

SCHEDULE

In accordance with the attached schedule instructions, you, Eric H. Holder Jr., are required to produce all records in unredacted form described below:

1. All communications referring or relating to Operation Fast and Furious, the Jacob Chambers case, or any Organized Crime Drug Enforcement Task Force (OCDETF) firearms trafficking case based in Phoenix, Arizona, to or from the following individuals:
 - a. Eric Holder Jr., Attorney General;
 - b. David Ogden, Former Deputy Attorney General;
 - c. Gary Grindler, Office of the Attorney General and former Acting Deputy Attorney General;
 - d. James Cole, Deputy Attorney General;
 - e. Lanny Breuer, Assistant Attorney General;
 - f. Ronald Weich, Assistant Attorney General;
 - g. Kenneth Blanco, Deputy Assistant Attorney General;
 - h. Jason Weinstein, Deputy Assistant Attorney General;
 - i. John Keeney, Deputy Assistant Attorney General;
 - j. Bruce Swartz, Deputy Assistant Attorney General;
 - k. Matt Axelrod, Associate Deputy Attorney General;
 - l. Ed Siskel, former Associate Deputy Attorney General;
 - m. Brad Smith, Office of the Deputy Attorney General;
 - n. Kevin Carwile, Section Chief, Capital Case Unit, Criminal Division;
 - o. Joseph Cooley, Criminal Fraud Section, Criminal Division; and,
 - p. James Trusty, Acting Chief, Organized Crime and Gang Section.
2. All communications between and among Department of Justice (DOJ) employees and Executive Office of the President employees, including but not limited to Associate Communications Director Eric Schultz, referring or relating to Operation Fast and Furious or any other firearms trafficking cases.
3. All communications between DOJ employees and Executive Office of the President employees referring or relating to the President's March 22, 2011 interview with Jorge Ramos of Univision.
4. All documents and communications referring or relating to any instances prior to February 4, 2011 where the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) failed to interdict weapons that had been illegally purchased or transferred.

exh A

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

Sharon Bridgewater
Claimant

VS.

Donald Trump in his Official Capacity as
United States President

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500 et al

Defendant

CASE # _____ (B.A.H.)

TO THE CLERK OF THE COURT

NOTICE OF ADDITIONAL FILING

TO: THE CLERK OF THE COURT:

CLAIMANT SUBMITS additional filings

Dated: June 9, 2017



Sharon Bridgewater

Sharon Bridgewater

RECEIVED
JUN 13 2017
IS

PRAECIPE

TO THE CLERK:

Please issue summons for the within named Defendant to be served upon:

Donald Trump in his Official Capacity as United States President

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500 et al

Defendant


TO APPEAR:

Place: Court Room #6600
333 Constitution Ave N.W.
Washington, D.C. 20001-2866

Time: TBA

Date: TBA

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.


Sharon Bridgewater -Pro Se
Claimant

18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridgell@yahoo.com
ATTORNEY FOR THE ABOVE

(2)

Sharon Bridgewater
Claimant

**Donald Trump in his Official Capacity as
United States President**

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500 et al

Defendant

7) CASE # _____(B.A.H.)

) WRIT

JUN 13 2017

U.S. Department of Commerce

WRIT

The President of the United States to the Marshal of the District Court of Columbia and/or authorized person appointed by this court, Greetings:

YOU MUST APPEAR AT :

Place: Court Room #6600
333 Constitution Ave N.W.
Washington, D.C. 20001-2866

Witness, the Honorable Beryl A. Howell, Judge of the United States District Court for the District of Columbia at _____, on the _____ day of , at _____, on the day if _____ [date].

_____, Clerk, United States District Court

[Seal of United States District Court]

D

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:

NOTICE OF Additional Filings - Precedence & WAIT.
_____ were sent by first class
mail(in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June
9TH, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in
this action sent the true and correct copy to the addresses listed below:

To: Jeff Sessions in his official capacity as

Attorney General of the United States

Department of Justice

950 Pennsylvania Ave, NW Washington DC 20530-0001

Certified mail#7015-1730-0000-4700-3776

To: The Clerk of the Court for the United States Federal District Court of Columbia 333

Constitution Ave., N.W. Washington, DC 20001

Certified mail#7015-1730-0000-4700-3813

To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF
COLUMBIA CIRCUIT

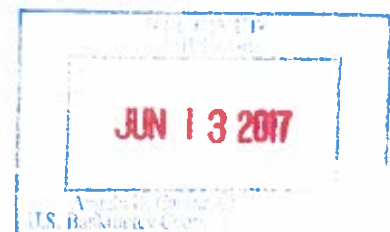
333 Constitution Ave., N.W. Washington, DC 20001

Certified mail#7015-1730-0000-4700-3905

To: Kerry W. Kircher, General Counsel D.C. Bar No. 386816 at U.S. House of
Representatives

219 Cannon House Office Building Washington, DC 20515

Certified mail#7015-1730-0000-4700-3783



To: John Russell Tyler, General Counsel for Eric Holder at 950 Pennsylvania Ave,
NW Washington DC 20530-0001 -
Certified mail #7015-1730-0000-4700-3790

To: Donald B. Verrilli , the Solicitor General of the United States, Room 5614 –
Department of Justice, 950 Pennsylvania Ave, NW Washington DC
20530-0001, - Certified Mail #7015-1730-0000-4700-3806

To: Channing D. Phillips U.S, Attorney General for the District of Columbia
555 Fourth Street, NW
Washington DC 20530- Certified mail#7015-1730-0000-4700-3820

To: Donald Trump in his official capacity as United States President
The White House
1600 Pennsylvania Avenue,N.W.
Washington, D.C.20500-0001
Certified mail#7015-1730-0000-4700-3837

To: Rex Tillerson in his official capacity as Secretary of State

United States Department of State
2201 C Street
Washington, DC 20520,
Certified mail#7015-1730-0000-4700-3837

To: John Kelly in his official capacity as Director of Homeland Security

United States Department of Homeland Security
245 Lane SW
Washington, DC 20528,
Certified mail#7015-1730-0000-4700-3844

To: Thomas E. Brandon in his official capacity as Acting Director of the United
States Bureau of the Alcohol, Tobacco, FireArms and Explosives(ATF),

The Bureau of Alcohol, Tobacco, Firearms and Explosive(AFT)Agency,
99 New York Avenue, NE
Washington, DC 20226
Certified mail#7015-1730-0000-4700-3851

To: H.R. McMaster in his official capacity as National Security Advisor

National Security Counsel
The White House
1600 Pennsylvania Ave. N.W. Washington, DC 20500
Certified mail#7015-1730-0000-4700-3868


To: RYAN MORAN IN HIS OFFICIAL CAPACITY AS ROYAL OAK
POLICE OFFICER

ROYAL OAK POLICE DEPARTMENT
AGENCY # 6371400
221 E. 3rd Street
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3875

To: THE "UNKNOWN" JUDGES OF THE 44TH DISTRICT COURT OF THE
THE STATE OF MICHIGAN – AND THE CLERK OF THE COURT

THE STATE OF MICHIGAN
44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
400 EAST 11 MILE ROAD
ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3882

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C.
§1746 that the foregoing is true and correct. Executed 9TH day of June 2017 in Detroit,
Michigan.


Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridgell@yahoo.com

ATTORNEY FOR THE ABOVE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CASE # _____ (B.A.H.)

Sharon Bridgewater

Petitioner

VS.

Donald Trump in his Official Capacity as
United States President

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500 et al

Defendant

)
) **AFFIDIVANT AND NOTICE OF INTENET**
) **TO FILE ADDITIONAL MOTIONS TO**
) **PUNISH OTHER VIOLATORS FOR**
) **CONTEMPT OF COURT**
)
)
)
)
)

I being duly sworn dispose and says that:

1. That I am the Petitioner herein and if called to testify I can do so based upon first hand and/or personal knowledge.
2. That I am the Petitioner and/or affiant is competent to testify to the matters stated herein.
3. That I did not have the time to file the additional motions, due to the deadline to file this petition is today. I do intend the petition the court punish other "court violators."

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CASE # _____(B.A.H.)

Sharon Bridgewater

Petitioner

Vs.

Eric Himpton Holder Jr.

Respondent

)
) **MOTION TO PUNISH FOR CONTEMPT**
)
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)
)
)
)

Plaintiff moves for an order adjudging Eric Himpton Holder Jr. in contempt of court for failure without adequate excuse to obey a subpoena served on or about Aug. 12, 2013 and/or for failing to produce in case number 1:12CV-1332(ABJ) to produce document numbers 9087, 883, 6592, 6594, 7038, 7987, 8002, 9685, and 14768; and produce to the Committee and Oversight all segregable portions of any responsive records withheld in full or in part on the grounds that they contain attorney-client privileged material, attorney work product, private information, law enforcement sensitive material, or foreign policy sensitive materials, in case #

1:12CV-1332(ABJ) from the attached affidavit of Sharon Bridgewater marked as exh. A, and showing service of the subpoena.(included in the Plaintiffs affidavit)

MEM AND POINTS OF AUTHORITY

Willful obstruction of justice and/or obstruction of a congressional investigation and/or and willful, intentional fraudulent concealment “tolls the statue of limitations.” Wherefore the Petitioner prays that this court issue a writ of attachment attached for Eric Himpton Holder *attached as exh C.*

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.



Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CASE # _____ (B.A.H.)

Sharon Bridgewater

Petitioner

Vs.

Eric Himpton Holder Jr.

Respondent

)
) **AFFIDIVANT IN SUPPORT TO PUNISH**
) **FOR CONTEMPT**
)
)
)
)
)
)

I being duly sworn depose and says that:

1. That I am the Petitioner herein and if called to testify I can do so based upon first hand and/or personal knowledge.
2. That I am the Petitioner and/or affiant is competent to testify to the matters stated herein.
3. That on or about Aug. 13, 2013 the Committee and Oversight Commence and investigation in the "fast and furious," case entitled Committee and Oversight Government reform vs. Eric Himpton Holder, and further served Eric Holder with a duly "authorized subpoena" and showing service of the subpoena is attached and marked "Exhibit B." Eric H. Holder, failed to comply with the subpoena and further was held in criminal and civil contempt of congress.

epm B

SCHEDULE

In accordance with the attached schedule instructions, you, Eric H. Holder Jr., are required to produce all records in unredacted form described below:

1. All communications referring or relating to Operation Fast and Furious, the Jacob Chambers case, or any Organized Crime Drug Enforcement Task Force (OCDETF) firearms trafficking case based in Phoenix, Arizona, to or from the following individuals:
 - a. Eric Holder Jr., Attorney General;
 - b. David Ogden, Former Deputy Attorney General;
 - c. Gary Grindler, Office of the Attorney General and former Acting Deputy Attorney General;
 - d. James Cole, Deputy Attorney General;
 - e. Lanny Breuer, Assistant Attorney General;
 - f. Ronald Weich, Assistant Attorney General;
 - g. Kenneth Blanco, Deputy Assistant Attorney General;
 - h. Jason Weinstein, Deputy Assistant Attorney General;
 - i. John Keeney, Deputy Assistant Attorney General;
 - j. Bruce Swartz, Deputy Assistant Attorney General;
 - k. Matt Axelrod, Associate Deputy Attorney General;
 - l. Ed Siskel, former Associate Deputy Attorney General;
 - m. Brad Smith, Office of the Deputy Attorney General;
 - n. Kevin Carwile, Section Chief, Capital Case Unit, Criminal Division;
 - o. Joseph Cooley, Criminal Fraud Section, Criminal Division; and,
 - p. James Trusty, Acting Chief, Organized Crime and Gang Section.
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4. All documents and communications referring or relating to any instances prior to February 4, 2011 where the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) failed to interdict weapons that had been illegally purchased or transferred.

Eric H. Holder Jr.

5. All documents and communications referring or relating to any instances prior to February 4, 2011 where ATF broke off surveillance of weapons and subsequently became aware that those weapons entered Mexico.
6. All documents and communications referring or relating to the murder of Immigrations and Customs Enforcement Agent Jaime Zapata, including but not limited to documents and communications regarding Zapata's mission when he was murdered, Form for Reporting Information That May Become Testimony (FD-302), photographs of the crime scene, and investigative reports prepared by the FBI.
7. All communications to or from William Newell, former Special Agent-in-Charge for ATF's Phoenix Field Division, between:
 - a. December 14, 2010 to January 25, 2011; and,
 - b. March 16, 2009 to March 19, 2009.
8. All Reports of Investigation (ROIs) related to Operation Fast and Furious or ATF Case Number 785115-10-0004.
9. All communications between and among Matt Axelrod, Kenneth Melson, and William Hoover referring or relating to ROIs identified pursuant to Paragraph 8.
10. All documents and communications between and among former U.S. Attorney Dennis Burke, Attorney General Eric Holder Jr., former Acting Deputy Attorney General Gary Grindler, Deputy Attorney General James Cole, Assistant Attorney General Lanny Breuer, and Deputy Assistant Attorney General Jason Weinstein referring or relating to Operation Fast and Furious or any OCDETF case originating in Arizona.
11. All communications sent or received between:
 - a. December 16, 2009 and December 18, 2009, and;
 - b. March 9, 2011 and March 14, 2011, to or from the following individuals:
 - i. Emory Hurley, Assistant U.S. Attorney, Office of the U.S. Attorney for the District of Arizona;
 - ii. Michael Morrissey, Assistant U.S. Attorney, Office of the U.S. Attorney for the District of Arizona;
 - iii. Patrick Cunningham, Chief, Criminal Division, Office of the U.S. Attorney for the District of Arizona;
 - iv. David Voth, Group Supervisor, ATF; and,
 - v. Hope MacAllister, Special Agent, ATF.

12. All communications sent or received between December 15, 2010 and December 17, 2010 to or from the following individuals in the U.S. Attorney's Office for the District of Arizona:
 - a. Dennis Burke, former United States Attorney;
 - b. Emory Hurley, Assistant United States Attorney;
 - c. Michael Morrissey, Assistant United States Attorney; and,
 - d. Patrick Cunningham, Chief of the Criminal Division.
13. All communications sent or received between August 7, 2009 and March 19, 2011 between and among former Ambassador to Mexico Carlos Pascual; Assistant Attorney General Lanny Breuer; and, Deputy Assistant Attorney General Bruce Swartz.
14. All communications sent or received between August 7, 2009 and March 19, 2011 between and among former Ambassador to Mexico Carlos Pascual and any Department of Justice employee based in Mexico City referring or relating to firearms trafficking initiatives, Operation Fast and Furious or any firearms trafficking case based in Arizona, or any visits by Assistant Attorney General Lanny Breuer to Mexico.
15. Any FD-302 relating to targets, suspects, defendants, or their associates, bosses, or financiers in the Fast and Furious investigation, including but not limited to any FD-302s ATF Special Agent Hope MacAllister provided to ATF leadership during the calendar year 2011.
16. Any investigative reports prepared by the FBI or Drug Enforcement Administration (DEA) referring or relating to targets, suspects, or defendants in the Fast and Furious case.
17. Any investigative reports prepared by the FBI or DEA relating to the individuals described to Committee staff at the October 5, 2011 briefing at Justice Department headquarters as Target Number 1 and Target Number 2.
18. All documents and communications in the possession, custody or control of the DEA referring or relating to Manuel Fabian Celis-Acosta.
19. All documents and communications between and among FBI employees in Arizona and the FBI Laboratory, including but not limited to employees in the Firearms/Toolmark Unit, referring or relating to the firearms recovered during the course of the investigation of Brian Terry's death.
20. All agendas, meeting notes, meeting minutes, and follow-up reports for the Attorney General's Advisory Committee of U.S. Attorneys between March 1, 2009 and July 31, 2011, referring or relating to Operation Fast and Furious.
21. All weekly reports and memoranda for the Attorney General, either directly or through the Deputy Attorney General, from any employee in the Criminal Division, ATF, DEA, FBI,

or the National Drug Intelligence Center created between November 1, 2009 and September 30, 2011.

22. All surveillance tapes recorded by pole cameras inside the Lone Wolf Trading Co. store between 12:00 a.m. on October 3, 2010 and 12:00 a.m. on October 7, 2010.

Schedule Instructions

1. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You should also produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. Subpoenaed records, documents, data or information should not be destroyed, modified, removed, transferred or otherwise made inaccessible to the Committee.
2. In the event that any entity, organization or individual denoted in this subpoena has been, or is also known by any other name than that herein denoted, the subpoena shall be read also to include that alternative identification.
3. The Committee's preference is to receive documents in electronic form (i.e., CD, memory stick, or thumb drive) in lieu of paper productions.
4. Documents produced in electronic format should also be organized, identified, and indexed electronically.
5. Electronic document productions should be prepared according to the following standards:
 - (a) The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
 - (b) Document numbers in the load file should match document Bates numbers and TIF file names.
 - (c) If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
6. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, box or folder is produced, each CD, hard drive, memory stick, thumb drive, box or folder should contain an index describing its contents.
7. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers or identifying markers with which they were associated when the subpoena was served.

8. When you produce documents, you should identify the paragraph in the Committee's schedule to which the documents respond.
9. It shall not be a basis for refusal to produce documents that any other person or entity also possesses non-identical or identical copies of the same documents.
10. If any of the subpoenaed information is only reasonably available in machine-readable form (such as on a computer server, hard drive, or computer backup tape), you should consult with the Committee staff to determine the appropriate format in which to produce the information.
11. If compliance with the subpoena cannot be made in full by October 25, 2011 at 12:00 noon, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided no later than October 23, 2011 at 12:00 noon.
12. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) the privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author and addressee; and (e) the relationship of the author and addressee to each other.
13. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject and recipients) and explain the circumstances under which the document ceased to be in your possession, custody, or control.
14. If a date or other descriptive detail set forth in this subpoena referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the subpoena, you are required to produce all documents which would be responsive as if the date or other descriptive detail were correct.
15. With the exception of paragraphs 4 and 5, the time period covered by this subpoena is from August 1, 2009 to the present, unless otherwise specified.
16. This subpoena is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data or information, not produced because it has not been located or discovered by the return date, shall be produced immediately upon subsequent location or discovery.
17. All documents shall be Bates-stamped sequentially and produced sequentially.
18. Two sets of documents shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee, production sets shall be delivered to the Majority Staff in Room 2157 of the Rayburn House Office Building and the Minority Staff in Room 2471 of the Rayburn House Office Building.
19. Upon completion of the document production, you should submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive

documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

Schedule Definitions

1. The term "document" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, inter-office and intra-office communications, electronic mail (e-mail), contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term "communication" means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, email (desktop or mobile device), text message, instant message, MMS or SMS message, regular mail, telexes, releases, or otherwise.
3. The terms "and" and "or" shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this subpoena any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.
4. The terms "person" or "persons" mean natural persons, firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, or other legal, business or government entities, and all subsidiaries, affiliates, divisions, departments, branches, or other units thereof.
5. The term "identify," when used in a question about individuals, means to provide the following information: (a) the individual's complete name and title; and (b) the individual's business address and phone number.
6. The term "referring or relating," with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is pertinent to that subject in any manner whatsoever.

7. The term “employee” means agent, borrowed employee, casual employee, consultant, contractor, de facto employee, independent contractor, joint adventurer, loaned employee, part-time employee, permanent employee, personnel, provisional employee, staffer, subcontractor, or any other type of service provider.
8. The terms “Target Number 1” and “Target Number 2” mean the individuals identified as such during the October 5, 2011 briefing for congressional staff provided by FBI, DEA, ATF, and DOJ employees at DOJ headquarters.

PROOF OF SERVICE

Subpoena for The Honorable Eric H. Holder Jr., Attorney General of the United States
SERVE: Faith Burton, Special Counsel, Office of Legislative Affairs

Address 950 Pennsylvania Avenue NW

Washington, D.C. 20530-0001

before the Committee on Oversight and Government Reform

U.S. House of Representatives
112th Congress

Served by (print name) Steve Castor

Title Chief Counsel for Investigations

Manner of service by e-mail per agreement

Date 10/12/11

Signature of Server 

Address 2157 RHOB, WDC 20515

CIVIL COVER SHEET

JS-44 (Rev. 5/12 DC)

I. (a) PLAINTIFFS Committee on Oversight and Government Reform, United States House of Representatives (b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF _____ (EXCEPT IN U.S. PLAINTIFF CASES)	DEFENDANTS Eric H. Holder, Jr., in his official capacity as Attorney General of the United States COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT <u>11001</u> (IN U.S. PLAINTIFF CASES ONLY) <small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small>																								
(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER) Kerry W. Kircher, Office of General Counsel U.S. House of Representatives 219 Cannon House Office Building Washington, DC 20515 (202) 225-9700	ATTORNEYS (IF KNOWN) 																								
II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)	III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY:																								
<input checked="" type="radio"/> 1 U.S. Government Plaintiff <input type="radio"/> 3 Federal Question (U.S. Government Not a Party) <input type="radio"/> 2 U.S. Government Defendant <input type="radio"/> 4 Diversity (Indicate Citizenship of Parties in item III)	<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="radio"/> 4</td> <td style="text-align: center;"><input type="radio"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="radio"/> 5</td> <td style="text-align: center;"><input type="radio"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="radio"/> 6</td> <td style="text-align: center;"><input type="radio"/> 6</td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4	Citizen of Another State	<input type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5	Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6
	PTF	DFT		PTF	DFT																				
Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4																				
Citizen of Another State	<input type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5																				
Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6																				

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

<input type="radio"/> A. Antitrust <input type="checkbox"/> 410 Antitrust	<input type="radio"/> B. Personal Injury/Malpractice <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="radio"/> C. Administrative Agency Review <input type="checkbox"/> 151 Medicare Act <u>Social Security</u> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction Any nature of suit from any category may be selected for this category of case assignment. *(If Antitrust, then A governs)*
<input checked="" type="radio"/> E. General Civil (Other) OR <input type="radio"/> F. Pro Se General Civil			
<u>Real Property</u> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property <u>Personal Property</u> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property <u>Damage</u> <input type="checkbox"/> 385 Property Damage Product Liability	<u>Bankruptcy</u> <input type="checkbox"/> 422 Appeal 27 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <u>Prisoner Petitions</u> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement <u>Property Rights</u> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <u>Federal Tax Suits</u> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609	<u>Forfeiture/Penalty</u> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <u>Other Statutes</u> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization	<input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input checked="" type="checkbox"/> 890 Other Statutory Actions (If not administrative agency review or Privacy Act)

<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) <i>*(If pro se, select this deck)*</i>	<input type="radio"/> I. FOIA/Privacy Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (If Privacy Act) <i>*(If pro se, select this deck)*</i>	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (If not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> M. Contract <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (If Voting Rights Act)

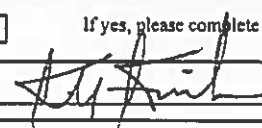
V. ORIGIN
☒ 1 Original Proceeding
 ☐ 2 Remand from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify)
 ☐ 6 Multi-district Litigation
 ☐ 7 Appeal to District Judge from Mag. Judge

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 U.S. Const. art I: Failure and refusal to comply with congressional subpoena

VII. REQUESTED IN COMPLAINT	CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 <input type="checkbox"/>	DEMAND \$	JURY DEMAND: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
Check YES only if demanded in complaint YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>			

VIII. RELATED CASE(S) IF ANY (See instruction) YES ☐ NO ☒ If yes, please complete related case form

DATE: 08/13/2012

SIGNATURE OF ATTORNEY OF RECORD: 

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

AO 440 (Rev. 12/09; DC 03/10) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

Committee on Oversight and Government Reform,
United States House of Representatives

Plaintiff

v.

Eric H. Holder, Jr., in his official capacity as Attorney
General of the United States

Defendant

Civil Action No. 1:12-cv-1332

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Eric H. Holder, Jr., U.S. Attorney General
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Kerry W. Kircher, General Counsel
Office of General Counsel
U.S. House of Representatives
219 Cannon House Office Building
Washington, DC 20515

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 1:12-cv-1332

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT AND BANKRUPTCY COURTS
FOR THE DISTRICT OF COLUMBIA

Sharon Bridgewater

vs.

Eric Himpton Holder Jr.

Civil/Criminal No.: _____

ATTACHMENT FOR CONTEMPT

TO ANY UNITED STATES MARSHAL OR ANY OTHER AUTHORIZED OFFICER:

You are hereby commanded to arrest

Eric Himpton Holder Jr. _____ and bring him/her forthwith before the District Court
for the District of Columbia for the reason that he/she willfully failed to appear after having been served with subpoena
to appear 6600 Constitution Ave. N.W. _____.

You are further commanded to detain Eric Himpton Holder Jr. _____ in your custody
until he/she is discharged by the Court.

Upon order of the Honorable _____, United States
District Judge at Washington, DC this _____ day of _____, _____.

ANGELA D. CAESAR, Clerk

By: _____

Deputy Clerk

RETURN:

DISTRICT OF COLUMBIA

Received the within warrant the _____ day of _____, _____ and executed same.

By: _____

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CASE # _____(B.A.H.)

Sharon Bridgewater

Petitioner

Vs.

Eric Himpton Holder Jr.

Respondent

)
)
) **WRIT OF ATTACHMENT**
)
)
)
)
)
)

WRIT OF ATTACHMENT

To the President of the United States of America and/or US Marshall and/or authorized Person
Appointed by this court of the United States District of Columbia., Greetings:

You are commanded to attach Eric Himpton Holder Jr., if he may be found in your
District, and bring him immediately and/or _____[date] personally before Judge

Beryl Howell of the District Court of the United States for the District of Columbia-----, at-----, in this District, to answer for certain contempt's in not obeying our writ of subpoena directed to Eric Himpton Holder Jr. and served on him, commanding him to produce in case number 1:12CV-1332(ABJ) to produce document numbers 9087, 883, 6592, 6594, 7038, 7987, 8002, 9685, and 14768; and produce to the Committee and Oversight all segregable portions of any responsive records withheld in full or in part on the grounds that they contain attorney-client privileged material, attorney work product, private information, law enforcement sensitive material, or foreign policy sensitive materials, directed to Eric Himpton Holder Jr.; and you are further commanded to detain Eric Himpton Holder in your custody until Eric Himpton Holder Jr. is discharged by the court. Any you there this writ.

Witness, the Honorable Beryl Alaine Howell Chief Judge for the United States District Court for the District of Columbia at _____, on the day of _____.

Clerk, United States District Court

[Seal of the United States District Court of Columbia]

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:

motion for contempt & Affidavit

were sent by first class mail (in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

To: Jeff Sessions in his official capacity as

Attorney General of the United States

Department of Justice

950 Pennsylvania Ave, NW Washington DC 20530-0001

Certified mail #7015-1730-0000-4700-3936

To: The Clerk of the Court for the United States Federal District Court of Columbia

333 Constitution Ave., N.W. Washington, DC 20001

Overnight mail

To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF
COLUMBIA CIRCUIT

333 Constitution Ave., N.W. Washington, DC 20001

Overnight mail

To: Kerry W. Kircher, General Counsel D.C. Bar No. 386816 at U.S. House of
Representatives

219 Cannon House Office Building Washington, DC 20515

Certified mail #7015-1730-0000-4700-3677

To: John Russell Tyler, General Counsel for Eric Holder at 950 Pennsylvania Ave, NW
Washington DC 20530-0001 - Certified mail #7015-1730-0000-4700-3684

To: Donald B. Verrilli, the Solicitor General of the United States, Room 5614 –
Department of Justice, 950 Pennsylvania Ave, NW Washington DC 20530-
0001, - Certified Mail #7015-1730-0000-4700-3691

To: Channing D. Phillips U.S, Attorney General for the District of Columbia
555 Fourth Street, NW
Washington DC 20530- Certified mail#7015-1730-0000-4700-3707

To: Donald Trump in his official capacity as United States President
The White House
1600 Pennsylvania Avenue,N.W.
Washington, D.C.20500-0001
Certified mail#7015-1730-0000-4700-3714

To: Rex Tillerson in his official capacity as Secretary of State

United States Department of State
2201 C Street
Washington, DC 20520,

To: John Kelly in his official capacity as Director of Homeland Security

United States Department of Homeland Security
245 Lane SW
Washington, DC 20528,
Certified mail#7015-1730-0000-4700-3714

To: Thomas E. Brandon in his official capacity as Acting Director of the United States
Bureau of the Alcohol, Tobacco, FireArms and Explosives(ATF),

The Bureau of Alcohol, Tobacco, Firearms and Explosive(AFT)Agency,
99 New York Avenue, NE
Washington, DC 20226
Certified mail#7015-1730-0000-4700-3738

To: H.R. McMaster in his official capacity as National Security Advisor

National Security Counsel
The White House
1600 Pennsylvania Ave. N.W. Washington, DC 20500
Certified mail#7015-1730-0000-4700-3721

To: RYAN MORAN IN HIS OFFICIAL
CAPACITY AS ROYAL OAK POLICE
OFFICER

ROYAL OAK POLICE DEPARTMENT
AGENCY # 6371400
221 E. 3rd Street
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745


AND

To: THE "UNKNOWN" JUDGES OF THE 44TH DISTRICT COURT OF THE THE STATE OF
MICHIGAN – AND THE CLERK OF THE COURT

THE STATE OF MICHIGAN
44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
400 EAST 11 MILE ROAD
ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3752

Eric Hampton Holder

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that
the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.



Sharon Bridgewater –Pro Se
Petitioner

18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

THE STATE OF MICHIGAN 44TH DISTRICT STATE COURT OF THE
STATE OF MICHIGAN

People of the State of Michigan

Plaintiff

Vs.

James Shannon Bridgewater

Petitioner Defendant,

CASE # 17RO05807

TO THE CLERK OF THE COURT:

PETITIONER
DEFENDANT

NOTICE OF REMOVAL

PETITIONER

**TO: THE CLERK OF THE COURT - DEFENDANT AND/OR
NOTICE OF REMOVAL TO THE
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
COLUMBIA**

PLEASE TAKE NOTICE that, on this 6th day of June 2017 James Shannon Bridgewater files
with the clerk of a true and correct copy of a notice of removal of Criminal Prosecution to the
THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA. A Copy
of the notice of removal is attached as exh. "*A*"

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed 6th day of June 2017 in Detroit, Michigan

Dated: 6/6/17


James Shannon Bridgewater -Pro Se
 Defendant

18952 Dale Street

Detroit, MI 48219

313-681-0572

BoonieBridgewater@gmail.com

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

**THE STATE OF MICHIGAN 44TH DISTRICT STATE COURT OF THE
STATE OF MICHIGAN**

People of the State of Michigan

Plaintiff

Vs.

James Shannon Bridgewater

*Petitioner/*Defendant,

CASE # 17RO05807

PETITIONER/
DEFENDANT

NOTICE OF REMOVAL

Akh A

NOTICE OF REMOVAL

Defendant James Shannon Bridgewater <sup>Petitioner
Defendant</sup>, on this 6th day of June 2017 files with the clerk of a true and correct copy of a notice of removal of Criminal Prosecution to the THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA. A Copy of the notice of removal is attached as exh. "A"

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed 6th day of June 2017 in Detroit, Michigan

Dated: 6/6/17


James Shannon Bridgewater -Pro Se

Petitioner
Defendant

18952 Dale Street

Detroit, MI 48219

313-681-0572

BoonieBridgewater@gmail.com

[REDACTED]
I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

[REDACTED]
Executed 6th day of June 2017 in Detroit, Michigan

[REDACTED]
Dated:

[REDACTED]
James Shannon Bridgewater -Pro Se

[REDACTED]
Petitioner

[REDACTED]
18952 Dale St

[REDACTED]
Detroit, MI 48219

[REDACTED]
313-471-8714

[REDACTED]
jbridge11@yahoo.com

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:

Defendant notice of removal

were sent by first class mail (in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

- To: Jeff Sessions in his official capacity as
Attorney General of the United States
Department of Justice
950 Pennsylvania Ave, NW Washington DC 20530-0001
Certified mail#7015-1730-0000-4700-3936
- To: The Clerk of the Court for the United States Federal District Court of Columbia
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail
- To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT
- UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF
COLUMBIA CIRCUIT
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail
- To: Kerry W. Kircher, General Counsel D.C. Bar No. 386816 at U.S. House of
Representatives
219 Cannon House Office Building Washington, DC 20515
Certified mail#7015-1730-0000-4700-3677
- To: John Russell Tyler, General Counsel for Eric Holder at 950 Pennsylvania Ave, NW
Washington DC 20530-0001 - Certified mail #7015-1730-0000-4700-3684
- To: Donald B. Verrilli, the Solicitor General of the United States, Room 5614 –
Department of Justice, 950 Pennsylvania Ave, NW Washington DC 20530-
0001, - Certified Mail #7015-1730-0000-4700-3691

To: Channing D. Phillips U.S, Attorney General for the District of Columbia
555 Fourth Street, NW
Washington DC 20530- Certified mail#7015-1730-0000-4700-3707

To: Donald Trump in his official capacity as United States President
The White House
1600 Pennsylvania Avenue,N.W.
Washington, D.C.20500-0001
Certified mail#7015-1730-0000-4700-3714

To: Rex Tillerson in his official capacity as Secretary of State

United States Department of State
2201 C Street
Washington, DC 20520,

To: John Kelly in his official capacity as Director of Homeland Security

United States Department of Homeland Security
245 Lane SW
Washington, DC 20528,
Certified mail#7015-1730-0000-4700-3714

To: Thomas E. Brandon in his official capacity as Acting Director of the United States
Bureau of the Alcohol, Tobacco, FireArms and Explosives(ATF),

The Bureau of Alcohol, Tobacco, Firearms and Explosive(AFT)Agency,
99 New York Avenue, NE
Washington, DC 20226
Certified mail#7015-1730-0000-4700-3738

To: H.R. McMaster in his official capacity as National Security Advisor

National Security Counsel
The White House
1600 Pennsylvania Ave. N.W. Washington, DC 20500
Certified mail#7015-1730-0000-4700-3721

To: RYAN MORAN IN HIS OFFICIAL
CAPACITY AS ROYAL OAK POLICE
OFFICER

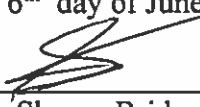
ROYAL OAK POLICE DEPARTMENT
AGENCY # 6371400
221 E. 3rd Street
Royal Oak, Michigan 48067- Certified mail #7015-1730-0000-4700-3745

AND

To: THE "UNKNOWN" JUDGES OF THE 44TH DISTRICT COURT OF THE THE STATE OF
MICHIGAN – AND THE CLERK OF THE COURT

THE STATE OF MICHIGAN
44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
400 EAST 11 MILE ROAD
ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3752

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that
the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.



Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

**THE STATE OF MICHIGAN 44TH DISTRICT STATE COURT OF THE
STATE OF MICHIGAN**

People of the State of Michigan

Plaintiff

Vs.

James Shannon Bridgewater

Petitioner Defendant,

CASE # 17RO05807

PETITIONER
DEFENDANT

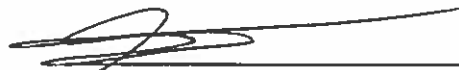
JOINDER IN NOTICE OF REMOVAL

JOINDER IN NOTICE OF REMOVAL

Notice is hereby given that ^{Petitioner} Defendant Sharon Bridgewater, hereby joins in
^{Petitioner} Defendant James Shannon Bridgewater notice of removal to this Court of the State Court
Action , on this 6th day of June 2017 described in the said Notice of Removal. The Attached
Affidavit of Sharon Bridgewater is filed concurrently and in conjunction with this joinder in
Notice of Removal of Actions.

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C.
§1746 that the foregoing is true and correct.

Executed 6th day of June 2017 in Detroit, Michigan


Sharon Bridgewater -Pro Se
18952 Dale Street ^{Petitioner/Defendant}
Detroit, MI 48219
313-471-8714
Sbridge11@yahoo.com

(2)

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

THE STATE OF MICHIGAN 44TH DISTRICT STATE COURT OF THE
STATE OF MICHIGAN

People of the State of Michigan

Plaintiff

Vs.

James Shannon Bridgewater

Petitioner Defendant,

CASE # 17RO05807

PETITIONER
DEFENDANT

AFFIDIVANT OF SHARON
BRIDGEWATER JOINDER IN NOTICE OF
REMOVAL

**AFFIDIVANT OF SHARON BRIDGEWATER JOINDER IN
NOTICE OF REMOVAL**

I being duly sworn dispose and says that:

1. That I am the Petitioner ^{Defendant} herein and if called to testify I can do so based upon first hand and/or personal knowledge.

2. That I am the Petitioner ^{Defendant} and/or affiant is competent to testify to the matters stated herein.

That I respectfully shows: I am a citizen of the State of Michigan and reside in the county of Wayne, and an "Whistleblower" has been damaged and continues to be damaged by the acts or omission of the above named Defendants Donald Trump and/or Jeff Sessions; and under "constructive custody" with warrants for arrest in two different states, via a probation violation(subject to imprisonment of one year and is incarcerated) under the direct physical control under the authority of Jeff Sessions in his official capacity as United States Attorney General et al whose freedom is unlawfully restrained in violation of the United States Constitution and/or International laws; "solely" because I exercised my US Constitutional rights, and continue to exercise my US Constitutional . This is a continuing Rico conspiracy "by multiple Rico Persons," all acted in joint participation, discriminated against race, class, gender, National origin and/or disability and denied and/or deprived the Plaintiff of rights as defined in the Declaration for Human rights(and the United States Constitution), hold the Plaintiff to a condition of peonage and slavery in violation of International, Federal and/or State laws.

And joins in the removal for one or more of the following:

Phase I: immediate preliminary injunctions;

Phase II: liability of damages

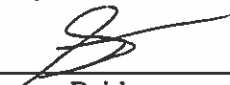
Phase III: declaratory Judgment

Phase IV: all other lawful relief which this

Court deems just and proper, the latter to include but is not necessarily limited to, permanent injunctions against certain named parties; human rights violations, civil rights violations, anti-trust violations, arising from schemes to defraud the Plaintiffs the intangle right to honest service[18 USC section 1961 – prohibited acts –Human rights violations, civil rights violations, , illegal monopoly in violation of Anti-Trust human trafficking, illegal spying, illegal use and/or access of the Plaintiff e-mails, etc. resulting directly or indirectly from Defendants “expressed and/or implied agreement with Donald Trump in his official capacity as United States President the former President Barak Obama,” and/or the deprivations, and conspiracy to deprive Plaintiff, of her fundamental Rights to liberty, to privacy, to freedom of religious belief, to freedom of expression, to work for a living, etc.. I have filed multiple lawsuits, and attach related cases as exh. A. I have been denied and/or deprived equal protection under the laws and my civil rights have been violated. I Sharon Bridgewater, hereby joins in ^{RETURN} Defendant James Shannon Bridgewater notice of removal to this Court of the State Court Action , on this 6th day of June 2017 described in the said Notice of Removal.


I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed 6th day of June 2017 in Detroit, Michigan



Sharon Bridgewater –Pro Se
18952 Dale Street
Detroit, MI 48219
313-471-8714
Sbridge11@yahoo.com

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.

Dated: 6/6/2017


Sharon Bridgewater – Pro Se
Petitioner/Defendant
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com

Sworn to and subscribed before me this 6th day of JUNE, 2017



NOTARY PUBLIC or other person
authorized to administer an oath

MY COMMISSION EXPIRES:

2/15/22



RELATED CASES

Petitioner/Defendant

Sharon Bridgewater [REDACTED] have begun other lawsuits in State and/or Federal and/or Appellant Courts relating to the same facts involved in this action as follows;

1. Filed: June 10, 2011 as 3:2011cv02828 - Defendant: Social Security Administration
Plaintiff: Sharon Bridgewater Cause Of Action: Petition for Removal Court: Ninth Circuit › California › California Northern District Court Type: Torts - Injury › Other Personal Injury Disposition - DISMISSED
2. Filed: December 1, 2010 as 3:2010cv05436 - Defendant: Shawn Bankon, Jane Creason Kimball, Hayes Valley Limited Partnership and others Plaintiff: Sharon Bridgewater Cause Of Action: Fed. Question Court: Ninth Circuit › California › California Northern District Court Type: Civil Rights › Other Civil Rights Disposition - DISMISSED
3. Filed: December 1, 2010 as Defendant: Housing Authority of Alameda County, United States Housing and Urban Development Plaintiff: Sharon Bridgewater Cause Of Action: Fed. Question Court: Ninth Circuit › California › California Northern District Court Type: Civil Rights › Other Civil Rights Disposition - DISMISSED
4. Sharon Bridgewater v. DeKalb County, et al Filed: November 17, 2010 as 10-15276 - Plaintiff - Appellant: SHARON BRIDGEWATER Defendant - Appellee: DEKALB COUNTY, by and through Vernon Jones, Chief, N. T. MARTINELLI, Executive Officer; Chief of Police for the Dekalb County Police Department, C. SCHREINER, Police Officer; #2491; Individually and in her official capacity as the arresting Officer and others Court: Eleventh Circuit U.S. Court of Appeals, Eleventh Circuit Type: Civil Rights › Other Civil Rights Disposition - DISMISSED - APPEALED - AND DISMISSED AGAIN
5. Bridgewater v. Tonna et al
Filed: November 3, 2010 as 3:2010cv04966 Plaintiff: Sharon Bridgewater
Defendant: Roger Tonna, Mary Tonna, William Gilg
Cause Of Action: Fair Debt Collection Act
Court: Ninth Circuit › California › California Northern District Court Type: Civil Rights › Other Civil Rights Disposition - DISMISSED

Q est 17

6. Bridgewater v. Hayes Valley Limited Partnership et al Filed: July 9, 2010 as 4:2010cv03022 - Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership, McCormack Baron Ragan Management Services Inc., MBA Urban Development Co. and others Cause Of Action: Civil Rights Act Court: Ninth Circuit › California › California Northern District Court Type: Civil Rights › Other Civil Rights Disposition –DISMISSED
7. Bridgewater v. DeKalb County et al Filed: April 12, 2010 as 1:2010cv01082 - JUDGE Plaintiff: Sharon Bridgewater Defendant: DeKalb County, N. T. Martinelli, C. Schreiner and others Cause Of Action: Civil Rights Act Court: Eleventh Circuit › Georgia › Georgia Northern District Court Type: Civil Rights › Civil Rights: Other Disposition -DISMISSED APPEALED TO THE US COURT OF APPEALS (GEORGIA)
8. Bridgewater v. Bankson et al Filed: February 18, 2010 as 3:2010cv00704 - Plaintiff: Sharon Bridgewater Defendant: Shawn Bankson, Jane Creason, Kimball Tirey & St. John, LLP Cause Of Action: Civil Rights Act Court: Ninth Circuit › California › California Northern District Court Type: Torts - Property › Fraud or Truth-In-Lending Disposition –DISMISSED
9. Bridgewater v. Hayes Valley Limited Partnership et al Filed: February 18, 2010 as 3:2010cv00703 - Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership, McCormack Baron Ragan Management Services Inc., MBA Urban Development Co. and others Cause Of Action: Civil Rights Act Court: Ninth Circuit › California › California Northern District Court Type: Civil Rights › Plaintiff Disposition –DISMISSED
10. Bridgewater v. Hayes Valley Limited Partnership et al Filed: December 1, 2009 as 4:2009cv05663 - Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership, McCormack Baron Ragan Management Services Inc., MBA Urban Development Co. and others Cause Of Action: Civil Rights Act Court: Ninth Circuit › California › California Northern District Court Type: Civil Rights › None Disposition –DISMISSED
11. Bridgewater v. Bankson et al Filed: August 7, 2009 as 3:2009cv03639 - Plaintiff: Sharon Bridgewater Defendant: Shawn Bankson, Jane Creason, Kimball, Tirey & St. John, LLP Cause Of Action: Fed. Question Court: Ninth Circuit › California › California Northern District Court Type: Torts - Property › Plaintiff Disposition –DISMISSED

12. Bridgewater v. Gwinnett County State of Georgia et al Filed: August 4, 2009 as 1:2009cv02131 - Petitioner: Sharon Bridgewater Respondent: Gwinnett County State of Georgia, People of the State of Georgia Cause Of Action: Petition for Writ of Habeas Corpus (State) Court: Eleventh Circuit › Georgia › Georgia Northern District Court Type: Other Statutes Disposition –DISMISSED
13. Bridgewater v. Hayes Valley Limited Partnership et al - Filed: August 3, 2009 as 4:2009cv03551 Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership, McCormack Baron Ragan Management Services Inc., MBA Urban Development Co. and others Cause Of Action: Civil Rights Act Court: Ninth Circuit › California › California Northern District Court Type: Torts - Property › Plaintiff Disposition –DISMISSED
14. Bridgewater v. Hayes Valley Limited Partnership Filed: December 17, 2008 as 3:2008cv05622 - Plaintiff: Sharon Bridgewater Defendant: Hayes Valley Limited Partnership Cause Of Action: Diversity Court: Ninth Circuit › California › California Northern District Court Type: Contract › Plaintiff Disposition –DISMISSED
15. Bridgewater v. State of Georgia, County of Gwinnett Filed: September 22, 2008 as 1:2008cv02971 Respondent: State of Georgia, County of Gwinnett - Petitioner: Sharon Bridgewater Cause Of Action: Petition for Writ of Habeas Corpus (State) Court: Eleventh Circuit › Georgia › Georgia Northern District Court Type: Prisoner Petitions › Habeas Corpus (General) Disposition –DISMISSED
16. State of Michigan vs. Sharon Bridgewater case # 122-1929
10/05/2012 (Washtenaw County 14A2 Judicial District Court (resisting, obstructing officer) removed from State Court to #44 Federal Court OUTSTANDING WARRANT
- 17.. State of Michigan vs. James S. Bridgewater case # 15117148 SM –
18. State of Georgia vs. Sharon Bridgewater – Judge Randy Rich (Criminal)
11/20/2005 (Gwinnett County Superior Court/Lawrenceville, GA) case # 06-d-03943-S2 – UNDER STATE OF GEORGIA CUSTODY
19. Committee and Oversight vs. Loretta Lynch case # 1:12 CV-1332 (ABJ)
20. Klayman v. Obama 16-CV-80087 (Lynch and/or Obama Gun Control).
21. Filed Dec. 9, 2011 by Sharon Bridgewater case # 1:11 CV-3828-) DE-ABJ – Sharon Bridgewater Vs. Randy Rich (Northern District Court for the District of Georgia)
22. Filed On or about Jan. 1, 2011 by Sharon Bridgewater case # 1:11 CV-4088-) DE-ABJ – Sharon Bridgewater Vs. Lawrenceville, Police Department, Randy Rich (Northern

District Court for the District of Georgia)

23. State of Texas et al. vs United States of America civil case No. B-14-254
24. Filed on August 4, 2008, entitled Sharon Bridgewater vs. Hayes Valley Limited Partnership case # CGC-08-478207
25. 0:16-cvus-05078 US Committee and Oversight vs. Loretta Lynch in her official Capacity as United States Attorney General
26. Case # 1:12-CV-01332(ABJ) Committee and Oversight vs. Loretta Lynch in his official capacity As United States Attorney General and/or Loretta Lynch in her official capacity as United States Attorney General
27. State of Texas, et al vs. United States of America, Department of Education; John B. King, JR. in his official capacity as States Secreatry of Education; United States Department of Justice; Loretta Lynch in her official capacity as United States Attorney General et al Case # 7:16-CV-00054-O
28. Judicial Watch, Inc. vs. Department of Sate 1:13-cv-01363-EGS
29. Judicial watch vs. Department of Justice 12-1510(JDB)
30. Case # 07-000915177 –State of Georgia vs. Sharon Bridgewater
31. Case # SX26752372 SI AND SX26752371 ST State of Michigan vs. James Shannon Bridgewater
32. Case # d-01—91-311 State of Georgia – Dekalb County vs. Sharon Bridgewater(Theft by Taking)
33. 0:16-cvus-05078 US Committee and Oversight vs. Loretta Lynch in her official Capacity as United States Attorney General
34. Tarequ Aquel Mohammed Aziz, et al vs. Donald Trump in his official capacity as United States President et al Civil Action No. 1:17-cv-116
35. Civil action No. 1:17-cv-480

36. Judicial Watch vs. Eric Holder

38. Judicial Watch vs. Covington, Burlington, Eric Holder

39. Case # 1:17-CV-00421 Judicial Watch vs. Department of Justice

40. Case # 1:17-CV-00414 Judicial Watch vs. Central Intelligence Agency

41. State of Hawaii and Ismail Elshikh vs. Donald Trump in his official capacity CASE #17-

00050dkw-ksC

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:

joinder in notice of removal

were sent by first class mail (in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

- To: Jeff Sessions in his official capacity as
Attorney General of the United States
Department of Justice
950 Pennsylvania Ave, NW Washington DC 20530-0001
Certified mail#7015-1730-0000-4700-3936
- To: The Clerk of the Court for the United States Federal District Court of Columbia
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail
- To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT
- UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF
COLUMBIA CIRCUIT
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail
- To: Kerry W. Kircher, General Counsel D.C. Bar No. 386816 at U.S. House of
Representatives
219 Cannon House Office Building Washington, DC 20515
Certified mail#7015-1730-0000-4700-3677
- To: John Russell Tyler, General Counsel for Eric Holder at 950 Pennsylvania Ave, NW
Washington DC 20530-0001 - Certified mail #7015-1730-0000-4700-3684
- To: Donald B. Verrilli , the Solicitor General of the United States, Room 5614 –
Department of Justice, 950 Pennsylvania Ave, NW Washington DC 20530-
0001, - Certified Mail #7015-1730-0000-4700-3691

To: Channing D. Phillips U.S, Attorney General for the District of Columbia
555 Fourth Street, NW
Washington DC 20530- Certified mail#7015-1730-0000-4700-3707

To: Donald Trump in his official capacity as United States President
The White House
1600 Pennsylvania Avenue,N.W.
Washington, D.C.20500-0001
Certified mail#7015-1730-0000-4700-3714

To: Rex Tillerson in his official capacity as Secretary of State

United States Department of State
2201 C Street
Washington, DC 20520,

To: John Kelly in his official capacity as Director of Homeland Security

United States Department of Homeland Security
245 Lane SW
Washington, DC 20528,
Certified mail#7015-1730-0000-4700-3714

To: Thomas E. Brandon in his official capacity as Acting Director of the United States
Bureau of the Alcohol, Tobacco, FireArms and Explosives(ATF),

The Bureau of Alcohol, Tobacco, Firearms and Explosive(AFT)Agency,
99 New York Avenue, NE
Washington, DC 20226
Certified mail#7015-1730-0000-4700-3738

To: H.R. McMaster in his official capacity as National Security Advisor

National Security Counsel
The White House
1600 Pennsylvania Ave. N.W. Washington, DC 20500
Certified mail#7015-1730-0000-4700-3721

To: RYAN MORAN IN HIS OFFICIAL
CAPACITY AS ROYAL OAK POLICE
OFFICER

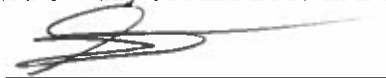
ROYAL OAK POLICE DEPARTMENT
AGENCY # 6371400
221 E. 3rd Street
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

To: THE "UNKNOWN" JUDGES OF THE 44TH DISTRICT COURT OF THE THE STATE OF
MICHIGAN – AND THE CLERK OF THE COURT

THE STATE OF MICHIGAN
44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
400 EAST 11 MILE ROAD
ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3752

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that
the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.



Sharon Bridgewater –Pro Se
Petitioner / *Defendant*
18952 Dale Street
Detroit, MI 48219
313-471-8714

sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

People of the State of Michigan

Plaintiff

Vs.

James Shannon Bridgewater

Petitioner Defendant,

Case # _____ (B.A.H.)

TO: THE HONORABLE BERYL A. HOWELL

PETITIONER
DEFENDANT

NOTICE OF REMOVAL

**TO: THE HONORABLE THE HONORABLE BERYL A. HOWELL OF
THE UNITES STATES DISTRICT COURT FOR THE DISTRICT OF
COLUMBIA**

PLEASE TAKE NOTICE that, on this 6th day of June 2017 James Shannon Bridgewater files
with the clerk of a true and correct copy of a notice of removal of Criminal Prosecution to the
THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA. A Copy
of the notice of removal is attached as exh. " A "

petition removed

2

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

People of the State of Michigan

Plaintiff

Vs.

James Shannon Bridgewater

Petitioner Defendant,

,

Case # _____ (B.A.H.)

TO: THE HONORABLE BERYL A. HOWELL

PETITIONER
DEFENDANT

NOTICE OF REMOVAL

A-14 A



NOTICE OF REMOVAL

Petitioner/Defendant
Defendant James Shannon Bridgewater, on this 6th day of June 2017 files with the clerk of a true and correct copy of a notice of removal of Criminal Prosecution to the THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA. A Copy of the notice of removal is attached as exh. "A"

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed 6th day of June 2017 in Detroit, Michigan

Dated: 6/6/17


James Shannon Bridgewater -Pro Se
 Plaintiff/Defendant
18952 Dale Street
Detroit, MI 48219
313-681-0572
BoonieBridgewater@gmail.com








Sharon Bridgewater -Pro Se
Plaintiff/Claimant
18952 Dale Street
Detroit, MI 48219
313-471-8714
bridge11@yahoo.com

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:

NOTICE OF Removal

were sent by first class mail (in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

To: Jeff Sessions in his official capacity as

Attorney General of the United States

Department of Justice

950 Pennsylvania Ave, NW Washington DC 20530-0001

Certified mail#7015-1730-0000-4700-3936

To: The Clerk of the Court for the United States Federal District Court of Columbia

333 Constitution Ave., N.W. Washington, DC 20001

Overnight mail

To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF
COLUMBIA CIRCUIT

333 Constitution Ave., N.W. Washington, DC 20001

Overnight mail

To: Kerry W. Kircher, General Counsel D.C. Bar No. 386816 at U.S. House of
Representatives

219 Cannon House Office Building Washington, DC 20515

Certified mail#7015-1730-0000-4700-3677

To: John Russell Tyler, General Counsel for Eric Holder at 950 Pennsylvania Ave, NW
Washington DC 20530-0001 - Certified mail #7015-1730-0000-4700-3684

To: Donald B. Verrilli , the Solicitor General of the United States, Room 5614 –
Department of Justice, 950 Pennsylvania Ave, NW Washington DC 20530-
0001, - Certified Mail #7015-1730-0000-4700-3691

To: Channing D. Phillips U.S, Attorney General for the District of Columbia
555 Fourth Street, NW
Washington DC 20530- Certified mail#7015-1730-0000-4700-3707

To: Donald Trump in his official capacity as United States President
The White House
1600 Pennsylvania Avenue,N.W.
Washington, D.C.20500-0001
Certified mail#7015-1730-0000-4700-3714

To: Rex Tillerson in his official capacity as Secretary of State

United States Department of State
2201 C Street
Washington, DC 20520,

To: John Kelly in his official capacity as Director of Homeland Security

United States Department of Homeland Security
245 Lane SW
Washington, DC 20528,
Certified mail#7015-1730-0000-4700-3714

To: Thomas E. Brandon in his official capacity as Acting Director of the United States
Bureau of the Alcohol, Tobacco, FireArms and Explosives(ATF),

The Bureau of Alcohol, Tobacco, Firearms and Explosive(AFT)Agency,
99 New York Avenue, NE
Washington, DC 20226
Certified mail#7015-1730-0000-4700-3738

To: H.R. McMaster in his official capacity as National Security Advisor

National Security Counsel
The White House
1600 Pennsylvania Ave. N.W. Washington, DC 20500
Certified mail#7015-1730-0000-4700-3721

To: RYAN MORAN IN HIS OFFICIAL
CAPACITY AS ROYAL OAK POLICE
OFFICER

ROYAL OAK POLICE DEPARTMENT
AGENCY # 6371400
221 E. 3rd Street
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

To: THE "UNKNOWN" JUDGES OF THE 44TH DISTRICT COURT OF THE THE STATE OF
MICHIGAN – AND THE CLERK OF THE COURT

THE STATE OF MICHIGAN
44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
400 EAST 11 MILE ROAD
ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3752

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that
the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.


Sharon Bridgewater –Pro Se
Defendant Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

changed it unilaterally. The States argue that the DAPA program constitutes a significant change in immigration law that was not implemented by Congress. Agreeing with the President's earlier declarations, the States argue that only Congress can create or change laws, and that the creation of the DAPA program violates the Take Care Clause of the Constitution and infringes upon any notion of separation of powers. Further, they assert that the President has effectuated a change in the law solely because he wanted the law changed and because Congress would not acquiesce in his demands.

Obviously, the Government denies these assertions.

C. Legal Contentions

This case presents three discrete legal issues for the Court's consideration. First, the Government maintains that none of the Plaintiffs have standing to bring this injunctive action. The States disagree, claiming that the Government cannot implement a substantive program and then insulate itself from legal challenges by those who suffer from its negative effects. Further, the States maintain that Secretary Johnson's DAPA Directive violates the Take Care Clause of the Constitution; as well as the Administrative Procedure Act ("APA") and the Immigration and Naturalization Act ("INA"). In opposition to the States' claims, the Government asserts that it has complete prosecutorial discretion over illegal aliens and can give deferred action status to anyone it chooses. Second, the Government argues that discretionary decisions, like the DAPA program, are not subject to the APA. Finally, the Government claims that the DAPA program is merely general guidance issued to DHS employees, and that the delineated elements of eligibility are not requirements that DHS officials are bound to honor. The Government argues that this flexibility, among other factors, exempts DAPA from the requirements of the APA.

IV. STANDING

A. Legal Standard

1. Article III Standing

Article III of the United States Constitution requires that parties seeking to resolve disputes before a federal court present actual “Cases” or “Controversies.” U.S. Const. art. III, § 2, cl. 1. This requirement limits “the business of federal courts to questions presented in an adversary context and in a form historically viewed as capable of resolution through the judicial process.” *Flast v. Cohen*, 392 U.S. 83, 95 (1968). Plaintiffs, as the parties invoking the Court’s jurisdiction, bear the burden of satisfying the Article III requirement by demonstrating that they have standing to adjudicate their claims in federal court. *Ramming v. United States*, 281 F.3d 158, 161 (5th Cir. 2001). The “irreducible constitutional minimum of standing contains three elements.” *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560 (1992). First, a plaintiff must demonstrate that they have “suffered a concrete and particularized injury that is either actual or imminent.” *Massachusetts v. E.P.A.*, 549 U.S. 497, 517 (2007). Second, a plaintiff must show that there is a causal connection between the alleged injury and the complained-of conduct—essentially, that “the injury is fairly traceable to the defendant.” *Id.* Finally, standing requires that it “be ‘likely,’ as opposed to merely ‘speculative,’ that the injury will be ‘redressed by a favorable decision.’” *Lujan*, 504 U.S. at 560 (quoting *Simon v. E. Ky. Welfare Rights Org.*, 426 U.S. 26, 41-42 (1976)).

2. Prudential Standing

In addition to these three constitutional requirements, “the federal judiciary has also adhered to a set of ‘prudential’ principles that bear on the question of standing.” *Valley Forge*

Christian Coll. v. Americans United for Separation of Church & State, Inc., 454 U.S. 464, 474 (1982). Many opinions refer to these principles as being under the banner of “prudential” standing. See, e.g., *Bennett v. Spear*, 520 U.S. 154, 164 (1997). First, the Supreme Court has held that when the “asserted harm is a ‘generalized grievance’ shared in substantially equal measure by all or a large class of citizens, that harm alone does not warrant exercise of jurisdiction.” *Id.* Rather, these “abstract questions of wide public significance” are more appropriately left to the representative branches of the federal government. *Warth v. Seldin*, 422 U.S. 490, 500 (1975). Second, the plaintiffs must come within the “zone of interests to be protected or regulated by the statute or constitutional guarantee in question.” *Valley Forge*, 454 U.S. at 475 (quoting *Ass’n of Data Processing Serv. Organizations, Inc. v. Camp*, 397 U.S. 150, 153 (1970)). Finally, a plaintiff “must assert his own legal rights and interests, and cannot rest his claim to relief on the legal rights or interests of third parties.” *Id.* at 474 (quoting *Warth*, 422 U.S. at 499).

3. Standing Under the Administrative Procedure Act

The APA provides that a “person suffering a legal wrong because of agency action, or adversely affected or aggrieved by agency action within the meaning of a relevant statute, is entitled to judicial review thereof.” 5 U.S.C. § 702. This right of judicial review extends to agency actions “for which there is no other adequate remedy in a court.” 5 U.S.C. § 704. To demonstrate standing under the APA, the plaintiff must show that it has suffered or will suffer a sufficient injury in fact. *Nat’l Credit Union Admin. v. First Nat’l Bank & Trust Co.*, 522 U.S. 479, 488 (1998). The plaintiff must also demonstrate prudential standing under the APA, which requires showing that “the interest sought to be protected by the complainant [is] arguably within

the zone of interests to be protected or regulated by the statute . . . in question.” *Id.* (quoting *Data Processing*, 397 U.S. at 152). For this prudential standing inquiry, it is not necessary for a court to ask “whether there has been a congressional intent to benefit the would-be plaintiff.” *Nat’l Credit Union Admin.*, 522 U.S. at 488-89. Rather, if the plaintiff’s interests are “arguably within the ‘zone of interests’ to be protected by a statute,” the prudential showing requirement is satisfied. *Id.* at 492. This requisite showing is not made, however, if the plaintiff’s interests are “so marginally related to or inconsistent with the purposes implicit in the statute that it cannot reasonably be assumed that Congress intended to permit the suit.” *Clarke v. Sec. Indus. Ass’n*, 479 U.S. 388, 399 (1987).

When seeking review of agency action under the APA’s procedural provisions, Plaintiffs are also operating under a favorable presumption. They are presumed to satisfy the necessary requirements for standing. *See Mendoza v. Perez*, 754 F.3d 1002, 1012 (D.C. Cir. 2014). Specifically, as stated by the D.C. Circuit, “[p]laintiffs asserting a procedural rights challenge need not show the agency action would have been different had it been consummated in a procedurally valid manner—the courts will assume this portion of the causal link.” *Id.*

B. Resolution of Standing Questions

Questions regarding constitutional and prudential standing implicate the court’s subject-matter jurisdiction; thus challenges to standing are evaluated as a Rule 12(b)(1) motion to dismiss for lack of subject-matter jurisdiction. *See Fed. R. Civ. P. 12(b)(1)*. When evaluating subject-matter jurisdiction, the court may consider: “(1) the complaint alone; (2) the complaint supplemented by undisputed facts evidenced in the record; or (3) the complaint supplemented by undisputed facts plus the court’s resolution of disputed facts.” *Ramming*, 281 F.3d at 161. The

court's analysis also depends on whether the challenging party has made a "facial" or "factual" attack on jurisdiction. *See Paterson v. Weinberger*, 644 F.2d 521, 523 (5th Cir. 1981). A facial challenge consists of only a Rule (12)(b)(1) motion without any accompanying evidence; for this challenge, the court "is required merely to look to the sufficiency of the allegations in the complaint because they are presumed to be true." *Id.*

Conversely, when making a factual attack on the court's jurisdiction, the challenging party submits affidavits, testimony, or other evidentiary materials to support its claims. *Id.* A factual attack requires the responding plaintiff "to submit facts through some evidentiary method" and prove "by a preponderance of the evidence that the trial court does have subject matter jurisdiction." *Id.* Here, Defendants submitted a number of exhibits in support of their attack on Plaintiffs' standing to bring this suit in federal court. Therefore, for the purposes of ruling on Defendants' challenge, the Plaintiffs bear the burden to prove by a preponderance of the evidence that they possess the requisite standing required by Article III. It is not necessary, however, for *all* Plaintiffs to demonstrate standing; rather, "one party with standing is sufficient to satisfy Article III's case-or-controversy requirement." *Rumsfeld v. Forum for Academic and Institutional Rights, Inc.*, 547 U.S. 47, 52 n.2 (2006). Thus Plaintiffs' suit may proceed as long as one Plaintiff can show by a preponderance of the evidence that it fulfills the necessary requirements to show standing.

C. Analysis

1. Article III Standing

a. Injury

The States allege that the DHS Directive will directly cause significant economic injury to their fiscal interests. Specifically, Texas argues that the DHS Directive will create a new class of individuals eligible to apply for driver's licenses,¹⁴ the processing of which will impose substantial costs on its budget. Plaintiffs rely on Texas' driver's license program to demonstrate how the costs associated with processing a wave of additional driver's licenses will impact a state's budget. Texas' undocumented population is approximately 1.6 million, and Plaintiffs' evidence suggests that at least 500,000 of these individuals will be eligible for deferred action through DAPA. Doc. No. 64, Pl. Ex. 14 ¶ 33; Pl. Ex. 24 ¶ 6. Under current Texas law, applicants pay \$24.00 to obtain a driver's license, leaving any remaining costs to be absorbed by the state. *See* Tex. Transp. Code Ann. § 521.421. If the majority of DAPA beneficiaries currently residing in Texas apply for a driver's license, it will cost the state \$198.73 to process and issue each license, for a net loss of \$174.73 per license. Doc. No. 64, Pl. Ex. 24 ¶ 8. Even if only 25,000 of these individuals apply for a driver's license—approximately 5% of the population estimated to benefit from the DHS Directive in Texas—Texas will still bear a net loss of \$130.89 per license, with total losses in excess of several million dollars. *Id.* These costs,

¹⁴ Some driver's license programs, like that in Arkansas, provide that individuals with deferred action status will be eligible to apply for a driver's license. *See, e.g.,* Ark. Code Ann. § 27-16-1105. Other programs, like the one in Texas, provide that a license will be issued to individuals who can show they are authorized to be in the country. *See, e.g.,* Tex. Transp. Code Ann. § 521.142. Employment authorization—a benefit that will be available to recipients of DAPA—is sufficient to fulfill this requirement. Thus under either statutory scheme, DAPA will make its recipients eligible to apply for state driver's licenses.

Plaintiffs argue, are not unique to Texas; rather, they will be similarly incurred in all Plaintiff States where DAPA beneficiaries will be eligible to apply for driver's licenses.

In addition to these increased costs associated with processing a wave of additional driver's licenses, a portion of the States' alleged injury is directly traceable to fees mandated by federal law. *See* REAL ID Act of 2005, PL 109-13, 119 Stat. 231 (2005). Following the passage of the REAL ID Act in 2005, states are now required to determine the immigration status of applicants prior to issuing a driver's license or an identification card. *Id.* To verify immigration status, states must submit queries to the federal Systematic Alien Verification for Entitlements (SAVE) program and pay \$0.50-\$1.50 for each applicant processed. SAVE Access Methods & Transaction Charges, USCIS. In Texas, estimates suggest that the state pays the federal government on average \$0.75 per driver's license applicant for SAVE verification purposes. Doc. No. 64, Pl. Ex. 24 ¶ 5. Thus by creating a new group of individuals that are eligible to apply for driver's licenses, the DHS Directive will increase the costs incurred by states to verify applicants' immigration statuses as required by federal law.¹⁵

As Defendants concede, "a direct and genuine injury to a State's own proprietary interests may give rise to standing." Doc. No. 38 at 23; *see also, e.g., Clinton v. City of N.Y.*, 524 U.S. 417, 430-31 (1998) (negative effects on the "borrowing power, financial strength, and fiscal planning" of a government entity are sufficient injuries to establish standing); *Sch. Dist. of City of Pontiac v. Sec'y of the U.S. Dep't of Educ.*, 584 F.3d 253, 261 (6th Cir. 2009) (school districts had standing "based on their allegation that they must spend state and local funds" to comply with federal law). Defendants in this case argue, however, that the projected costs to Plaintiffs'

¹⁵ In a procedural rights case, the size of the injury is not important for defining standing; rather it is the fact of the injury. "The litigant has standing if there is some possibility that the requested relief will prompt the injury causing party to reconsider the decision." *Massachusetts v. E.P.A.*, 549 U.S. at 518, 525-26.

driver's license programs are "self-inflicted" because the DHS Directive does not directly require states to provide any state benefits to deferred action recipients, and because states can adjust their benefit programs to avoid incurring these costs. Doc. No. 38 at 21-22. This assertion, however, evaluates the DHS Directive in a vacuum. Further, this claim is, at best, disingenuous. Although the terms of DAPA do not compel states to provide any benefits to deferred action recipients, it is clear that the DHS Directive will nonetheless affect state programs. Specifically, in the wake of the Ninth Circuit's decision in *Arizona Dream Act Coalition v. Brewer*, it is apparent that the federal government will compel compliance by all states regarding the issuance of driver's licenses to recipients of deferred action. 757 F.3d 1053 (9th Cir. 2014).

In *Arizona Dream Act Coalition v. Brewer*, the plaintiffs, DACA beneficiaries, sought an injunction to prevent the defendants from enforcing an Arizona policy that denied driver's licenses to recipients of deferred action. *Id.* at 1060. Necessary for the imposition of an injunction, the Ninth Circuit examined whether the plaintiffs were likely to succeed on the merits of their case, and focused on the fact that Arizona's driver's license program permitted other non-citizens to use employment authorization documents to obtain driver's licenses—the same documentation that would be conferred upon DAPA recipients. *Id.* at 1064. Finding that this policy likely discriminated against similarly-situated parties in violation of the Equal Protection Clause, the court enjoined the defendants from denying driver's licenses to deferred action beneficiaries. *Id.* at 1069.

More importantly, the Ninth Circuit in *Arizona* also considered whether the denial of driver's licenses to deferred action recipients was preempted by the Executive Branch's determination that deferred action recipients were also authorized to work in the United States.

Id. at 1063. Stating that “the ability to drive may be a virtual necessity for people who want to work in Arizona,” the court noted that more than 87% of Arizona’s workforce depended on personal vehicles to commute to work. *Id.* at 1062. Although not the basis for its finding, the court addressed preemption at length. It reasoned that the defendants’ policy of denying driver’s licenses to deferred action recipients “interferes with Congress’s intention that the Executive determine when noncitizens may work in the United States” and would be preempted by federal law. *Id.* at 1063. Reinforcing this position, the concurring opinion argued that the majority should have not merely discussed it, but should have included this reasoning as part of its holding since there was no question that federal law required the issuance of driver’s licenses to deferred action recipients. *Id.* at 1069-75. The Government filed briefs in that case arguing that all of Arizona’s attempts to avoid these expenses were preempted. Doc. No. 54, Pl. Ex. 3.

Although the Ninth Circuit’s opinion in *Arizona* is not necessarily binding on the majority of Plaintiffs in this case, it nonetheless suggests that Plaintiffs’ options to avoid the injuries associated with the DHS Directive are virtually non-existent and, if attempted, will be met with significant challenges from the federal government.¹⁶ The federal government made it clear in *Arizona* (and would not retreat from that stance in this case) that any move by a plaintiff state to limit the issuance of driver’s licenses would be viewed as illegal. As held by the Ninth Circuit in *Arizona*, denying driver’s licenses to certain recipients of deferred action violated the Equal Protection clause, and would likely be preempted by DAPA, as well. *See id.* at 1067. This conclusion would be particularly persuasive in Texas since its driver’s license program—like Arizona’s—permits applicants to rely on federal employment authorization documentation

¹⁶ The Ninth Circuit opinion is binding on Arizona, Idaho, and Montana, the Plaintiff States located in the Ninth Circuit. Therefore, the Government’s argument with respect to these states is totally meritless.

to show legal status in the United States. If Texas denied driver's licenses to beneficiaries of the DHS Directive, as suggested by the Government here, it would immediately be sued for impermissibly discriminating against similarly-situated parties that rely on employment authorization documentation to apply for driver's licenses. *See id.* at 1064. Even if Texas could structure its driver's license program to avoid these impermissible classifications, the court in *Arizona* strongly suggested that the denial of driver's licenses to deferred action recipients would be preempted by the Executive Branch's intent that deferred action recipients work while they remain in the United States. Therefore, if Texas or any of the other non-Ninth Circuit States sought to avoid an Equal Protection challenge and instead denied driver's licenses to all individuals that rely on employment authorization documentation, they would be subjecting themselves to a different but significant challenge on federal preemption grounds. As stated above, Arizona, Idaho, and Montana—the Plaintiff States that fall within the Ninth Circuit's jurisdiction—do not even have the option of trying to protect themselves.¹⁷

Setting aside these legal questions, this all-or-nothing choice—that Texas either allow the DAPA beneficiaries to apply for driver's licenses and suffer financial losses or deny licenses to

¹⁷ Also, it is not a defense to the Plaintiffs' assertion of standing to argue that it is not the DAPA program causing the harm, but rather the Justice Department's enforcement of the program. Both departments are a part of the United States and work for the same branch of the federal government.

The Court additionally notes that while the Government claimed preemption on the one hand, it correctly notes that the actual Circuit decision was based upon equal protection. Thus, it argues that the Government is not ultimately causing the States' injuries; rather, it is the Constitution. This is not accurate. This distinction is not convincing for several reasons. First, if the Government enforced the INA as written, these applicants would not be in the states to apply. Second, the Government is still maintaining and asserting its right of preemption to prevent the states from enforcing the INA provisions requiring removal of these individuals and instead is using that power to force a state's compliance with these applications. Third, whether or not the Constitution is involved, it is ultimately the combination of the REAL ID Act and DAPA combined with the failure to enforce the INA that will compel the complained-about result. It is the implementation of the DACA program that has been causing and the implementation of the DAPA program that will cause these damages when they intersect with the REAL ID Act. Stated another way, without DAPA there are no damages, and without the REAL ID Act, there are less damages. Finally, the Government has also not indicated that it will refrain from litigation or aiding litigants to compel the States to issue licenses and incur these expenses once DAPA is instituted.

all individuals that rely on employment authorization documentation—is an injury in and of itself. An injury cannot be deemed “self-inflicted” when a party faces only two options: full compliance with a challenged action or a drastic restructure of a state program. *See Texas v. United States*, 497 F.3d 491, 496-98 (5th Cir. 2007) (finding that Texas had standing on the basis of a “forced choice”: after federal regulations, Texas either had to comply with an administrative procedure it thought was unlawful or forfeit the opportunity to comment on proposed gaming regulations). Further, the necessary restructuring to ensure constitutional compliance would require Texas to deny driver’s licenses to individuals it had previously decided should be eligible for them—a significant intrusion into an area traditionally reserved for a state’s judgment. This illusion of choice—instead of protecting the state from anticipated injuries—merely places the states between a rock and hard place.

Defendants also argue that the projected injuries to Plaintiffs’ driver’s license programs are merely generalized grievances that are shared by all the states’ citizens, and as such are insufficient to support standing in this case. The cases that Defendants cite for this contention, though, are easily distinguishable. In these cases, the plaintiffs broadly alleged general harm to state revenue or state spending. *See Commonwealth of Pa. v. Kleppe*, 533 F.2d 668, 672 (D.C.C. 1976) (Pennsylvania’s “diminution of tax receipts [was] largely an incidental result of the challenged action” and was not sufficient to support standing); *People ex rel. Hartigan v. Cheney*, 726 F. Supp. 219, 226 (C.D. Ill. 1989) (Illinois’ alleged injury of “decreased state tax revenues and increased spending on social welfare programs” not sufficient to support standing). When, however, an action directly injures a state’s identifiable proprietary interests, it is more likely that the state possesses the requisite standing to challenge the action in federal court. *See*