

MAR 18 2025

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In the Matter of:

TERRY LEE HINDS,
Pro se & Suri Juris,
Officially a/k/a Terry Lee Hinds,

Real Party in Interest as Plaintiff/Petitioner, (“[P/P]”)

-Vs-

JOSEPH R. BIDEN, JR., *in his official capacity*
as the President of the United States of America; &
actions of the Government of the United States, and

DANIEL WERFEL, *in his official capacity*
as Commissioner of Internal Revenue Service, &/or
as Commissioner of Internal Revenue; via § 7803 &
actions of INTERNAL REVENUE SERVICE, IRS &

JANET YELLEN, *in her official capacity*
as Secretary of the United States Department
of the Treasury; & actions of the UNITED STATES
DEPARTMENT OF THE TREASURY, and

MERRICK B. GARLAND, *in his official capacity*
as Attorney General of the United States; & actions of
UNITED STATES DEPARTMENT OF JUSTICE

Defendants/Respondents/Interested Party. (“[D/R/I P]”)

CIVIL ACTION

FILE NUMBER:

4:25-CV-00047 AGF

NOTICE OF ERROR, MISTAKE OR DEFECT IN LEGAL DOCUMENT

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, [P/P] and for his Petition & Protest, states as follows:

The legal document in question and conduct unbecoming as presented herein, concerns a
“MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND
TO THE PLAINTIFF’S ‘COMPLAINT’ ” filed on March 13, 2025. [ECF No. 6].

POINT #1

Pursuant to [P/P]’s right to petition the government or protest government activities or, to make a complaint to, or seek the assistance of one’s government, hereby gives Notice of error, mistake or defect in a legal document of the two DOJ lawyers representing “United States” government or “*In an abundance of caution, the extension of time requested should cover the individually named defendants because they were named in their official capacities.*” However, the adverse parties, as listed within [P/P]’s “Petition” and Summons served or within the Court’s JS 44 civil cover sheet, titled under DEFENDANTS declaring “SEE ATTACHED LIST” of which named *eight adverse parties*. Upon further review, the Court Clerk office listed in PACER system: “JOSEPH R. BIDEN, JR, et al., Defendants.” versus the entire lists of names & type of governmental agency involved, of which the [P/P] set forth all adverse parties as: “Defendants/Respondents/Interested Party.” (“[D/R/I P]”). If this Court finds this offensive to the nature of this case or serves as a *prejudicial matter*, the Court has power to change or declare the proper named status of these adverse parties, by ordering the Clerk Office to make any changes or to meet certain requirements. On a personal note, I thought the Clerk Office did a great job in handling this case court’s filings, being professional, polite, & proficient.

POINT #2

Unfortunately, these opportunistic attorneys declared, in part, “Defendant United States (incorrectly named here through the listing of the officials in their ‘official capacity’ in the caption of the ‘Complaint’).” Characteristically, their motion mentions “Complaint” 12 times versus “Petition” as a *nefarious suggestion*. Nefarious suggests flagrant breaching of time-honored laws and traditions of conduct. [P/P]’s identified that five of these *adverse*

parties apparently failed to realize; based upon the unfounded opinions of the two assigned DOJ attorneys that, [P/P]'s *suit in equity*, is in fact, *free exercise* of protected/pure speech:

**PETITION FOR JUDICIAL REVIEW, JUDGMENT OR DECREE
AND FOR ALL WRITS NECESSARY OR APPROPRIATE TO THIS CASE
AS WELL ISSUE WRITS AGREEABLE TO USAGES & PRINCIPLES OF LAW**

Regardless, this motion was conducted without following the United States District Judge Audrey G. Fleissig local "Requirements" "2. Informal Matters" regarding pertinent parts:

If you have an informal matter, *please notify opposing counsel, ascertain the opposing counsel's availability*, and call my judicial assistant to schedule a time for an in-court or telephone conference.

Most minor, *agreed deadline changes* can be handled in writing, by filing a motion to extend the deadline and *stating that opposing counsel consents*.

I will rule on *such consent motions* as soon as possible.

Emphasis Added.

For the record, I received no phone calls, or a message left or an email, or U.S. Mail from either DOJ attorneys regarding this *motion's deadline change*. Moreover, I do **not** consent, particularly, when *legal assertion or conclusions are made* when attorneys declared, in part:

"Given the bulk of the 'Complaint' and the fact that once again Plaintiff has unmistakably violated Rule 8(a)..."

or by being violent to my principles, *religious beliefs* & protected speech, asserting in part:

"...at first blush it appears that Plaintiff seeks to challenge the constitutionality of the Internal Revenue Code *under the guise* of the First Amendment." *Emphasis Added.*

For the record, I deny these *legal assertions or conclusions made*. I place on notice any lawyers from the DOJ who elects to violate their oath of office or to U.S. Constitution. The legal/moral measure has been established pursuant to [Exec.Order/Directive/A.G.Policy]. [¶ 45 of ECF No. 2]. The *free exercise* and protection of rights privileges, or immunities

concerning *religious liberties & protected speech* secured by President Trump's Executive Order No. 13798; whereby on October 6, 2017, DOJ's legal guidance & its implementation to all administrative agencies & executive departments about their obligations to protect *religious liberty* & its *expressive speech* in the United States. The [D/R/I P] 7 years failure/disregard of [Rights]. <https://www.justice.gov/archives/opa/press-release/file/1001886/dl>

POINT #3

The attorneys for five of eight adverse parties, professed under "Statement & Argument"

That "pleading" consists of 1,226 paragraphs that purport to assert a total of 78 "causes of action" and multiple counts. In addition, Plaintiff attached to his "Complaint" hundreds of pages of "exhibits."

If in fact, hundreds of pages of "exhibits" are burdensome; then 7000 pages of the latest version the I.R.C. of 1986 is insurmountable. This task must be done each year to find the changes or to legally understand ones' duties, liability or in [P/P]'s case a moral necessity. Unfortunately, these supposed, astute attorneys declared, in part, [P/P]'s "*assert a total of 78 'causes of action' and multiple counts.*" The fact is [P/P] pleaded 9 justiciable categories with a total number of 108 meritorious claims for relief sought as; Claim Rights Owed, Constitutional Protections, Violations & Statutory Claims, Counts, & Causes of Action as:

1. CLAIM RIGHTS OWED IN LIBERTY RIGHTS SOUGHT FOR RELIEF
7 CLAIMS FOR RELIEF
2. CLAIM RIGHTS OWED OF LEGAL RIGHTS SOUGHT FOR RELIEF
7 CLAIMS FOR RELIEF
3. CONSTITUTIONAL PROTECTIONS CLAIMS OF CIVIL LIBERTY
7 CLAIMS FOR RELIEF
4. CONSTITUTIONAL PROTECTIONS CLAIMS OF RELIGIOUS LIBERTY
7 CLAIMS FOR RELIEF
5. CONSTITUTIONAL PROTECTIONS CLAIMS OF SUBSTANTIVE LAW & REMEDIAL LAW AS [Q.R.F.A.]

7 CLAIMS FOR RELIEF

6. VIOLATIONS OF THE ADMINISTRATIVE PROCEDURE ACT ("APA")
32 CAUSES OF ACTION
7. VIOLATIONS OF FIRST AMENDMENT OF THE UNITED STATES CONSTITUTION
ESTABLISHMENT CLAUSE/PROHIBITING FREE EXERCISE THEREOF
14 COUNTS
8. Violations of The Supreme Court of the United States' Doctrines, Decisions & Tests
And with [P/P]'s Controlling Legal Principles ("[CLP]")
As Constitutional Principles, Protections & Practices
14 COUNTS
9. CLAIMS OF QUINTESSENTIAL DISESTABLISHMENT RIGHT ("[QDR]")
13 CLAIMS FOR RELIEF

POINT #4

Last but not least, DOJ attorney MOLLIE CLARK AHSAN Minnesota Bar No. **0505284**
as presented/declared on the last page of this *non-consent motion* appearing/belonging to:

Marin Jane Kowal
Minnesota Bar No. **0505284**
Address listed: Wilcox Law Office P.A.
1150 Wisconsin Ave.
Benson, MN 56215
Date Admitted 10/15/24
Authorized to Practice Law? Authorized

This information was obtained through:
Minnesota Supreme Court Lawyer Registration Office
Minnesota Judicial Center
25 Rev. Dr. Martin Luther King Jr. Blvd., Suite 110
St. Paul, MN 55101
See:
<https://mars.courts.state.mn.us/AttorneyDetail.aspx?attyID=0505284>

I request a written explanation of what has occurred & why she used Marin Jane Kowal's
Minnesota Bar No.0505284. Such conduct is unbecoming as listed herein & is self-evident.

Respectfully Submitted,



Dated this 18th day of March 2025

Terry Lee Hinds [P/P] *Pro se & Suri Juris*

CERTIFICATE OF SERVICE AND DELIVERY

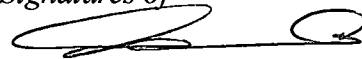
I hereby certify that the foregoing was filed on this 18th day of March 2025 with the court, with a true and correct copy, served upon [D/R/I P] through their counsels for the defense, by First Class U.S. Mail, postage prepaid, at the following address and named attorneys:

MOLLIE CLARK AHSAN
Minnesota Bar No. 0505284
GREGORY L. MOKODEAN
DC Bar No. 1002890
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 7238
Washington, D.C. 20044
Telephone: (202) 307-0155
Fax: (202) 514-6770
Email: Mollie.Ahsan@usdoj.gov

Initials



Signatures of



Dated the 18th day of March 2025

TERRY LEE HINDS,
Pro se & Suri Juris,
Officially a/k/a Terry Lee Hinds
438 Leicester Square Drive
Ballwin, Missouri 63021
PH (636) 777-0397
Email: alphaomega44@outlook.com

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Two Attachments: Minnesota Supreme Court Lawyer Registration Office

Lawyer Details

Lawyer ID	0505284
Last Name	Kowal
First Name	Marin
Middle Name	Jane
Address	Wilcox Law Office P.A. 1150 Wisconsin Ave. Benson, MN 56215
Date Admitted	10/15/24
Last Payment	10/15/24
Next Payment Due	04/01/25

Authorized to Practice Law?	Authorized
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Additional information related to limited license statuses may be obtained through the **Lawyer Registration Website**.

Current Disciplinary Status	NONE
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Additional information on disciplinary history or statuses may be obtained at **Lawyer's Professional Responsibility Board Website**.

CLE Status	2
Fee Status	ACTIVE
Professional Liability Insurance	Lawyer does NOT represent private clients
Good Standing:	Yes

<https://mars.courts.state.mn.us/AttorneyDetail.aspx?attyID=0505284>

Lawyer Details

Lawyer ID	0505321
Last Name	Ahsan
First Name	Mollie
Middle Name	Clark
Address	3753 Greensboro Dr. Eagan, MN 55123
Date Admitted	10/25/24
Last Payment	10/28/24
Next Payment Due	01/01/26

Authorized to Practice Law?	Authorized
------------------------------------	------------

Additional information related to limited license statuses may be obtained through the **Lawyer Registration Website.**

Current Disciplinary Status	NONE
------------------------------------	------

Additional information on disciplinary history or statuses may be obtained at **Lawyer's Professional Responsibility Board Website.**

CLE Status	2
Fee Status	ACTIVE
Professional Liability Insurance	Lawyer does NOT represent private clients
Good Standing:	Yes

<https://mars.courts.state.mn.us/AttorneyDetail.aspx?attyID=0505321>