTEENTH, and FOURTEENTH AMENDMENTS, to the Constitution for the United States of America, and under the laws of the State of Florida.

9. Section 1983 allows Defendants to be found liable as they have acted "under color of any statute, ordinance, regulation, custom, or usage, of the State, or Territory, or the District of Columbia." 42 U.S.C. § 1983.

10. Each defendant acted under color of federal, state, and local law.

11. This case involves Amendment 14 to the United States Constitution, which provides:

> Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside.... enforce any law which shall abridge the privileges or immunities of citizens of the United States; . . . deprive any person of life, liberty, or deny to any person within its jurisdiction the equal protection of the laws. The Amendment is enforced by Title 42, Section 1983, United States Code.

12. As direct, and effecting, violation of constitutional guaranteed rights, under the FOURTH, FIFTH, SIXTH, NINTH, TENTH, THIRTEENTH, and FOURTEENTH AMENDMENTS, to the 'Constitution for the United States of America' to be free from:

i. the imposing of United States written law in land that is not evidenced as being land of the United States, as defined in Article one, Section 8, Paragraph 17, Constitution for the United States of America;

ii. the imposing of written law upon Plaintiffs **HANSEN** and **HOVIND** that are not evidenced as acting in the land of the United States, as defined in Article One, Section 8, Paragraph 17, Constitution for the United States of America;

iii. the imposing of **UNITED STATES OF AMERICA** written law upon Plaintiffs, that are not evidenced as having any contract, or contact, with '**UNITED STATES OF AMERICA**';

iv. as to Plaintiffs, not being secure in their persons, houses, papers, and effects, against unreasonable searches;

iv. as to Plaintiff's loss of physical liberty (arrested);

vi. as to workers of **CSE**, intentional, offensive conduct, police brutality, against **JO HOVIND**, a **CSE** ministry worker, as they arrested her, at gunpoint, at 7:30 a.m., in her nightgown, and refused to give her an opportunity to change her clothing. Without evidence as required in the 4th Amendment;

vii. as to workers of **CSE**, fear of imminent peril from armed U.S. officers assigned to execute arrest warrants;

viii. as to **CSE**, and workers of **CSE**, forced by threat, armed robbery, as to being forced to unlock the **CSE** safe and Defendants taking of **CSE** money;

ix. as to **CSE**, and workers of **CSE**, and as to property and land, of arrest (and seizure) with no evidence of any warrants of probable cause, supported by oath or affirmation;

x. as to **CSE**, and workers of **CSE**, not being informed of the **nature and cause** of the accusation, as to jurisdiction claim over the man, and as to jurisdiction over **CSE**, and acts against the ministry, as to the fact that no man has attested that the activity of the subject case charges occurred in land of 'The United States of America', as enumerated in Art. 1, Section 8, Paragraph 17, Constitution for the United States of America;

xi. as to **CSE**, and workers of **CSE**, not to be confronted with the **witnesses** against them, as to the above elements of the alleged crime, and the taking of CSE property;

xii. as to HOVIND not having the **effective assistance of counsel** for his defense, for the attorney stopped defending when threatened by Judge Rogers when counsel started forcing proof of the elements of the alleged crime;

xiii. as to **HOVIND** being prosecuted with **no evidence of a complaint, or warrant, supported by oath or affirmation**, in the official record, thus not charged as a matter of law; (HOVIND was never constitutionally charged.)

xiv. as to **HOVIND**, and **HANSEN**, not having certain **rights**, as the court administrators (Rogers) practices had effect to **deny** or disparage others retained by **the people**, such as a biblical fair trial, as such was denied when the presiding judge, Judge **ROGERS**, threatened **HOVIND**'s attorney;

xv. as to **CSE** being denying the land, and property rights, (independence fromU.S.) that belong **to the people**;

xvi. as **HOVIND** being denied access to legal papers to form a meaningful appeal due to being moved approximately twenty-five (25) times during his appeal window, and a total of thirty-two (32) times total during his eight-and-one-half years of incarceration;

xvii. exculpatory evidence was withheld from **HOVIND** and there was no sworn complaint to legally, and formally initiate, the criminal proceedings and there was no originating sworn statement in the

official record, so therefore, **HOVIND** was not charged as a matter of law (Due process violation);

xviii. as to **HOVIND**, and **CSE**, both were subjected to prejudicial and negative national publicity, and personal humiliation, without any sworn claim of a crime, or sworn evidence before the court of land jurisdiction, as is the required subject matter jurisdiction pleading/evidence, to complete the sufficiency of the pleadings before the U.S. court;

xix. as to **HOVIND**, and **HANSEN**, of being denied meaningful time and meaningful access to the court and **CSE** was denied in opportunity to defend **CSE** property rights;

Defendants' Misconduct

13. As a direct and proximate result of the acts of Defendants working together, Plaintiffs suffered the following injuries and damages:

14. At all times relevant to this Complaint, Defendants' are as follows:

15. **UNITED STATES OF AMERICA**, an entity;

16. **MARGARET CATHARINE RODGERS**, an individual, Presiding Criminal Trial US Attorney;

17. **THE ESTATE OF JOHN DAVID ROY ATCHISON**, former U.S. Attorney;

18. **MICHELLE HELDMYER**, an individual, U.S. Attorney;

19. **SCOTT SCHNEIDER**, an individual, IRS Criminal Investigator;

20. **ALAN STUART RICHEY**, an individual, Washington State Defense counsel;

21. These Defendants all were employees of the **UNITED STATES OF AMERICA**.

22. All Defendants were acting as Officers, within the scope and course of their employment and under color of law.

23. All Defendants are being sued in their individual and official capacities.

BACKGROUND

24. On or about March 1st, 2004, **HOVIND** founded the ministry called **CREATION SCIENCE EVANGELISM (CSE)**, to basically expound on the truths of God's Word, the Bible, and the Lord's relationship to all creation.

25. **CSE** existed by documented, 'of-record', as a non-statutory trust, and had no contract, or contact, (no legal nexus/business) with the **UNITED STATES OF AMERICA**.

26. That on July 13, 2006, at 7:30 A.M, after **CSE** was operating with no known legal nexus with **UNITED STATES OF AMERICA**, a S.W.A.T. team, led by **UNITED STATES OF AMERICA** Federal Agents, representing themselves as acting officially, in official uniform, consisting of more than twenty (20) individual, all brandishing **UNITED STATES OF AMERICA** issued assault rifles, surrounded the house with a post address [redacted] Pensacola, FL [redacted]*, where **HOVIND** and his wife were sleeping, which was property/land owned by, **CSE** Trust Ministry.

27. Then on the same morning the same armed **UNITED STATES OF AMERICA** Agents went to all surrounding ministry property and arrested all ministry workers, numbering thirty-five (35). The arrested were then separated, and then individually interrogated for up to six (6) hours before allowing them to return to their respective housing.

28. On or about July 13, 2006, **HOVIND**, and **JO HOVIND**, were presented a 'Indictment' from a Grand Jury proceeding, with case number 3:06cr83/MCR/EMT), upon which both were soon arraigned under, with recorded pleas of 'not guilty', with challenges to personal jurisdiction being asserted by **HOVIND**, and then the same challenge was ignored by the presiding administrator **MARGARET CATHARINE RODGERS**.

29. By order of **MARGARET CATHARINE RODGERS,** all CSE Trustee were barred from joining the case as a defendant.

30. Soon after the arrest **HOVIND**, and **JO HOVIND**, retained counsel **ALAN STUART RICHEY,** by paying **$50,000.00,** to make the appropriate jurisdictional challenges, and necessary defenses, as, and when, needed.

31. **HOVIND** retained **ALAN STUART RICHEY** as defense counsel, for an additional upfront fee of **$50,000.00**, **JO HOVIND** counsel and fee being independent of **HOVIND**'s payment. An additional **$50,000.00** has also been allocated to legal fees associated with Hovind and CSE, as related to this cse subject from the year of 2006 to 5-10-2020.

32. On or about September 2006 the case was tried.

33. The case ended with **HOVIND**, and **JO HOVIND**, being found guilty of all charges, ending in sentencing **HOVIND** to ten (10) years prison, $430,000.00 structured fine, and \$700,000.00 in restitution for the U.S.A/IRS, with three (3) years of strict supervised probation, also **JO HOVIND** with one (1) year imprisonment, and one (1) year of supervised probation.

34. In the year of:

i. 2004 CSE revenue was approximately $2,000,000.00,

ii. 2005 CSE revenue was approximately $2,250,000.00,
iii. 2006 CSE revenue was approximately $2,500,000.00.

35. On or about February September 19, 2009 CSE collapsed and CSE product sales ceased, due to **MARGARET CATHARINE RODGERS** court determination that CSE was an alter ego of **HOVIND**, therefore **CSE** was deemed as non-existent by court order.

36. To this day **CSE** does not operate due to fear imposed by **CATHARINE RODGERS** orders.

37. **CSE** had its land, and most all of its property, having a present value of $3,000,000.oo, taken by the UNITED STATES OF AMERICA court, on February September 19, 2009. See Appendix 1. as hereto attached.

38. CSE lead speaker **HOVIND** was generally invited to speak at approximately thirty (30) churches worldwide weekly on the average in 2006, but in 2020 it is zero. **HOVIND** is striving daily to regain his, and like ministries, popularity since his release on August 7th, 2015. **HOVIND** soon after being greeted at home to a notice of divorce, forced removal by his own son with aid of police to get off the once 'CSE Ministry' land, ending with close to full separation from all his family members, and immediate family, including all his beloved five (5) grandchildren.

Plaintiffs' Allegations Against Defendant -
UNITED STATES OF AMERICA

39. That Defendant **UNITED STATES OF AMERICA**, by various policies, and or customs, employed by its agents and officers, enabled false testimony and false evidence, to be used against **HOVIND**, and **CSE**, at trial, case No. 3:06cr83/MCR/EMT), in the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA.

40. Specifically, the Defendant **UNITED STATES OF AMERICA**, in open court, by various policies, and or customs, enabled false testimony and false evidence, in the subject case in 2006 that:

i. **HOVIND** and **CSE**, had a legal duty, to be employed in, collecting taxes, keep an account and safekeeping of funds and then pay over the same funds as federal income taxes, and FICA taxes, to the **UNITED STATES OF AMERICA**, for each ministry worker;

ii. **HOVIND**, and **CSE**, was involved in a regulated activity that required collection of taxes for the **UNITED STATES OF AMERICA**;

iii. **HOVIND**, and **CSE**, was involved in an activity 'in' land where the UNITED STATES written law had force and effect upon **HOVIND**, and **CSE**, that required collection of taxes for the **UNITED STATES OF AMERICA**;

iv. **HOVIND**, and **CSE**, had ministry workers that were required to pay taxes over to **HOVIND**, and **CSE,** for the **UNITED STATES OF AMERICA**;

v. **HOVIND**, and **CSE**, had a legal duty, to obtain an EIN / Tax ID Number (Employer Identification Number*) license, from the **UNITED STATES OF AMERICA**;

vi. **HOVIND**, and/or **CSE**, were qualified, or eligible, to obtain an EIN license from the **UNITED STATES OF AMERICA**;

vii. **HOVIND**, or **CSE**, is subject to involuntary servitude, as a non-statutory trust, or as a man, possessing unalienable rights, as to being forced to be a tax collector for the **UNITED STATES OF AMERICA** under threat of arrest, long term imprisonment, and mass financial loss;

viii. **HOVIND**, or **CSE** ministry workers had a legal duty to file, or pay taxes, or have withholdings collected for the **UNITED STATES OF AMERICA**. No evidence exists that any ministry worker had a legal duty, or were qualified, to file and pay taxes to the **UNITED STATES OF AMERICA**, as a matter of law (See Hansen's FDCPA Request);

ix. many agents and officers of **UNITED STATES OF AMERICA,** by its various policies, and or customs, enabled false testimony and false evidence, by multiple witnesses, that gave much of the above same false testimony, without any of such agents or officers noticing any officer of the court of the same false evidence;

x. **UNITED STATES OF AMERICA**, agents, and officers, by operation of various policies, and or customs, failed to inform that **HOVIND**, or **CSE** had a moral and legal right to a response from **SCHNEIDER**, and other IRS agents, as to the many letters written to **SCHNEIDER**, starting in 1996, many sent to other IRS agents, as to any legal duty that may apply to **HOVIND**, and **CSE**, as were highly germane to the criminal case.

Plaintiff Allegations Against Defendant -
MARGARET CATHARINE RODGERS, an individual

41. That Defendant **MARGARET CATHARINE RODGERS**, as an officer, employed by the **UNITED STATES**, knowingly allowed false and misleading evidence, to be used against

HOVIND, and **CSE**, at trial, case No. 3:06cr83/MCR/EMT), in the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA.

42. Specifically, the Defendant **MARGARET CATHARINE RODGERS**, in open court, knowingly allowed false evidence that:

i. **HOVIND** and **CSE**, had a legal duty, to be employed in, collecting taxes, keep an account and safe keeping the funds and then pay over the same funds as federal income taxes, and FICA taxes, to the **UNITED STATES OF AMERICA**, for each ministry worker;

ii. **HOVIND**, and **CSE**, was involved in a regulated activity that required collection of taxes for the **UNITED STATES OF AMERICA**;

iii. **HOVIND**, and **CSE**, was involved in an activity in land where the UNITED STATES written law had force and effect upon **HOVIND**, and **CSE**, that required collection of taxes for the **UNITED STATES OF AMERICA**;

iv. **HOVIND**, and **CSE**, had ministry workers that were required to pay taxes over to **HOVIND**, and **CSE,** for the **UNITED STATES OF AMERICA**;

v. **HOVIND**, and **CSE**, had a legal duty, to obtain an EIN / Tax ID Number (Employer Identification Number) license, from the **UNITED STATES OF AMERICA**;

vi. **HOVIND**, and/or **CSE**, were qualified to obtain an EIN license from the **UNITED STATES OF AMERICA**;

vii. **HOVIND**, or **CSE**, is subject to involuntary servitude*, as a non-statutory trust, or as a man, possessing unalienable rights*, as to being forced to be a tax collector for the **UNITED STATES OF AMERICA** under threat of arrest, long term imprisonment, and mass financial loss;

viii. **HOVIND**, or **CSE** ministry workers had a legal duty to file, or pay taxes, or have withholdings collected for the **UNITED STATES OF AMERICA**. No evidence exists that any ministry worker had a legal duty, or were qualified, to file and pay taxes to the **UNITED STATES OF AMERICA**, as a matter of law;

ix. many agents and officers of **UNITED STATES OF AMERICA,** by its various policies, and or customs, enabled false testimony and false

evidence, by multiple witnesses, that gave much of the above same false testimony, without any of such agents or officers noticing any officer of the court of the same false evidence;

x. **UNITED STATES OF AMERICA**, agents, and officers, by operation of various policies, and or customs, failed to inform that **HOVIND**, or **CSE** had a moral and legal right to one response from **SCHNEIDER**, and other IRS agents, as to the many letters written to **SCHNEIDER**, starting in 1996, and also to many other IRS agents, as to any legal duty that may apply to **HOVIND**, and **CSE**, as were highly germane to the criminal case;

xi. indicated that all the Defendants of this case conspired to give, or allow to give, the above false testimony;

xii. **HOVIND** had a right to a response, during direct examination in open court, before the jury, from **SCHNEIDER**, and other IRS agents, as to questions posed, in the jury's presence, and also the approximately five (5) letters mailed yearly for nine (9) years, thus totaling of approximately forty-five (45) letters without one responded from **SCHNEIDER** for the many letters written, starting in 1996, by **HOVIND**, to **SCHNEIDER**, and many other IRS agents, as to any existing legal duty that may apply to **HOVIND**, or to **CSE**, as were highly germane to the criminal case;

xiii. **ROGERS** had evidenced administrative authority over CSE land, or any property in said land.

Plaintiff Allegations Against Defendant - THE ESTATE OF JOHN DAVID ROY ATCHISON, former U.S. Prosecutor

43. That Defendant **ATCHISON**, as a US Attorney, employed by the **UNITED STATES**, provided, and allowed, knowingly, false testimony and false evidence, to be used against Plaintiff **HOVIND**, and **CSE**, at trial, (case No. 3:06cr83/MCR/EMT), in the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA.

44. Specifically, the Defendant **ATCHISON**, US Attorney, in open court, falsely testified, informed, and evidenced, in 2006 that:

i. **HOVIND** and **CSE**, had a legal duty to be employed in collecting taxes, maintain a proper accounting, and maintain the safe keeping of the funds and then pay over the same funds as federal income taxes, and FICA taxes, to the **UNITED STATES OF AMERICA**, for each ministry worker;

ii. **HOVIND**, and **CSE**, was involved in a regulated activity that required collection of taxes for the **UNITED STATES OF AMERICA**;

iii. **HOVIND**, and **CSE**, was involved in an activity in land where the UNITED STATES written law had force and effect upon **HOVIND**, and **CSE**, that required collection of taxes for the **UNITED STATES OF AMERICA**;

iv. **HOVIND**, and **CSE**, had ministry workers that were required to pay taxes over to **HOVIND**, and **CSE,** for the **UNITED STATES OF AMERICA**;

v. **HOVIND**, and **CSE**, had a legal duty, to obtain an EIN / Tax ID Number (Employer Identification Number*) license, from the **UNITED STATES OF AMERICA**;

vi. **HOVIND**, and/or **CSE**, were qualified to obtain an EIN license from the **UNITED STATES OF AMERICA**;

vii. **HOVIND**, or **CSE**, is subject to involuntary servitude, as a non-statutory trust, or as a man, possessing unalienable rights, as to being forced to be a tax collector for the **UNITED STATES OF AMERICA** under threat of arrest, long term imprisonment, and mass financial loss;

viii. **HOVIND**, or **CSE** ministry workers had a legal duty to file, or pay taxes, or have withholdings collected for the **UNITED STATES OF AMERICA**. No evidence exists that any ministry worker had a legal duty, or were qualified, to file and pay taxes to the **UNITED STATES OF AMERICA**, as a matter of law;

ix. many agents and officers of **UNITED STATES OF AMERICA,** by its various policies, and or customs, enabled false testimony and false evidence, by multiple witnesses, that gave much of the above same false testimony, without any of such agents or officers noticing any officer of the court of the same false evidence;

x. **UNITED STATES OF AMERICA**, agents, and officers, by operation of various policies, and or customs, failed to inform that **HOVIND**, or **CSE** had a moral and legal right to a response from **SCHNEIDER**, and other IRS agents, as to the many letters written, started in 1996, to **SCHNEIDER**, and many other IRS agents, as to any legal duty that may apply to **HOVIND**, and **CSE**, as were highly germane to the criminal case;

xi. indicated that all the Defendants of this case conspired to give, or allow to give, the above false testimony;

xii. **HOVIND** had a right to a response during direct examination in open court, before the jury, from **SCHNEIDER**, and other IRS agents, as to questions posed, in the jury's presence, as to the many letters written, started in 1996, by **HOVIND**, to **SCHNEIDER**, and many other IRS agents, as to any existing legal duty that may apply to **HOVIND**, or to **CSE**, as were highly germane to the criminal case.

Plaintiff Allegations Against Defendant - MICHELLE HELDMYER, former U.S. Prosecutor

45. That Defendant **MICHELLE HELDMYER**, as an officer, employed by the UNITED STATES, knowingly allowed false and misleading evidence, to be used against Plaintiff Kent E Hovind, and CSE, at trial, (case No. 3:06cr83/MCR/EMT), in the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA.

46. Specifically, **MICHELLE HELDMYER,** the Defendant, in open court, knowingly allowed false evidence that:

i. **HOVIND** and **CSE**, had a legal duty, to be employed in, collecting taxes, keep an account, and safe keeping of the funds and then pay over the same funds as federal income taxes, and FICA taxes, to the **UNITED STATES OF AMERICA**, for each ministry worker;

ii. **HOVIND**, and **CSE**, was involved in a regulated activity that required collection of taxes for the **UNITED STATES OF AMERICA**;

iii. **HOVIND**, and **CSE**, was involved in an activity in land where the UNITED STATES written law had force and effect upon **HOVIND**, and **CSE**, that required collection of taxes for the **UNITED STATES OF AMERICA**;

iv. **HOVIND**, and **CSE**, had ministry workers that were required to pay taxes over to **HOVIND**, and **CSE,** for the **UNITED STATES OF AMERICA**;

v. **HOVIND**, and **CSE**, had a legal duty, to obtain an EIN / Tax ID Number (Employer Identification Number*) license, from the **UNITED STATES OF AMERICA**;

vi. **HOVIND**, and/or **CSE**, were qualified to obtain an EIN license from the **UNITED STATES OF AMERICA**;

vii. **HOVIND**, or **CSE**, is subject to involuntary servitude, as a non-statutory trust, or as a man, possessing unalienable rights, as to being forced to be a tax collector for the **UNITED STATES OF AMERICA** under threat of arrest, long term imprisonment, and mass financial loss;

viii. **HOVIND**, or **CSE** ministry workers had a legal duty to file, or pay taxes, or have withholdings collected for the **UNITED STATES OF AMERICA**. No evidence exists that any ministry worker had a legal duty, or were qualified, to file and pay taxes to the **UNITED STATES OF AMERICA**, as a matter of law;

ix. many agents and officers of **UNITED STATES OF AMERICA,** by its various policies, and or customs, enabled false testimony and false evidence, by multiple witnesses, that gave much of the above same false testimony, without any of such agents or officers noticing any officer of the court of the same false evidence;

x. **UNITED STATES OF AMERICA**, agents, and officers, by operation of various policies, and or customs, failed to inform that **HOVIND**, or **CSE** had a moral and legal right to a response from **SCHNEIDER**, and other IRS agents, as to the many letters written, starting in 1996, to **SCHNEIDER**, and many other IRS agents, as to any legal duty that may apply to **HOVIND**, and **CSE**, as were highly germane to the criminal case;

xi. indicated that all the Defendants of this case conspired to give, or allow to give, the above false testimony;

xii. **HOVIND** had a right to a response during direct examination in open court, before the jury, from **SCHNEIDER**, and other IRS agents, as to questions posed, in the jury's presence, as to the many letters written, by **HOVIND**, to **SCHNEIDER**, starting in 1996, and also to many other IRS agents, as to any existing legal duty that may apply to **HOVIND**, or to **CSE**, as were highly germane to the criminal case;

Plaintiffs Allegations Against Defendant -
SCOTT SCHNEIDER, an individual, IRS Criminal Investigator

47. That Defendant **SCHNEIDER**, as an IRS Agent, employed by the **UNITED STATES**, provided, and allowed, knowingly, false testimony and false evidence, to be used against Plaintiff **HOVIND**, and **CSE**, at trial, (case No. 3:06cr83/MCR/EMT), in the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA.

48. Specifically, the Defendant **SCHNEIDER**, IRS Agent, in open court, falsely testified, informed, and evidenced, in 2006 that:

i. **HOVIND,** or **CSE**, had a legal duty, to be employed in, collecting taxes, keep an account, and safe keeping of the funds and then pay over the same funds as federal income taxes, and FICA taxes, to the **UNITED STATES OF AMERICA**, for each ministry worker;

ii. **HOVIND**, or **CSE**, was involved in a regulated activity that required collection of taxes for the **UNITED STATES OF AMERICA**;

iii. **HOVIND**, or **CSE**, was involved in an activity on land where the **UNITED STATES** written law had force and effect upon **HOVIND**, and **CSE**, that required collection of taxes for the **UNITED STATES OF AMERICA**;

iv. **HOVIND**, or **CSE**, had ministry workers that were required to pay taxes over to **HOVIND**, and **CSE,** for the **UNITED STATES OF AMERICA**;

v. **HOVIND**, or **CSE**, had a legal duty, to obtain an EIN / Tax ID Number (Employer Identification Number*) license, from the **UNITED STATES OF AMERICA**;

vi. **HOVIND**, and/or **CSE**, were qualified to obtain an EIN license from the **UNITED STATES OF AMERICA**;

vii. **HOVIND**, or **CSE**, is subject to involuntary servitude, as a non-statutory trust, or as a man, possessing unalienable rights, as to being forced to be a tax collector for the **UNITED STATES OF AMERICA** under threat of arrest, long term imprisonment, and mass financial loss;

viii. **HOVIND**, or **CSE** ministry workers had a legal duty to file, or pay taxes, or have withholdings collected for the **UNITED STATES OF AMERICA**. No evidence exists that any ministry worker had a legal

duty, or were qualified, to file and pay taxes to the **UNITED STATES OF AMERICA**, as a matter of law;

ix. many agents and officers of **UNITED STATES OF AMERICA,** by its various policies, and or customs, enabled false testimony and false evidence, by multiple witnesses, that gave much of the above same false testimony, without any of such agents or officers noticing any officer of the court of the same false evidence;

x. **UNITED STATES OF AMERICA**, agents, and officers, by operation of various policies, and or customs, failed to inform that **HOVIND**, or **CSE** had a moral and legal right to a response from **SCHNEIDER**, and other IRS agents, as to the many letters written, starting in 1996, to **SCHNEIDER**, and many other IRS agents, as to any legal duty that may apply to **HOVIND**, and **CSE**, as were highly germane to the criminal case;

xi. all the Defendants of this case conspired to give, or allow to give, the above false testimony;

xii. **HOVIND** had a right to a response during direct examination in open court, before the jury, from **SCHNEIDER**, and other IRS agents, as to questions posed, in the jury's presence, as to the many letters written, by **HOVIND**, to **SCHNEIDER**, starting in 1996, and many other IRS agents, as to any existing legal duty that may apply to **HOVIND**, or to **CSE**, as were highly germane to the criminal case.

Plaintiff Allegations Against Defendant - ALAN STUART RICHEY
Washington State Defense Counsel

49. That Defendant **ALAN STUART RICHEY**, as a duly licensed attorney of the state of Washington, employed by **HOVIND**, did knowingly, and allowed, false and misleading evidence, to be used against Plaintiff **HOVIND**, and **CSE**, at trial, (case No. 3:06cr83/MCR/EMT), in the UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA.

50. Specifically, the Defendant **ALAN STUART RICHEY**, in open court, knowingly allowed false evidence that:

i. **HOVIND,** or **CSE**, had a legal duty, to be employed in, collecting taxes, keep an account, and safe keeping of the funds and then pay over the same funds as federal income taxes, and FICA taxes, to the **UNITED STATES OF AMERICA**, for each ministry worker;

ii. **HOVIND** and/or **CSE**, was involved in a regulated activity that required collection of taxes for the **UNITED STATES OF AMERICA**;

iii. **HOVIND**, or **CSE**, was involved in an activity on land where the UNITED STATES written law had force and effect upon **HOVIND**, or **CSE**, that required collection of taxes for the **UNITED STATES OF AMERICA**;

iv. **HOVIND**, or **CSE**, had ministry workers that were required to pay taxes over to **HOVIND**, or **CSE,** for the **UNITED STATES OF AMERICA**;

v. **HOVIND**, or **CSE**, had a legal duty, to obtain an EIN / Tax ID Number (Employer Identification Number*) license, from the **UNITED STATES OF AMERICA**;

vi. **HOVIND**, or **CSE**, were qualified to obtain an EIN license from the **UNITED STATES OF AMERICA**;

vii. **HOVIND**, or **CSE**, is subject to involuntary servitude, as a non-statutory trust, or as a man, possessing unalienable rights, as to being forced to be a tax collector for the **UNITED STATES OF AMERICA** under threat of arrest, long term imprisonment, and mass financial loss;

viii. **HOVIND**, or **CSE** ministry workers had a legal duty to file, or pay taxes, or have withholdings collected for the **UNITED STATES OF AMERICA**. No evidence exists that any ministry worker had a legal duty, or were qualified, to file and pay taxes to the **UNITED STATES OF AMERICA**, as a matter of law;

ix. many agents and officers of **UNITED STATES OF AMERICA,** by its various policies, and or customs, enabled false testimony and false evidence, by multiple witnesses, that gave much of the above same false testimony, without any of such agents or officers noticing any officer of the court of the same false evidence;

x. **UNITED STATES OF AMERICA**, agents, and officers, by operation of various policies, and or customs, failed to inform that **HOVIND**, or **CSE** had a moral and legal right to a response from **SCHNEIDER**, and other IRS agents, as to the many letters written to **SCHNEIDER**, starting in 1996, and many other IRS agents, as to any legal duty that

may apply to **HOVIND**, or **CSE**, as were highly germane to the criminal case;

xi. all the Defendants of this case conspired to give, or allow to give, the above false testimony;

xii. **HOVIND** had a right to a response during direct examination in open court, before the jury, from **SCHNEIDER**, and other IRS agents, as to questions posed, in the jury's presence, as to the many letters written, by **HOVIND**, to **SCHNEIDER**, starting in 1996, and many other IRS agents, as to any existing legal duty that may apply to **HOVIND**, or to **CSE**, as were highly germane to the criminal case.

51. PARAMOUNT NOTICE - That on or about 3/15/2019 Kent E **HOVIND**, and Paul John **HANSEN**, both mailed three separate **FOIA REQUEST** upon the **United States of America**, **Internal Revenue Service**, and **SCOTT SCHNEIDER**, requesting if **HOVIND**, or **CSE**, NOW had a legal duty to acquire an EIN (Employer Identification Number), or withhold taxes from any man that works for HOVIND, or CSE, under the exact same scenario that operated in 2006, upon which **HOVIND** was prosecuted. No response has been received from any of the recipients. (See Addendum 4.)

COUNT ONE – 42 U.S.C. § 1983

Against Defendant **UNITED STATES OF AMERICA**

51. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

52. Plaintiff claims damages under 42 U.S.C. § 1983 for the injuries set forth above against Defendant **UNITED STATES OF AMERICA** for violation of constitutional rights, under color of law.

COUNT TWO – 42 U.S.C. § 1983

False Imprisonment

53. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

54. Plaintiff was arrested with no sworn complaint in the official record that meets the 4th Amendment requirement as found in the 'Bill of Rights' of the 'Constitution for the United States', which is the custom and policy of Defendant.

55. As described more fully above, all of the Defendants, as agents of **UNITED STATES OF AMERICA,** while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of their employment, caused **HOVIND** to be falsely imprisoned in violation of constitutional written law for HOVIND, as a man of right, cannot be arrested by warrant, and then prosecuted, without the Defendants meeting the requirement of the said 4th Amendment 'Bill of Rights'.

56. As a result of this violation, **HOVIND** suffered injuries, including but not limited to emotional distress, loss of reputation, loss of revenue, loss of relationships such as a divorce after 42 years of a blessed marriage, followed by complete abandonment by son Eric, daughter Marlissa, and all grandchildren, with close to no speaking engagements as compared to being booked up in advance for 18 months prior to the convection, as associated with speaking in 30+ countries, in 50+ churches, and before more than 50,000 people yearly before the said arrest in 2006. where all this false notoriety started, and HOVIND'S popularity vanished.

57. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, systematically, with willful indifference to **HOVIND**'s constitutional rights.

58. The misconduct described in this Count was undertaken pursuant to the policy and practice of the US Attorney's office and the Internal Revenue Service as the manner is described more fully above.

COUNT THREE – 42 U.S.C. § 1983
Equal Protection

59. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

60. As described more fully above, Defendants, all while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of their employment, denied Plaintiff equal protection of the law in violation of constitutional rights.

61. Specifically, these Defendants actively participated in, or personally caused, misconduct in terms of abusing select people who are deemed in conflict with state and federal unconstitutional agendas to govern the American people beyond its constitutional authority. All done in a manner calculated to coerce, confuse, and secure unjust convictions. Said misconduct was motivated by adverse political animus and constituted purposeful discrimination; and religious persecution, it also affects the masses, by show of "blast imprisonment", in a grossly disproportionate manner vis-a-vis sending a message to all observing Americans. Just as practiced in communist China, "**The *nail that sticks up gets* hammered *down***".

62. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally with willful indifference to Plaintiff's constitutional rights.

63. The misconduct described in this Count was undertaken pursuant to the policy and practice of the US Attorney's office and the Internal Revenue Service in the manner described more fully above.

64. It was the policy and/or custom of the **UNITED STATES OF AMERICA** to fail to exercise reasonable care in hiring, and training, and monitoring, its officers, including all Defendants, thereby failing to adequately prevent constitutional violations on the part of its policy enforcers, as acting in direct violation of the plain view 4th Amendment, 'Bill of Rights' as afforded to a man, and mans' entities (property/CSE).

65. As a result of the above described policies and customs of **UNITED STATES OF AMERICA,** and all other Defendants believed that their actions would not be reported by supervisory administrative officers and that misconduct would not be investigated or sanctioned but would in fact be tolerated, encouraged, and financially rewarded.

66. The above described policies and customs demonstrate a deliberate indifference on the part of **UNITED STATES OF AMERICA** to the constitutional rights of free, independent, men like Plaintiff, in America, and were the underlying cause of the violations of Plaintiff's rights alleged herein.

COUNT FOUR – 42 U.S.C. § 1983

State Created Danger

67. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

68. Defendant **UNITED STATES OF AMERICA** is liable for the policy and custom of allowing its officers and agents to seize people and property, and prosecute, without oaths or affirmation in the official record compliant to the 4th Amendment as such was established in the year of 1791, 'Bill of Rights'.

69. Defendant **UNITED STATES OF AMERICA** agents are accustomed in doing said acts without first evidencing, or even evidenced as of this day, if **HOVIND**, or CSE, was qualified, eligible, or had a legal duty, to obtain an EIN and withhold any taxes for **UNITED STATES OF AMERICA**.

70. Defendant **UNITED STATES OF AMERICA** agents are accustomed in doing said acts without first evidencing if **HOVIND**, or CSE, was doing any business in land where the legislative authority reaches as limited in Article 1, Section 8, Paragraph 17, of the Constitution for the United States, as associated with each charge against **HOVIND** in 2006.

71. Defendant **UNITED STATES OF AMERICA** agents are accustomed in doing said acts without first evidencing if **HOVIND**, or CSE, had any legal, or contractual, duty with any withholding for the Defendant.

COUNT FIVE – 42 U.S.C. § 1983

Malicious Prosecution

72. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

73. Defendant **UNITED STATES OF AMERICA,** is liable for the policy and custom of allowing its officers and agents to maliciously prosecute **HOVIND**, and ministries such as CSE.

74. Defendant **UNITED STATES OF AMERICA** agents are accustomed in bringing multiple fatal title waves of force against Plaintiffs, and in doing said acts of prosecution without first evidencing if **HOVIND**, or CSE, was even subject to the charged written laws. Americans have never consented to unjust force upon the weak in our society by any government, especially the most powerful one in the world.

75. It is charged by Plaintiff that the event was 'religious persecution', and 'unconstitutional state expansion' in nature.

COUNT SIX – 42 U.S.C. § 1983

Unlawful Seizure

76. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

77. Defendant **UNITED STATES OF AMERICA** is liable for the policy and custom of allowing its officers and agents to arrest, and seize, Plaintiffs property without due process.

78. **UNITED STATES OF AMERICA** agents and officers seized $52,000 from **CSE** safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker **JO HOVIND** to unlock the **CSE** safe with threat of if refused they would force the safe open.

COUNT SEVEN – 42 U.S.C. § 1983

Armed Robbery

79. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

80. Defendant **UNITED STATES OF AMERICA** is liable for the policy and custom of allowing its officers and agents to do acts of armed robbery.

81. **UNITED STATES OF AMERICA** agents and officers seized $52,000 from **CSE** safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker **JO HOVIND**, at gunpoint, to unlock the safe, with verbal threat of if not opened they would force the safe open.

COUNT EIGHT – 42 U.S.C. § 1983

Coercive Power

82. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

83. Defendant **UNITED STATES OF AMERICA** is liable for the policy and custom of applying coercive power through the ranks of its agents and officers, to act with disregard for constitutional limits, and rights of **HOVIND** and **CSE**.

84. **UNITED STATES OF AMERICA** agents, and officers, seized and arrested **HOVIND** with **CSE** assets, as formerly stated, adding that such acts are done with the attitude that "crime pays". The more collected the greater chance of employment advancement for the violator. Out of 10 million confiscations done without law only a few are stopped thus ending with the gain (violation) far outweighs the cost, again "crime pays". U.S. employees that collect, regardless if they lack constitutional authority, get advanced.

COUNT NINE – 42 U.S.C. § 1983

Knowingly Accepts Benefits from Unconstitutional Behavior

85. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

86. Defendant **UNITED STATES OF AMERICA** is liable for the policy and custom of allowing its officers and agents to do unconstitutional acts thus, Knowingly Accepts Benefits, (hundreds of millions) from Unconstitutional Behavior.

87. **UNITED STATES OF AMERICA** agents and officers seized and arrest, as formerly stated, adding that such acts are done with the custom and policy of take, take, take, and we will sort out the legality of it all later, thus the small percentage that will be fought for and given back is insignificant to the amount the Plaintiff gains due the heavy atmosphere of fear, and control of the masses. They, the strong, therefore impose on those few that try and oppose such tyranny.

COUNT TEN – 42 U.S.C. § 1983

Defendant UNITED STATES OF AMERICA

88. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

89. Defendant **UNITED STATES OF AMERICA** is liable for, False Imprisonment, Failure of Equal Protection, State Created Danger, Unlawful Seizure, Armed Robbery, Coercive Power, and Knowingly Accepts Benefits from Unconstitutional Behavior, under the law, committed against Plaintiff, by Defendants as listed agents, and officers, while acting in the scope of their employment.

COUNT ELEVEN – 42 U.S.C. § 1983

42 U.S.C. §1983 Against Defendant

MARGARET CATHARINE RODGERS, an individual,
Presiding Criminal Trial Administrator

90. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

90.1 Defendant **ROGERS** is liable for allowing **False Imprisonment, Failure of Equal Protection, State Created Danger, Unlawful Seizure, Armed Robbery, Coercive Power, and Knowingly Accepts Benefits from Unconstitutional Behavior,** under the law, committed against Plaintiff, by all the Defendants, as listed agents, and officers, while acting in the scope of their employment.

91. Plaintiff claims damages under 42 U.S.C. § 1983 for the injuries set forth above against Defendant **RODGERS** for violation of constitutional rights, under color of law.

COUNT TWELVE – 42 U.S.C. § 1983

False Imprisonment

92. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

93. Plaintiff was arrested with no sworn complaint in the official record that meets the 4th Amendment requirement as found in the 'Bill of Rights' of the 'Constitution for the United States', which is the custom and policy of **RODGERS**.

94. As described more fully above; **RODGERS**, as an officer of **UNITED STATES OF AMERICA,** while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of their employment, caused **HOVIND** to be falsely imprisoned in violation of constitutional written law for HOVIND, as a man of right, cannot be arrested by warrant, and then prosecuted, without the Defendants meeting the requirement of the said 4th Amendment 'Bill of Rights'.

95. As a result of this violation, **HOVIND** suffered injuries, including but not limited to emotional distress, loss of reputation, loss of revenue, loss of relationships such as a divorce after 42 years of a blessed marriage, followed by complete abandonment by son Eric, daughter Marlissa, and all grandchildren, with close to no speaking engagements as compared to being booked up in advance for 18 months prior to the convection, as associated with speaking in 30+ countries, in 50+ churches, and before more than 50,000 people yearly before the said arrest in 2006, where all this false notoriety started, and HOVIND'S popularity vanished.

96. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, systematically, with willful indifference to **HOVIND**'s constitutional rights.

97. The misconduct described in this Count was undertaken pursuant to the policy and practice of the US Attorney's office and the Internal Revenue Service as the manner is described more fully above.

COUNT THIRTEEN – 42 U.S.C. § 1983
Equal Protection

98. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

99. As described more fully above, **RODGERS**, all while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **RODGERS** employment, denied Plaintiff equal protection of the law in violation of constitutional rights.

100. Specifically, **RODGERS** actively participated in, or personally caused, misconduct in terms of abusing select people who are deemed in conflict with state and federal unconstitutional agendas to govern the American people beyond its constitutional authority. All done in a manner calculated to coerce, confuse, and secure unjust convictions. Said misconduct was motivated by adverse political animus and constituted purposeful discrimination; and religious persecution, it also affects the masses, by show of "blast imprisonment" (giving the max of a ten year sentence to **HOVIND**), in a grossly disproportionate manner vis-a-vis sending a message to all observing Americans. Just as practiced in communist China, "**The *nail that sticks up gets* hammered *down***".

101. The misconduct described in this Count, by **RODGERS,** was objectively unreasonable and was undertaken intentionally with willful indifference to Plaintiff's constitutional rights.

102. The misconduct described in this Count was undertaken pursuant to the policy and practice of **RODGERS, with** the US Attorney's office, and the Internal Revenue Service, in the manner described more fully above.

103. It was the policy and/or custom of **RODGERS** to fail to exercise reasonable care administration officers conduct, including all Defendants, thereby failing to adequately prevent constitutional violations on the part of policy, as acting in direct violation of the plain view 4th Amendment, 'Bill of Rights' as afforded to a man, and mans' entities (property/CSE).

104. As a result of the above described policies and customs of **RODGERS,** all other Defendants believed that their actions would not be reported by **RODGERS** administrative governance, and that such misconduct would not be investigated or sanctioned but would in fact be tolerated, encouraged, and financially rewarded.

105. The above described policies and customs demonstrated by **RODGERS** is a deliberate indifference to the constitutional rights of free, independent, men like Plaintiff, in America lands, and were much of the underlying cause of the violations of Plaintiff's rights alleged herein.

COUNT FOURTEEN – 42 U.S.C. § 1983

State Created Danger

106. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

107. Defendant **RODGERS** is liable for the policy and custom of allowing officers and agents to seize people and property, and prosecute, without oaths or affirmation in the official record compliant to the 4th Amendment as such was established in the year of 1791,'Bill of Rights'.

108. Defendant **RODGERS** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was qualified, eligible, or had a legal duty, to obtain an EIN and withhold any taxes for **UNITED STATES OF AMERICA**.

109. Defendant **RODGERS** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was doing any business in land where the legislative authority reaches as limited in Article 1, Section 8, Paragraph 17, of the Constitution for the United States, as associated with each charge against **HOVIND** in 2006.

110. Defendant **RODGERS** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, had any legal, or contractual, duty with any withholding for the Defendant.

111. Defendant **RODGERS** even took aggressive measures to assure evidence did not get before the jury that **HOVIND**, or **CSE**, had no evidence of any legal, or contractual, duty associated with any withholding, from any of the listed Defendants.

COUNT FIFTEEN – 42 U.S.C. § 1983

Malicious Prosecution

112. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

113. Defendant **RODGERS** is liable for the policy and custom of allowing officers and agents, under **RODGERS,** to maliciously prosecute **HOVIND**, and ministries such as CSE.

114. Defendant **RODGERS** being accustomed in allowing the bringing of multiple fatal title waves of force against Plaintiffs such as HOVIND, and in doing said acts of prosecution without first evidencing if **HOVIND**, or CSE, was even formally charged, or even being subject to the charged written laws. Americans have never consented to unjust force upon the weak in our society by any government, especially by the most powerful one in the world.

115. It is charged by Plaintiff that the event was **RODGERS' agenda of** 'religious persecution', and 'unconstitutional state expansion'.

COUNT SIXTEEN – 42 U.S.C. § 1983

Unlawful Seizure

116. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

117. Defendant **RODGERS** is liable for the policy and custom of allowing agents to arrest, and seize, Plaintiffs property without due process.

118. Defendant **RODGERS** is liable for the policy and custom of allowing **UNITED STATES OF AMERICA** agents and officers to seized $52,000 from CSE safe during the raid of July 13,

2006, without court order warrant or judgment, by forcing a ministry worker JO HOVIND to unlock the CSE safe with threat of if refused they would force the safe open.

COUNT SEVENTEEN – 42 U.S.C. § 1983

Armed Robbery

119. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

120. Defendant **RODGERS** is liable for the policy and custom of allowing officers and agents to do acts of armed robbery.

121. **RODGERS allowed UNITED STATES OF AMERICA** agents and officers to seize $52,000 from CSE safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker JO HOVIND, at gun point, to unlock the safe, with verbal threat of if not opened they would force the safe open.

COUNT EIGHTEEN – 42 U.S.C. § 1983

Coercive Power

122. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

123. Defendant **RODGERS** is liable for the policy and custom of applying coercive power personally, and through the ranks to act with disregard for constitutional limits, and rights of **HOVIND** and **CSE**.

124. **RODGERS allowed** agents, and officers, to seize and arrest HOVIND and CSE assets, as formerly stated, adding that such acts are done with the attitude that "crime pays". The more collected the greater chance of employment advancement by the very violator. Out of 10 million confiscations done without law only a few are stopped thus ending with the gain (violation) far outweighs the cost, again "crime pays". U.S. employees that collect, regardless of how, get advanced.

COUNT NINETEEN – 42 U.S.C. § 1983

Knowingly Accepts Benefits from Unconstitutional Behavior

125. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

126. Defendant **RODGERS** is liable for the policy and custom of allowing officers and agents to do unconstitutional acts thus, Knowingly Accepts Benefits, (hundreds of millions) from Unconstitutional Behavior.

127. **RODGERS allowed UNITED STATES OF AMERICA** agents and officers to seize and arrest, as formerly stated, adding that such acts are done with the custom and policy of take, take, take, and we will sort out the legality of it all later, thus the small percentage that will be fought

for and given back is insignificant to the amount the Plaintiff gains due to the heavy atmosphere of fear, and control of the masses. They, the strong, therefore impose on those, the few, that try and oppose such tyranny.

COUNT TWENTY – 42 U.S.C. § 1983
Defendant UNITED STATES OF AMERICA

128. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

129. Defendant **RODGERS** is liable for the False Imprisonment, Failure of Equal Protection, State Created Danger, Unlawful Seizure, Armed Robbery, Coercive Power, and Knowingly Accepts Benefits from Unconstitutional Behavior, under the law, committed against Plaintiff, by all the Defendants, as listed agents, and officers, while acting in the scope of their employment.

COUNT TWENTY-ONE – 42 U.S.C. § 1983

42 U.S.C. §1983 Against Defendant

THE ESTATE OF JOHN DAVID ROY ATCHISON, an individual
former U.S. Attorney

130. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

131. Plaintiff claims damages under 42 U.S.C. § 1983 for the injuries set forth above against Defendant **ATCHISON** for violation of constitutional rights, under color of law.

COUNT TWENTY-TWO – 42 U.S.C. § 1983

False Imprisonment

132. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

133. Plaintiff was arrested with no sworn complaint in the official record that meets the 4th Amendment requirement as found in the 'Bill of Rights' of the 'Constitution for the United States', which occurred under **ATCHISON**.

134. As described more fully above, **ATCHISON**, as an officer of **UNITED STATES OF AMERICA,** while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **ATCHISON** employment, caused **HOVIND** to be falsely imprisoned in violation of constitutional written law for HOVIND, as a man of right, cannot be arrested by warrant, and then prosecuted, without the Defendants meeting the requirement of the said 4th Amendment 'Bill of Rights'.

135. As a result of this violation, **HOVIND** suffered injuries, including but not limited to emotional distress, loss of reputation, loss of revenue, loss of relationships such as a divorce after

42 years of a blessed marriage, followed by complete abandonment by son Eric, daughter Marlissa, and all grandchildren, with close to no speaking engagements as compared to being booked up in advance for 18 months prior to the convection, as associated with speaking in 30+ countries, in 50+ churches, and before more than 50,000 people yearly before the said arrest in 2006, where all this false notoriety started, and HOVIND'S popularity vanished.

136. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, systematically, with willful indifference to **HOVIND**'s constitutional rights.

137. The misconduct described in this Count was undertaken pursuant to the policy and practice of the US Attorney's office and the Internal Revenue Service, all conspiring with **ATCHISON,** as the manner is described more fully above.

COUNT TWENTY-THREE – 42 U.S.C. § 1983
Equal Protection

138. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

139. As described more fully above, **ATCHISON**, all while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **ATCHISON** employment, denied Plaintiff equal protection of the law in violation of constitutional rights.

140. Specifically, **ATCHISON** actively participated in, or personally caused, misconduct in terms of abusing select people who are deemed in conflict with state and federal unconstitutional agendas to govern the American people beyond its constitutional authority. All done in a manner calculated to coerce, confuse, and secure unjust convictions. Said misconduct was motivated by adverse political animus and constituted purposeful discrimination; and religious persecution, it also affects the masses, by show of "blast imprisonment", in a grossly disproportionate manner vis-a-vis sending a message to all observing Americans. Just as practiced in communist China, "**The *nail that sticks up gets* hammered *down***".

141. The misconduct described in this Count, by **ATCHISON,** was objectively unreasonable and was undertaken intentionally with willful indifference to Plaintiff's constitutional rights.

142. The misconduct described in this Count was undertaken pursuant to the intentional acts of **ATCHISON,** while conspiring with the US Attorney's office, and the Internal Revenue Service, in the manner as described more fully above.

143. **ATCHISON** fail to exercise reasonable care in his administration of written law, conspiring with all Defendants, thereby failing to adequately prevent constitutional violations on the part of policy, and law, as acting in direct violation of the plain view 4th Amendment, 'Bill of Rights' as afforded to a man, and mans' entities (property), and to all the above listed violations.

144. As a result of the above described policies and customs of **ATCHISON,** and all other Defendants believed that their actions with **ATCHISON** would not be investigated or sanctioned but would in fact be tolerated, encouraged, and financially rewarded.

145. The above described policies and customs demonstrated by **ATCHISON** is a deliberate indifference to the constitutional rights of free, independent, men like Plaintiff, in America lands, and were much of the underlying cause of the violations of Plaintiff's rights alleged herein.

COUNT TWENTY-FOUR – 42 U.S.C. § 1983

State Created Danger

146. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

147. Defendant **ATCHISON** is liable for allowing officers and agents to seize people and property, and prosecute, without oaths or affirmation in the official record compliant to the 4th Amendment as such was established in the year of 1791,'Bill of Rights'.

148. Defendant **ATCHISON** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was qualified, eligible, or had a legal duty, to obtain an EIN and withhold any taxes for **UNITED STATES OF AMERICA**.

149. Defendant **ATCHISON** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was doing any business in land where the legislative authority reaches as limited in Article 1, Section 8, Paragraph 17, of the Constitution for the United States, as associated with each charge against **HOVIND** in 2006.

150. Defendant **ATCHISON** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, had any legal, or contractual, duty with any withholding for the Defendant.

151. Defendant **ATCHISON** even participated in measures to assure evidence did not get before the jury that **HOVIND**, or **CSE**, had no evidence of any legal, or contractual, duty associated with any withholding, from any of the listed Defendants.

COUNT TWENTY-FIVE – 42 U.S.C. § 1983

Malicious Prosecution

152. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

153. Defendant **ATCHISON** is liable for the policy and custom of allowing officers and agents, under **ATCHISON,** to maliciously prosecute **HOVIND**, and ministries such as CSE.

154. Defendant **ATCHISON** being accustomed in allowing the bringing of multiple fatal title waves of force against Plaintiffs such as HOVIND, and in doing said acts of prosecution without first evidencing if **HOVIND**, or CSE, was even formally charged, or even being subject to the charged written laws. Americans have never consented to unjust force upon the weak in our society by any government, especially by the most powerful government in the world.

155. It is charged by Plaintiff that the event was **ATCHISONS' agenda of** 'religious persecution', and 'unconstitutional state expansion'.

COUNT TWENTY-SIX – 42 U.S.C. § 1983

Unlawful Seizure

156. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

157. Defendant **ATCHISON** is liable for the policy and custom of allowing agents to arrest, and seize, Plaintiffs property without due process.

158. **ATCHISON allowed UNITED STATES OF AMERICA** agents and officers to seize $52,000 from CSE safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker JO HOVIND to unlock the CSE safe with threat of if refused they would force the safe open.

COUNT TWENTY-SEVEN – 42 U.S.C. § 1983

Armed Robbery

159. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

160. Defendant **ATCHISON** is liable for the policy and custom of allowing officers and agents to do acts of armed robbery.

161. **ATCHISON allowed UNITED STATES OF AMERICA** agents and officers to seize $52,000 from CSE safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker JO HOVIND, at gunpoint, to unlock the safe, with verbal threat of if not opened they would force the safe open.

COUNT TWENTY-EIGHT – 42 U.S.C. § 1983

Coercive Power

162. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

163. Defendant **ATCHISON** is liable for the policy and custom of applying coercive power through the ranks to act with disregard for constitutional limits, and rights of men.

164. **ATCHISON** personally allowed agents, and officers, to seize and arrest HOVIND and CSE assets, as formerly stated, adding that such acts are done with the attitude that "crime pays". The more collected the greater chance of employment advancement by the very violator. Out of 10 million confiscations done without law only a few are stopped thus ending with the gain (violation) far outweighs the cost, again "crime pays". U.S. employees that collect, regardless of how, get advanced.

COUNT TWENTY-NINE – 42 U.S.C. § 1983

Knowingly Accepts Benefits from Unconstitutional Behavior

165. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

166. Defendant **ATCHISON** is liable for allowing officers and agents to do unconstitutional acts thus, Knowingly Accepts Benefits, (hundreds of millions) from Unconstitutional Behavior.

167. **ATCHISON** allowed **UNITED STATES OF AMERICA** agents and officers to seize and arrest, as formerly stated, adding that such acts are done with the custom and policy of take, take, take, and we will sort out the legality of it all later, thus the small percentage that will be fought for and given back is insignificant to the amount the Plaintiff gains due to the heavy atmosphere of fear, and control of the masses. They, the strong, therefore impose on those, the few, that try and oppose such tyranny.

COUNT THIRTY – 42 U.S.C. § 1983

Defendant UNITED STATES OF AMERICA

168. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

169. Defendant **ATCHISON** is liable for the False Imprisonment, Failure of Equal Protection, State Created Danger, Unlawful Seizure, Armed Robbery, Coercive Power, and Knowingly Accepts Benefits from Unconstitutional Behavior, under the law, committed against Plaintiff, by all the Defendants, as listed agents, and officers, while acting in the scope of their employment.

COUNT THIRTY-ONE – 42 U.S.C. § 1983

42 U.S.C. §1983 Against Defendant

MICHELLE HELDMYER, an individual
U.S. Attorney

170. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

171. Plaintiff claims damages under 42 U.S.C. § 1983 for the injuries set forth above against Defendant **HELDMYER** for violation of constitutional rights, under color of law.

COUNT THIRTY-TWO – 42 U.S.C. § 1983

False Imprisonment

172. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

173. Plaintiff was arrested with no sworn complaint in the official record that meets the 4th Amendment requirement as found in the 'Bill of Rights' of the 'Constitution for the United States', which occurred under **HELDMYER**.

174. As described more fully above, **HELDMYER**, as an officer of **UNITED STATES OF AMERICA,** while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **HELDMYER** employment, caused **HOVIND** to be falsely imprisoned in violation of constitutional written law for HOVIND, as a man of right, cannot be arrested by warrant, and then prosecuted, without the Defendants meeting the requirement of the said 4th Amendment 'Bill of Rights'.

175. As a result of this violation, **HOVIND** suffered injuries, including but not limited to emotional distress, loss of reputation, loss of revenue, loss of relationships such as a divorce after 42 years of a blessed marriage, followed by complete abandonment by son Eric, daughter Marlissa, and all grandchildren, with close to no speaking engagements as compared to being booked up in advance for 18 months prior to the convection, as associated with speaking in 30+ countries, in 50+ churches, and before more than 50,000 people yearly before the said arrest in 2006, where all this false notoriety started, and HOVIND'S popularity vanished.

176. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, systematically, with willful indifference to **HOVIND**'s constitutional rights.

177. The misconduct described in this Count was undertaken pursuant to the policy and practice of the US Attorney's office and the Internal Revenue Service, all conspiring with **HELDMYER,** as the manner is described more fully above.

COUNT THIRTY-THREE – 42 U.S.C. § 1983

Equal Protection

178. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

179. As described more fully above, **HELDMYER**, all while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **HELDMYER** employment, denied Plaintiff equal protection of the law in violation of constitutional rights.

180. Specifically, **HELDMYER** actively participated in, or personally caused, misconduct in terms of abusing select people who are deemed in conflict with state and federal unconstitutional agendas to govern the American people beyond its constitutional authority. All done in a manner calculated to coerce, confuse, and secure unjust convictions. Said misconduct was motivated by adverse political animus and constituted purposeful discrimination; and religious persecution, it also affects the masses, by show of "blast imprisonment", in a grossly disproportionate manner vis-a-vis sending a message to all observing Americans. Just as practiced in communist China, "**The *nail that sticks up gets* hammered *down***".

181. The misconduct described in this Count, by **HELDMYER,** was objectively unreasonable and was undertaken intentionally with willful indifference to Plaintiff's constitutional rights.

182. The misconduct described in this Count was undertaken pursuant to the intentional acts of **HELDMYER,** while conspiring with the US Attorney's office, and the Internal Revenue Service, in the manner as described more fully above.

183. **HELDMYER** fail to exercise reasonable care in her administration of written law, conspiring with all Defendants, thereby failing to adequately prevent constitutional violations on the part of policy, and law, as acting in direct violation of the plain view 4th Amendment, 'Bill of Rights' as afforded to a man, and mans' entities (property), and to all the above listed violations.

184. As a result of the above described policies and customs of **HELDMYER,** and all other Defendants, they believed that their actions with **HELDMYER** would not be investigated or sanctioned but would in fact be tolerated, encouraged, and financially rewarded.

185. The above described policies and customs demonstrated by **HELDMYER** is a deliberate indifference to the constitutional rights of free, independent, men like Plaintiff, in America lands, and were much of the underlying cause of the violations of Plaintiff's rights alleged herein.

COUNT THIRTY-FOUR – 42 U.S.C. § 1983

State Created Danger

186. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

187. Defendant **HELDMYER** is liable for allowing officers and agents to seize people and property, and prosecute, without oaths or affirmation in the official record compliant to the 4th Amendment as such was established in the year of 1791,'Bill of Rights'.

188. Defendant **HELDMYER** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was qualified, eligible, or had a legal duty, to obtain an EIN and withhold any taxes for **UNITED STATES OF AMERICA**.

189. Defendant **HELDMYER** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was doing any business in land where the legislative authority reaches as limited in Article 1, Section 8, Paragraph 17, of the Constitution for the United States, as associated with each charge against **HOVIND** in 2006.

190. Defendant **HELDMYER** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, had any legal, or contractual, duty with any withholding for the Defendant.

191. Defendant **HELDMYER** even participated in measures to assure evidence did not get before the jury that **HOVIND**, or **CSE**, had no evidence of any legal, or contractual, duty associated with any withholding, from any of the listed Defendants.

COUNT THIRTY-FIVE – 42 U.S.C. § 1983

Malicious Prosecution

192. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

193. Defendant **HELDMYER** is liable for the policy and custom of allowing officers and agents, under **HELDMYER,** to maliciously prosecute **HOVIND**, and ministries such as CSE.

194. Defendant **HELDMYER** being accustomed in allowing the bringing of multiple fatal title waves of force against Plaintiffs such as HOVIND, and in doing said acts of prosecution without first evidencing if **HOVIND**, or **CSE**, was even formally charged, or even being subject to the charged written laws. Americans have never consented to unjust force upon the weak in our society by any government, especially the most powerful government in the world.

195. It is charged by Plaintiff that the event was **HELDMYERS' agenda of** 'religious persecution', and 'unconstitutional state expansion'.

COUNT THIRTY-SIX – 42 U.S.C. § 1983

Unlawful Seizure

196. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

197. Defendant **HELDMYER** is liable for the policy and custom of allowing agents to arrest, and seize, Plaintiffs property without due process.

198. Defendant **HELDMYER** is liable for the policy and custom of allowing **UNITED STATES OF AMERICA** agents and officers to seized $52,000 from CSE safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker **JO HOVIND** to unlock the **CSE** safe with threat of if refused they would force the safe open.

COUNT THIRTY-SEVEN – 42 U.S.C. § 1983

Armed Robbery

199. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

200. Defendant **HELDMYER** is liable for the policy and custom of allowing officers and agents to do acts of armed robbery.

201. **HELDMYER allowed UNITED STATES OF AMERICA** agents and officers to seize $52,000 from CSE safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker JO HOVIND, at gunpoint, to unlock the safe, with verbal threat of if not opened they would force the safe open.

COUNT THIRTY-EIGHT – 42 U.S.C. § 1983

Coercive Power

202. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

203. Defendant **HELDMYER** is liable for the policy and custom of applying coercive power through the ranks to act with disregard for constitutional limits, and rights of men.

204. **HELDMYER** allowed agents, and officers, to seize and arrest HOVIND and CSE assets, as formerly stated, adding that such acts are done with the attitude that "crime pays". The more collected the greater chance of employment advancement by the very violator. Out of 10 million confiscations done without law only a few are stopped thus ending with the gain (violation) far outweighs the cost, again "crime pays". U.S. employees that collect, regardless of how, get advanced.

Count 39 -- 42 U.S.C. § 1983

Knowingly Accepts Benefits from Unconstitutional Behavior

205. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

206. Defendant **HELDMYER** is liable for allowing officers and agents to do unconstitutional acts thus, Knowingly Accepts Benefits, (hundreds of millions) from unconstitutional Behavior.

207. **HELDMYER** allowed **UNITED STATES OF AMERICA** agents and officers to seize and arrest, as formerly stated, adding that such acts are done with the custom and policy of take, take, take, and we will sort out the legality of it all later, thus the small percentage that will be fought for and given back is insignificant to the amount the Plaintiff gains due to the heavy atmosphere of fear, and control of the masses. They, the strong, therefore impose on those, the few, that try and oppose such tyranny.

COUNT FOURTY – 42 U.S.C. § 1983
Defendant **UNITED STATES OF AMERICA**

208. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

209. Defendant **HELDMYER** is liable for the **False Imprisonment, Failure of Equal Protection, State Created Danger, Unlawful Seizure, Armed Robbery, Coercive Power, and Knowingly Accepts Benefits from Unconstitutional Behavior,** under the law, committed against Plaintiff, by all the Defendants, as listed agents, and officers, while acting in the scope of their employment.

COUNT FOURTY-ONE – 42 U.S.C. § 1983

42 U.S.C. §1983 Against Defendant, **SCOTT SCHNEIDER**, an individual

IRS Criminal Investigator

210. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

211. Plaintiff claims damages under 42 U.S.C. § 1983 for the injuries set forth above against Defendant **SCHNEIDER** for violation of constitutional rights, under color of law.

COUNT FORTY-TWO – 42 U.S.C. § 1983

False Imprisonment

212. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

213. Plaintiff was arrested with no sworn complaint in the official record that meets the 4th Amendment requirement as found in the 'Bill of Rights' of the 'Constitution for the United States', which occurred under **SCHNEIDER**.

214. As described more fully above, **SCHNEIDER**, as an officer of **UNITED STATES OF AMERICA,** while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **SCHNEIDER** employment, caused **HOVIND** to be falsely imprisoned in violation of constitutional written law for HOVIND, as a man of right, cannot be arrested by warrant, and then prosecuted, without the Defendants meeting the requirement of the said 4th Amendment 'Bill of Rights'.

215. As a result of this violation, **HOVIND** suffered injuries, including but not limited to emotional distress, loss of reputation, loss of revenue, loss of relationships such as a divorce after 42 years of a blessed marriage, followed by complete abandonment by son Eric, daughter Marlissa, and all grandchildren, with close to no speaking engagements as compared to being booked up in advance for 18 months prior to the convection, as associated with speaking in 30+ countries, in 50+ churches, and before more than 50,000 people yearly before the said arrest in 2006, where all this false notoriety started, and HOVIND'S popularity vanished.

216. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, systematically, with willful indifference to **HOVIND**'s constitutional rights.

217. The misconduct described in this Count was undertaken pursuant to the policy and practice of the US Attorney's office and the Internal Revenue Service, all conspiring with **SCHNEIDER,** as the manner is described more fully above.

COUNT FORTY-THREE – 42 U.S.C. § 1983
Equal Protection

218. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

219. As described more fully above, **SCHNEIDER**, all while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **SCHNEIDER** employment, denied Plaintiff equal protection of the law in violation of constitutional rights.

220. Specifically, **SCHNEIDER** actively participated in, or personally caused, misconduct in terms of abusing select people who are deemed in conflict with state and federal unconstitutional agendas to govern the American people beyond its constitutional authority. All done in a manner calculated to coerce, confuse, and secure unjust convictions. Said misconduct was motivated by adverse political animus and constituted purposeful discrimination; and religious persecution, it also affects the masses, by show of "blast imprisonment", in a grossly disproportionate manner vis-a-vis sending a message to all observing Americans. Just as practiced in communist China, "**The *nail that sticks up gets* hammered *down***".

221. The misconduct described in this Count, by **SCHNEIDER,** was objectively unreasonable and was undertaken intentionally with willful indifference to Plaintiff's constitutional rights.

222. The misconduct described in this Count was undertaken pursuant to the intentional acts of **SCHNEIDER,** while conspiring with the US Attorney's office, and the Internal Revenue Service, in the manner as described more fully above.

223. **SCHNEIDER** fail to exercise reasonable care in his administration of written law, conspiring with all Defendants, thereby failing to adequately prevent constitutional violations on the part of policy, and law, as acting in direct violation of the plain view 4th Amendment, 'Bill of Rights' as afforded to a man, and mans' entities (property), and to all the above listed violations.

224. As a result of the above described policies and customs of **SCHNEIDER,** and all other Defendants, they believed that their actions with **SCHNEIDER** would not be investigated or sanctioned but would in fact be tolerated, encouraged, and financially rewarded.

225. The above described policies and customs demonstrated by **SCHNEIDER** is a deliberate indifference to the constitutional rights of free, independent, men like Plaintiff, in America lands, and were much of the underlying cause of the violations of Plaintiff's rights alleged herein.

COUNT FORTY-FOUR – 42 U.S.C. § 1983

State Created Danger

226. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

227. Defendant **SCHNEIDER** is liable for allowing officers and agents to seize people and property, and prosecute, without oaths or affirmation in the official record compliant to the 4th Amendment as such was established in the year of 1791,'Bill of Rights'.

228. Defendant **SCHNEIDER** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was qualified, eligible, or had a legal duty, to obtain an EIN and withhold any taxes for **UNITED STATES OF AMERICA**.

229. Defendant **SCHNEIDER** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was doing any business in land where the legislative authority reaches as

limited in Article 1, Section 8, Paragraph 17, of the Constitution for the United States, as associated with each charge against **HOVIND** in 2006.

230. Defendant **SCHNEIDER** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, had any legal, or contractual, duty with any withholding for the Defendant.

231. Defendant **SCHNEIDER** even participated in measures to assure evidence did not get before the jury that **HOVIND**, or **CSE**, had no evidence of any legal, or contractual, duty associated with any withholding, from any of the listed Defendants.

COUNT FORTY-FIVE – 42 U.S.C. § 1983

Malicious Prosecution

232. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

233. Defendant **SCHNEIDER** is liable for the policy and custom of allowing officers and agents, under **SCHNEIDER,** to maliciously prosecute **HOVIND**, and ministries such as CSE.

234. Defendant **SCHNEIDER** being accustomed in allowing the bringing of multiple fatal title waves of force against Plaintiffs such as HOVIND, and in doing said acts of prosecution without first evidencing if **HOVIND**, or **CSE**, was even formally charged, or even being subject to the charged written laws. Americans have never consented to unjust force upon the weak in our society by any government, especially the most powerful one in the world.

235. It is charged by Plaintiff that the event was **SCHNEIDERS' agenda of** 'religious persecution', and 'unconstitutional state expansion'.

COUNT FORTY-SIX – 42 U.S.C. § 1983

Unlawful Seizure

236. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

237. Defendant **SCHNEIDER** is liable for the policy and custom of allowing agents to arrest, and seize, Plaintiffs property without due process.

238. Defendant **SCHNEIDER** is liable for the policy and custom of allowing **UNITED STATES OF AMERICA** agents and officers to seized $52,000 from CSE safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker JO HOVIND to unlock the CSE safe with threat of if refused they would force the safe open.

COUNT FORTY-SEVEN – 42 U.S.C. § 1983

Armed Robbery

239. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

240. Defendant **SCHNEIDER** is liable for the policy and custom of allowing officers and agents to do acts of armed robbery.

241. Defendant **SCHNEIDER** is liable for his act of armed robbery.

242. **SCHNEIDER** aided, and allowed other **UNITED STATES OF AMERICA** agents and officers to seize $52,000 from CSE safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker JO HOVIND, at gunpoint, to unlock the safe, with verbal threat of if not opened they would force the safe open.

COUNT FORTY-EIGHT – 42 U.S.C. § 1983

Coercive Power

243. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

244. Defendant **SCHNEIDER** is liable for the policy and custom of applying coercive power personally and through the ranks to act of others with disregard for constitutional limits, and rights of men against **HOVIND** and **CSE**.

245. **SCHNEIDER** personally did, and allowed, other agents, and officers, to seize and arrest **HOVIND** and **CSE** assets, as formerly stated, adding that such acts are done with the attitude that "crime pays". The more collected the greater chance of employment advancement by the very violator. Out of 10 million confiscations done without law only a few are stopped thus ending with the gain (violation) far outweighs the cost, again "crime pays". U.S. employees that collect, regardless of how, get advanced.

COUNT FORTY-NINE – 42 U.S.C. § 1983

Knowingly Accepts Benefits from Unconstitutional Behavior

246. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

247. Defendant **SCHNEIDER** is liable for personally doing, and allowing, other officers and agents to do unconstitutional acts thus, Knowingly Accepts Benefits, (hundreds of millions) from unconstitutional Behavior.

248. **SCHNEIDER** personal did, and allowed **UNITED STATES OF AMERICA** agents and officers to seize and arrest, as formerly stated, adding that such acts are done with the custom and policy of take, take, take, and we will sort out the legality of it all later, thus the small percentage that will be fought for and given back is insignificant to the amount the Plaintiff gains due to the heavy atmosphere of fear, and control of the masses. They, the strong, therefore impose on those, the few, that try and oppose such tyranny.

COUNT FIFTY – 42 U.S.C. § 1983
Defendant UNITED STATES OF AMERICA

249. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

250. Defendant **SCHNEIDER** is liable for the False Imprisonment, Failure of Equal Protection, State Created Danger, Unlawful Seizure, Armed Robbery, Coercive Power, and Knowingly Accepts Benefits from Unconstitutional Behavior, under the law, committed against Plaintiff, by all the Defendants, as listed agents, and officers, while acting in the scope of their employment.

Count FIFTY-ONE – 42 U.S.C. § 1983

42 U.S.C. §1983 Against Defendant

ALAN STUART RICHEY, an individual,
Washington State Defense counsel.

251. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

252. Plaintiff claims damages under 42 U.S.C. § 1983 for the injuries set forth above against Defendant **RICHEY** for violation of constitutional rights, under color of law.

COUNT FIFTY-TWO – 42 U.S.C. § 1983

False Imprisonment

253. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

254. Plaintiff was arrested with no sworn complaint in the official record that meets the 4th Amendment requirement as found in the 'Bill of Rights' of the 'Constitution for the United States', which occurred under **RICHEY counsel**.

255. As described more fully above, **RICHEY**, as an officer of **UNITED STATES OF AMERICA,** while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **RICHEY** employment, caused **HOVIND** to be falsely imprisoned in violation of constitutional written law for HOVIND, as a man of right, cannot be arrested by warrant, and then prosecuted, without the Defendants meeting the requirement of the said 4th Amendment 'Bill of Rights'.

256. As a result of this violation, **HOVIND** suffered injuries, including but not limited to emotional distress, loss of reputation, loss of revenue, loss of relationships such as a divorce after 42 years of a blessed marriage, followed by complete abandonment by son Eric, daughter Marlissa, and all grandchildren, with close to no speaking engagements as compared to being booked up in advance for 18 months prior to the convection, as associated with speaking in 30+ countries, in 50+ churches, and before more than 50,000 people yearly before the said arrest in 2006, where all this false notoriety started, and HOVIND'S popularity vanished.

257. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, systematically, with willful indifference to **HOVIND**'s constitutional rights.

258. The misconduct described in this Count was undertaken pursuant to the policy and practice of the US Attorney's office and the Internal Revenue Service, all conspiring with **RICHEY,** as the manner is described more fully above.

COUNT FIFTY-THREE – 42 U.S.C. § 1983

Equal Protection

259. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

260. As described more fully above, **RICHEY**, all while acting individually, jointly, and conspiracy, as well as under color of law, and within the scope of **RICHEY** employment, and contract with **HOVIND**, denied Plaintiff equal protection of the law in violation of constitutional rights.

261. Specifically, **RICHEY** actively participated in, or personally allowed by not challenging, misconduct in terms of abusing select people who are deemed in conflict with state and federal unconstitutional agendas to govern the American people beyond its constitutional authority. All done in a manner calculated to coerce, confuse, and secure unjust convictions. Said misconduct was motivated by adverse political animus and constituted purposeful discrimination; and religious persecution, it also affects the masses, by show of "blast imprisonment", in a grossly disproportionate manner vis-a-vis sending a message to all observing Americans. Just as practiced in communist China, "**The *nail that sticks up gets* hammered *down***".

262. The misconduct described in this Count, by **RICHEY,** was objectively unreasonable and was undertaken intentionally with willful indifference to Plaintiff's constitutional rights.

263. The misconduct described in this Count was undertaken pursuant to the intentional acts of **RICHEY,** while conspiring with the US Attorney's office, and the Internal Revenue Service, and all other Defendants, in the manner as described more fully above.

264. **RICHEY** fail to exercise reasonable care in his part in administration of written law, conspiring with all Defendants, thereby failing to adequately prevent constitutional violations on the part of policy, and law, as acting in direct violation of the plain view 4th Amendment, 'Bill of Rights' as afforded to a man, and mans' entities (property), and to all the above listed violations.

265. As a result of the above described policies and customs of **RICHEY,** and all other Defendants, they believed that their actions with **RICHEY** would not be investigated or sanctioned but would in fact be tolerated, encouraged, and financially rewarded.

266. The above described policies and customs demonstrated by **RICHEY** is a deliberate indifference to the constitutional rights of free, independent, men like Plaintiff, in America lands, and were much of the underlying cause of the violations of Plaintiff's rights alleged herein.

COUNT FIFTY-FOUR – 42 U.S.C. § 1983

State Created Danger

267. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

268. Defendant **RICHEY** is liable for not challenging, therefore allowing officers and agents to seize people and property, and prosecute, without oaths or affirmation in the official record compliant to the 4th Amendment as such was established in the year of 1791,'Bill of Rights'.

269. Defendant **RICHEY** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was qualified, eligible, or had a legal duty, to obtain an EIN and withhold any taxes for **UNITED STATES OF AMERICA**.

270. Defendant **RICHEY** being accustomed in doing said acts without first evidencing if **HOVIND**, or **CSE**, was doing any business in land where the legislative authority reaches as limited in Article 1, Section 8, Paragraph 17, of the Constitution for the United States, as associated with each charge against **HOVIND** in 2006.

271. Defendant **RICHEY** being accustomed in doing said acts without fully challenging first evidencing if **HOVIND**, or **CSE**, had any legal, or contractual, duty with any withholding for the Defendant.

272. Defendant **RICHEY** even participated in measures to assure evidence did not get before the jury that **HOVIND**, or **CSE**, had no evidence of any legal, or contractual, duty associated with any withholding, from any of the listed Defendants.

COUNT FIFTY-FIVE – 42 U.S.C. § 1983

Malicious Prosecution

273. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

274. Defendant **RICHEY** is liable for the policy and custom of allowing officers and agents, without challenge by **RICHEY,** to maliciously prosecute **HOVIND**, and ministries such as CSE.

275. Defendant **RICHEY** allowing the bringing of multiple fatal title waves of force against Plaintiffs such as HOVIND, without meaningful challenge, and in doing said acts of aiding the prosecution by not challenging if any evidencing exists if **HOVIND**, or **CSE**, was even formally charged, or even being subject to the charged written laws. Americans have never consented to unjust force upon the weak in our society by any government, especially the most powerful one in the world.

276. It is charged by Plaintiff that the event was **RICHEYS'** participation in the agenda of 'religious persecution', and 'unconstitutional state expansion'.

COUNT FIFTY-SIX – 42 U.S.C. § 1983

Unlawful Seizure

277. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

278. Defendant **RICHEY** is liable for the policy and custom of allowing agents to arrest, and seize, Plaintiffs property without due process.

279. Defendant **RICHEY** is liable for the policy and custom of allowing **UNITED STATES OF AMERICA** agents and officers to seized $52,000 from **CSE** safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker **JO HOVIND** to unlock the **CSE** safe with threat of if refused they would force the safe open.

COUNT FIFTY-SEVEN – 42 U.S.C. § 1983

Armed Robbery

280. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

281. Defendant **RICHEY** is liable for the policy and custom of allowing by not challenging officers and agents to do acts of armed robbery.

282. Defendant **RICHEY** is liable for his act of not challenging the armed robbery.

283. **RICHEY aided, UNITED STATES OF AMERICA** agents and officers to seize $52,000 from CSE safe during the raid of July 13, 2006, without court order warrant or judgment, by forcing a ministry worker (JO HOVIND, at gunpoint, to unlock the safe, with verbal threat of if not opened they would force the safe open, by not challenge authority to do so.

COUNT FIFTY-EIGHT – 42 U.S.C. § 1983

Coercive Power

284. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

285. Defendant **RICHEY** is liable for the policy and custom he did not challenge the other Defendants applying coercive power personally and through the ranks to act of others with disregard for constitutional limits, and rights of men against HOVIND and CSE.

286. **RICHEY** personally did allow by not challenging all agents, and officers, who seize and arrest HOVIND and CSE assets, as formerly stated, adding that such acts are done with the attitude that "crime pays". The more collected the greater chance of employment advancement by the very violator. Out of 10 million confiscations done without law only a few are stopped thus ending with the gain (violation) far outweighs the cost, again "crime pays". U.S. employees that collect, regardless of how, get advanced. RICHEY wanted to keep good relations with the Defendants and sold out **HOVIND** and **CSE**.

COUNT FIFTY-NINE – 42 U.S.C. § 1983

Knowingly Accepts Benefits from Unconstitutional Behavior

287. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

288. Defendant **RICHEY** is liable for personally allowing, without challenge, other officers and agents to do unconstitutional acts against **HOVIND** and **CSE**, thus, Knowingly Accepts Benefits, (hundreds of millions) from unconstitutional Behavior.

289. **RICHEY personal did, and** allowed **UNITED STATES OF AMERICA** agents and officers to seize and arrest, as formerly stated, without challenge, adding that such acts are done with the custom and policy of take, take, take, and we will sort out the legality of it all later, thus the small percentage that will be fought for and given back is insignificant to the amount the Plaintiff gains due to the heavy atmosphere of fear, and control of the masses. They, the strong, therefore impose on those, the few, that try and oppose such tyranny. RICHEY gained good standing with all Defendants by throwing HOVIND under the bus.

COUNT SIXTY – 42 U.S.C. § 1983

Defendant UNITED STATES OF AMERICA

290. Plaintiff realleges and incorporates by reference paragraphs 1 through 51 above.

291. Defendant **RICHEY** is liable for his part in False Imprisonment, Failure of Equal Protection, State Created Danger, Unlawful Seizure, Armed Robbery, Coercive Power, and Knowingly Accepts Benefits from Unconstitutional Behavior, under the law, committed against Plaintiff, by all the Defendants, as listed agents, and officers, while acting in the scope of their employment.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, KENT E. HOVIND and CSE, requests that this Court grant them the following relief, jointly and severally against the named defendants:

1. Judgment for compensatory damages against all defendants in an amount to be determined at trial;

2. Declaration that the conduct and actions against the Plaintiffs carried out by the US Treasury Department, the United States Attorney's Office, and the US Bureau of Prisons, be declared unconstitutional;

3. The US Treasury Department, the United States Attorney's Office, and the US Bureau of Prisons, their employees and agents, including, but not limited to the Defendants named in this action, be enjoined from further implementation of unconstitutional practices and policies;

4. Judge **MARGARET CATHARINE RODGERS** conduct in suppressing Plaintiffs' testimony and sentencing Plaintiff HOVIND to prison be declared unconstitutional;

5. The actions of Defendants, jointly and severally, be declared unconstitutional;

6. Plaintiff HOVIND's conviction and sentence be vacated in the interests of justice;

7. Sanctions against the various Defendants;

8. Compensatory damages for pain, suffering, stress, humiliation and mental anguish;

9. Punitive damages;

10. Attorneys' fees, interest and costs of suit; and

11. As well as any other relief this Court deems appropriate.

JURY DEMAND

Plaintiffs, KENT E. **HOVIND** and **CSE**, hereby demand their/It's right to '**trial by jury**', where no administrative dismissal is allowed, and all the '**facts and the laws**' are determined by the

majority vote of the impartial jurors, with no alliances (contacts/oaths/remuneration) to/from/with ether party, which is likewise also enumerated in Federal Rule of Civil Procedure 38(b) on all issues so triable. As KENT E. **HOVIND** and **CSE** have no evidenced residency or domicile in land of the United States, as to establishing the law of the case.

RESPECTFULLY SUBMITTED:

KENT E HOVIND

[redacted] Repton Alabama [redacted] * Telephone [redacted]

(28 U.S. Code § 1746 Limited Jurat, Land Jurisdiction Specific)

I, **KENT E HOVIND**, Affiant, declare under penalty of perjury under the laws of the United States of America that the foregoing Affidavit is true and correct. Executed on __ day of the __ month of 2020. Jurat: As sworn to before the below signed Notary this __ day of __ month, 2020, Oath: I, **KENT E HOVIND**, as speaking to the signed notary, now solemnly swears that the contents of the above Affidavit as subscribed is **sworn** to be correct and true.

Affiant – **KENT E HOVIND**

State of ALABAMA

County of LOWNDES

Personally, appeared before me the undersigned notary, an officer authorized to administer oaths, **KENT E HOVIND**, with valid identification, and/or personally known to me, who first being duly sworn, deposes and says that the forgoing 56 page (including 4 addendums), instrument was subscribed and sworn before me, this 21 day of 5 Month 2020.

Lisa Bartlett Notary

My Commission expires: 9/20/20

TIM LEE ELLIS
Commission Number 805847
MY COMMISSION EXPIRES
8-11-2020

-- and --

Paul John Hansen as Trustee of CSE

PAUL JOHN HANSEN, as Trustee of **CSE**
[redacted],
Repton, Alabama [redacted] *
Telephone [redacted]

(28 U.S. Code § 1746 Limited Jurat, Land Jurisdiction Specific)

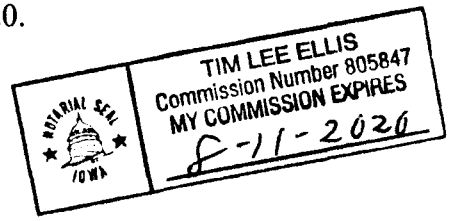
I, Paul John Hansen, Affiant, declare under penalty of perjury under the laws of the United States

of America that the foregoing Affidavit is true and correct. Executed on 15 day of the 5 month of 2020. Jurat: As sworn to before the below signed Notary this 15 day of 5 month, 2020, Oath: I, Paul John Hansen, as speaking to the signed notary, now solemnly swears that the contents of the above Affidavit as subscribed is **sworn** to be correct and true.

Paul John Hansen
Affiant – Paul John Hansen

State of Iowa
County of Pottawattamie
Personally, appeared before me the undersigned notary, an officer authorized to administer oaths, Paul John Hansen, with valid identification, and/or personally known to me, who first being duly sworn, deposes and says that the forgoing 56 page (including 4 addendums), instrument was subscribed and sworn before me, this 15 day of 5 Month 2020.

Tim Lee Ellis Notary
Tim Lee Ellis



Terms Defined:
*individual – a man, possessing unalienable rights as enumerated in the 'Declaration of Independence' 1776.

*civil rights – a man, possessing unalienable rights as enumerated in the 'Declaration of Independence' 1776.

*32503 – This code is only for mailing purposes, the subject land is not evidenced as being land ceded, or purchased, by the United States of America, thus not a US federal zone.

*36475 - This code is only for mailing purposes, the subject land is not evidenced as being land ceded, or purchased, by the United States of America, thus not a US federal zone.

--(49 pages - THE END--

7

Addendum 1,KEH

5-15-2020

CSE trustee and longtime friend Paul Hansen asked me today what damages were done to me and the CSE ministry as a result of the unlawful actions of the defendants in this case, and how much compensation is justified.

That is a soul-searching question! Just as the damages done by a drunk driver causing an accident that kills a man's family and puts him in a wheelchair for life cannot ever be repaid, there is no amount of money that will ever fix the damages done to me, my family, and the CSE ministry.

Obviously, there was great damage done to my good name, and my reputation, so an open public apology from each of the defendants would be a great place to start, but I hold no hope of that happening! People who do these things to innocent people certainly should NOT have a badge or authority to represent our great country!

I gave my heart to the Lord Jesus Christ in 1969 when I was 16 and have sought to please and obey Him ever since. I was receiving about 30 invitations each week to travel and preach from all over the world. This case destroyed my good name and effectiveness to spread the gospel. What is that worth? I'll let the jury pick a number.

My wife Jo and I were childhood sweethearts, married in 1973, were both virgins on our honeymoon, were loyal to each other for 43 years, (The July 13 arrest was the day before our July 14 anniversary, likely conveniently planned by some of the defendants). We had 3 children and 5 grandchildren-all serving the Lord with us in the ministry. She is 5 ft tall, the church pianist and a music teacher and is the least dangerous person on the planet!

She was arrested at gunpoint in bed and was not allowed to get dressed or go to the bathroom! What's the first thing you want to do when you get up? She was taken in handcuffs to the courthouse in her nightgown. Due to her being terrorized by the entire ordeal she soon stopped writing to me or visiting me in prison. Upon my release from prison she made me sleep in a separate room until she filed for divorce. Florida is a no contest state and the divorce court hearing lasted 6 minutes. On the way out of court I asked her to marry me again. She, afraid of the defendants' further actions against me, said no and has not talked to me since. What is the cost one can put on the defendants' evil actions that broke up a loving marriage? How can anyone put a dollar figure on that? $50? $50,000? $50Million? $500M? Certainly punitive damages to teach them NOT to do this again to anyone are in order. I can only show why only effectual punitive damages can curtail such lawless conspiring behavior, I ask the jury to prayerfully decide this.

I raised my 3 children in the church ministry and they all lived around me and worked beside me every day. I helped my son Eric go to Bible college to study to be a 'creation science evangelist' like me and upon his graduation he began helping me take some of the hundreds of requests I was getting to go preach at churches and schools. I helped him build his house 2 doors down from us and his three children were the most loved grandchildren on the planet. I read them to sleep every night before my arrest. I wrote 15 books for them while I was in prison. We were a very close loving family! I helped my daughter Marlissa go to college and to be one of my secretaries to handle the hundreds of phone calls I get. She worked in our ministry from the time she was a child. She asked me to perform her wedding, which I was honored to do. It has been played over 50 times on America's Funniest Home Videos. Please watch "Dr. Hovind's daughter's wedding" and see what a loving family we were. She and her husband lived next door also.

Due to the actions of the defendants she and my son Eric are still to this day terrorized by the events and people surrounding this case and are afraid to be associated with me, their own father. Neither they nor the grandkids have ever come to visit me in the 5 years I've been in Lenox, AL, just 70 miles away, in spite of my repeated invitations and they never call or invite me to family events in Pensacola. What is the dollar figure on the damages done to destroy a loving Christian family all simply working hard to spread the Word of God? What would you

want if they did this to you? I'm sorry, I can't put a price on that. I'll let the jury decide.

DAMAGES TO THE CREATION MINISTRY

Our CSE ministry was producing videos and books that were reaching people world-wide in 42 languages! The record shows that the ministry was bringing in about $2.5M /year and growing by $1/2M/year when I was arrested. Just that loss of revenue would be about $70M so far and climbing every year. My health is great, and I think I'll preach another 20 years, praying my ministry outreach via DVDs and books would continue for many years. In addition, our ministry was inspiring scores of others to go out and do likewise. I'm sorry but I can't put a dollar value on the souls lost for eternity due to the defendants' actions to destroy this ministry of God.

Through our preaching and teaching at schools, churches, radio, debates at universities etc. many thousands were coming to the Lord and being strengthened in their faith in God's infallible Word each year. I was getting hundreds of invitations each year to preach. I preached in all 50 states and well over 30 foreign countries. Since my return from prison this has dropped to near zero. The effectiveness of the gospel outreach was stopped. Only Satan or one of his helpers would want that to happen.

In 2006 when the arrest took place the CSE ministry had property and equipment valued at about $3M. (a sworn itemized list will be available for the courts evidence.) That all disappeared due to the illegal actions of the defendants in this case.

Based on my 51 year track record of giving everything to the Lord's work I know that whatever damages the jury awards will go right back into the gospel ministry to win souls and spread His Word.

5-15-2020_____ Kent E Hovind

EXHIBIT 'AD1KEH'

Addendum 2,PJH

5-15-2020

1. I have reviewed Kent E Hovind's Addendum 1,KEH (EXHIBIT AD1KEH), and find that I too attest to it as being true to the best of my knowledge.
2. That I have been CSE Trustee since 2006.
3. As I have communicated with Eric Hovind numerous times of all those years with no success as to any cooperation with me as CSE Trustee.
4. That I did not push many issues as CSE for fear of retaliation from Eric Hovind and the U.S. Courts until recently, primarily by this 42USC1983 lawsuit.
5. That CSE ministry suffered as the result of the unlawful actions of the Defendants in this case, and how, herein, address just cause for compensation.
6. The main consideration is that there is great evidence that all Defendants had the ability to investigate if Kent E Hovind had a legal duty to withhold taxes for the United States. None is evidenced.
7. That all Defendants had access to documents, written law, and experts in tax law, as part of their employment, as to ascertain if KENT HOVIND was qualified, eligible, and foremost required to withhold taxes for the United States.
8. That the evidence is clear that all Defendants factually knew, and now know, that KENT HOVIND, or CSE, was not qualified, eligible, or required to withhold taxes for the United States.
9. The evidence is clear that KENT HOVIND relied on all the Defendant's duty to be professional and honest, and withhold no evidence, in their reach, that would prove that KENT HOVIND, or CSE, was not qualified, eligible, or required to withhold taxes for the United States. That not one Defendant has come forward to confess their malicious conduct in this matter.
10. That Defendant's did what was their part in grinding KENT HOVIND, and CSE to dust, to promote themselves, and a statism agenda that violates the U.S. Constitution, and each Defendant's sworn oath of office, and the Word of God.
11. I ask the jury to understand that the damages should not be less than what is itemized in Addendum 3 (EXHIBIT 3damages), to do their small, yet meaningful part, in curtailing evil behavior from all men so entrusted, so employed. See below biblical guidance.

5-15-2020 Paul John Hanse Paul John Hanse, as Trustee of CSE

TIM LEE ELLIS
Commission Number 805847
MY COMMISSION EXPIRES
8-11-20

TIM LEE ELLIS
Commission Number 805847
MY COMMISSION EXPIRES
8-11-2020

Exodus20: (Violation of God's foundational laws.)

3 Thou shalt have no other gods before me.

(All Defendants should have followed Him who is right, with complete disregard for employment, then and now.)

5 Thou shalt not bow down thyself to them, nor serve them: for I the Lord thy God am a jealous God, visiting the iniquity of the fathers upon the children unto the third and fourth generation of them that hate me;

(Statism goals have no place before God.)

7 Thou shalt not take the name of the Lord thy God in vain; for the Lord will not hold him guiltless that taketh his name in vain.

(All Defendants swore during their testimony, and by their oath of offices.)

13 Thou shalt not kill.

(False prosecution, slander, kills deeply, ever enduring.)

15 Thou shalt not steal.

(Defendant stole much of Kent's life, and CSE ministry.)

16 Thou shalt not bear false witness against thy neighbour.

(Defendant's conspiring to withhold the whole truth is 'a false witness'. Biblical false witnesses are to surfer what their false testimony was attempting to accomplish.)

17 Thou shalt not covet thy neighbour's house, thou shalt not covet thy neighbour's wife, nor his manservant, nor his maidservant, nor his ox, nor his ass, nor any thing that is thy neighbour's.

(CSE, and Kent Hovind ministry was reaching millions for the good in 2006 for God, it is a great wrong to destroy such, and even greater wrong to conspire to do so.)

a. **Deuteronomy 13:11 "So all Israel (Americans) shall hear and fear, and not again do such wickedness as this among you."**

b. **1 Timothy 5:20** "Those (Defendants) who are sinning rebuke in the presence of all, that the rest also may fear."

c. Prov. 6:30-31 "People do not despise a thief if he steals to satisfy himself when he is starving. Yet when he is found, he must restore sevenfold: He may have to give up all the substance of his house." (The acts (taking) of all Defendants were intentional.)

EXHIBIT 'AD2PJH'

[redacted]

The below is based on a conservative 12% increase yearly of CSE from the year of 2004 to 2020, with customary compensatory triple damages, and punitive damages, along with the normal $3,500.00 per day for false imprisonment.

	Millions		
2004	$ 2.00	< actual revenue.	
2005	$ 2.25	< actual revenue.	A revenue increase of 2 to 2.5 in three years is an average of 12% increase per year.
2006	$ 2.50	< actual revenue.	

The below is based on the same yearly growth.

	Millions			
2007	$ 2.80	< based on 12 increase in yearly revenue growth.		
8	$ 3.14	"		
9	$ 3.51	"		
10	$ 3.93	"	12% revenue increase per year.	Year
11	$ 4.41	"	2	2004
12	$ 4.93	"	2 x 1.12 =	2.24 2005
13	$ 5.53	"	2.24 x 1.12 =	2.5 2006
14	$ 6.19	"		
15	$ 6.93	"		
16	$ 7.76	"		
17	$ 8.70	"		
18	$ 9.74	"		
19	$ 10.91	"		
2220	$ 12.22	"		
Total >	$ 90.70		< suffered financial damages.	Direct Loss CSE business.

	[redacted]		Suffered financial damages.	Future Loss.	Based on triple damages.	90.69929	x 3	272
	$ 50,000,000.00	HOVIND	Emotional distress and anguish.					
10.860,500	$ 100,000,000.00	CEA	Punitive Damage	Assure that crime does not pay.	"Thou shalt not steal." Exodus 20:15			
	$ 100,000,000.00	Hovind	Punitive Damage	Assure that crime does not pay.	"Thou shalt not steal." Exodus 20:15			
	$ 10,860,500.00	HOVIND	8.5 prison time.	$3,500 per day.	x 3,103 days (8.5 x 365)	(3,500 x 3,103 = $10,860,500.00)		
	$ 30,600.00		300$ per month for commessary and phone privilages.	(300$ x (8.5 x12) =				
	$ 4,000,000.00		Loss of land and Property owned by CSE.	See Adendum 1, (Sworn itemized list is available.)				
	$ 150,000.00							
	$ 536,041,100.00	< total proposed damages.						

https://ballotpedia.org/American_Image_Guide/

How much money did the federal government spend in 2019?
In 2019, the federal government spent $4.4 trillion.
$4.4 T = $4,400,000,000,000.
525,600 minutes in a year.
$4,400,000,000,000 / 525,600 minutes = $8,381,000.00 per minute. < Millions spent by U.S.A. every minute of the year.
536,04... < [redacted] is equivalent to 64 minutes of revenue for the U.S.A. Essentially one hour out of one year goes to help restore CSE, and Kent Hovind.
That is equivalent to getting a judgment against your neighbor, for like damages of > 6.09, [redacted] 0.000122 x 50K $6.09
and historically, such small amount has likely never deterred any man from damaging another man.

U.S.A. agents and officers are doing like damages daily, and such a judgment is therefore minimally just biblically.

CSE	HOVIND						
[redacted]		Suffered financial damages.	Future Loss.	[redacted]	90.69929	x 3	272
	$ 50,000,000.00	Emotional distress and anguish.					
$ 100,000,000.00		Punitive Damage	Assure that crime does not pay.	"Thou shalt not steal." Exodus 20:15			
	$100,000,000.00	Punitive Damage	Assure that crime does not pay.	"Thou shalt not steal." Exodus 20:15			
	$ 10,860,500.00	8.5 prison time.	$3,500 per day.	x 3,103 days (8.5 x 365)	(3,500 x 3,103 = $10,860,500.00)		
	$ 30,600.00	300$ per month for commessary and phone privilages.	(300$ x (8.5 x12) = 30,600.				
$ 3,000,000.00		Loss of land and property owned by CSE.	See Adendum 1, (Sworn itemized list is available.)				
	$ 150,000.00	Attorney, and legal fees.					
$ 375,000,000.00	###############						

^ 375,000,000.00
161,041,100 ^
536,041,100.00

Signature > Paul John Hansen 5/15/2020 EXHIBIT '3damages' Addendum 3 — Paul John Hansen 5-15-2020.

Signature > Kent E Hovind 5/15/2020 EXHIBIT '3damages' Addendum 3

NOTARIAL SEAL IOWA
TIM LEE ELLIS
Commission Number 805847
MY COMMISSION EXPIRES
8-11-2020