

pursuant to *procedural due process & substantive due process/rights/grounds* for [P/P]'s case of [PPP]. For the purposes of preserving the assignment of errors issues that are pending or unresolved, it is crucial for ensuring the ability to raise those issues on appeal. Therefore, [P/P] takes objections with & the arguments proffered in their response [ECF No. 31] within:

UNITED STATES' REPLY IN SUPPORT OF ITS MOTION TO DISMISS

A. Procedural or Prejudicial Errors & Legal Defects:

“The United States moved to dismiss Plaintiff Terry Lee Hinds’s Petition for either or both of two reasons. (ECF Nos. 12–13.)” re: [ECF No. 31] p.1, cl.1.

To Create a Clear Record & Clearly State the Legal Basis:

1. *“Plaintiff Terry Lee Hinds’s Petition”* certainly has the legal status of a “Petition” & is procedurally generated. However, *their **misleading** legal status* as a “Plaintiff” is a legal defect; simply because it confuses the role of a party in a *lawsuit* (plaintiff) vs a person as a petitioner (petition case). [P/P] addressed this matter with the Court & Defendants on 04/02/25 within [ECF No. 10] “NOTICE OF MISAPPLICATION OF LAW & THEORY IN LEGAL DOCUMENTS” p. 2-3 to wit & in particular:

POINT #1 - Prejudice with [P/P]'s FAITH in [LAW].

On point, "United States" lawyers' purport to assert [P/P]'s "Petition" is nothing more than a "Complaint" to proceed under. Under their *legal theory* "*unless a waiver is unequivocally expressed by Congress*" the *doctrine of sovereign immunity* bars claims against federal officials in their official capacity *of which* is misplaced and is a misapplication of law. This is self-evident as all these cases cited above or as set forth below are existing legal standards of Doctrine of Sovereign Immunity ("[DSI]") with lawsuits as a "Complaint" case **not as** "Petition" cases, as a suit in equity. Petition's cases are where people are natural sovereign.

B. “UNITED STATES” inviting plain error or accepting reversible error:

“First, Hinds failed to file a pleading that complies with the ‘short and plain statement’ requirement in Rule 8. So the Court should dismiss his Petition under Rule 41(b).” re: [ECF No. 31] p.1, cl.1.

NOTE: There is *no motion presented* before the court to dismiss a “**Petition**” only *all counts & claims for relief in Plaintiff’s Complaint/“Petition”*. Consequently, their pre-trial motion to dismiss was “Pursuant to Fed. R. Civ. P. 12(b)(1) and 41(b)” however failed or plead any requirements or include the entire scope and breath of “Rule 8”.

To Create a Clear Record & Clearly State the Legal Basis:

For the record again, this legal matter was addressed within:

**[P/P]’s OPPOSITION TO [D/R/I P]’s RULE 12(b)(1) & 41(b) MOTION TO DISMISS
“with prejudice all counts & claims for relief in Plaintiff’s Complaint/“Petition””**

On Point #1: [ECF No. 28] p. 7-9

1.E. “UNITED STATES” strive for a final dismissal of the “Petition” under Rule 41(b) Involuntary Dismissal; Effect as “This ‘Petition’ should also be dismissed pursuant to Rule 41(b) *for failing to comply with Rule 8.*” In legal contexts, an *“appeal to ignorance”* whether as a conclusion is drawn based on a lack of evidence (“Hinds fails to establish a waiver”) or *using the absence of proof as proof in itself*, (“for failing to comply”).

And

B. Present Suit – [D/R/I P]’s *motion* seeking “*the Court dismiss with prejudice all counts and claims for relief in Plaintiff’s Complaint/‘Petition.’*” However, declining or failing to properly enter into the record to “*move the Court*” that: “*This ‘Petition’ should also be dismissed pursuant to Rule 41(b) for failing to comply with Rule 8.*” Accordingly, *no motion* exists pursuant to **Rule 8**.

On Point #2: [ECF No. 13] p. 5

Inviting another plain error the “UNITED STATES” stated within [ECF No. 13] in part:

II. ARGUMENT

A. Hinds’s “Petition” should be dismissed pursuant to Rule 41(b) for violating Rule 8. The Court should dismiss the Petition because it violates the pleading requirements in Rule 8. Rule 8(a) requires, in part, that a pleading contains a “short and plain statement” of the grounds for the court’s jurisdiction and “short and plain statement” of the claim. A complaint that fails to comply with Rules 8(a) may be dismissed pursuant to Rule 41(b).6 *Nevijel v. N. Coast Life Ins. Co.*, 651 F.2d 671, 675 (9th Cir. 1981).

This was properly addressed within [ECF No. 28] read pages 21-30 for full effect, in part:

IV. *Counsel for Defendants purported: Argument without merit or specification*

The defense counsel is correct about Rule 8(a) requirements. However, their *argument NEVER declared Hinds’s “Petition” violated specifically Rule 8[(a)]*. There sole argument on this matter “Hinds’s ‘Petition’ should be dismissed pursuant to Rule 41(b) for violating **Rule 8.**” For the record, their *argument is frivolous*, because their claim is for *the entire breath and scope of “Rule 8”*. See [Decl. #9] *attached hereto & incorporated herein*.

And

Jurisdiction: [P/P]’s [PPP] [ECF No. 1] in ¶12 averment is a “short and plain statement” of the grounds for the court’s jurisdiction:

“This Court has original jurisdiction pursuant to 28 U.S. Code § 1343(a)(4) - Civil rights and elective franchise to *secure equitable or other relief* under *any Act of Congress* providing for the *protection of civil rights*, as acknowledged within The Religious Freedom Restoration Act of 1993 ("RFRA"); The Paperwork Reduction Act, 44 U.S.C. 3501, et seq., ("PRA") & Privacy Act of 1974 (5 U.S.C.A. 552a) ("Privacy Act").” **Emphasis Added.**

And on page 24, in part:

For the record, by preserving an issue for appeal, making a point publicly, & creating a permanent and official record of it for future use; **NOWHERE IN THEIR MEMORANDUM IN SUPPORT OF THE MOTION TO DISMISS** *are actual &/or accurate circumstances of any example(s) pleaded in complaint/“Petition” exceeding that legal standard of “short and plain statement”*. Why is there no list, no evidence presented, affidavit(s) offer by experts or a sworn declaration of what is a violation or a failure to plea

a “short and plain statement” of the grounds for the court’s jurisdiction
and “short and plain statement” of the claim (Def.Memo.p.5,cl.A.1)

[P/P] provided the Defendants and the court firsthand and direct or irrefutable facts of

GENERAL FACTS, FACTUAL ALLEGATIONS OR FACTS OF FAITH

[ECF No. 1] ([P/P] Complaint/ “Petition” (“Plf. [PPP]) page 8-24 set forth as
“short and plain statement” of the claim

See [Decl. #10] *attached hereto & incorporated herein*.

And on pages 14-15 [ECF No. 28] to wit:

GENERAL FACTS, FACTUAL ALLEGATIONS OR FACTS OF FAITH

A). Enactments of Law &/or Application of Internal Revenue Laws (“[THE CODE]”)

See :Averments #146 to #183

B). Declarations Filed in this Case.

See :Averments #185 to 191

C). [P/P] 's Free Exercise of Religious Liberty.

See :Averments #192 to 203 and #204 to #217 and #224 to #228 and #268 to #282

D). [D/R/I P] 's application of religious beliefs or activity.

See :Averments #285 to #383

E). Governmental actions are substantially burdening the free exercise of religion.

See :Averments #384 to 434 and #449 to #485

F). [To LIVE as EVIL] is advance against any person & this [P/P].

See :Averments #486 to #539

G). A Factual Religious Revelation of Proselytizing Taxpayers into taxp[r]ayers.

See :Averments #540 to #542 and #544 to #556 and #559 to #575 and #557 to #586

If any averment pleaded would or should fall outside the vague standards or *opinion of other* under Rule 8(a) [P/P] asserts those averments are pure speech as a protected speech protesting the unlawful activities, illegal conduct, or actions of the “United States” and the seven other adverse parties, in this case.

C. The “UNITED STATES” presenting Fundamental error, via Jurisdictional Error, & Manifest Constitutional Error or [To LIVE as EVIL].

Second, the Court lacks subject matter jurisdiction over this lawsuit because the United States has not waived its sovereign immunity. To the contrary, the suit is specifically precluded by the Anti-Injunction Act, 26 U.S.C. § 7421(a), and/or the tax exception to the Declaratory Judgment Act, 26 U.S.C. § 2201(a), because Hinds seeks to restrain the assessment and collection of taxes. Thus, the Court should dismiss his Petition under Rule 12(b)(1). re: [ECF No. 31] p.1, cl.1.

To Create a Clear Record & Clearly State the Legal Basis:

On Point #3: See in general [ECF Nos. 9-10 & 24-25 & 26-27] to wit:

[P/P] maintains in the vital legal matters of subject matter jurisdiction, in regard to Federal Sovereign Immunity Doctrine [F/S/I/D], (religious dogma) & its unequivocal wavers or as a consent by Congress, [P/P] presents these four premises in law & in equity:

1). **Judicial Powers & Authority** - Article III, sec.2, cl.1, to wit:

“The judicial Power shall extend to *all Cases, in Law and Equity*, arising under this Constitution, the Laws of the United States...” and “to Controversies *to which the United States shall be a Party*”.

2). **Federal common law** is a term of United States law used to describe common law that is developed by the federal courts, instead of by the courts of the various states.

Federal common law is created by federal courts through case decisions, rather than through legislative action. [P/P] seeks the Court’s permission to *enlighten and expand* the knowledge concerning [F/S/I/D] with Rule of Law, the *doctrine of stare decisis* & the *separation of powers & Chevron decision, inter alia*, allowing a minimum 156 pages with attached exhibits from Harvard, Yale & others legal institutions.

Procedural Common Law: Federal courts also develop procedural common law, which governs the internal operations of the court system.

Federal common-law remedy is available to [P/P] in this [P/P/P] case in the 3rd Amend.

Joseph Story, Commentaries on the Constitution 3:§ 1893 to wit:

§ 1893. This provision speaks for itself. Its plain object is *to secure the perfect enjoyment of that great right of the common law*, that a man's house shall be his own castle, *privileged against all civil and military intrusion. - Emphasis Added*

3). If **Federal common law** is to be the final determination factor with this *suit of equity* then so governs **28 U.S. Code § 1652** - State laws as rules of decision (Missouri)

Religion:

Religion Liberty of conscience and belief Art. I, Sec. 5
Practice, and support of, not compulsory Art. I, Sec. 6
Preferences, and discriminations on religious grounds Art. I, Sec. 7
Public aid for religious purposes Art. I, Sec. 7
Religious freedom Art. I, Sec. 5

4). **Federalist No. 80** is an essay by Alexander Hamilton, the eightieth of The Federalist Papers. It was published on June 21, 1788, under the pseudonym Publius, the name under which all The Federalist papers were published. It is titled "The Powers of the Judiciary", and it is the third in a series of six essays discussing the powers and limitations of the judicial branch. Publius posits that there can be no argument against this power of the federal judiciary. The necessity of uniform laws, and the status of the judiciary as equal to the legislative branch and the executive branch, requires that the judiciary hear cases involving the text of the Constitution. [P/P]'s FAITH in [LAW] holds [F/S/I/D] is an evil. **On Point #4:** *“Second, the Court lacks subject matter jurisdiction over this lawsuit because the United States has not waived its sovereign immunity.”*

To Create a Clear Record & Clearly State the Legal Basis: See in general [ECF No. 10] p. 2-10 & p. 14 and [ECF No. 25] p. 4-8, to wit, particularly with [F/S/I/D] in part:

1. “UNITED STATES’ ” motion [ECF No. 12] violate First Amendment, *inter alia* “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; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.”

- a. [F/S/I/D] is law respecting an establishment of religion. [F/S/I/D] arises from a common law doctrine from the Church of England (secular/religious powers). A legal maxims as "the king can do no wrong." It refers to "wrongs" in the narrower sense of the word, meaning torts and related edicts.
- b. [F/S/I/D] is manifested as prevailing law by the Courts, not Congress violating well established Court's doctrine of separation of power & check & balance of power.

- c. [F/S/I/D] is manifested itself like the Chevron doctrine violating the role and duty of Article III court. [P/P] admits [F/S/I/D] can and does exist in Article I courts (U.S. Tax Court) because it involves monetary matters.
- d. [F/S/I/D] and its wavier/consent cannot exist within or exercise as a right of the government in a Federal Court of Equity.
- e. [F/S/I/D] violates or disturbs [P/P]'s constitutional rights of [PPP].
- f. [F/S/I/D] when exercise by "UNITED STATES" this law or doctrine is based on "complaint" of monetary matters. No law or precedent exist for "Petition."
- g. [F/S/I/D] and its wavier/consent violates the supremacy clause of Article VI of the U.S. Constitution as well as "vested rights" under the Article III powers of standing and subject matter jurisdiction & federal question jurisdiction.
- h. [F/S/I/D] and its wavier/consent violates or [Burdens] [P/P]'s FAITH in [LAW].
- i. [F/S/I/D] and its wavier/consent directly violates or disregards a constitutional guarantee "*to petition the Government for a redress of grievances.*"
- j. [F/S/I/D] is a constitutional evil manifesting [To LIVE as EVIL] and confuses the real doctrine of sovereignty or as true sovereigns of the "UNITED STATES" being "We the People".
- k. [F/S/I/D] applies to the United States of America ("USA") and its 50 States. How can any Nation have two so called sovereignty: USA & the government of the "United States"?.
- l. [F/S/I/D] comes from common law, and if [P/P] or any person chose a "jury trial" for their suit, this man made, hand crafted & self-serving doctrine would violate the seventh amendment of the U.S. Constitution, to wit:

“In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined in any Court of the United States, than according to the rules of the common law.”

Personal Note: [P/P] thought it was in the best the “UNITED STATES” & the Courts should review the facts of faith vs not being re-examined in any Court

- m. [F/S/I/D] creates & supports an *unconstitutional condition* & a legal culture of *involuntary servitude* thus violating another Court’s doctrine or the 13th amend.
- n. [F/S/I/D] and its wavier/consent is further addressed within [ECF No. 10].
- o. [F/S/I/D] is a legal fiction so the “UNITED STATES” can function as usurper for *ultra vires act*, as declared in [P/P]’s “Petition”.
- p. [F/S/I/D] and its wavier/consent cannot pass *strict scrutiny* review used to protect fundamental rights and prevent discrimination based on suspect classification (here religion). To survive strict scrutiny, the “UNITED STATES” must demonstrate:

Compelling Interest: The law must be necessary to achieve a compelling government interest, meaning it is essential to protect a vital government purpose.

Narrowly Tailored: The law must be narrowly tailored to achieve the compelling interest, meaning it does not unnecessarily restrict fundamental rights.

Least Restrictive Means: The law must be the least restrictive way to achieve the compelling interest, meaning there are no other less intrusive means to achieve the same goal.

- q. [F/S/I/D] and its waiver/consent is a clear and prejudicial error of law and fact as a clear abuse of discretion, as Defects of Justice to Work a Manifest Injustice.
- r. [F/S/I/D] and its waiver/consent is grounds for fundamental error.
- s. [F/S/I/D] and its waiver/consent is the malfeasance of fundamental error, existing as Plain Error of Law or as Reversible Error.
- t. [F/S/I/D] and its waiver/consent violates [P/P]'s FAITH in [CLP].
- u. [F/S/I/D] and its waiver/consent is in conflict with or disregard these germane U.S. Supreme Court cases/decisions/precedents, to wit:
 - (1) *Chisholm v. Georgia*, 2 U.S. 419, 431 (1793) & *Mottley*, 211 U.S. 149 (1908)
(binding precedent, Federal question juris. is a subset of subject matter jurisdiction.
 - (2) *Yick Wo v. Hopkins*, 118 U.S. 356, 370 (1886) / *Langford v. U.S.*, 101 U.S. 341, 1 (1879). (persuasive precedent, re: "...sovereignty itself remains with the people, by whom and for whom all government exists and acts." & "...King can do no wrong has no place...")
 - (3) *CAPRON v. VAN NOORDEN*, 6 U.S. 126 (Cranch) (1804) "Here it was the duty of the Court to see that they had jurisdiction, for the consent of parties could not give it."
 - (4) *Louisville & Nashville R. Co. v. Mottley*, 211 U.S. 149 (1908)
To determine whether federal question jurisdiction is appropriate, a court should consider only the complaint, rather than any anticipated defenses or any counterclaims or cross-claims.
 - (5) *Marbury v. Madison*, 5 U.S. (1 Cranch) 137 (1803)

This landmark 1803 case established the Supreme Court's power of judicial review, meaning they can strike down laws, policy, doctrines, or legal practices that conflict with the U.S. Constitution & the Bill of Rights.

(6) *Bailey v. Alabama*, 219 U.S. 219 (1911)

The words "involuntary servitude" has a larger meaning than slavery, and the Thirteenth Amendment prohibited all control by coercion of the personal service of one man for the benefit of another.

(7) *Olmstead v. United States*, 277 U. S. 438, (1928)

Our Government is the potent, the omnipresent teacher. For good or for ill, it teaches the whole people by its example. Crime is contagious. If the Government becomes a lawbreaker, it breeds contempt for law; it invites every man to become a law unto himself; it invites anarchy.

(8) *West Virginia State Board of Education v. Barnette*, 319 U.S. 624 (1943)

“If there is any fixed star in our constitutional constellation, it is that no official, high or petty, *can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion, or force citizens to confess by word or act their faith therein.* If there are any circumstances which permit an exception, they do not now occur to us.” 319 U. S. 642 (Emphasis added)

These matters of law and its equity, as well as legal matters, issues, and rights about Rule 41(b) MOTION TO DISMISS are addressed in detail within:

[P/P]’s OPPOSITION TO [D/R/I P]’s RULE 12(b)(1) & 41(b) MOTION TO DISMISS
“with prejudice all counts & claims for relief in Plaintiff’s Complaint/‘Petition’”

On Point #5: Legal Defects of [ECF Nos. 12-13] manifesting the prerequisites & grounds
for the assignment of errors to be considered for an Appeal.

“United States” proffered this legal premise as misplaced or misapplication of law:

To the contrary, the suit is specifically precluded by the Anti-Injunction Act, 26 U.S.C. § 7421(a), and/or the tax exception to the Declaratory Judgment Act, 26 U.S.C. § 2201(a), because Hinds seeks to restrain the assessment and collection of taxes.
re: [ECF No. 31] p.1, cl.1.

To Create a Clear Record & Clearly State the Legal Basis:

[P/P]’s argues this is a *frivolous legal position* otherwise **moot** to pursuant to [ECF No. 28]

1. This is an action with actual controversies that are substantial and concrete, to settle as applied violations of statutory and constitutional provisions; by this means, to protect constitutional rights and liberties pursuant to *free exercise claims* of religious belief, religion, conscience, association, petition, protest, protected speech, etc. (“[Rights]”).

See [P/P]’s Brief in Support of Petition and in “Petition” ¶ 1, page 1.

[D/R/I P]’s Response: *Failure to make disclosures or inadequate response (silence).*

2. The challenged opinions/conduct/actions/law of the [D/R/I P], *as applied*, concerns:
(1) violations of U.S. Const./Amends. (2) unwarranted intrusions, (3) *ultra vires acts*, (4) legal defects, (5) Crudely Crafted Burdens of Law, Belief & Practice (“[Burdens]”) (6) invasions of legally protected interest of fundamental rights, doctrines, federal laws, & executive policy, (7) unjust liberty deprivations, aimed at (“[unconstitutional ends]”).

See [P/P]’s Brief in Support of Petition ¶ 4, page 3-4 and in “Petition” ¶ 2, page 1.

[D/R/I P]’s Response: *Failure to make disclosures or inadequate response (silence).*

3. The federal arguments, disputes & concrete harms here, concern **“unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness”** (“[LLP]”) and with governmental actions substantially burdening an exercise of religion & the liberty of sincerely held religious beliefs, practices, or observances. (“FAITH”) or (“[believes]”).

See [P/P]’s Brief in Support of Petition ¶ 5, page 2 and in “Petition” ¶ 3, page 1.

[D/R/I P]’s Response: *Failure to make disclosures or inadequate response (silence).*

4. The substance here is claim-rights owed & differ as to things that touch the heart of an existing order. In our Federal Constitution, government compulsion as employed herein is not a lawful measure of achieving taxation via compelled speech violating [Rights]. Also, one’s *faithfulness* to the rule of law used & hybrid forums applied are central to this case for the applications of **religious liberty** rights, one’s personal constitution & Facts of Faith/exhibits/declarations incorporated herein by reference. (“[Testimony]”) See [P/P]’s Brief in Support of Petition ¶ 2, page 1 and in “Petition” ¶ 4, page 1.

[D/R/I P]’s Response: *Failure to make disclosures or inadequate response (silence).*

On Point #6: If, On Point#5 should be accepted by the Court this would manifest an **Abuse of Discretion**, if the judge fails to realize this “Petition” concerns *religious liberty* & [CLP] and [P/P]’s FAITH in [LAW] & FAITH in [LLP] & FAITH in [LLP], *inter alia* verse [THE CODE] & actions or conduct as law respecting an establishment religion.

If the “United States” lawyers would review [P/P]’s jurisdiction plea in paragraph 22 page 6, cl. 2 to wit:

Judicial relief is also sought under 26 U.S. Code § 7426(b)(1) - Civil actions by persons other than taxpayers: (b)Adjudication

The district court shall have jurisdiction to grant only such of the following forms of relief as may be appropriate in the circumstances: (1)Injunction "If a levy or sale would irreparably injure rights in property which the court determines to be superior to rights of the United States in such property, the court may grant an injunction to prohibit the enforcement of such levy or to prohibit such sale."

The legal fact is 26 U.S. Code § 7426(b)(1) **creates** exceptions with respect to Federal taxes particularly with Anti-Injunction Act, 26 U.S.C. § 7421(a) Tax

Except as provided in sections 6015(e), 6212(a) and (c), 6213(a), 6232(c), 6330(e)(1), 6331(i), 6672(c), 6694(c), **7426(a)** and (b)(1), 7429(b), and 7436, no suit for the purpose

of restraining the assessment or collection of any tax shall be maintained in any court by any person, whether or not such person is the person against whom such tax was assessed.

Additionally, 26 U.S. Code § 7421 - Prohibition of suits to restrain assessment or collection

is not valid or recognized under 26 U.S. Code § 7428(b)(1) - Declaratory judgments

relating to status and classification of organizations under section 501(c)(3), etc.

(b) Limitations

(1) Petitioner

A pleading may be filed under this section only by the organization the qualification or classification of which is at issue.

Furthermore, 28 U.S. Code § 2201 - Creation of remedy was to be made by the

Court regarding all the lawful/legal determinations, such as:

28 U.S. Code § 2201 - Creation of remedy

“(a) In a case of actual controversy within its jurisdiction, except with respect to Federal taxes other than actions brought under section 7428 of the Internal Revenue Code of 1986”

(b) Limitations

(1) Petitioner

A pleading may be filed under this section only by the organization the qualification or classification of which is at issue.

On point #7 *Administrative Procedure Act & the Religious Freedom Restoration Act*

Hinds points to waivers of sovereign immunity in the Administrative Procedure Act and the Religious Freedom Restoration Act, but he does not dispute that a condition of those waivers is that relief is not precluded by some other statute— in this case, the Anti-Injunction Act and/or Declaratory Judgment Act. See 5 U.S.C. § 701(a) (“This chapter [the APA] applies . . . except to the extent that—(1) statutes preclude judicial review”);⁴ *We the People Found., Inc. v. United States*, 485 F.3d 140, 142-143 (D.C. Cir. 2007) (Kavanaugh, J.) (“We agree with the Government that the Anti-Injunction Act precludes plaintiffs’ second claim [under the APA]— related to collection of taxes.”); *see also CIC Servs., LLC v. IRS*, 593 U.S. 209, 216 (2021) (“If the suit [under the APA] is for [the purpose of restraining the assessment or collection of any tax], it must be dismissed.”); *Hobby Lobby Stores, Inc. v. Sebelius*, 723 F.3d 1114, 1128 (10th Cir. 2013) (evaluating “the merits of the RFRA claim” only after determining that the AIA did not apply to preclude the relief), *aff’d sub nom. Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682 (2014); *id.* at 1157 (Gorsuch, J., concurring) (“We could not, of course, reach the merits of the RFRA question if we thought the Anti-Injunction Act barred our way.”).⁵
re: [ECF No. 31] p. 3-4, cl.2.

To Create a Clear Record & Clearly State the Legal Basis:

[P/P] does not have the essential number of pages necessary to *facilitate a due process*, pursuant to court local rules. But attacks “Unites States” legal assertions, including but not limited to, *We the People Found., Inc. v. United States*, 485 F.3d 140, 142-143 (D.C. Cir. 2007). This cited case and its supporting case law concerns “*citizen's right to receive a government response*” versus [P/P]’s [P/P/P] is establishment/free exercise clauses claims.

Plaintiffs contend that the First Amendment guarantees a citizen's right to receive a government response to or official consideration of a petition for redress of grievances. Plaintiffs' argument fails because, as the Supreme Court has held, the First Amendment does not encompass such a right. See *Minn. State Bd. for Cmty. Colls. v. Knight*, 465 U.S. 271, 283, 285, 104 S.Ct. 1058, 79 L.Ed.2d 299 (1984); *Smith v. Arkansas State Highway Employees*, 441 U.S. 463, 465, 99 S.Ct. 1826, 60 L.Ed.2d 360 (1979).

Signatures of

Dated the first day of June 2025

 /s/ Terry Lee Hinds
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CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing was filed on this first day of June 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:

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