

RECEIVED

MAY 21 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

EXHIBIT COVER SHEET

Exhibit Name on this document:

**[P/P] HINDS’ MOTION FOR SANCTIONS PURSUANT TO F.R.C.P., RULE 11
RE: [ECF No. 6] AS FACIALLY DEFECTIVE & PROCDURALLY IMPROPER
& FOR THE REASONS SET FORTH IN ACCOMPANYING MEMORANDUM**

Exhibit Number: Exhibit BB #1

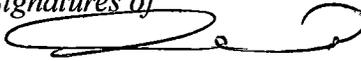
Number of pages 23 and # total of sheets 23

Title of document this Exhibit belongs with:

[P/P]'s MOTION TO VACATE, SET ASIDE, CANCEL OR CORRECT LEGAL DEFECTS IN THE DECISION WITH [ECF No. 6] & IN THE COURT'S ORDER [ECF No. 7] PREMISED ON SUBSTANTIVE RULE, LAW, RIGHTS & GROUNDS

Document filed date 5/21 with Exhibit Filed on Behalf of [P/P].

Submitted by: Terry Lee Hinds

Signatures of


Dated the 20th day of May 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

CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing was filed on this 20th day of May 2025 with the court, with a true and correct copy, served upon [D/R/I P] through their counsel for the defense, by First Class U.S. Mail, postage prepaid, at the following address and named attorney:

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) 307-6554
Fax: (202) 514-6770
Email: Gregory.L.Mokodean@usdoj.gov
Counsel for Defendants entry ECF No. 14 of Appearance on Thursday April 15, 2025

Initials 

Dated the 20th day of May 2025

Signatures of

TERRY LEE HINDS,
Pro se & Suri Juris,
Officially a/k/a Terry Lee Hinds
438 Leicester Square Drive
Ballwin, Missouri 63021
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-Vs-

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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
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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]”)

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NOTICE OF FILING EXHIBIT

Exhibit Name on this document:

**[P/P] HINDS’ MOTION FOR SANCTIONS PURSUANT TO F.R.C.P., RULE 11
RE: [ECF No. 6] AS FACIALLY DEFECTIVE & PROCDURALLY IMPROPER
& FOR THE REASONS SET FORTH IN ACCOMPANYING MEMORANDUM
Exhibit Number: Exhibit BB #1**

will be filed with the Clerk’s Office in paper format.

I certify that within 24 hours of the filing of this Notice, I will file and serve paper copies

of the document identified above.

Date Executed: 5/20/25

Signatures of



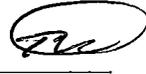
Dated the 20th day of May 2025

TERRY LEE HINDS,
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Officially a/k/a Terry Lee Hinds
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CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing was filed on this 20th day of May 2025 with the court, with a true and correct copy, served upon [D/R/I P] through their counsel for the defense, by First Class U.S. Mail, postage prepaid, at the following address and named attorney:

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) 307-6554
Fax: (202) 514-6770
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Dated the 20th day of May 2025

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**[P/P] HINDS’ MOTION FOR SANCTIONS PURSUANT TO F.R.C.P., RULE 11
RE: [ECF No. 6] AS FACIALLY DEFECTIVE & PROCDURALLY IMPROPER
& FOR THE REASONS SET FORTH IN ACCOMPANYING MEMORANDUM**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, movant [P/P] for his Petition, Protest, Protected Speech (“[PPP]”) respectfully moves this Court to impose sanctions against “United States” DOJ attorney, MOLLIE CLARK AHSAN pursuant to the Rules of Civil Procedure, (“Fed. R. Civ. P.”)



for the following reasons being reasonable and supported by the record, declares:

I. INTRODUCTION

1. This motion seeks sanctions on “United States” DOJ attorney, MOLLIE CLARK AHSAN (“AHSAN”) for filing a *facially defective* and *procedurally improper* motion for an *extension of time* or otherwise respond to, pleaded as (“[Plaintiff’s “Complaint”]”) by defense lawyers which was filed on 03/13/25. [ECF No. 6].
2. AHSAN’s motion, when declared as [Plaintiff’s “Complaint”] is *facially defective & procedurally improper* whereby; AHSAN’s motion *characteristically*, injects and mentions “Complaint” 12 times versus “Petition” as a *nefarious suggestion*. Particularly, when her motion raised a moot *affirmative defense*, by declaring that:

Defendant United States (*incorrectly named here through the listing of the officials in their “official capacity” in the caption of the “Complaint”*)[¹] respectfully moves the Court, pursuant to Fed. R. Civ. P. 6(b)(1)(A), for an order extending by 30 days the time within which the United States as the “Defendants” is required to answer or otherwise move with respect to the Plaintiff’s 1,126 paragraph “Complaint.” Good cause exists for the requested extension as explained below.

Emphasis added within Footnote [1] presenting defense’s legal arguments/theory.

3. AHSAN’s motion, when declared as [Plaintiff’s “Complaint”] is *facially defective*, asserting [P/P]’s Petition is nothing more than a “Complaint” to proceed under, pursuant to “Fed. R. Civ. P. 6(b)(1)(A)” as a baseless legal theory & a debunked practice of other legal contentions that are warranted by existing law. *i.e.*, Rule 12. Defenses and Objections., including but not limited to protected speech, *inter alia*.
4. Rule 12. Defenses and Objections and Rule 6. Computing and Extending Time; Time for Motion Papers of the Fed. R. Civ. P., serve different legal matters, but AHSAN’s motion pleaded: Rule 6(b)(1)(A) vs Rule 12 of the Fed. R. Civ. P., as:

Rule 6. Computing and Extending Time; Time for Motion Papers

(b) Extending Time.

(1) In General. When an act may or must be done within a specified time, the court may, for good cause, extend the time:

(A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or

5. AHSAN’s motion was presented *without a reasonable inquiry*, as attorneys are required to make a *reasonable inquiry into the facts and law* before filing a pleading or motion, but nevertheless AHSAN’s motion proffered as facts under the section of “Statement & Argument” declaring in part:

Good cause exists for the requested extension as explained below.

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.”

Emphasis added as a misrepresentation of facts.

and

This is the first motion for an extension of time in this matter.

It is not sought for purposes of delay and will not prejudice Plaintiff.

Emphasis added as a misrepresentation of facts.

and

“district courts should normally grant extension requests, made before the deadline, **in the absence of bad faith by the requesting party or prejudice to another party.**”

Emphasis added as a misrepresentation of facts.

and

AHSAN’s motion was presented *without any reasonable inquiry* under the circumstances, that [P/P]’s **Petition is not [Plaintiff’s “Complaint”]** or by **stating “Plaintiff’s” or “Plaintiff” a total number of sixteen times vs** the Real Party in Interest as Petitioner/Plaintiff (“[P/P]”). Under Fed. R. Civ. P. Rule 17(a)(1), every action must be prosecuted in the name of the real party in interest, as herein [P/P]’s Petition & his case as a suit in equity.

Emphasis added as a misrepresentation of facts.

6. AHSAN’s motion is **procedurally improper**, (1) obtained & was granted, under the false pretext & **improper purpose for a due process**; having a total disregard **for obtaining a non-consent motion as a “specific conduct”** of not following the United States District Judge Audrey G. Fleissig’s published local “Requirements” “2. Informal Matters” mandated by this Court 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.

See: <https://www.moed.uscourts.gov/judge/audrey-g-fleissig>

Emphasis Added. In violation of legal requirements & a *valid due process*.

7. AHSAN's motion is **procedurally improper**, (2) without any *reasonable inquiry* under the *justiciable controversies*, conduct alleged circumstances, and *matters of law* as pleaded in [P/P]'s Petition [ECF No. 1], Brief in Support [ECF No. 2] & the Court's JS 44 civil cover sheet [ECF No. 1] Att: 27, the facts and law; when her motion failed to mention such concerns or matters or law cited, ***The Judiciary Act; 1 Stat. 73. (SEC.32.) & 5 U.S.C. § 552a*** or within [Decl. #1], only to state:

Plaintiff also invokes various statutes, including the Administrative Procedure Act, the Religious Freedom Restoration Act, and the Paperwork Reduction Act, to support his "Complaint."

Emphasis added as a misrepresentation, equally an omission of facts and law.

8. AHSAN's motion is **procedurally improper**, (3) when [P/P]'s Petition affirms a [PPP], as constitutionally protected rights & whereby AHSAN's actions are based on *improper procedures* pursuant to [ECF No. 9] & [ECF No. 10]; as a **clearly erroneous assessment** of the [PPP] or as an **erroneous view of the law** when she declared their legal theory/arguments vs a motion regarding a Petition, warranted by existing law vs her **current legal contentions** as within [Motion on Complaint], based on grounds other than those addressed in [P/P]'s Petition, **as a suit in equity**.
9. AHSAN's motion is **procedurally improper**, (4) when DOJ's 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

10. AHSAN's motion is based on facts that are demonstrably false or unsupported by the record invoking an **improper purpose**, such as to **change/control** [P/P]'s [PPP], thereby a method to harass, or cause unnecessary delay by violating *due process*, or needlessly increase the cost [Burdens] of litigation or as an expenditure of time on the [P/P]'s [LLP] via an **encroachment** thereon. Rule 11(b)(1) Fed. R. Civ. P.
11. AHSAN's argument(s) relying on **Rule 12(a)(2)** was filed as a motion or *otherwise move respect to the* "Complaint" with claims, defenses, and other legal contentions that are not warranted by existing law¹ or by *non-frivolous* argument for extending, modifying, or reversing existing law in violation of Rule 11(b)(2) Fed. R. Civ. P.
12. In legal contexts, the phrase "*or by a nonfrivolous argument for extending, modifying, or reversing existing law*" refers to a requirement, often found in Rule 11 of the Fed. R. Civ. P., that attorneys must ensure legal arguments are either

supported by existing law or based on a reasonable, non-frivolous argument for changing or expanding the law.

II. REVEVANT BACKGROUND

1. [P/P] filed with the Court a “Petition” *as a suit in equity*, 01/13/2025. [ECF No. 1].
2. Contemporaneously, [P/P] filed a Brief in Support of Petition, *inter alia*, see [ECF No. 2] with Att: 1-33.
3. The “United States” government, represented by 2 tax lawyers of the Tax Division of the DOJ, filed 03/13/25 a MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE PLAINTIFF’S “COMPLAINT” (“[Motion on Complaint]”) or (“[Plaintiff’s “Complaint]”) [ECF No. 6]. Signed by AHSAN.
4. The Court granted said [Motion on Complaint] on 03/14/25. [ECF No. 7].
5. [P/P] filed with the Court on 03/18/25, in response to re: [ECF No. 6] “NOTICE OF ERROR, MISTAKE OR DEFECT IN LEGAL DOCUMENT”. [ECF No. 9].
6. [P/P] filed with the Court on 04/2/25, in response to re: [ECF No. 7] a “NOTICE OF MISAPPLICATION OF LAW & THEORY IN LEGAL DOCUMENTS”, [ECF No. 10].
7. [P/P] received no response from or concerns from AHSAN or the Court regarding [ECF No. 9] or [ECF No. 10]. Note: action/inactions of *adversity thoughts* herein.
8. [P/P] filed with the Court on 04/7/25 a Notice of Compliance for establishment or a confirmed timeline, *to safeguard due process* regarding Safe Harbor Notification.

III. GROUNDS FOR SANCTIONS

1. By filing a Motion, attorney AHSAN certified to the Court that [ECF No. 6] i.e., [Motion on Complaint] was presented to the best of a person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances and was not presented for any improper purpose, including to harass or cause unnecessary delay, or increase the cost of litigation. Fed. R. Civ. P., Rule 11(b)(1). Rule 11 provides for the striking of pleadings, *inter alia*.
2. Attorney AHSAN further certified that the [Motion on Complaint] has claims, defenses, and other legal contentions being warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law. Fed. R. Civ. P., Rule 11(b)(2).
3. Attorney AHSAN also certified that the factual contentions in the [Motion on Complaint] had evidentiary support declaring “*Undersigned counsel is waiting*

on information from the IRS that may assist with preparing an appropriate response to the 'Complaint'." Note: IRS' "information" = evidentiary support. Fed. R. Civ. P., Rule 11(b)(3).

4. Attorney AHSAN's specific conduct violated Rule 11(b) because:

- a. [Motion on Complaint] lacks legal grounds & being presented for *improper purposes* as stated above within Section I, thus, to harass, cause unnecessary delay, or as *dilatory tactics* to needlessly increase the [Burdens] of litigation or expenditure of time on the [P/P]'s [LLP] as an *encroachment* thereon.
 - b. [Motion on Complaint] is meritless or AHSAN has *no reasonable basis* to believe her claims, defenses, and other legal contentions are warranted by existing law or as nonfrivolous arguments for extending, modifying, or reversing existing law or of pleaded statutory law/constitutional provisions.
 - c. Attorney AHSAN has failed to demonstrate that the factual contentions in the [Motion on Complaint] have evidentiary support or would likely have evidentiary support after discovery. IRS' material is *patently unmeritorious*.
 - d. [Motion on Complaint] is a frivolous filing and lacks merit, as the [P/P]'s Petition is not barred by the Doctrine of Sovereign Immunity, or pursuant to [s]overeign immunity that bars claims *against federal officials* in their *official capacity* unless a waiver is unequivocally expressed by Congress.
5. Attorney AHSAN's *specific conduct* in a *lack of due process* and her [Motion on Complaint] as a *bad faith claim*, intended to harass, delay or embarrass [P/P] FAITH in [LAW] by violating [Exec.Order/Directive/A.G.Policy], ensuring her claims are *frivolous* and lacks any arguable basis either in law or in fact. See *Neitze v. Williams*, 490 U.S. 319, 325 (1989) & Fed. R. Civ. P., Rule 11(c)(6).
6. Attorney AHSAN's vexatious conduct *as an abuse of the process* is self-evident when she failed to respond to, or to correct wrongful actions or explain to [P/P] about his *rightful concerns* within two Notices re: [ECF No. 9] & [ECF No. 10].

IV. SAFE HARBOR NOTICE

1. Movant [P/P] served a copy of [P/P]'s motion on Attorney AHSAN on 04/07/2025 in accordance with Fed. R. Civ. P., Rule 11(c)(2)(B).
2. Attorney AHSAN has failed to withdraw the [Motion on Complaint] within 21 days of being served with this motion via her email address: Mollie.Ahsan@usdoj.gov as well as, being served with this motion via First Class, Certified U.S. Mail.
3. Movant [P/P] obeyed requirements for Rule 11(c)(6), an order imposing a sanction must describe the sanctioned conduct and explain the basis for the sanction.

Footnote 1: Rule 12. Defenses and Objections: When and How Presented; Motion for Judgment on the Pleadings; Consolidating Motions; Waiving Defenses; Pretrial Hearing
(a) Time to Serve a Responsive Pleading.

(2) ***United States and Its Agencies, Officers, or Employees Sued in an Official Capacity.*** The United States, a United States agency, or a ***United States officer or employee sued only in an official capacity must serve an answer to a complaint***, counterclaim, or crossclaim within 60 days after service on the United States attorney. ***Emphasis Added.*** See top of page #3 of [Motion on "Complaint"]. *otherwise move respect to the "Complaint"*

Respectfully Submitted,

Signature of

Dated this seventh day of April 2025

_____/s/ TERRY LEE HINDS _____
TERRY LEE HINDS,
Pro se & Suri Juris,

CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing motion was forwarded via email on this seventh day of April 2025 to MOLLIE CLARK AHSAN & with a true and correct copy, served upon AHSAN, as the counsel for the defense by First Class Certified U.S. Mail, postage prepaid, at the following address and named attorney:

MOLLIE CLARK AHSAN
Minnesota Bar No. 0505284
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 _____s/TLH

Dated this seventh day of April 2025

Respectfully Submitted,

Signature of

_____/s/ TERRY LEE HINDS _____
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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

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**MEMORANDUM & BRIEF IN SUPPORT OF MOTION FOR SANCTIONS
PURSUANT TO FEDERAL RULES CIVIL PROCEDURE, RULE 11**

COMES NOW, movant [P/P] for his Petition, Protest, Protected Speech (“[PPP]”) respectfully submits this MEMORANDUM & BRIEF IN SUPPORT OF MOTION FOR SANCTIONS PURSUANT TO FEDERAL RULES CIVIL PROCEDURE, RULE 11 and whereby [P/P] presented Motion for Sanctions (“[MFS]”) to “United States” DOJ attorney,

MOLLIE CLARK AHSAN (“AHSAN”) served pursuant to Fed. R. Civ. P. Rule 5, to wit:

[P/P] HINDS’ MOTION FOR SANCTIONS PURSUANT TO F.R.C.P., RULE 11 RE: [ECF No. 6] AS FACIALLY DEFECTIVE & PROCDURALLY IMPROPER & FOR THE REASONS SET FORTH IN ACCOMPANYING MEMORANDUM

I. STATEMENT OF FACTS OR IN LAW OF PRESENTED MOTIONS

a. Relevant Facts:

Constitutionality Case presented as a Petition for a *suit of equity*: 4:25-CV-00047 AGF. This Petition, Protest, Protected Speech (“[PPP]”) of the [P/P] is *constitutionally* protected as this civil action & its claims arises under the Constitution and federal laws of the United States, with this Court having federal question jurisdiction over this case pursuant to Article III § 2, Clause 1 of the Constitution as this case in Law & Equity involves justiciable controversies concerned with the construction, enforcement, and application of federal laws.

b. AHSAN’s motion & Court action & [P/P]’s practices & observances of FAITH

AHSAN’s motion [ECF No. 6] presented affirmative defense, claims, immunity, and other legal contentions when filing a *facially defective* and *procedurally improper* motion and for reasons set forth in this MEMORANDUM & BRIEF IN SUPPORT OF MOTION FOR SANCTIONS PURSUANT TO FEDERAL RULES CIVIL PROCEDURE, RULE 11.

The Court granted AHSAN’s [Motion on Complaint] relating to upholding a *due process violation*, committed by AHSAN’s *specific conduct* of obtaining a *non-consent motion* & without regard to Judge Fleissig’s published local “Requirements” “2. Informal Matters” *inter alia*, mandated by this Court.

[P/P]’s practices & observances of his FAITH in [LAW] when he filed with the Court [ECF No. 1] and its attachments & [ECF No. 2] and when the Court granted an extension of time [P/P]’s FAITH vs [To LIVE as EVIL] filed in response to re: [ECF No. 6] “NOTICE OF ERROR, MISTAKE OR DEFECT IN LEGAL DOCUMENT”. [ECF No. 9].

The governmental actors (DOJ/Judge) took no actions for a period of over two weeks, [P/P]’s FAITH filed in response to re: [ECF No. 7] a “NOTICE OF MISAPPLICATION OF LAW & THEORY IN LEGAL DOCUMENTS”, [ECF No. 10].

c. Matters, Issues or Conduct in Fact & in Law.

Set forth in Section I. INTRODUCTION in the presented [MFS]; whereby listing twelve of [P/P]’s factual matters, disputes, issues or conduct in Fact & in Law.

See [P/P]’s presented [MFS] issued, served or in accordance with pursuant to Fed. R. Civ. Rule 5 and Rule 11(c)(2)(B) of the Fed. R. Civ. P.. See AHSAN’s [Motion on Complaint]

for matters, issues or conduct in Fact & in Law concerning the Court & [P/P].

d. Procedural History:

Set forth in Section II. RELEVANT BACKGROUND in the presented [PPP] & [MFS] or with AHSAN's [Motion on Complaint]; whereby listing eight events and dates of legal filings, proceeding or other matters with the Court.

e. Rule 11 Sanctions & Standard of Review:

Set forth in Section III. GROUNDS FOR SANCTIONS in the presented [MFS] or with AHSAN's [Motion on Complaint]; whereby listing six significant & substantial matters or controversies with factual matters based on verifiable facts or objective evidence. Rule 11 sanctions in federal court address improper conduct in filings, requiring attorneys to certify that their actions are not for an *improper purpose*, that legal contentions are warranted by law, and that *factual contentions have evidentiary support*.

1. Standard of Review - Federal Rule of Civil Procedure

a. Fed. R. Civ. P., Rule 1. Scope and Purpose

These rules govern the procedure in all civil actions and proceedings in the United States district courts, except as stated in Rule 81 . They should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding.

b. Rule 8. General Rules of Pleading

(e) *Construing Pleadings. Pleadings must be construed so as to do justice.*
Emphasis added.

c. Fed. R. Civ. P., Rule 6(b)(1)(A)

Rule 6. Computing and Extending Time; Time for Motion Papers

(b) Extending Time.

(1) In General. When an act may or must be done within a specified time, the court may, for good cause, extend the time:

(A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or

d. Fed. R. Civ. P., Rule 12(a)(2)

Rule 12. Defenses and Objections: When and How Presented; Motion for Judgment on the Pleadings; Consolidating Motions; Waiving Defenses; Pretrial Hearing.

(a) Time to Serve a Responsive Pleading.

(2) United States and Its Agencies, Officers, or Employees Sued in an Official Capacity. The United States, a United States agency, or a United States officer or employee sued only in an official capacity must serve an answer to a complaint, counterclaim, or crossclaim within 60 days after service on the United States attorney.

e. Fed. R. Civ. P., Rule 5

Rule 5. Serving and Filing Pleadings and Other Papers.

f. Fed. R. Civ. P., Rule 12

(b) How to Present Defenses. Every defense to a claim for relief in any pleading must be asserted in the responsive pleading if one is required. But a party may assert the following defenses by motion:

- (1) lack of subject-matter jurisdiction;
- (2) lack of personal jurisdiction;
- (3) improper venue;
- (4) insufficient process;
- (5) insufficient service of process;
- (6) failure to state a claim upon which relief can be granted; and
- (7) failure to join a party under Rule 19 .

A motion asserting any of these defenses must be made before pleading if a responsive pleading is allowed. If a pleading sets out a claim for relief that does not require a responsive pleading, an opposing party may assert at trial any defense to that claim. No defense or objection is waived by joining it with one or more other defenses or objections in a responsive pleading or in a motion.

(d) Result of Presenting Matters Outside the Pleadings. If, on a motion under Rule 12(b)(6) or 12(c) , matters outside the pleadings are presented to and not excluded by the court, the motion must be treated as one for summary judgment under Rule 56 . All parties must be given a reasonable opportunity to present all the material that is pertinent to the motion.

g. Fed. R. Civ. P., Rule 7(b)(3)

Rule 7. Pleadings Allowed; Form of Motions and Other Papers.

(b) Motions and Other Papers.

(1) In General. A request for a court order must be made by motion. The motion must:

- (A) be in writing unless made during a hearing or trial;
- (B) state with particularity the grounds for seeking the order; and
- (C) state the relief sought.

(2) Form. The rules governing captions and other matters of form in pleadings apply to motions and other papers

h. Fed. R. Civ. P., Rule 17(a)(1)

Rule 17. Plaintiff and Defendant; Capacity; Public Officers

(a) Real Party in Interest.

(1) Designation in General. An action must be prosecuted in the name of the real party in interest.

i. Fed. R. Civ. P., Rule 11

Rule 11. Signing Pleadings, Motions, and Other Papers; Representations to the Court; Sanctions

(a) Signature. Every pleading, written motion, and other paper must be signed by at least one attorney of record in the attorney's name—or by a party personally if the party is unrepresented. The paper must state the signer's address, e-mail address, and telephone number. Unless a rule or statute specifically states otherwise, a pleading need not be verified or accompanied by an affidavit. The court must strike an unsigned paper unless the omission is promptly corrected after being called to the attorney's or party's attention.

(b) Representations to the Court. By presenting to the court a pleading, written motion, or other paper—whether by signing, filing, submitting, or later advocating it—an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

(1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;

(2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;

(3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and

(4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

(c) Sanctions.

(1) In General. If, after notice and a reasonable opportunity to respond, the court determines that Rule 11(b) has been violated, the court may impose an appropriate sanction on any attorney, law firm, or party that violated the rule or is responsible for the violation. Absent exceptional circumstances, a law firm must be held jointly responsible for a violation committed by its partner, associate, or employee.

(2) Motion for Sanctions. A motion for sanctions must be made separately from any other motion and must describe the specific conduct that allegedly violates Rule 11(b). The motion must be served under Rule 5, but it must not be filed or be presented to the court if the challenged paper, claim, defense, contention, or denial is withdrawn or appropriately corrected within 21 days after service or within another time the court sets. If warranted, the court may award to the prevailing party the reasonable expenses, including attorney's fees, incurred for the motion.

(3) On the Court's Initiative. On its own, the court may order an attorney, law firm, or party to show cause why conduct specifically described in the order has not violated Rule 11(b).

(4) Nature of a Sanction. A sanction imposed under this rule must be limited to what suffices to deter repetition of the conduct or comparable conduct by others similarly situated. The sanction may include nonmonetary directives; an order

to pay a penalty into court; or, if imposed on motion and warranted for effective deterrence, an order directing payment to the movant of part or all of the reasonable attorney's fees and other expenses directly resulting from the violation.

(5) Limitations on Monetary Sanctions. The court must not impose a monetary sanction:

(A) against a represented party for violating Rule 11(b)(2) ; or

(B) on its own, unless it issued the show-cause order under Rule 11(c)(3) before voluntary dismissal or settlement of the claims made by or against the party that is, or whose attorneys are, to be sanctioned.

(6) Requirements for an Order. An order imposing a sanction must describe the sanctioned conduct and explain the basis for the sanction.

(d) Inapplicability to Discovery. This rule does not apply to disclosures and discovery requests, responses, objections, and motions under Rules 26 through 37 .

II. ANALYSIS, PURPOSE & SCOPE OF RULE 11

Rule 11 of The Fed. R. Civ. P., mandates that attorneys and parties sign pleadings, motions, and other papers in federal court must conduct a reasonable inquiry into the facts and law, ensuring their filings are not frivolous, presented for an improper purpose, or lack evidentiary support, with potential sanctions for violation

- Purpose:

To deter frivolous litigation and the abuse of the judicial process, ensuring accountability and efficiency in legal proceedings.

- Scope:

Applies to pleadings, motions, and other papers signed and filed in federal court.

- Who is covered:

Attorneys **and** *pro se* parties who sign, submit, or advocate for a writing in court.

A). Certifications Under Rule 11

- Improper Purpose:

The writing is not presented for any improper purpose, such as harassment, delay, or needlessly increasing the cost of litigation.

- Legal Contentions:

The claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law.

- Factual Contentions:

Factual contentions have evidentiary support or will have evidentiary support after discovery.

B). When Rule 11 Sanctions May Be Imposed

- **Violation of Rule 11(b):**

If the court determines that a violation of Rule 11(b) has occurred, sanctions may be imposed.

- **Objective Standard:**

Rule 11 requires an attorney to make an objectively reasonable inquiry into the facts and law prior to filing.

- **Failure to Meet Requirements:**

Failure to meet these requirements can trigger sanctions against the offending parties and their attorneys.

III. LAW & ANALYSIS & ITS ARGUMENTS - Challenged Practices

Generally, Rule 11 was enacted to require litigants to “stop and think” before making assertions in court. [P/P]’s FAITH in [LAW] holds Standard of Review - Federal Rule of Civil Procedure were to stop *relentless collateral attacks, asserted by the government* on [P/P]’s [PPP]. In our system when a “court has jurisdiction it has a right to settle every question which occurs in the case.” Buck v. Colbath, 70 U.S. (3 Wall.) 334, 337 (1865). But it cannot “settle” that which remains under *relentless collateral attack*. To ask a district court to foresee and expressly prohibit through court order *every conceivable abuse of process* is to ask it to chase its tail. Litigation is complicated enough as it is. District courts should not have to wage a sprawling, three-front war to defend their rightful role, as well as the lawful [Rights] of [P/P]’s [PPP].

Rule 11's Purpose:

Rule 11, which pertains to "Signatures on Pleadings, Motions, and Other Papers," ensures that *legal filings are made in good faith* and that attorneys *and pro se* litigants are held accountable for their claims. [P/P]’s arguments are in a presented Motion, when AHSAN’s [Motion on Complaint] and her *specific conduct* violated Rule 11's Purpose, however, but more importantly Rule 8(e).

Signatures Required:

Every pleading, motion, and other paper must be signed by at least one attorney of record in the attorney's individual name, or, if the party is not represented by an attorney, by the party themselves. [P/P]’s presents a *procedural argument* with this signature requirement, because AHSAN’s [Motion on Complaint] and her *specific conduct* of using the BAR# of *another attorney* &/or wrong Bar #, thereby violated Rule 11's Signatures Requirement. [P/P]’s presents a *substantive argument*, that AHSAN elected to ignore, response to or correct a *procedural argument* when noticed by [P/P]’s [ECF No. 9] or [ECF No. 10].

Certification:

By signing a motion, an attorney or pro se litigant certifies, to the best of their knowledge, information, and belief, that the claims, defenses, and other legal contentions are not meant to harass, cause unnecessary delay, or increase the cost of litigation. [P/P]'s arguments are in a presented Motion [MFS], show why, when & how AHSAN's [Motion on Complaint] and her *specific conduct* violated Rule 11's Certification.

Sanctions:

If a court finds that a motion or other paper was filed in violation of Rule 11, it may impose sanctions, including monetary penalties or other appropriate remedies. [P/P]'s shall seek Court sanctioned relief, upon meeting Section IV. SAFE HARBOR NOTICE requirements as in the presented [MFS]. [P/P] argues that [t]his *specific conduct* with AHSAN's motion [ECF No. 6] is ripe for sanctions.

An attorney or *pro se* litigant is considered to be "presenting" to the court when the attorney or *pro se* litigant signs, files, submits, or later advocates a pleading, written motion, or other paper. Fed. R. Civ. P., Rule 11(b). The sanctions for an attorney or pro se litigant violating Rule 11 can be instituted on the court's initiative, or by motion. Fed. R. Civ. P. Rule 11(c)(1). The procedure for filing a motion for Rule 11 sanctions includes a "safe harbor" of *twenty-one days* between the service of the motion and its filing with the court, so that the individual who has allegedly violated Rule 11 has twenty-one days to retract the statement. Fed. R. Civ. P., Rule 11(c)(1)(A).

"[T]he central purpose of Rule 11 is to deter baseless findings in district court... ." *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 393 (1990). Under Rule 11(c)(1), "[i]f, after notice and a reasonable opportunity to respond the court determines that Rule 11(b) has been violated, the court may impose an appropriate sanction on any attorney ... that violated the rule or is responsible for the violation." Rule 11(c)(2) prescribes the procedure for filing a motion for sanctions under Rule 11:

A motion for sanctions must be made separately from any other motion and must describe the specific conduct that allegedly violates Rule 11(b). The motion must be served under Rule 5, but it must not be filed or presented to the court if the challenged paper, claim, defense, contention, or denial is withdrawn or appropriately corrected within 21 days after service or within another time the court sets. If warranted, the court may award to the prevailing party the reasonable expenses, including attorney's fees, incurred for the motion.

This so-called "safe harbor" provision seeks to "give the parties at whom the motion is directed an opportunity to withdraw or correct the offending contention." *Elliott v. Tilton*, 64 F.3d 213, 216 (5th Cir. 1995). The Fifth Circuit has interpreted the "plain language of the rule" to mean that such "notice and opportunity prior to filing is mandatory." *Id.*

Article III Judicial Powers:

Article III's grant of "judicial Power" has long been understood to vest federal courts with certain "implied powers" inherent to "courts of justice from the nature of their institution." *United States v. Hudson*, 11 U.S. (7 Cranch) 32, 34 (1812). At the core of this inherent power is the authority to "fashion an appropriate sanction for conduct which abuses the judicial process." *Goodyear Tire & Rubber Co. v. Haeger*, 581 U.S. 101, 107 (2017). Without it the "judicial Power" would be no "Power" at all. It would be but a shell, lacking the substance courts need to protect their role within our constitutional structure.

For this reason, the *sanctions power* is a mainstay for "*protecting the due and orderly administration of justice*" and "*maintaining the authority and dignity of the court.*" *Cooke v. United States*, 267 U.S. 517, 539 (1925); see also *United States v. Shaffer Equip. Co.*, 11 F.3d 450, 462 (4th Cir. 1993). [P/P]'s FAITH in [LAW] and one's trust with this Court shall uphold:

Pleadings:

In legal proceedings, pleadings are the formal written statements filed by parties to a lawsuit, outlining their claims and defenses. [P/P] argues that AHSAN's [Motion on Complaint] is lesser than the standards of a *motion for deadline change*; but greater than the standards as a *subjective pleading* on [Plaintiff's "Complaint"]. [P/P]'s FAITH holds AHSAN's *specific conduct* violates Fed. R. Civ. P., Rule 1. Scope and Purpose, as well as Fed. R. Civ. P., Rule 8(e). (Pleadings must be construed so as to do justice.)

"Rule 1" (in the context of civil procedure):

This likely refers to the general scope and purpose of all rules of civil procedure, which often includes a provision that pleadings should be construed liberally to ensure a just outcome.

"To do justice":

This phrase emphasizes the importance of fairness and equity in the interpretation and application of legal rules, particularly in the context of pleadings.

Federal Rules of Civil Procedure:

The FRCP, which governs civil procedure in U.S. federal courts, includes Rule 8(e), which states that *pleadings must be construed so as to do justice*.

In addition to its Rule 11 discretion, the district court possesses inherent power "to manage [its] own affairs so as to achieve the orderly and expeditious disposition of cases." *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43(1991) (quoting *Link v. Wabash R.R. Co.*, 370 U.S. 626, 630–31(1962)). The district court's "inherent powers include the ability to supervise and 'discipline attorneys who appear before it' and discretion 'to fashion an appropriate sanction for conduct which abuses the judicial process, "including assessing attorney fees or dismissing the case." *Wescott Agri-Prods., Inc. v. Sterling State Bank, Inc.*, 682 F.3d 1091, 1095 (8th Cir. 2012) (quoting *Chambers*, 501 U.S. at 43, 44–45). The court's inherent power "*reaches both conduct before the court and that beyond the court's confines*" to secure compliance with the court's orders. *Chambers*, 501 U.S. at 44.

IN CONCLUSION BUT NOT OF [P/P]'s RESOLUTION

Another challenge practices of AHSAN's motion [ECF No. 6] and *specific conduct* of an unorthodox notice or as a *nefarious suggestion* in the form of a pleading; framing, changing or transforming the "**Petitioner**" in this case regarding his [PPP], *as a suit of equity, into or converted as a "Plaintiff" via* AHSAN's motion serving as [Plaintiff's "Complaint"]. The fact is, AHSAN's motion, *being so titled* by two DOJ's tax lawyers. Whether by the very strong arm of the Executive Branch (here DOJ) or by the Courts' hammer (court gavel) for injustice for its *lack of enforcing a due process*, see [ECF No. 9] & [ECF No. 10]; [P/P]'s FAITH in [LAW] fights for *religious liberty* and against *any government branch* or its officers claiming power & image as sovereign, or worst to accept, so far the values and beliefs as [To LIVE as EVIL].

A. NOTICE vs [To LIVE as EVIL].

1. Notice of Specific Conduct

"Rule 11 provides a specific procedure to be followed when sanctions are considered." *Clark v. United Parcel Serv., Inc.*, 460 F.3d 1004, 1008 (8th Cir. 2006). Before "impos[ing] Rule 11 sanctions on its own initiative," the district court "must first enter an order describing the *specific conduct* that appears to violate Rule 11(b) and direct the attorney to show cause why he has not violated the rule." *Id.* (emphasis added); *see also* Fed. R. Civ. P. 11(c)(3) ("On its own, the court may order an attorney, law firm, or party to show cause why *conduct specifically described* in the order has not violated Rule 11(b)." (emphasis added)). "If, after notice and a reasonable opportunity to respond, the court determines that Rule 11(b) has been violated, the court may impose an appropriate sanction on any attorney, law firm, or party that violated the rule or is responsible for the violation." Fed. R. Civ. P. 11(c)(1). A district court must limit a sanction imposed under Rule 11 "to what suffices to deter repetition of the conduct or comparable conduct by others similarly situated. The sanction may include nonmonetary directives." Fed. R. Civ. P. 11(c)(4). The district court's "order imposing a sanction must describe the sanctioned conduct and explain the basis for the sanction." Fed. R. Civ. P. 11(c)(6).

"Rule 11 does not license a district court to sanction any action by an attorney or party that it disapproves of. Imposition of sanctions must be based on a pleading, motion or other paper signed and filed in federal court." *Coltrade Int'l, Inc. v. United States*, 973 F.2d 128, 131 (2d Cir. 1992) (cleaned up). A district court's "findings of frivolous litigation, dilatory tactics, or bad faith are insufficient to support the award of sanctions under Rule 11." *Id.* "[G]eneral findings, without greater specificity, are an insufficient basis for [a court's] imposition of sanctions under Rule 11." *Id.* at 132. The court must "specify which papers were submitted to the court, and by whom, in violation of Rule 11." *Id.*

What constitutes "adequate notice of the specific conduct that appear[s] to violate Rule 11"? *Clark*, 460 F.3d at 1008. In *Clark*, we held that a district court afforded an attorney "adequate notice of the specific conduct that appeared to violate Rule 11" when the district court's show-cause order "incorporated by reference the orders granting summary

judgment, which detailed the court’s objections to [a specific pleading]” filed by the attorney. *Id.* The district court in Clark identified specific paragraphs deemed in violation of Rule 11, as well as specific objectionable conduct. *Id.* at 1009.

2. Notice of Sanction

In addition to requiring notice of the specific conduct that potentially violates Rule 11, our precedent also requires that “[b]efore imposing the ‘most severe sanctions,’ a district court should provide ‘clear notice’ as to the form of the sanction” to comport with due process. *Jones Day*, 800 F.3d at 944 (quoting *Harlan v. Lewis*, 982 F.2d 1255, 1262 (8th Cir. 1993)). “Particularized notice may be of critical importance when ‘a lawyer or firm’s reputation is at stake’ because ‘sanctions act as a symbolic statement about the quality and integrity of an attorney’s work—a statement which may have a tangible effect upon the attorney’s career.’” *Id.* (quoting *In re Prudential Ins. Co. Am. Sales Prac. Litig. Actions*, 278 F.3d 175, 191 (3d Cir. 2002)). The party must know “the nature of a potential sanction” in order to “respond in a cogent way.” *Id.* “[N]otice of the type and severity of the sanction being considered ‘may lead to substantially different (e.g., more detailed [and] differently directed) responses’ by the targeted lawyer.” *Id.* (second alteration in original) (quoting Gregory P. Joseph, *Sanctions: The Federal Law of Litigation Abuse* § 17(D)(1)(d), at 388 (5th ed. 1998)).

For the reasons presented herein and in [P/P]’s presented [MFS] [P/P] avers AHSAN’s motion [ECF No. 6] is **facially defective** and **procedurally improper** & for the reasons set forth in this Memorandum and Brief in Support of Motion is self-evident and proper relief is sought.

Respectfully Submitted,

Signature of

Dated this seventh day of April 2025

_____/s/ TERRY LEE HINDS _____
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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Please Take Notice: attached hereto & incorporated herein by reference are four germane documents as in [ECF No. 6] & [ECF No. 7] & [ECF No. 9] & [ECF No. 10]

**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 Petitioner/Plaintiff (“[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

[P/P] HINDS’ NOTICE OF COMPLIANCE WITH Fed. R. Civ. P., Rule 11(c)(2)

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, movant [P/P] for his Petition, Protest, Protected Speech (“[PPP]”) issues this Notice of Compliance for Sanctions sought pursuant to Fed. R. Civ. P., Rule 11 against “United States” DOJ attorney, MOLLIE CLARK AHSAN (“AHSAN”), served pursuant to Rule 5 as in compliance with Fed. R. Civ. P., Rule 11(c)(2)’s ‘safe harbor’ provision.

Respectfully Submitted,

Signature of

Dated this seventh day of April 2025

_____/s/ TERRY LEE HINDS _____
TERRY LEE HINDS,
Pro se & Suri Juris,

CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing Notice was forwarded via email on this seventh day of April 2025 to MOLLIE CLARK AHSAN & with a true and correct copy, served upon AHSAN, as the counsel for the defense by First Class Certified U.S. Mail, postage prepaid, at the following address and named attorney:

MOLLIE CLARK AHSAN
Minnesota Bar No. 0505284
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 /s/TLH

Dated this seventh day of April 2025

Respectfully Submitted,

Signature of

Dated this seventh day of April 2025

_____/s/ TERRY LEE HINDS _____
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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HINDS' MOTION FOR SANCTIONS PURSUANT TO F.R.C.P., RULE 11

Ms. MOLLIE CLARK AHSAN,

Minnesota Bar No. 0505284
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

Re: 4:25-CV-00047 AGF

PLEASE TAKE NOTICE - Attached to this email are the following documents:

1. MOTION FOR SANCTIONS, and
2. MEMORANDUM & BRIEF IN SUPPORT OF MOTION, and
3. NOTICE OF ERROR, MISTAKE OR DEFECT IN LEGAL DOCUMENT and
4. NOTICE OF MISAPPLICATION OF LAW & THEORY IN LEGAL DOCUMENTS.
5. MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE PLAINTIFF'S "COMPLAINT"
6. CERTIFICATE OF SERVICE AHSAN's MOTION
7. ORDER issued by the Court, granted on 3/14/2025 [ECF No. 7].

As you know, I am required to send the motion and its supporting documents for review.

A notice for a motion for sanctions under Federal Rule of Civil Procedure F.R.C.P. Rule 11 requires a separate motion, served at least 21 days before filing, describing the specific conduct violating Rule 11(b), and must be filed with the court if the challenged conduct isn't withdrawn or corrected within that period.

I hereby certify that the foregoing motion and supporting documents was forwarded via email on this seventh day of April 2025 to MOLLIE CLARK AHSAN & with a true and correct copy, served upon AHSAN, as the counsel for the defense by First Class Certified U.S. Mail, postage prepaid, at the above address and named attorney:

Respectfully Submitted,

Signature of

Dated this seventh day of April 2025

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

438 Leicester Square Drive
Ballwin, Missouri 63021
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