



SPECIAL
REPORT

2ND EDITION

THE LAWLESS ONES

THE RESURGENCE OF THE SOVEREIGN CITIZEN MOVEMENT



The Lawless Ones: The Resurgence of the Sovereign Citizen Movement

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Key Findings

- **Significant Growth.** The sovereign citizen movement is an extreme anti-government movement whose members believe the government has no authority over them. It began a resurgence of activity, including criminal activity, in 2009 that has shown no signs of stopping. In 2012, the sovereign citizen movement is currently one of the most problematic domestic extremist movements in the United States.
- **Potential for Violence.** Sovereign citizen criminal activity includes violent acts, exemplified recently by the brutal murder of two West Memphis police officers at the hands of a father and son pair of sovereign citizens in May 2010. More violent encounters have occurred between police and sovereign citizens since then. Spontaneous sovereign citizen violence, especially during traffic stops and visits to residences, poses a significant risk to law enforcement officers and public officials.
- **Harassing Liens a Major Problem.** More widespread than violence is a set of tactics known as “paper terrorism,” in which sovereign citizens use legal filings to harass, intimidate, and retaliate against public officials, law enforcement officers, and others. Most common is the filing of bogus liens on the property of perceived enemies. Though a number of laws were passed in the 1990s to deal with this problem, sovereign citizens remain undeterred and continue to file such harassing liens in large numbers.
- **Exploiting the Mortgage/Foreclosure Crisis.** Self-appointed “gurus” in the sovereign citizen movement have actively been exploiting the foreclosure crisis, crisscrossing the country promoting schemes and scams to desperate homeowners, while falsely claiming that such schemes can save people’s homes. Other sovereign citizens are even brazenly seizing homes left empty because of foreclosures and claiming the homes for their own.
- **Infecting Prisons.** As a result of imprisoned sovereign citizens continuing to recruit and teach their ideology while behind bars, a growing number of federal and state prisoners are becoming sovereign citizens or using the “paper terrorism” tactics of the movement to retaliate against judges, prosecutors and others involved in their case. Prison officials have so far had little luck in stemming the growth of this movement in prisons.
- **Growing “Moorish” Movement.** Though the sovereign citizen movement is still largely white (and contains some white supremacist members), in recent years a growing African- American offshoot of the sovereign citizen movement, often called the “Moorish” movement, has been gaining strength, teaching sovereign citizen ideas and tactics to a new pool of potential recruits.

I. Introduction to the 2012 Edition

In recent years, Americans have witnessed a wave of anti-government sentiment sweeping the country. In the mainstream, this manifested itself in anti-incumbent attitudes as well as the growth of movements like the Tea Party.

Out on the fringes of American society, the growth of anti-government sentiment spawned the proliferation of extreme anti-government conspiracy theories and the resurgence of anti-government extremist groups and movements. Of these, the movement that exhibited the most rapid growth of membership and activity—including violent and criminal activity—was the so-called “sovereign citizen” movement.

The sovereign citizen movement, though it has existed for decades, has traditionally garnered so little attention from the media that most Americans are not even aware that it exists, much less that it has a long track record of criminality and violence. Part of the reason for this lack of attention is that the ideology of the movement is complicated, its tactics and activities are unusual, and adherents of the movement typically do not form organized groups that can draw more attention. Usually, the movement operates “under the radar” of public attention; even when attention is drawn to the activities of adherents, the media often does not understand their connection to an organized movement.

Occasionally the sovereign citizen movement does come to public attention, usually through a shocking act such as standoff or shootout. In 2010, such an act occurred. On May 20, 2010, a 45-year-old sovereign citizen with Ohio and Florida connections, Jerry Kane, was driving along I-40 in eastern Arkansas when he was pulled over by West Memphis, Arkansas, police officers running a drug interdiction operation.

Kane, travelling with his 16-year-old son, Joseph, a dedicated disciple of his father’s extreme theories, exited the mini-van and began talking to, then arguing with, the officers. Joseph Kane then jumped out of the mini-van with an AK-47, opening fire on the unsuspecting officers almost immediately, hitting one officer 11 times and the other 14 times, killing them both. Ninety minutes later, after authorities located the Kane’s vehicle, a second shootout occurred, in which the Crittenden County sheriff and his chief deputy were both wounded, and the Kanes were killed.

Shortly after this tragic incident, the Anti-Defamation League released the first edition of this report, designed to draw attention to the growing tide of sovereign citizen activity and violence across the country and to explain the current trends and tactics within the movement.

Unfortunately, in the nearly two years since the West Memphis shootout and the report’s release, the sovereign citizen movement has shown no signs of slowing down. Instead, from every quarter, there have been more violent confrontations, more threats and acts of intimidation and harassment, and more scams and frauds.

Because of the continued threat that this extreme movement poses to the safety and well-being of law

enforcement officers, public officials, and the public at large, the Anti-Defamation League has issued a new and updated version of *The Lawless Ones*, showing many of the most recent criminal incidents that have come out of the sovereign citizen movement and highlighting the main trends of the movement.

The resurgence of the sovereign citizen movement has already caused problems across the country. If the movement's growth is allowed to continue unchecked, further acts of violence are inevitable, putting government officials, law enforcement officers, and private citizens all at risk. An even larger number of people will fall victim to sovereign citizen acts of harassment and intimidation, as well as to their frauds and scams. This report should serve as a warning call.

II. Sovereign Citizen Ideology

The sovereign citizen movement began in the early 1970s with a single group, the Posse Comitatus, but its ideology did not really mature until the 1980s, when a serious recession and simultaneous farm crisis created a ready pool of potential recruits. The Posse expanded and a number of other, similar groups formed around the country. By the end of the decade, the Posse had died away but the movement it helped create lived on. During the mid to late 1990s, the sovereign citizen movement received another burst of energy, forming scores of vigilante “common law courts.”

As it evolved, the sovereign citizen movement developed an ideology centered on a massive conspiracy theory. Though different sovereign theorists all have their own varying versions of this conspiracy, including exactly when it started and how it manifested itself, the theories all share the belief that many years ago an insidious conspiracy infiltrated the U.S. government and subverted it, slowly replacing parts of the original, legitimate government (often referred to by sovereigns as the “de jure” government) with an illegitimate, tyrannical government (the “de facto” government).

As a result, sovereign citizens believe that today there are really two governments: the “illegitimate” government that everyone else thinks is genuine and the original government that existed before the conspiracy allegedly infiltrated it. They claim allegiance to the original government and disdain the “illegitimate” one. To them the original government was a utopian minimalist government which never interfered with the citizenry; in their fantasy history of the United States, they believe that people followed “God’s laws” rather than “man’s laws.”

Sovereign citizens (adherents may also refer to themselves by such terms as “constitutionalists,” “freemen,” and “state citizens”) make many efforts to separate themselves from the “illegitimate” government. Some will even renounce their U.S. citizenship (by which they intend only to renounce any ties with the “illegitimate” government, not the country itself). Very common is for sovereign citizens to use punctuation in their name—such as commas, colons, and semi-colons—to separate their first and middle names (their “Christian appellation”) from their last name, which many think is their “government-given” name. Thus Michigan militia leader Mark Koernke, when he also became a sovereign citizen, began writing his name as “Mark Gregory,, Koernke.”

Sovereign citizens believe that the “illegitimate government,” largely through the 14th Amendment, enslaved all Americans by creating a special class of citizenship, “citizens of the United States,” members of which would have no rights—only whatever privileges the government deigned to grant them. The government tricked Americans into becoming “citizens of the United States” by offering them privileges, such as driver’s licenses and Social Security, which were actually hidden contracts with the government through which Americans unknowingly gave away their sovereignty.

Sovereign citizens believe that Americans can tear up these so-called contracts, regain their sovereignty and become immune to the “illegitimate” government, which they claim has no jurisdiction over them.

As a result, sovereign citizens eschew taxes, Social Security, and almost all licenses, registrations and permits. Many sovereign citizens even believe that using zip codes is a contract with the “illegitimate” government and thus will use special forms of address that they think allows them to avoid a contract while still getting their mail delivered. Representative examples taken from actual sovereign citizen documents include (names, street names and numbers have been changed):

John Doe
c/o 110 West 15th Street, #20-P Austin, Texas
Republic
Postal Zone 78705/tdc

John Doe
c/o 1379 S. Lipton Avenue #140
Tucson, Arizona state
Postal Zone 85719/tdc

John Doe
c/o 12000 N. Peachtree Road
Grants Pass, Oregon near Postal Zone 97527

Jane Doe
Postal Zone Exempt Non Domestic c/o:
2300 Everett Rd., T.D.C. Kapa’a, Kaua’I,
Haai’I, (u.S.A.)
near (96746) C. F.

John Doe
2nd Judicial District
4389 W. Ave. #123
Lancaster, California Republic

Jane Doe, Sui Juris
Non-Resident, Non-Domestic Delivery c/o
HC 24, Box 142
Witt Springs, Arkansas Republic
United States of America

The result of sovereign citizen ideology is that its adherents believe the government (including police and the judicial system) has no jurisdiction over them. To give a typical example, in April 2010 in Brush, Colorado, after several traffic and other violations, David Hemby told the Brush City Council that he wasn’t subject to city ordinances because he was a “sovereign citizen.” Sovereigns also are attracted to setting up their own parallel governmental institutions (such as their own courts or grand juries or even law enforcement agencies) in opposition to those of the “illegitimate” government.

Sovereign citizens can rationalize disobeying or ignoring virtually any law or regulation, major or minor. This, combined with their antagonistic attitude towards government, can put them on a collision course with virtually any form of authority. For example, in February 2012, a Chelan County, Washington, jury convicted sovereign citizen Robert Stewart of seven counts of animal cruelty and unsafe confinement of horses, as well as one count of second degree criminal trespass. In September 2011, the Humane Society had seized five horses from Stewart that were suffering from malnutrition and injury; one later had to be put down. A month later, Stewart walked onto the property of the director of the Humane Society to take photographs of her home. Stewart, who believes local authorities have no jurisdiction over him, had claimed that they could not prosecute him because he was a sovereign citizen.

Many sovereign citizens refuse to stop engaging in their clashes with government even after repeated run-ins with the law. For example, Tampa, Florida, sovereign citizen Emilio Ippolito was convicted in 1998 of obstruction of justice and sending threatening letters to federal officials and was sentenced to 11

years in federal prison. His daughter, also a sovereign citizen, was similarly convicted and actually died in prison. However, after his release, Ippolito, who is 85 years old, went right back to sovereign citizen activities and was arrested twice in 2011, once for impersonating a public officer and once for practicing law without a license.

III. Organization of the Sovereign Citizen Movement

The sovereign citizen movement is unusual in that, unlike many other extreme movements, it is not generally oriented around groups. Though sovereign citizen groups do form, and sometimes certain types of sovereign citizen groups even become popular for a time, the default structure of the sovereign citizen movement is that of a large mass of individuals or loosely aligned and informal/ad hoc groups, led by a number of sovereign citizen “gurus,” who provide leadership and inspiration as well as new sovereign citizen ideas and tactics.

The Sovereign Citizen Guru

Gurus may refer to themselves by a variety of terms (such as “constitutional scholar,” “private attorney general,” etc.; the list is endless), often claiming to be some sort of legal or constitutional expert (though there are few if any actual attorneys in the movement, as the movement believes they are illegitimate). Though some may have other jobs, many are full-time gurus, making a living by selling materials and holding seminars. Some will offer their services as “legal consultants,” while others will also engage in scams and frauds. Some do all of these things simultaneously. When sovereign citizen groups do form, they will sometimes be teams of sovereign citizen gurus working together, such as TeamLaw of Colorado, a collection of several sovereign citizen presenters.

The most common guru activity is the seminar, often held in hotel meeting rooms and sometimes attended by hundreds of people, from long-time sovereign citizens to potential recruits. For example, in 2010, sovereign citizen guru Tim Turner and some of his disciples organized “America Can Be Free” seminars, usually with the help of local sovereign citizens, ostensibly offering people the chance to “free yourself from the debt prison” for the admittance price of \$405 and one pre-1964 Silver Dollar (sovereign citizens believe that only gold and silver constitute “constitutional” money, so this is a symbolic gesture). They held a “4-Day Super Advanced Enforcement Seminar” in Seattle, Washington, from May 20-23, 2010, then followed it up with another seminar on May 29-30 near Boise, Idaho, which they advertised would actually be held in a conference room of the Meridian, Idaho, Police Department. Similar seminars are regularly held in most areas of the country by various sovereign citizen gurus.

Since the 1980s, some sovereign citizens have even started their own “law schools.” One of the first to emerge was the “Barrister’s Inn School of Common Law” out of Boise, Idaho. It no longer exists, but one of its leaders still runs the eponymous George Gordon School of Law out of Isabella, Missouri. Other sovereign citizen “law schools” operating today include the Texas-based “Freedom School” and the Minnesota-based “Erwin Rommel School of Common Law.”

There are scores of sovereign citizen gurus across the United States. Some, such as Richard James McDonald of California (or “Sir Richard James, McDonald,” as he often refers to himself) and

David Wynn Miller of Wisconsin (or “PLENIPOTENTIARY-JUDGE: David-Wynn: Miller”), have been prominent gurus for decades. Others, such as Jerry Kane, the man involved in the West Memphis shootings, are newer to the scene.

Among a few of the other more prominent gurus active today are Winston Shrou, Tim Turner, Sam Kennedy, Jean Keating, and Jack Smith; they may hold seminars around the country. New gurus constantly emerge. One individual, Robert Kelly of Oregon, has long occupied a special role in the movement, as the publisher of the *Americans Bulletin*, a bimonthly newspaper that acts as the “New York Times” of the sovereign citizen movement. Many new sovereign citizen theories first see print there.

The most influential sovereign citizen gurus are the ones who contribute new lore to the sovereign citizen canon, coming up with new pseudo-legal and pseudo-historical theories. Most sovereign gurus, though, repackage and repeat already existing sovereign citizen theories, or create variations of them. When Roger Elvick, an elder statesman in the sovereign citizen movement, came up with a package of new theories in 1999 that he called “redemption,” within only months a number of gurus were holding “redemption” seminars around the country, a practice that continues to this day. One such disciple, Winston Shrou of Oregon, has now become a “master” of his own, and a variety of lesser gurus now offer seminars based on his ideas (Kane was one such).

Some gurus, though, have theories so arcane that few others could ever easily repeat them. Perhaps the best example is David Wynn Miller, who has actually created (and uses) a completely alternative grammar for the English language, which he claims allows him to master the judicial system. Or, as Miller puts it on his Web site, “FOR THIS PLENIPOTENTIARY-JUDGE: David-Wynn: Miller's-KNOWLEDGE OF THESE CORRECT-SENTENCE-STRUCTURES-COMMUNICATION-SYNTAX-LANGUAGE=(C.-S.-S.-C.-S.-L.) IS WITH THE CLAIMS BY THE QUANTUM-LANGUAGE-SYNTAX-NOW-TIME-FACTS.”

Sovereign Citizen Groups

In addition to gurus and their followers, sovereign citizen groups do emerge from time to time. Often they are informal groups of sovereign citizens in a particular geographic area, who meet together to share ideas or sometimes host a travelling guru. Sometimes they may give themselves names, such as a “constitutional study group” (not to be confused with similarly named groups started by Tea Party-type activists).

Occasionally sovereigns may form other types of groups. One of the more common types is a group that duplicates, resembles, or emulates a governmental entity. In the 1980s, for example, a Utah sovereign citizen named Walt Mann started the “township” movement, urging people to form their own independent “townships.” In the 1990s, vigilante “common law courts” became extremely popular in the sovereign citizen movement, with over a hundred forming. A few common law courts still exist today, such as the “Sovereign People’s Court for the United States” in Nevada, which has had over 100 people attend some of its meetings in recent years. Various sovereign citizens may dub themselves “private postmasters” or “private attorneys general.”

In the 2000s, no one such type of group has predominated. Some sovereign citizens, most notably a

group called Guardians of a Free Republic, have tried to create their own “grand jury” system (a sovereign citizen tactic dating back to the 1980s), arguing that such entities can nullify any law or judicial ruling. The most popular sovereign citizen group in the U.S. today is a spin-off of the Guardians led by Alabama-based guru Tim Turner (aka James Timothy Turner). Calling itself the Republics for the united States of America (lower case “u” intentional on their part) or RuSA, the group is a loose collection of Turner followers and local sovereign citizen groups. Larger sovereign citizen groups tend to be unstable and fractious.

One recent innovation, which may or may not prove popular, has been promoted by a few gurus, notably James Thomas McBride of Ohio. This is the so-called “Three Notary Panel.” This is an expansion of an older sovereign notion that notary publics actually have extensive powers, of which most people are entirely unaware, using the “Notary Protest Process.” Three notaries can form a special panel, or a sovereign citizen may select three notaries to form such a panel to help him or her, and when the panel convenes, it may subpoena people, authorize bogus liens, rule laws unconstitutional, and more. As a result, in some places, sovereign citizens are attempting to become notaries, to avail themselves of this “power.” As with so many other recent sovereign citizen tactics, its advocates often suggest these notary panels can be used to fight mortgage foreclosure.

Sovereign Citizens on the Internet

As is true for most types of extremist movements, the sovereign citizen movement has come to rely heavily on the Internet for propaganda, recruitment, and funds. The Internet is particularly important to sovereign citizen gurus, as it gives them an inexpensive and reliable way to introduce people to their pseudo-legal theories and to promote their seminars and products (such as instructional manuals, form templates, and DVDs). It also is useful for sovereign citizen con artists to reach gullible victims. As a result, an increasing number of sovereign citizen gurus create their own Web sites.

From the perspective of rank-and-file or prospective sovereign citizens, the Internet is full of discussion forums and other venues where sovereign citizens can exchange information about strategies, their own experiences, their favorite mentors, and more. In the past few years, a number of sovereign citizens have aggressively exploited the new social media, utilizing social networking Web sites such as Facebook to connect and recruit, and video hosting services like YouTube to market various gurus and their theories. Sovereign citizen videos in particular are becoming increasingly common on-line; many gurus will even put up videos of a sample seminar, or portion of it, to market themselves and their theories. Sovereign citizens may also film traffic stops or other encounters with police, then upload the videos to the Internet.

In addition to these more or less standard ways for extremists to exploit the Internet, sovereign citizens have used the Internet in less common ways as well. For example, they have taken advantage of the recent emergence of document hosting sites (essentially like YouTube but for PDF files) to upload thousands of documents, especially templates and examples of various sovereign citizen paperwork. It is easy in 2012 to find downloadable templates that allow people to declare themselves sovereign citizens, file bogus liens on perceived enemies, or engage in other harassing or intimidating letters and filings.

They have also turned to the Internet to try to help solve a perennial problem that sovereign citizens

face: county and state officials refusing to accept and file their bogus documents. Although unfortunately some county recorder offices and secretary of state offices continue to accept all sovereign citizen filings, no matter what problems they may cause (sometimes out of ignorance, sometimes because of state law, but often out of a fear of being sued), a growing number of governmental recording/filing agencies now refuse to accept such pseudo-legal documents, thus stymieing the harassing or other intentions of the sovereign citizens trying to file them.

As a result, several on-line entities have emerged to accept sovereign citizen filings as “third party recording entities.” The National Republic Registry, for example, out of Mansfield, Texas, bills itself as “YOUR Solution to Hassle Free Public Recording.” GetNotice is a similar site operating from Fort Collins, Colorado; so too is America’s Public Record, based in Scottsdale, Arizona.

IV. Composition and Makeup of the Sovereign Citizen Movement

The loose and unorganized nature of the sovereign citizen movement makes its size difficult to gauge, but it is clear that its membership is well into the tens of thousands, at the very least. The composition of its membership is somewhat easier to determine.

Personality Types

Though an individual may get involved in the sovereign citizen movement for any number of reasons, three types of people turn up again and again when one examines its membership:

- People who are financially stressed. Whether the stress is due to unemployment, bankruptcy, creditors, spousal or child support, tax problems or something else, the desperation that comes with financial troubles can be a powerful motivator. Though many different extremist movements have tried to take advantage of economic troubles over the years to recruit new adherents, the sovereign citizen movement has an advantage in that it doesn't just offer people targets to blame for their woes (the banks, the illegitimate government, etc.), but it can also seem to offer relief in the form of a variety of pseudo-legal "solutions" that offer almost magical ways to get out of foreclosure, debt, or other financial troubles.
- People who are angry at government, especially government regulation. Some people develop intense antipathy toward government rules and regulations, from property codes to tax laws. Every unsuccessful encounter with the government simply makes them angrier. Consequently, when they encounter the sovereign citizen movement, with its alleged ways to get around laws and regulations, as well as tools of retaliation against government officials, they find the movement very attractive.
- Con artists and people who want "something for nothing." The sovereign citizen movement is full of theories that promise people quick riches or other seemingly magical benefits, from being able to eliminate a mortgage to be able to hide one's income in a series of trusts and make it immune to government scrutiny. As a result, the movement appeals powerfully to people who are always seeking a quick buck or something for nothing. It also appeals to con artists and confidence men and women who can use the movement's theories to create schemes to attract money from the greedy or the innocent alike.

Demographics

Demographically, most sovereign citizens tend to be middle-aged or older. Many of the leaders of the movement are in their 60s and 70s. This has sometimes caused law enforcement officers to underestimate a sovereign's potential for violence, as there are fewer elderly violent offenders in general, but unfortunately there have been many armed confrontations between police and older sovereign citizens. However, the resurgence of the movement in the past several years have brought in a lot of new adherents, including young ones. The majority of sovereign citizens are male, but there is a sizable female minority and even a few female sovereign citizen gurus.

In its early decades, the sovereign citizen movement was overwhelmingly white. Indeed, a number of its founders and pioneers were explicit white supremacists. Today, there are still some white supremacists in the movement, typically followers of Christian Identity, a racist and anti-Semitic religious sect whose anti-government beliefs are often compatible with movements such as the militia, tax protest and sovereign citizen movements.

However, since the 1990s, the percentage of non-white sovereign citizens has increased substantially. The basic ideology of the movement is inherently anti-government, rather than white supremacist; moreover, it is infinitely adaptable to different circumstances. As a result, there are Asian sovereign citizens, Hispanic sovereign citizens, and so forth. Many members of the native Hawaiian secessionist movement are sovereign citizens.

It is among African-Americans, though, that the sovereign citizen movement has really seen growth over the past 15 years or so, so much so that an entire sub-movement of African-American sovereign citizens, who often describe themselves as "Moors," "Moorish," or "Mu'urish," has developed. The Moorish movement started as a mixture of ideas from the sovereign citizen movement and a religious sect called the Moorish Science Temple (MST). The movement has expanded beyond MST members to include other African-Americans (and, oddly, a few whites), while there are many MST members who do not adhere to sovereign citizen ideology at all, but there remain many connections between the Moorish movement and the MST.

The Moorish movement arose in the 1990s in northeastern cities and southeastern rural areas, which still tend to be its areas of strength. Adherents subscribe to all of the popular traditional sovereign citizen theories, but have added additional, Afro-centric pseudo-legal theories, such as the notion that a 1787 treaty between the United States and Morocco somehow gives "Moors" in the United States a set of special privileges and immunities. Ironically, most Moorish movement members have no idea that their ideology is descended from an extreme right-wing belief system created in part by white supremacists (though Moors frequently will cooperate with white sovereign citizens).

The tactics that Moorish movement adherents engage in are essentially identical to those practiced by other sovereign citizens. A few recent examples illustrate this:

- Elyria, Ohio, March 2012: Moorish sovereign citizen Kareen Tucker received a sentence of 25 years in prison on robbery, drug and kidnapping charges for a 2010 incident in which he and two other men kidnapped a man, then held his girlfriend and her three children at gunpoint

while demanding money. During his trial, Tucker, who defended himself, claimed that he had “diplomatic immunity” and that, because the Uniform Commercial Code allegedly governed law in the United States, he couldn’t face criminal charges because he did not have a “contract” with the state of Ohio.

- Akron, Ohio, May 2011: Moorish sovereign citizen Chico Rhasiatry of Akron, Ohio, was convicted for unauthorized practice of law, criminal trespassing and obstructing official business. Rhasiatry had introduced himself as “counsel” during the trial of another Moorish adherent, Demond El-Muur, and told the judge that El-Muur was an “Aboriginal” whose case had to be heard in a Moorish jurisdiction. Prior to his sentencing, he was found in contempt for again trying to represent someone and sentenced to a month in jail for this new offense.
- Detroit, Michigan, March 2010: A Detroit resident, Andre Frank Hardy, led police on an extensive chase rather than pull over for a traffic stop for expired plates (Hardy also allegedly had six outstanding warrants and a suspended license). Taken into custody, Hardy told police that, as a member of the Moorish Nation, the U.S. government had no authority over him.
- Newport News, Virginia, March 2010: A Newport News, Virginia, sovereign, Amun Asaru Heh-El, was brought to court to face four counts of driving without a license. Heh-El allegedly told the judge that he was not under the authority of the United States, and subsequently left the courtroom during a recess before the trial began (coincidentally, that afternoon the judge had to deal with a white sovereign citizen couple over a different issue).

A number of African-American sovereign citizens are also involved with fringe religious groups of different types. The most common such group, of course, is the MST. The Georgia-based “Nuwaubian Nation” is another fringe religion with a number of sovereign citizen members. From time to time, adherents of the Nation of Islam may also become sovereign citizens. One African American sovereign citizen in Tennessee claimed in March 2010 that he was a follower of Yahweh ben Yahweh, leader of the Nation of Yahweh, a black separatist religious sect.

This trend is not, however, limited to African-American sovereign citizens. Some white sovereign citizens also belong to fringe religious groups. In recent years, for example, some members of the polygamist Fundamentalist Church of Latter Day Saints, a controversial and radical offshoot of the Mormon church, have sported sovereign citizen license plates.

Prisoners as Sovereign Citizens

Since the 1990s, hundreds, possibly thousands, of sovereign citizens have been sent to county jails or state or federal prisons. Though imprisoned, many of them have seen no need to curtail their sovereign citizen activities. Some sovereign citizens have continued their paper terrorism tactics

from behind bars, while a number of them have also been teaching the ideology of the sovereign citizen movement to other prisoners.

As a result, over the last ten years, a wave of prison-based sovereign citizen activity has swept the country, much of it generated by “traditional” criminals such as drug dealers or thieves, some of whom have actually become sovereign citizens themselves, with others simply trying some sovereign citizen tactics because they have been told they would work. In the mid to late 2000s, for example, as uncovered by an in-depth investigation by the Washington Monthly, a number of inner city Baltimore drug dealers have used sovereign citizen arguments during their trials. One public defender described it as “an infection that was invading our client population of pre-trial detainees.”

Some recent examples include:

- Southport Correctional Facility, Chemung County, New York, 2010: Prison officials charged sovereign citizen inmate Jose A. Fuentes with impermissible filing of documents, copyrighting his name and disobeying a direct order following their discovery that Fuentes, in a letter to his wife, directed his spouse to file harassing Uniform Commercial Code documents against corrections employees. He was found guilty of the charges; in 2011, a New York appeals court confirmed the conviction.
- Marion, Illinois, April 2010: Daniel Petersen, one of the leaders of the Montana Freeman, who engaged in an 81-day standoff with the federal government in 1996, was sentenced to 7½ years in prison for filing bogus liens against three federal judges. Petersen was still in federal prison at the time he filed the liens, serving out the 15-year prison sentence handed to him by U.S. District Judge John Coughenour, one of the victims of Petersen’s liens. Petersen’s full scheme reveals the ingenuity and energy of sovereign citizens. He not only filed liens against the federal judges, but also issued bounties for their arrests. Then he created a phony company and recruited other inmates to invest in it, promising them large sums of money after he collected the money (\$100 trillion, plus interest, he told them) that the government allegedly owed him.
- Queens, New York, March 2009: A Queens County court declared “null and void” a series of bogus liens placed on Queens prosecutors who had been involved in the case of Ronald Thompson, a convicted murderer serving a 20 years to life sentence at Sing Sing. Declaring that the prosecutors had violated his “copyright” by using his name without his permission, he claimed they owed him more than \$1 million.
- Miami, Florida, May 2009: Miami resident Marlon T. Moore was arrested for filing tax forms that claimed a total return of \$14 trillion. Moore had recently been released from federal prison after serving a six-year sentence on money laundering charges. According to a former fellow prisoner, Moore and another inmate, Willie Cameron, had become sovereign citizens while in a federal prison near Orlando. Cameron also allegedly filed a fraudulent return, but only for \$53,000 or so; he was also arrested.
- Terre Haute, Indiana, April 2008: Russell Dean Landers, another imprisoned member of the Montana Freeman, was sentenced to an additional 15 years in prison; Landers was one of

three federal inmates who had demanded millions of dollars from prison officials for using their “copyrighted” names without their permission. They were convicted of conspiracy and mailing threatening communications with the intent to extort.

Law Enforcement

Amazing as it may seem, especially given that police are among the most common targets of sovereign citizens, sometimes even current or former law enforcement officers can get lured into the sovereign citizen movement. Though this is rare, in the past few years there have unfortunately been several such incidents, including:

- Sarasota, Florida, May 2011: The Sarasota Police Department fired officer Tom Laughlin because of his alleged involvement in the sovereign citizen movement. In the spring of 2010, reportedly at the urging of his older brother, Jimmy, a sovereign citizen adherent, Laughlin had filed documents claiming that he was an “American National Sovereign” and no longer a citizen of the United States. A few months later, the two brothers were involved in a traffic stop in St. Augustine, following which Jimmy sent demands to the state trooper who had pulled him over for over \$8 million in “penalties.” Jimmy Laughlin was charged with extortion, though those charges were later dropped. However, he was arrested on fraud charges for attempting to pay off a significant credit card debt using a bogus sovereign citizen “straw man” account. The two brothers also filed other sovereign citizen filings. Following these incidents, the Sarasota police opened an internal investigation on Tom Laughlin that resulted eventually in his firing. Laughlin appealed his firing to the Civil Service Board, but abandoned the attempt during his May 2011 hearing.
- Minneapolis, Minnesota, May 2010: Former Minneapolis police officer Douglas Earl Leiter received a 10 year sentence for his role as the leader of a sovereign citizen/tax protest group called Common Law Venue, which taught people how to use bogus trusts to evade taxes.
- Las Vegas, Nevada, March 2010: Jan Lindsey, a retired FBI agent from Henderson, Nevada, pleaded guilty to a felony count of tax evasion for evading \$109,000 in personal income taxes. Lindsey was one of four sovereign citizens and tax protesters arrested by the FBI in May 2009 following a three-year investigation into money laundering, tax evasion, and illegal weapons.

Exporting Sovereign Citizenship

The sovereign citizen movement originated in the United States and for many years was present nowhere else. In the mid to late 1990s, however, the sovereign citizen movement and its cousin tax protest movement began to appear in Canada, primarily the western provinces of British Columbia, Alberta, and Saskatchewan. It was both imported into Canada by Canadians who had become exposed to sovereign citizen theories and exported to Canada by American sovereign citizen gurus who saw Canada as an easy way to expand their seminar audiences. David Wynn Miller was one such American guru who held seminars in Canada, at least until Canadian authorities banned him from the country. As a result, the movement now has a fairly strong presence in Canada—a presence that has experienced a resurgence in recent years just as the American sovereign citizen movement has.

More recently, sovereign citizen activists have been trying the same thing with regard to Australia and New Zealand. Despite the great distances, sovereign citizen guru Winston ShROUT has held seminars in Perth, Brisbane, and Adelaide in the past couple of years. David Wynn Miller has also held seminars in Australia—and has been banned from the country in the past, though despite this he apparently scheduled a major multi-city tour of Australia for the summer of 2010. Sovereigns now have at least a foothold in Australia and New Zealand.

The newest target for the sovereign citizen movement has been Great Britain. In early 2010, sovereign citizen guru Winston ShROUT visited London, while would-be British sovereign citizens have been imbibing the ideology from the Internet. Since then, some British sovereign citizens have already uploaded YouTube videos portraying or describing traffic stop encounters with British police.

One sovereign citizen-related incident has even become “international.” In January 2011, a federal grand jury in Nashville, Tennessee, issued a 21-count indictment against a British gun company owner, Guy Savage, and four Americans for allegedly engaging in illegal overseas arms sales. The American defendants subsequently reached plea deals with the government, but Savage decided instead to represent himself and use sovereign citizen arguments and tactics in his defense, including sending the federal court a demand for nearly \$250 million, claiming that the court—and indeed, the U.S. government—was a “legal fiction.” The U.S. government is attempting to extradite Savage from Great Britain to stand trial in the United States.

V. Sovereign Citizen Tactics: Paper Terrorism

The array of tactics that sovereign citizens utilize is diverse and ever-changing. Some sovereign citizen tactics date all the way back to the 1970s, while others are brand-new. Sovereign citizen gurus probably read more statutes and codes than most attorneys or legal scholars, but they do so for entirely different reasons and in very different ways. They look for passages they can misuse, recast, take out of context, or exploit. Any phrase or definition can become fodder for a new pseudo-legal argument.

The most common sovereign citizen tactics fall into the realm of what has come to be termed “paper terrorism.” Paper terrorism involves the use of bogus legal documents and filings, or the misuse of legitimate ones, to intimidate, harass, threaten, or retaliate against public officials, law enforcement officers, or private citizens. Acts of paper terrorism can range from simple and straightforward acts, such as frivolous lawsuits, to more complex strategies, such as filing fraudulent IRS forms alleging that the victim has been paid large sums of money, in order to “sic” the IRS on him or her.

Bogus Liens

Among the oldest paper terrorism tactics is the use of bogus or nuisance liens filed on the property of victims (often law enforcement officers or public officials). This has the effect of clouding the title of homes or other property belonging to the victim, who must hire an attorney to clear the title, at considerable expense in time and money. Despite dozens of laws passed in different states in the 1990s and 2000s to deal with the problem, it still is a very effective tactic, and commonly used by sovereign citizens.

Some of the many recent incidents include:

- Spokane, Washington, March 2012: A federal judge sentenced federal jury sovereign citizen Ronald James Davenport of Chewelah, Washington, to 41 months in prison after his conviction in November 2011 on four counts of filing more than \$20 billion in bogus liens against government officials. The victims had all been involved in a civil case against Davenport for unpaid taxes.
- Devine, Texas, February 2012: Podiatrist and sovereign citizen Donald Robinson of Devine, Texas, pleaded guilty in state district court to fraudulent filing of a financial statement for filing a lien on the home of a local police officer following a traffic stop. He was sentenced to two years of probation and 100 hours of community service. He had previously spent time in federal prison for filing false income tax returns.
- Baltimore, Maryland, February 2012: A federal judge sentenced Maryland sovereign citizen and tax protester Andrew Isaac Chance to 65 months in prison for filing a \$1.3 billion lien against a federal prosecutor (as well as a similar lien against a state prosecutor) involved in tax-related cases against him.

- Skagit County, Washington, January 2012: Sovereign citizen and tax protester Timothy Garrison received a 42-month federal prison sentence for his involvement in a tax fraud scheme. He had also filed more than \$500 million in bogus liens against a variety of public officials following a traffic stop.
- Minneapolis/St. Paul, Minnesota, January 2012: Thomas Wayne Eilertson and Lisa Joan Connery Eilertson were charged with filing more than \$100 billion in bogus liens against a variety of local public officials. Thomas faces 30 criminal counts, while Lis faces 47. The couple allegedly filed the liens while being foreclosed upon and evicted from their home in 2009-2010.
- Albany, New York, December 2011: Former IBM engineer and sovereign citizen activist Richard Ulloa was sentenced in December 2011 to five years in federal prison for filing \$4 trillion of bogus liens and other retaliatory and harassing filings against a variety of police, judges, government employees and private citizens. He and his followers even created their own “court” and issued bogus indictments against people and threatened to arrest them. Ulloa was also ordered to pay \$63,401 in restitution to Ulster County and a local credit union.
- Boerne, Texas, December 2011: Podiatrist and sovereign citizen Donald E. Robinson was indicted for allegedly filing a bogus lien on property owned by a Boerne police officer who had issued Robinson a citation during a 2009 traffic stop. The trial was scheduled for February 2012, but Robinson did not wait for the trial in order to become active. When he received a copy of the indictment, he wrote “accept for value—return for fraud” on the document (a standard sovereign citizen pseudo-legal notion) and sent it back, which resulted in his arrest in June 2011 for tampering with a government record. In a two-hour-long trial held in December 2011, in which Robinson represented himself, the jury deliberated for a mere six minutes before convicting him. He was sentenced to 14 days in prison. Robinson had previously served four months in federal prison for filing false income tax returns. In February 2012, he pleaded guilty to fraudulent filing of a financial statement (the lien charge) and was sentenced to two years deferred adjudication probation and 100 hours of community service.
- Mineral Bluff, Georgia, October 2011: Georgia Bureau of Investigation agents arrested sovereign citizen Robert Eugene Stephens of Mineral Bluff, Georgia, on 12 criminal counts related to a series of bogus liens Stephens allegedly filed against a variety of state and local officials, including a county clerk, a local judge and her secretary, the county tax commissioner, the Speaker of the Georgia House of Representatives, and others. Stephens allegedly called his liens “maritime liens.”
- Pensacola, Florida, September 2011: Sovereign citizen Mark D. Leitner received a 30-month federal prison sentence in Pensacola, Florida, in September 2011 for filing bogus liens against a variety of federal prosecutors, agents, and other officials who were involved in a 2010 criminal case against Leitner for tax fraud. Leitner had filed bogus maritime liens against the property of the victims and claimed that each victim owed him almost \$48.5 billion. Leitner was already serving a five-year sentence after being convicted in the 2010 case.

- Highland, New York, August 2011: Sovereign citizen Jeffrey Burfeindt received a six-month prison sentence after pleading guilty to mail fraud for filing \$736 billion in bogus liens against local police and government officials. The liens followed an incident in which he and another sovereign citizen, Ed Parenteau, were arrested for trespassing at a foreclosed-upon home. Parenteau was previously convicted in May 2011 and sentenced to 21 months in prison.
- Daytona Beach, Florida, June 2011: Sovereign citizen Patricio E. Sanchez filed a harassing lien for \$350,000 against a local judge and two attorneys who had been involved in a foreclosure case against Sanchez. As a result, Sanchez was jailed for almost half a year for contempt of court.
- Ogden, Utah, May 2011: Sovereign citizen Harvey Douglas Goff was indicted in federal court on 14 counts related to 77 bogus liens he allegedly filed against government entities and employees. He also allegedly mailed documents to state and local officials demanding payment of more than \$53 trillion in “damages.” These incidents followed a March 2010 traffic stop in which he allegedly claimed “diplomatic immunity.” Goff was charged with obstruction of justice, impeding internal revenue laws, fictitious obligations, attempt to commit mail fraud, mailings in furtherance of a scheme and artifice to defraud.
- Birmingham, Alabama, October 2010: Jefferson County sheriff’s deputies arrested father and son sovereign citizens Donald Joe Barber and Donald Jason Barber on charges of intimidating a witness (Donald Joe) and possession of a forged instrument (Donald Jason, who also faced other apparently unrelated charges). The charges allegedly stemmed of “actions” taken by the Barbers against various police and government officials, including alleged threats as well as filing bogus liens, such as a \$15 million lien against a local judge.
- Colorado Springs, Colorado, September 2010: A federal judge sentenced Ronald Roy Hoodenpyle to a year in prison and two years of supervised release following a conviction for filing a bogus lien against an IRS employee for \$1,160,000.

Other Harassing Attempts

In addition to bogus liens, sovereign citizens have developed a large repertoire of tactics to intimidate, threaten, and retaliate against people, ranging from involuntary bankruptcy filings to a wide variety of threats and extortions to bogus criminal complaints. Some recent examples of these tactics include:

- Polk County, Florida, October 2011: Polk County, Florida, authorities charged members of a local sovereign citizen group with simulating legal process. The most prominent member, Jacob Franz Dyck, 72, had achieved notoriety for filing sovereign deeds on houses he did not own and for allegedly setting up trusts that would ostensibly protect other people’s property from foreclosure or seizure. The charges stemmed from an incident involving Gary Chenot of Lakeland, one of Dyck’s followers, who had outstanding vehicle loans and a mortgage on his home. Chenot allegedly placed the vehicles and home into trusts that Dyck created. Chenot, Dyck, and another person, Kim Clayton Perry, allegedly began sending various pseudo-legal

documents, including some from a common law court (a common sovereign tactic in the 1990s), apparently in order to get a bank to cease trying to reclaim one of the vehicles. In connection with this case, Chenot has been charged with grand theft, resisting an officer, and attempting to influence, intimidate or hinder law enforcement duties. Dyck has been charged with simulating the legal process. Perry and another person, Khamma Inthavong, have also been charged with simulated legal process.

- Talladega County, Alabama, January 2011: Two Alabama sovereign citizens were indicted on felony warrants from South Carolina for conspiracy and using sham legal process to intimidate or hinder a state or local official. The defendants, Gary Wayne Presley and Michael Donald Wilsey, were part of a sovereign citizen group called the Central Assemblies Union of the Several States of the Union of the States of the United States of America. Wilsey was also part of the Little Shell Pembina Band sovereign citizen group, a fictitious Native American tribe.
- Casper, Wyoming, October 2010: After sovereign citizen Ed Corrigan was found guilty of contempt in October 2010 for refusing to fix a variety of health and safety code violations on his property outside Casper, a sovereign citizen group calling itself a “Wyoming Grand Jury” allegedly met to re-hear the case, with sovereign citizen John Lee Cotton serving as the vigilante jury’s foreman. These “jurors” subsequently tried to file a presentment criminally charging four local government officials and judges for violating their oaths of office. “At this point,” Cotton told one reporter, “we have no strong arm of the law to back us up; but that day will come.”

VI. Sovereign Citizen Tactics: Counterfeit Documents and Entities

Sovereign citizens are some of the most brazen counterfeiters around. They create fake license plates, drivers' licenses, vehicle registrations, insurance cards, identification cards, and passports. Even more ambitiously, sovereign citizens have created fictitious financial instruments, such as "sight drafts" and "bills of exchange;" fictitious countries, colonies, and even Native American tribes; fictitious law enforcement agencies and more. They are constantly engaged in ways to create spurious forms of documentation and authority to help them avoid the reach of the actual government.

Fictitious Documents and Identification

One sovereign citizen fad that has been sweeping the country in recent years is the notion of "diplomatic immunity," in which sovereigns declare themselves "diplomats" and their homes as "embassies." Once they have done so, they will create or procure their own "Diplomatic Agent" identity cards and attempt to use them in various circumstances, such as traffic stops.

Some recent examples include:

- Indianapolis, Indiana, November 2011: Indianapolis police pulled over a sovereign citizen, Mark Osborn, who allegedly claimed that he did not have to have a driver's license or register his motorcycle. Instead, Osborn showed officers an identification card that proclaimed Osborn a "diplomat." Local reporters discovered that vehicles on his property had license plates that read "Free State Republic." Following the traffic stop, Osborn demanded that Indiana pay him \$1.6 million in gold or silver coins. In April 2012, Osborn was arrested again by Indianapolis police on a number of charges for allegedly still driving his SUV with his "Free State Republic" plates.
- Austin, Texas, October 2011: Sovereign citizen Randall Kelton of Austin, Texas, received a one-year prison sentence and a \$4,000 fine for impersonating a licensed investigations company officer in order to give evidence to a grand jury on behalf of Robert Fox, a sovereign citizen guru and leader of the so-called "House of Israel." Kelton represented himself in the trial, which is common for sovereign citizens.
- Norfolk, Virginia, September 2011: Roland Lee Morrison, aka Rashid Muhammad, a "Moorish" sovereign citizen, was convicted of two counts of fraudulent assertion of diplomatic immunity following a 2010 open container incident in which Morrison proclaimed to police that he had "sovereign immunity" and presented a Moorish diplomatic identification card as his ID. In December 2011, he was sentenced to time served (more than a year in jail).
- Arab, Alabama, September 2011: Officers from the Arab, Alabama, Police Department arrested a sovereign citizen, Soni Dale Jackson, following a traffic stop. Jackson had

allegedly been using a bogus identification card that claimed he was actually Soni Dale Carlee. Jackson also pulled out a common sovereign citizen document called a Public Servant's Questionnaire and demanded the officer fill it out. According to a statement that Jackson made in an on-line forum in November 2011, Jackson told the officer he had no driver's license but had a "Common Law Identification Card." Jackson also claimed that he had made a "common law name change" to "Soni-Dale: Carlee."

- Bartlett, Tennessee, July 2011: Sovereign citizen Joseph Augustine Dattilo, Jr., of Indiana was arrested on several traffic charges related to driving with a home-made "United States" tag on his vehicle. In court, Dattilo contended that the court had no jurisdiction over him, that he was not required to have a car registration or driver's license, and that he did not need car insurance because he had a "\$10 million bond." The judge fined him.
- Front Royal, Virginia, July 2011: Front Royal police officers arrested Randy Linamen of Manassas following a traffic stop in which Linamen reportedly tried to give police a "Kingdom of Heaven" driver's license instead of a legitimate one. Linamen also allegedly attempted to drive away during the traffic stop, but was prevented from doing so by police. He was charged with driving after revocation as a habitual offender. After police found a gun and ammo in the vehicle, he was also charged with being a felon in possession of a firearm.
- Hollidaysburg, Pennsylvania, July 2011: The state police arrested Don Ralph Ickes, Jr., of Osterburg, Pennsylvania, on charges of resisting arrest, disorderly conduct, and various motor vehicle violations following a traffic stop because Ickes' vehicle was allegedly displaying a bogus license plate issued by the Embassy of Heaven, an Oregon-based sovereign citizen group that has marketed bogus plates, drivers licenses and vehicle registrations to the sovereign citizen movement since the 1990s. Ickes allegedly refused to cooperate during the traffic stop and ended up being dragged from the vehicle by the state trooper.
- Vay, Idaho, June 2011: After police stopped a vehicle on I-90 for allegedly carrying a homemade license plate, they discovered that the driver, sovereign citizen Alexander Duncan Campbell, had a loaded 9mm pistol inside. Campbell was arrested and charged with carrying a weapon without a license and failure to purchase a driver's license. He was also subsequently arrested for a failure to appear in court charge on another driver's license incident in 2008 in another county.
- Staunton, Virginia, May 2011: Sovereign citizen Michael Creath Jones of Hanover, Virginia, was charged with five misdemeanors following a traffic stop in Staunton, Virginia. Jones had been pulled over by a Virginia state trooper for allegedly having a license plate that had been modified with phrases such as "private use." During the stop, Jones allegedly refused to cooperate with the trooper. He was charged with resisting arrest, obstructing justice, driving without a license, operating an uninsured vehicle and driving with defective equipment.

Fictitious Financial Instruments

Because most sovereign citizens claim that paper money is unconstitutional, with gold and silver the only lawful forms of currency, they find it easy to rationalize creating their own forms of paper money, claiming they are at least as legitimate as Federal Reserve Notes. Sovereign citizens have engaged in this tactic since the early 1980s and it is still common today. Over the years, sovereign citizens have called such fictitious financial instruments by a variety of names, including certified money orders, comptroller's warrants, bills of exchange, and sight drafts, among others. Currently popular are "bond promissory notes" or "bonded promissory notes." Some recent incidents include:

- Kansas City, Missouri, February 2012: Sovereign citizen Danny Ray Hardin received a 10-year federal prison sentence after being convicted of 21 counts of mail fraud and creating fictitious financial instruments for selling \$100 million in bogus "promissory notes" as part of the "Private Bank of Danny Ray Hardin." The notes were used by purchasers largely to pay off mortgages. At the time of his 2010 indictment, Harbin was already in prison. His probation for an earlier conviction had been revoked after he tried to arrest the lieutenant governor of Kansas for "violating the Constitution."
- Hammond, Indiana, December 2011: Christopher Cannon, a sovereign citizen from Gary, Indiana, was convicted in federal court for using 181 counterfeit bills to buy large-screen televisions in Hobart in 2010. During his trial, Cannon claimed the government had no jurisdiction over him. The counterfeit currency was made from \$5 bills that had been made to look like \$50 bills. "Traditional" counterfeiting is rather rare in the sovereign citizen movement, which usually prefers to create entirely fictitious financial instruments with titles such as "bills of exchange" or "promissory notes."
- Bakersfield, California, October 2011: A federal jury convicted Michael Ioane of Atwater, California, of conspiracy to defraud the U.S. and of four counts of presenting fictitious documents to the U.S. Ioane was involved with Acacia Corporate Management and First Amendment Publishers, which marketed bogus trusts to people as ways to avoid paying taxes. Ioane also created fictitious financial instruments called "Bills of Exchange" to send to the IRS to eliminate tax debt. A codefendant, Vincent Steven Booth, previously pleaded guilty in 2010.
- Kansas City, Missouri, June 2011: Husband and wife defendants Roderick Moore and Amber Catrece Moore of Kansas City were sentenced in federal court to, respectively, 13 months in prison and three years of probation. Earlier in the year, Roderick Moore had pleaded guilty to one count of mail fraud and his wife to conspiracy to commit wire fraud. Roderick Moore had created a popular sovereign citizen fictitious financial instrument, a "Registered Bonded Promissory Note," to pay off over \$200,000 in debts. Amber Moore had filed bogus liens against several government officials or entities.

Fictitious Law Enforcement Entities

Some of the most troubling counterfeit entities that sovereign citizens establish are fictitious law enforcement agencies. Sovereign citizens have declared themselves members of the Constitution Rangers, Republic of Texas Rangers, u. S. [sic] marshals, Civil Rights Task Force, and more. Sovereigns who purport to represent such agencies often have identification cards, badges, and sometimes even accoutrements such as police raid jackets. Using these props, sovereign citizens have attempted to get past courtroom security, to extricate themselves from encounters with police, and even to intimidate or “interrogate” others. The most popular current fictitious law enforcement agency is probably the “County Rangers,” which has appeared in a number of states (along with a variant, the so-called “American Rangers”).

Among recent examples of such items are the following:

- Spanaway, Washington, November 2011: Kenneth Leaming, a sovereign citizen from Spanaway, Washington, was charged with three charges related to filing a series of bogus liens in 2010 and 2011 against federal judges, prosecutors and law enforcement officers that totaled around \$225 billion. Leaming, formerly a Thurston County deputy sheriff, is one of the leaders of the so-called “County Rangers,” a fictitious law enforcement agency created by the sovereign citizen movement that has been growing in popularity. In the past, Leaming has been involved with other sovereign citizen groups, including the Civil Rights Task Force (another fictitious law enforcement agency) and the Little Shell Pembina Band of North America, a fictitious Native American tribe. He had allegedly filed the liens in response to conflicts with authorities over a previous criminal case in which he was convicted.
- San Antonio, Texas, October 2011: Police arrested sovereign citizen Gregory Brent Davis in October 2011 in San Antonio on charges of impersonating a peace officer and unlawfully carrying a weapon for allegedly pretending to be a Texas Ranger. He had previously been arrested on the same charges in August 2011. In the earlier instance, he had allegedly been allowed into a rodeo without paying admission by claiming to be a “colonel of Rangers;” in the later instance, he allegedly entered a bank while wearing a badge and carrying a gun. Davis is part of the Republic of Texas, a large and long-running Texas-based sovereign citizen group, which has had a history of adherents posing as fictitious Texas Rangers.
- Kerrville, Texas, October 2010: A local judge sentenced two sovereign citizens, father and son, for impersonating police officers. Both persons, Charles Tiller III and Charles Tiller IV, are members of the so-called Republic of Texas, a large sovereign citizen group based in that state. Charles Tiller III was charged earlier in the year with a felony count of impersonating a public servant after he had allegedly identified himself as a constable while trying to order a badge. He received a sentence of three years of probation and a \$2,000 fine. His son, Charles Tiller IV, was charged with falsely identifying himself as a peace officer for allegedly putting a sign on his vehicle identifying it with a star and the phrase

“Bexar County Sheriff’s Department.” He pleaded no contest and was sentenced to two years’ probation and an \$800 fine. Kerrville has historically been a hotspot in Texas for the sovereign citizen movement.

- Eureka, Montana, June 2010: U.S. customs officials in Montana ordered a Canadian sovereign citizen living in the United States to leave the country after he pleaded guilty to charges of domestic abuse. The man, Donald Roy Fehr, was also part of a sovereign citizen group that dubbed itself the “County Rangers.” Fehr had allegedly made threatening telephone calls to a local justice of the peace and had begun to show up at local government meetings wearing a uniform sporting a badge, and carrying a pistol.

Fictitious Nations, Quasi-Nations and Tribes

Members of the sovereign citizen movement, in order to escape the jurisdiction of a government they believe is illegal, frequently try to create their own fictitious governmental or quasi-governmental entities, largely in an attempt to avoid authority. For example, in the 1990s, a group of sovereign citizens invented a fictitious British colony, the “British West Indies,” and manufactured and sold realistic looking license plates that purported to come from this colony.

This tactic continued in the 2000s, surging along with the rest of the sovereign citizen movement beginning in 2009. To give just one example from among many, in Harrison, New York, in May 2011, Harrison police officers arrested sovereign citizen Jason R. Mack for second-degree criminal impersonation for allegedly providing “Moorish” identification documents, including an “Indigenous Government ID – Tax Exempt” that identified Mack as an “aboriginal MINISTER Cherokee Choctaw Native.” Another card claimed that its bearer was exempt from taxation because he was a “minister.”

In the 21st century, such tactics have not abated. Notable examples of fictitious tribes include:

- Little Shell Pembina Band of North America. Perhaps the most “successful” such attempt was the creation in 2003 of a fictitious Native American tribe dubbed the Little Shell Pembina Band of North America, which quickly spread across the United States. In 2010, some of its original members have dropped out, but the concept itself has remained very popular, and Little Shell related incidents regularly pop up, many of them involving frauds or scams of various kinds (see frauds and scams section). To give one recent example, two Little Shell members, Gregory Allen Davis and Michael Howard Reed of North Dakota, were sentenced in February 2011 for filing \$3.4 million in bogus liens against a federal judge and federal prosecutors in 2009. Reed received a nine year sentence, Korman a sentence of three years and five months. They were arrested after Reed threatened a judge who refused to dismiss federal drug charges against two other Little Shell members and Davis filed a bogus lien against another judge and against an acting U.S. Attorney for not dismissing a firearms charge against Reed. They were subsequently convicted of conspiring to file and filing false liens against federal officials; Reed was also convicted of obstruction of justice.

“Little Shell” adherents now use several different variations of the original name of the group. However, they are unrelated to the similarly-named Montana-based Little Shell Tribe, which is not a sovereign citizen group.

- Washitaw Nation/Empire. This sovereign citizen group emerged in Louisiana and Texas in the mid-1990s. It is one of several sovereign citizen groups that are essentially Moorish in nature but also claim “native” status. Washitaw members claim they are descendants of the ancient mound-builders of the Mississippi Valley. Members have created license plates, diplomatic identification cards and similar fictitious sovereign citizen documents. Although in the 1990s the Washitaw was essentially a single group, by the end of that decade it had become more of a concept and today there are a number of completely independent “Washitaw” sovereign citizen groups across the country. In April 2010, a Washitaw member in Greensboro, North Carolina, Tornello Fontaine Pierce El-Bey, sued the city for \$7 million, claiming that a police officer had violated his rights during a March 2010 traffic stop. When stopped, El-Bey told the officer he was not a U.S. citizen and tried to present a diplomatic identification card instead of a drivers’ license. El-Bey also claimed a copyright violation for his name appearing on the ticket the officer issued.
- United Nations of Turtle Island (UNOTI). UNOTI is based primarily in east Tennessee, western North Carolina, and northern Georgia, although “members” have been found as far away as California. UNOTI has been creating bogus license plates, driver’s licenses and similar documents since around 2003.
- Sovran Nations Embassies of Mother Earth (also known as Sovran Unity Nations). Sovran is a group that started up recently in Montreal in Canada, but has now spread to a number of places in Canada and the United States, with contact points in California, Arkansas, Montana, and Hawaii. One of their Montana contact points is in the tiny town of Roundup, famous in 1995-1996 for being one of two towns housing the Montana Freemen.
- Wampanoag Nation, Tribe of Grayhead, Wolf Band. This small group emerged in the 2000s in eastern Utah (unrelated to the legitimate Mashpee Wampanoag Nation in Massachusetts), issuing driver’s licenses and filing lawsuits against a variety of public officials and law enforcement officers, including a \$250 million lien against a Uintah County prosecutor. In May 2008, a federal judge ordered a \$63,000 civil judgment against four of its organizers, ordering them to stop their “complete sham.”

VII. Sovereign Citizen Tactics: Frauds and Scams

For decades, the sovereign citizen movement has been home to hundreds of con artists and tricksters who use the language and pseudo-legal theories of the movement to beguile people into giving them their money. It is not uncommon for successful sovereign con artists to get more than a million dollars out of their schemes; several of the largest sovereign-involved scams have raked in over a hundred million dollars.

Among the most common type of sovereign scams are pyramid schemes, other investment schemes, bogus trust scams, real estate fraud, and various types of tax frauds. However, sovereign citizens have engaged in more esoteric scams as well, ranging from immigration fraud to malpractice insurance fraud. Some sovereign scam artists will target anybody, while others actually primarily target adherents of the sovereign citizen movement themselves, in a form of affinity fraud.

Any sort of debt can also potentially be fodder for a sovereign citizen scheme: student loans, car loans, credit card debts, etc. In March 2010, for example, eight operators (from Oregon, Washington, New York and Florida) of a sovereign citizen and tax protest group called Pinnacle Quest International were convicted of tax fraud, wire fraud and money laundering charges. Among their various enterprises was Financial Solutions, operated by Arthur Merino of Renton, Washington, which charged victims thousands of dollars to “eliminate” their credit card debt. Many victims were forced into bankruptcy after discovering the scheme did not work.

Some recent examples of sovereign citizen scams include:

- Erie, Pennsylvania, July 2012: A federal judge in Erie, Pennsylvania, sentenced tax protester, sovereign citizen, and Erie County Councilman Ebert G. Beeman to 12 months and one day in prison following his conviction on eight counts of Social Security fraud. Beeman allegedly used a fake name to fraudulently obtain a Social Security number, then used it to apply for jobs, credit cards, and a car loan. Beeman has had other legal problems as well, including a long-running battle with the IRS for \$2.1 million in unpaid income taxes, penalties, and interest. In that case, Beeman unsuccessfully represented himself, using sovereign citizen pseudo-legal arguments. In October 2011, FBI agents seized property owned by Beeman to help repay the debt. In November, Beeman was found guilty of violating a federal court order directing him to vacate the properties seized by the IRS; federal authorities had allegedly found him hiding in the bathroom of one of the properties. Beeman has also been cited at least eight times for driving without a license. He mailed two such citations to a local judge with the words “refuse for cause” written on them—a common sovereign citizen tactic.
- Ventura County, California, March 2012: Ventura County sheriff’s deputies arrested Sharon Palmer, James Cecil Stewart, and Eugenie Victoria Bloch on charges of conspiracy to commit a crime, money laundering, grand theft, and failure to file an income tax return. James Stewart was a sovereign citizen who signed his name with sovereign punctuation as

“James-Cecil: Stewart.” In a February 2012 document purporting to be a signed “statement under oath” by Stewart, he claimed that the state of California had no jurisdiction over him. The defendants ran businesses such as Healthy Family Farms and the Rawesome Food Club, which allegedly illegally produced and sold unpasteurized or “raw” milk (for which they were charged in August 2011). Prosecutors charged that they stole more than \$1.5 million from investors in the business.

- Las Vegas, Nevada, October 2011: Samuel Davis, a prominent sovereign citizen “guru,” received a federal prison sentence of 57 months in Las Vegas, Nevada, for his role in a \$1.3 million money laundering scheme. He was also ordered to serve three years of supervised release and to pay almost \$100,000 in restitution. Davis pleaded guilty in March 2011. A co-defendant, Shawn Talbot Rice, remained a fugitive for months until his capture in December 2011 following a brief standoff.
- Maui, Hawaii, May 2011: Five sovereign citizens were indicted by a federal grand jury for their involvement in a tax and mortgage fraud scheme. The defendants, Mahealani Ventura-Oliver, John D. Oliver, Pilialoha K. Teves, Leatrice Lehua Hoy, and Peter Hoy, were charged with 25 counts of fraud, money-laundering and tax-related charges. Using several groups, they had allegedly collected nearly \$500,000 in fees from 2008-2010 for a “debt assistance program” that they claimed could eliminate mortgage, credit card, and other debts. They had also allegedly prepared false income tax filings and issued fictitious financial instruments such as bonds, promissory notes, and money orders. The sovereign citizen movement has long been active in Hawaii, where it is often associated with segments of the native Hawaiian independence movement.
- Indianapolis, Indiana, August 2010: An Indianapolis jury found sovereign citizen Walter Eugene Lunsford guilty of multiple counts of fraud and theft for attempting to use Federal Reserve routing numbers in a scheme to get free cars from an Indianapolis car dealership for himself and his friends. Lunsford’s scam was initially successful when he tried it, but failed when all of his friends showed up at the car dealership on the same day to repeat his tactic, one of them even allegedly offering to “buy” a car for one of the employees of the dealership. He received a two year sentence of home detention after agreeing to help federal and state investigators.

Mortgage/Foreclosure Schemes

Of the many sovereign schemes active today, some of the most troubling are schemes purporting to allow victims to save their homes or property from foreclosure. They are especially troubling because they target desperate property owners and can potentially take their last dime and at the same time insure that they will lose their property. None of their schemes actually have the ability to save property from foreclosure.

Such schemes date back to the serious recession and farm crisis of the early to mid-1980s, and regularly reappear. From 2003-2006 a major wave of sovereign citizen mortgage scams swept the United States, with more than a half dozen major groups (some operating as multi-level marketing schemes so that they had hundreds of “associates”) offering what they dubbed “mortgage

elimination.” Victims would pay thousands of dollars to have their mortgages “eliminated” within four to six months, only the “elimination” would never actually occur. Although consumer alerts from a variety of federal and state sources helped to stem this tide of scams, only a relatively few perpetrators were ever prosecuted. One group that was investigated and successfully prosecuted was the California-based Dorean Group, whose leaders, Kurt Johnson and Dale Scott Heineman, were convicted of 35 counts of mail fraud in 2008 and sentenced to 25 and nearly 22 years in prison, respectively.

Since the foreclosure crisis broke in late 2008, a new wave of mortgage-related sovereign citizen schemes has appeared, as sovereign citizen gurus around the country have leapt to take advantage of a large pool of people newly worried about saving their homes from seizure. Many, perhaps most, sovereign citizen gurus have rushed to add mortgage-related material to their seminars. “Our plan is really simple,” explains the Web site of one such entity, the Debt Free Sovereign Trust, operating in Washington state and British Columbia. “To eliminate your debts, we simply assume your debts....All debts arising from privately created money or ‘digitally created’ money can be eliminated.” The cost? Only \$1,000 for “expenses.”

A mortgage scheme in Hawaii charged considerably more. In late 2008, the FBI began investigating a mortgage elimination ring that charged victims between \$2,500 and \$10,000 to attend seminar and meetings where people were given special \$1 million “Royal Hawaiian Treasury Bonds” that they could allegedly use to pay off their mortgages (a sovereign citizen tactic dating back to the 1980s), though they would have to make payments to the mortgage elimination ring for a while. Of course, the bonds turned out to be worthless.

Many gurus do not themselves offer to eliminate people’s mortgages or save their homes, but rather market schemes or instructions as to how people can do it on their own. The gurus make less money, taking in seminar and materials fees and sometimes perhaps acting as “consultants,” but probably believe they face less risk of criminal prosecution.

Sovereign citizens have come up with a variety of pseudo-legal ways to attempt to “protect” their property. One such tactic, which dates back to the early 1980s, is attempting to use gold or silver coins to purchase properties or interfere with their resale. The theory behind such attempts rests on the sovereign citizen belief that paper money holds no value and only gold or silver actually is valid money. For example, in 2008, three Pennsylvania sovereign citizens—Victor Balleta of Allentown, Michael Proetta of Whitehall Township, and Michael Reis of Bethlehem—attempted to purchase foreclosed property with gold and silver coins. When outbid, they challenged the bids. Proetta explained that the other bidders “made an unlawful money bid in credit in opposition to my lawful money bid. I was the only lawful bidder and therefore the only bidder.” The men might not have been trying to obtain the properties for themselves but trying to hinder the banks’ ability to re-sell the properties by challenging their ownership (as actually happened; it was not until 2010 that their suit was dismissed).

Another ancient sovereign tactic given new life in recent years is the notion of putting a lien on one’s own property because of the “sweat equity” an owner has put into it. The theory is that no other creditor can take the property until the owner’s lien has been satisfied. As one Michigan-based Moorish sovereign citizen group, the Moorish Republic Trust, puts it, “Under common law,

life experience has value. The idea is that you have lived, worked, played, laughed, cried, in other words, you have put yourself into the property, and the property owes you as a result.” The Moorish Republic Trust suggests that the figure of \$3,000 per year of ownership is an “uncontestable” figure; they generously offer to help people, presumably for a fee, prepare such “common law liens.” However, the courts have ruled that such self-targeted liens are illegitimate.

Most common has been the resuscitation of the notion of the “land patent.” Sovereign citizens take historical and legal references to an old legal concept (land patents are how the federal government historically transferred title of public lands to private ownership) and imbue it with the magical quality of being able to protect one’s property from creditors and foreclosure. Along with the related concept of “allodial titles,” the “land patent” concept dates at least as far back as the early 1980s in the sovereign citizen movement—and has been struck down by the courts many times. In recent years it has seen new life, as sovereign citizens across the country have begun promoting the notion and offering instructions—for a price.

“The mortgage industry doesn’t want anyone to know about land patents,” claims one Web site promoting the tactic. According to these promoters, “a land patent claim has never successfully [been] challenged in court.” How are more people are not aware of land patents? Because “state and local authorities are in collusion to ensure that this information never reaches the public.”

Many sovereign citizens have rushed to become land patent promoters, including people one might not ordinarily associate with such schemes. One example is Rita Granberry, a model who helped parley stints on the Howard Stern radio show into a career as a nude model. Of Afro-Italian descent, Granberry recently became involved with the Moorish movement, changed her last name to Granberry-El, and even delivered presentations (one of which was uploaded to YouTube) promoting the notion of land patents.

Granberry-El has a lot of company. In fact, not only are sovereign citizens heavily involved in promoting the notion of land patents, but the idea has now slipped the bounds of the movement and some non-sovereign con artists have also recently picked up on the scheme.

Some sovereign citizens have been taking advantage of the foreclosure crisis in a very different way: by appropriating for themselves homes in foreclosure. Typically, sovereign citizens would identify foreclosed-upon homes whose occupants had been evicted but which had not yet been resold by the bank. They would then file bogus deeds, change the locks, and move in. The more ambitious would actually become de facto landlords by renting out the seized properties to others. Sovereign citizen “squatting” incidents have occurred in every region of the country.

Some recent sovereign citizen mortgage scam and “squatting” incidents include:

- Memphis, Tennessee, March 2012: A federal grand jury indicted sovereign citizen Devitoe Farmer on three counts of theft of government property after Farmer allegedly used bogus quit-claim deeds in an attempt to take possession of foreclosed houses from government agencies or government-backed housing lenders. According to news reports, Farmer claimed that since 1933, federal law has prevented government agencies and banks from possessing property. He may also face state charges.

- Appleton, Wisconsin, March 2012: Erik Hudson (aka Kabir Bey) of Appleton, Wisconsin, was convicted of criminal property slander after using a bogus warranty deed to seize a foreclosed-on home and then renting it out—a popular sovereign citizen tactic in recent years. Hudson, a member of the Moorish offshoot of the sovereign citizen movement, told the judge, “I’m not in a state of mind of Wisconsin, I’m in a state of mind of Moorish America.”
- DeKalb County, Georgia, October 2011: A DeKalb County grand jury indicted Susan Weidman, Ian Greye, Giulio Greye, and Mathew Lowery on charges related to a “squatting” scheme, in which the defendants allegedly seized and occupied vacant foreclosed-upon houses in four different Georgia counties. Weidman, the alleged ringleader, was indicted on state racketeering charges. The suspects, at least some of them self-declared sovereign citizens, have decided to represent themselves in court.
- Charlotte, North Carolina, October 2011: Mecklenburg County authorities reported a rash of filings—more than 200—from Moorish sovereign citizens who allegedly claimed that their group membership gave them the right to claim vacant homes for their own. In one reported case, two individuals entered a dwelling and claimed that they now had a deed for the house. Several people have been arrested in connection with some of these incidents, including Kenneth William Lewis, charged with obtaining property by false pretenses, possessing stolen goods, breaking and entering and trespassing; and Asaru Aalim Ali, charged with breaking and entering and trespassing.
- Tucson, Arizona, September 2011: A federal grand jury in Tucson indicted two sovereign citizens, Marshall Home and Margaret Elizabeth Broderick, for an alleged mortgage fraud scheme. They were charged with 10 counts of mail fraud, bankruptcy fraud, and wire fraud. Home and Broderick, associated with the ‘Individual Rights Party’ and the ‘Mortgage Rescue Service,’ allegedly charged people \$500 to “help” people facing foreclosure. However, their rescue services reportedly consisted of bogus sovereign citizen filings, such as an involuntary petition of bankruptcy against the U.S. government. They also allegedly registered as trade names the formal names of government-sponsored loan organizations Fanny Mae and Freddie Mac, then used those names to file fraudulent deeds on property owned by those organizations and transfer them to the Independent Rights Party (following which, they would allegedly rent out the properties).
- Chicago, Illinois, August 2011: Cook County officials discovered that a Moorish sovereign citizen or sovereign citizen group allegedly filed bogus deeds on more than 30 Chicago-area homes and properties with an estimated worth of more than \$10 million. Many of the deeds listed the Moorish Science Temple of America and/or Noble Drew Ali (the group’s long-dead founder) as the owner. However, MSTA officials have claimed to have had nothing to do with the deeds and that the MSTA itself was being victimized by this.
- Mullica Township, New Jersey, July 2011: Police in Mullica Township, New Jersey, arrested Moorish sovereign citizen Jolanda S. Bordley-Jackson-El for allegedly stealing a foreclosed home worth \$300,000. As has been typical in such cases, Bordley-Jackson-El

allegedly filed a bogus deed to the house, then changed the locks and utilities. She was charged with theft by deception and forgery.

VIII. Sovereign Citizen Tactics: Threats, Takeovers and Violence

Sovereign citizens engage in harassing tactics such as bogus liens, as well as a variety of scams and frauds, but as the West Memphis shootout involving Jerry and Joseph Kane tragically demonstrated, they are willing to resort to violence as well.

Indeed, threats and ultimatums, attempted “citizens arrests” and takeovers of government or other buildings, and acts of violence, especially during traffic stops and residence visits, are common among the sovereign citizen movement, making them a serious officer safety threat as well as a potential threat to public officials and private citizens in the communities in which they operate.

In addition to the West Memphis shootout, other recent incidents include:

- Valparaiso, Indiana, July 2012: A Michigan truck driver and sovereign citizen, Martin J. Jonassen, 55, was convicted of kidnapping and obstruction of justice in September 2011 for allegedly kidnapping his 21-year old daughter in September 2011 from her Missouri home in order to take her to his home in Michigan. According to court documents, his daughter had never been to school and had only read books about religion, history and the government that had been approved by her father. The woman escaped while they were travelling through Portage, Indiana. Jonassen recaptured her, but not before residents saw her running naked through the streets and reported the incident to police. Jonassen was arrested when police found the two together. Jonassen has been charged with federal kidnapping charges, as well as local charges of felony confinement. Following his arrest, he filed a petition with the federal and local courts, stating that they had not proven they had any jurisdiction over him as a sovereign citizen of Michigan. He was also subsequently charged with two counts of obstruction of justice for trying to get his daughter to change her testimony. At a court hearing, he pleaded not guilty “under duress” and claimed that he was “a man of the land, born of the land.” He represented himself during trial.
- Fairbanks, Alaska, June 2012: Alaska militia leader and sovereign citizen Schaeffer Cox and two other defendants, Coleman Barney and Lonnie Vernon, were convicted of a variety of charges related to a plot to kill state and federal officials. Cox, the ringleader, was convicted of 9 of the 11 charges against him, including conspiracy to murder, solicitation to murder and seven weapons charges. The three defendants, and two others, all belonging to either a local militia group, sovereign citizen group, or others, were arrested in Fairbanks, Alaska, in March 2011, on state and federal weapons and other charges related to an alleged plot to kill Alaska state troopers and other state and federal officials.
- Colleyville, Texas, February 2012: A Tarrant County jury sentenced sovereign citizen James M. Tesi of Hurst, Texas, to 35 years in prison after convicting him of aggravated assault on a public servant with a deadly weapon. Tesi was wounded in July 2011 during a shootout with police in the town of Colleyville, near Fort Worth. Prior to the shooting, Tesi, who signs his name “James-Michael: Tesi” and calls himself a “true natural living

being,” had been involved with several previous incidents with police in Arlington and Colleyville. In February 2010, Arlington police stopped Tesi and cited him for failure to wear a seatbelt. Tesi allegedly refused to pay the fine, claiming that the police and court had no jurisdiction over him. Because of the nonpayment, an arrest warrant was issued. The following December, Colleyville police stopped him for speeding, then arrested him because of the Arlington warrant. After alleged continued non-cooperation, Colleyville itself eventually issued an arrest warrant for Tesi. In July 2011, a Colleyville police officer spotted Tesi’s car. When Tesi allegedly refused to pull over, the officer followed Tesi home. After getting out of his vehicle, Tesi allegedly fired at the officer, who returned fire and wounded Tesi in the face and foot.

- Valencia, California, February 2012: Self-declared sovereign citizen Vahe Ohanian was arrested after entering a sheriff’s station in Santa Clarita Valley and allegedly threatening deputies there, telling them he would return with a shotgun. According to police, in postings on a social networking site Ohanian also threatened to hurt one of the officers.
- Daytona Beach, Florida, February 2012: Self-declared sovereign citizen Laurine Sue Arnold was convicted of kidnapping her grandson in 2011 from the home of her sister, who was acting as a temporary guardian. The child was eventually found in a Hare Krishna temple in another town. Arnold, who was out on bail following her arrest, did not show up for the final days of her trial, and a warrant has been issued for her arrest.
- Denver, Colorado, February 2012: Sovereign citizen Matthew O’Neill, of Kremmling, Colorado, pleaded guilty to providing false information related to a terrorism offense after being arrested for sending a package with white powder to the Colorado Department of Revenue. The powder, which caused the evacuation of the building, turned out to be baking soda.
- Phoenix, Arizona, January 2012: Police arrested Michael Crane in connection with the murder/robbery of an elderly Paradise Valley couple in January; Crane is also the prime suspect in another robbery/murder that occurred soon after. In his initial court appearance, Crane attempted to use sovereign citizen arguments, including saying that he wanted to “reserve my right to Uniform Commercial Code 1-207 and Uniform Commercial Code 1-103.”
- Glengary, West Virginia, January 2012: Police investigating a mobile home fire in Glengary, West Virginia, discovered a gruesome scene: the burned bodies of David Hutzler and his 9-year-old son James. Even more disturbing was their discovery that both had been shot in the head, apparently as part of a murder-suicide. According to the Southern Poverty Law Center, Hutzler had been an active member in the prominent sovereign citizen group Republic for the united [sic]States of America and a later breakaway group called the Vandalia Solution.
- Sumter County, Florida, January 2012: Sovereign citizen Brody Whitaker, who once referred to himself as the “Grandson of God,” received a sentence of life in prison after being found guilty of two counts of attempted murder of a Florida state trooper.

Whitaker engaged state police in a high-speed chase and shootout in 2010 before escaping to Connecticut, where he was eventually caught. As is common for sovereign citizen defendants, Whitaker acted as his own attorney.

- Albuquerque, New Mexico, January 2012: Albuquerque police fatally shot sovereign citizen Mark Macoldowna of Ruidoso, New Mexico, during a close-range shootout that occurred when they responded to the robbery of a Catholic church. Two alleged accomplices, who do not appear to have been sovereign citizens, were arrested and charged with conspiracy to commit armed robbery and conspiracy to commit kidnapping.
- Seattle, Washington, December 2011: Redmond resident and sovereign citizen David Myrland, 53, was sentenced to three years in federal prison following his conviction on threat charges. Following a traffic stop in Kirkland, Washington, in which his car was impounded, Myrland issued a series of threatening “citizens’ arrest warrants” to the mayor of Kirkland and others. In a letter to the mayor, Myrland wrote that she should prepare for a visit from “50 armed men and women” would come to arrest her and that she should not resist. Charges were filed against him in September 2010. Other sovereign citizens from around the country also sent threatening letters related to Myrland’s case, including one from Texas that informed a King County prosecutor that it was “lawful for a private citizen to use deadly force in attempting to apprehend a fleeing felon.” Myrland is connected to several prominent sovereign citizen groups in the Pacific Northwest.
- Lakota, North Dakota, November 2011: Sovereign citizen Rodney Brossart and four of his adult children, Alex, Thomas, Jacob, and Abby, were arrested following the end of a months-long standoff near Lakota, North Dakota. The standoff began after local deputies arrived at the 3500-acre Brossart ranch to serve a search warrant regarding another rancher’s cattle allegedly on their property. Brossart allegedly refused to return the cattle and told deputies that if they came on his property they wouldn’t be coming back. He and his daughter were arrested for an alleged physical confrontation; later that evening, when officers returned to the property, the three sons allegedly confronted them with rifles and threatened the officers. They were arrested the next morning, but the family refused to show up for a hearing on August 26, holing up on their property instead. Rodney Brossart has been charged with one count of terrorizing, one count of theft of property, one count of criminal mischief, one count of failure to comply with estray order, and one count of preventing arrest. Months of negotiation followed their failure to appear, without success, but authorities eventually arrested them while avoiding further violence. The three brothers were charged with terrorizing and bail jumping; the sister with simple assault and bail-jumping charges, as well as a misdemeanor harassment charge. Susan Brossart was charged with lying to authorities who asked her about guns on the property.
- Oregon, October 2011: A so-called “de jure Grand Jury,” a self-proclaimed sovereign citizen pseudolegal entity, sent “indictments” to all district attorneys in Oregon. The alleged charges included treason, kidnapping, and slave trafficking. The documents moreover called on “provost marshals” to arrest the officials and suggested that in some cases the death penalty might be appropriate.

- Page, Arizona, June 2011: Sovereign citizen William Foust of Page, Arizona, was shot to death by a Page police officer after a physical confrontation. The officer was responding to a domestic violence call at a business owned by Foust. By the time the officer arrived at the business, Foust had left, but he returned as the officer was talking to the woman who had made the 911 call. According to police, Foust was confrontational. When the officer and Foust left the building, their encounter became physical and Foust allegedly attempted to grab the officer's Taser. The officer shot Foust, mortally wounding him. The officer had received minor injuries. Foust was an active sovereign citizen and "Chief Justice" for Arizona for the sovereign citizen group Republic for the United States of America. He had made many sovereign citizen filings in the past and had occasionally gotten in minor legal troubles related to his sovereign citizen actions.
- Ensley, Florida, June 2011: Sovereign citizen Larry Wayne Kelly was arrested in June 2011 for shooting at a seafood market with an AK-47 in Ensley, Florida. According to police, Kelly became angry with the seafood store after employees informed him that it had no crawfish for sale. Kelly called them 11 times then went to the store in his truck, where he allegedly opened fire at the front of the store with an AK-47. He then led police on a car chase before eventually crashing his car, following which he was taken into custody. Kelly's vehicle reportedly had a homemade license plate on it at the time and he told officers after being arrested that he was a sovereign citizen and did not have to obey them. In the past, he had filed a number of pseudo-legal sovereign citizen documents.
- Charlotte County, Florida, April 2011: Authorities arrested two sovereign citizens, Robert Chapman and John Ridge Emery III, for allegedly giving a judge an envelope marked "bio-hazard" containing a mysterious substance. The incident caused the entire building to have to be evacuated. According to police, Chapman drove Emery to the Charlotte County Justice Center and gave him an envelope containing a suspected chemical agent to give to the judge overseeing a hearing for Emery on traffic-related offenses. Both men were charged with the manufacture, possession, delivery, or attempted use or threatened use of a weapon of mass destruction. An analysis of the substance in the envelope marked "biohazard" revealed that it was not, in fact, hazardous. In December 2011, Chapman filed a pro se motion demanding that his case be dismissed and that the state pay him \$115 million in "restitution," claiming in the motion that "if you do not file this motion, you are a traitor to the basis this country was established on."



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