

**CERTIFICATE OF SERVICE**

I certify that on December 16, 2013, I filed and served one copy of the foregoing  
Memorandum of Points and Authorities in Support of Plaintiff's Motion for Summary Judgment  
by CM/ECF on all registered parties.

/s/ *Kerry W. Kircher*

Kerry W. Kircher

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**(U) PROCEDURES FOR THE AVAILABILITY OR DISSEMINATION OF  
RAW SIGNALS INTELLIGENCE INFORMATION BY THE  
NATIONAL SECURITY AGENCY UNDER SECTION 2.3 OF  
EXECUTIVE ORDER 12333  
(RAW SIGINT AVAILABILITY PROCEDURES)**

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**(U) PROCEDURES FOR THE AVAILABILITY OR  
DISSEMINATION OF RAW SIGNALS INTELLIGENCE  
INFORMATION BY THE NATIONAL SECURITY AGENCY  
UNDER SECTION 2.3 OF EXECUTIVE ORDER 12333  
(RAW SIGINT AVAILABILITY PROCEDURES)**

**(U) INTRODUCTION**

(U) Section 2.3 of Executive Order (E.O.) 12333 allows an Intelligence Community (IC) element (IC element) to disseminate information to other appropriate IC elements "for purposes of allowing the recipient element to determine whether the information is relevant to its responsibilities and can be retained by it." For the dissemination of information derived from signals intelligence (SIGINT), section 2.3 requires that such information only be disseminated or made available in accordance with procedures established by the Director of National Intelligence (DNI) in coordination with the Secretary of Defense and approved by the Attorney General. The DNI is establishing these Procedures to implement this provision of section 2.3 and to govern the availability of unevaluated and/or unminimized SIGINT and associated data (hereinafter "raw SIGINT") to IC elements by the National Security Agency/Central Security Service (NSA/CSS, hereinafter "NSA").

**(U) SECTION I – PURPOSE AND SCOPE**

**A. (U) Purpose.** The purpose of these Procedures is to enable IC elements to conduct their national security missions more effectively by providing them with access to raw SIGINT from NSA, as authorized by section 2.3 of E.O. 12333, in a manner that complies with the Fourth Amendment and protects the privacy of U.S. persons.

**B. (U) Exclusions.** These Procedures do not apply to:

1. (U) NSA's SIGINT activities. SIGINT activities conducted by NSA under its authorities and SIGINT activities conducted by another element of the IC pursuant to a delegation of SIGINT authority under section 1.7(c)(2) of E.O. 12333.
2. (U) FISA information. Information that NSA acquires under the Foreign Intelligence Surveillance Act (FISA), as amended. Foreign Intelligence Surveillance Court orders, authorizations from the Attorney General, and related minimization procedures govern the acquisition, retention, and dissemination of such information. Questions about access to such information should be referred to the National Security Division of the Department of Justice and NSA's Office of General Counsel (OGC).

3. (U) Finished reporting based on SIGINT. The receipt and further processing by an IC element of finished reporting from NSA based on SIGINT.
4. (U//FOUO) Other activities. Disseminations of raw SIGINT, or data provided by NSA, pursuant to a joint program or arrangement lawfully conducted under applicable procedures approved by the Attorney General, including activities conducted pursuant to National Security Council Intelligence Directives No. 5 (NSCID-5) and No. 6 (NSCID-6) or successor documents, and disseminations under any Presidentially-authorized covert action program where NSA has been named as a supporting agency.
5. (U) Non-U.S. persons. SIGINT information that is exclusively about non-U.S. persons that is evaluated and disseminated under other authorities, except where otherwise stated. SIGINT information about non-U.S. persons is subject to Presidential Policy Directive 28 (PPD-28) and implementing procedures and any successor documents.

**C. (U) No authorization to collect information.** These Procedures do not authorize NSA or any other IC element to collect SIGINT or other information.

#### **(U) SECTION II - REQUESTS FOR RAW SIGINT**

**A. (U) Access request from an IC element.** NSA may provide raw SIGINT to an IC element only if the head of the IC element or a high-level designee makes a written request describing the raw SIGINT sought and stating whether the element wishes to conduct communications metadata analysis in accordance with section IV.F below. The request will address the following:

1. (U) Use of information. The IC element will explain how it will use the raw SIGINT, to include identifying the particular authorized foreign intelligence or counterintelligence missions or functions that are the basis for its request.
2. (U) Value of information. The IC element will describe how it expects the raw SIGINT to further such missions or functions in a significant way.
3. (U) Other sources of information. The IC element will explain why other sources reasonably available to it cannot provide the information the element expects to obtain from the raw SIGINT.
4. (U) Access requirements. The IC element will describe its access requirements (e.g., the estimated number of analysts who will have access to the raw SIGINT and the time period that the element will retain the raw SIGINT).

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5. (U) Processing and dissemination. The IC element will explain how it will process raw SIGINT and, if appropriate, disseminate the information obtained from it.

6. (U) Protection of information. The IC element will explain how it will safeguard the raw SIGINT, including limiting access to those personnel described in section III.B.5 and protecting all sensitive sources, methods, and activities, in a manner consistent with security requirements specified or agreed to by the Director, NSA (DIRNSA).

7. (U) Attorney General procedures. The IC element's personnel will comply with either (i) these Procedures or (ii) any alternative procedures covering sections III through VIII and later established by the DNI and approved by the Attorney General governing the availability of raw SIGINT. Alternative procedures may be established based on existing procedures and may apply to NSA as well as other IC elements. The DNI will establish any alternative procedures in coordination with the Secretary of Defense, after consulting with affected elements and after approval by the Attorney General.

8. (U) Reporting. The IC element will provide in a timely and complete way any reporting required by these Procedures, and, if the IC element is seeking an extension of its access to raw SIGINT, the IC element must have provided such reporting prior to approval of an extension.

9. (U) Compliance and oversight. The IC element will describe its compliance and oversight program, including addressing how that program will meet each of the requirements found in section VII.C.

10. (U) PPD-28. The IC element's personnel will comply with PPD-28, implementing policies, and any successor documents.

11. (U) Consultation. The official has consulted with legal counsel and the senior official designated or identified by the IC element head, pursuant to section E.2.b of ICD 107, as responsible for matters involving the protection of civil liberties and privacy.

**B. (U) Notification of SIGINT information of interest.** In the course of its operations, NSA may identify raw SIGINT of potential interest to an IC element. NSA may, on its own initiative, notify the IC element of the existence of such information. The IC element must follow the procedure in paragraph A to request that the information be made available to it.

**C. (U) Evaluation of requests.** A high-level NSA official designated by the DIRNSA will review requests for raw SIGINT covered by these Procedures. NSA will document its approval decisions in writing and include a statement explaining how the request fully

complies with paragraph A. If the request complies with the requirements of paragraph A, in deciding whether to approve a request, the reviewing official will also consider:

1. (U) Reasonableness. Whether approving the request is reasonable in light of all the circumstances known at the time of the evaluation of the request, including but not limited to:
  - a. (U) The information provided under paragraph A by the requesting IC element;
  - b. (U) The likelihood that NSA has raw SIGINT responsive to the request that it is able to make available;
  - c. (U) The importance of the information to the IC element, as explained in the request;
  - d. (U) The ability of the IC element to process and, if appropriate, further disseminate the information as compared to the ability of NSA or other IC elements already possessing the information to do so;
  - e. (U) The likelihood that sensitive U.S. person information (USPI) will be found in the information and, if known, the amount of such information;
  - f. (U) The potential for substantial harm, embarrassment, inconvenience, or unfairness to U.S. persons if the USPI is improperly used or disclosed;
  - g. (U) The time period for which the IC element intends to retain the information; and
  - h. (U) The safeguards that will be applied to the information.
- (U) Nothing in this paragraph should be construed to require NSA to review or evaluate the raw SIGINT that has been requested by the IC element when assessing the reasonableness of the request.
2. (U) Need for the information requested. Whether NSA can reasonably meet the requesting IC element's needs by providing, when practicable, more limited access to the requested information, or whether NSA has information other than raw SIGINT that can meet the requesting element's needs.
3. (U) Compliance and protection. Whether, based on the request from the IC element and any other information available, the requesting element has the ability to comply with these Procedures and to protect and handle raw SIGINT properly.

**D. (U) Approved requests.**

1. (U) *Memorandum of agreement (MOA)*. Before NSA makes raw SIGINT available to a requesting IC element, the element and NSA must execute an MOA governing the availability, retention, and use of the information. The MOA will describe the element's oversight and compliance procedures to address the requirements of section VII; any additional training, guidance, or other assistance to be provided by NSA; and measures to protect SIGINT sources and methods from unauthorized disclosure. The MOA requires the approval of appropriate high-level officials at the requesting element, NSA, and the ODNI (in coordination with Department of Defense (DoD)), based on a finding that the requesting IC element has satisfied the requirements of these Procedures. The term of the MOA, or any renewal of it, will not exceed three years.
2. (U) *Access request and approval documentation*. Each specific request for access to raw SIGINT that has been approved by NSA will be documented in an appendix to the MOA with the recipient element. Access requests will be reviewed at least every three years, unless a shorter period is otherwise required by the MOA or otherwise. Any renewal of access to raw SIGINT, or expansion of the information that the recipient IC element is seeking, will require the recipient element to make a new request for the renewal or for the additional information, respectively, in accordance with paragraph A above.

**E. (U) Denied requests.** NSA will return a denied request to the requesting IC element with an explanation. Reasonable efforts will be made to resolve disagreements between NSA and the requesting IC element in a timely manner. The requesting IC element may appeal an adverse decision to the DIRNSA's designee, and then to the DIRNSA absent resolution with the DIRNSA's designee. In the event a disagreement between NSA and another DoD IC element cannot be resolved, the issue will be referred to the Secretary of Defense, and in the event resolution still cannot be reached, the issue will be referred to the DNI. For all other IC elements, when resolution cannot be reached, the issue will be referred to the DNI. An official resolving any disagreement will apply the standards of paragraph C.

**(U) SECTION III – PROTECTIONS FOR RAW SIGINT**

**A. (U) Access to information.** NSA may choose to make raw SIGINT available (i) through NSA's systems; (ii) through a shared IC or other Government capability, such as a cloud-based environment; or (iii) by transferring some or all of the information to the recipient IC element's information systems. Only information that can be afforded appropriate handling, storage, retention, and access protections by the recipient IC element will be made available.

B. (U) **General protections.** Any IC element that obtains access to raw SIGINT under these Procedures will:

1. (U) Fourth Amendment. Take steps to ensure its processing, retention, and dissemination of the information complies with applicable requirements of the Fourth Amendment.
2. (U) Compliance with law. Ensure that IC element personnel with access to raw SIGINT abide by the Constitution, applicable law, executive order, directive, regulation, policy, or guidance, including E.O. 12333, these Procedures, and the applicable MOA.
3. (U) Political process in the United States. Not engage in any intelligence activity authorized by these Procedures, including disseminations to the White House, for the purpose of affecting the political process in the United States. The IC element will comply with the guidance applicable to NSA regarding the application of this prohibition. Questions about whether a particular activity falls within this prohibition will be resolved in consultation with the element's legal counsel and the General Counsel of the Office of the Director of National Intelligence (ODNI) (and the DoD's Office of the General Counsel in the case of a DoD IC element).
4. (U) Change in need for SIGINT. Notify NSA of changes in its mission need and, if necessary, notify NSA that raw SIGINT no longer needs to be made available under the applicable MOA.
5. (U) Access. Limit access to raw SIGINT to those IC element personnel who have appropriate security clearances, accesses, training, and a mission need.
6. (U) Auditing records. Protect auditing records against unauthorized access, modification, or deletion, and retain these records for a sufficient period of time to verify compliance with the requirements of these Procedures.
7. (U) Marking of files. Use reasonable measures to identify and mark or tag raw SIGINT files reasonably believed or known to contain USPI. Marking and tagging will occur regardless of the format or location of the information, or the method of storing it. When appropriate and reasonably possible, files and documents containing USPI will also be marked individually. In the case of certain electronic databases, if it is not reasonably possible to mark individual files containing USPI, a banner may be used before access informing users that they may encounter USPI.
8. (U) Disseminations. Monitor disseminations of information derived from raw SIGINT to ensure compliance with the provisions of section VI below.
9. (U) Removal of information. Ensure that raw SIGINT is removed from all electronic and hard copy files within the time periods specified in section V below.

**(U) SECTION IV – PROCESSING RAW SIGINT**

**A. (U) Intelligence purpose.** An IC element obtaining raw SIGINT under these Procedures may only evaluate the raw information obtained for the authorized foreign intelligence or counterintelligence purposes documented in the applicable MOA.

**B. (U) Selection of domestic communications prohibited.** An IC element obtaining raw SIGINT under these Procedures may not use a query, identifier, or other selection term that is intended to select domestic communications.

**C. (U) Selection terms based on identity.** An IC element obtaining raw SIGINT under these Procedures may use a selection term that is intended to select foreign communications on the basis of the identity of a communicant or the fact that the communications mention a particular person. The IC element will take all reasonable measures, if necessary on an ongoing basis, to determine whether a selection term is associated with a U.S. person or a person in the United States and may not use such a term unless authorized in accordance with this paragraph. These measures may include appropriate coordination with NSA or other Government departments and agencies. The IC element may only intentionally select foreign communications of or concerning a U.S. person or a person in the United States if the element's compliance organization or legal counsel confirms that one of the following circumstances exists:

1. (U) Current FISA targets. Foreign communications known to be to, from, or about a U.S. person or a person located in the United States may be intentionally selected if such person is the subject of an order or emergency authorization authorizing electronic surveillance, a physical search, or an acquisition under sections 105, 304, 703, 704, or 705 of FISA, 50 U.S.C. §§ 1805, 1824, 1881c-e, at the time when such raw SIGINT is to be selected. (Note that this provision does not apply to a U.S. person or a person in the United States who is the subject of an order or emergency authorization under the pen register or business records provisions of FISA, 50 U.S.C. §§ 1842, 1843, 1861.) If there is any question about the applicability of such an order or authorization, the compliance organization or legal counsel must consult with the Office of Intelligence of the National Security Division, Department of Justice.

2. (U) Other targets. Unless authorized under paragraph 1, foreign communications reasonably likely to be to, from, or about a U.S. person or a person located in the United States may not be intentionally selected for the purpose of targeting a U.S. person or a person in the United States, unless approved by:

a. (U) The Attorney General, if all of the following requirements are met:

(i) ~~(S//SI//REL)~~ [REDACTED]

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;

(ii) (U) The person is an agent of a foreign power or an officer or employee of a foreign power; and

(iii) (U) The purpose of the selection is to acquire significant foreign intelligence or counterintelligence information.

(U) The Attorney General's approvals will be limited to a period of time not to exceed 90 days.

b. (U) The DIRNSA or the IC element head, or a high-level designee of the IC element head, if any of the following requirements is met:

(i) (U) The person consented, by completing an appropriate consent agreement, to the use by a recipient element of a selection term intended to select communications to, from, or about that person. The IC element will promptly provide NSA with a copy of all such approvals;

(ii) (U) The targeted individual is reasonably believed to be held captive by a foreign power or group engaged in international terrorism. When an IC element authorizes under this paragraph the selection of raw SIGINT concerning a U.S. person held captive, the IC element's legal counsel will, within 72 hours, notify the Attorney General and NSA's OGC, and in the case of a DoD IC element, will also notify DoD's OGC;

(iii) (S//SI//REL) [REDACTED]

;

(iv) (S//SI//REL) [REDACTED]

;

(v) (S//SI//REL) The targeted entity is a [REDACTED] business entity in the United States that is openly acknowledged to be directed or controlled by a foreign power. Any approval under this subparagraph will be granted as follows:

a. (U) If the DIRNSA is approving the selection, the DIRNSA will comply with the requirements of section 4.A.1(b) of the Classified Annex to Department of Defense Procedures Under E.O. 12333 or any successor documents.

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b. (U) If an IC element head or a high-level designee is approving the selection, he or she will certify to the Attorney General that the targeted entity is openly acknowledged to be directed and controlled by a foreign power; that the purpose of the selection is to obtain foreign intelligence or counterintelligence information about that foreign power in accordance with valid intelligence requirements; and that the element will protect any USPI reviewed as a result of the selection in accordance with these Procedures. Such official will provide a copy of the certification to the DIRNSA or a designee, and will also advise the Attorney General and the DIRNSA on an annual basis of all such selections.

D. (U) **Selection terms based on content.** When a selection term is intended to select communications or related data on the basis of its content, rather than on the basis of the identity of the communicant or the fact that the communication mentions a particular person, the following rules apply:

1. (S//SI//REL) *Results anticipated from selection term.* No selection term that is reasonably likely to result in the retrieval of communications to or from a U.S. person (wherever located) [REDACTED]

[REDACTED], or data related to such communications, may be used unless there is reason to believe that foreign intelligence or counterintelligence will be obtained by the use of such selection term.

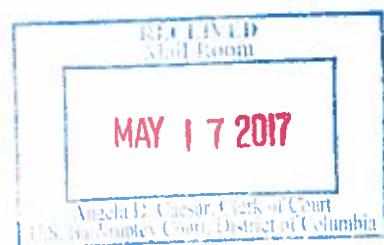
2. (U) *Results obtained from selection term.* No selection term that has resulted in the retrieval of a significant number of communications to or from such persons or entities, or data related to such communications, may be used unless there is reason to believe that foreign intelligence or counterintelligence will be obtained.

3. (U) *Minimize retrieval of communications that do not contain foreign intelligence or counterintelligence.* Selection terms that have resulted or are reasonably likely to result in the retrieval of communications to or from such persons or entities, or data related to such communications, will be designed to defeat, to the greatest extent practicable under the circumstances, the retrieval of those communications that do not contain foreign intelligence or counterintelligence.

E. (U) **Attorney-client communications.** An IC element receiving raw SIGINT will comply with any guidance promulgated by the Assistant Attorney General for National Security, after consultation with the ODNI, with respect to the processing, retention, and dissemination of attorney-client communications.

F. (U) **Exception for communications metadata analysis.** An IC element receiving raw SIGINT may conduct communications metadata analysis, including contact chaining, of the raw SIGINT only for valid, documented foreign intelligence or counterintelligence purposes. It may engage in these activities without regard to the location or nationality of the communicants. These activities are subject to all the requirements of these

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Procedures, except for paragraphs B through E above, which do not apply to them. Each year by October 15th, any recipient IC element using the provisions of this paragraph will report to the Attorney General on (i) the kinds of information that the element is processing as communications metadata; (ii) the element's implementation of the protections required by these Procedures with respect to metadata; and (iii) any significant new legal or oversight issues that have arisen in connection with the element's processing or dissemination of communications metadata of U.S. persons. The element will provide a copy of this report to NSA's OGC, NSA's Civil Liberties and Privacy Office, the DNI's Civil Liberties Protection Officer, DoD's OGC, and the DoD Senior Intelligence Oversight Official (SIOO).

**(U) SECTION V – RETENTION**

**A. (U) Time periods for retention of raw SIGINT.** A recipient IC element may retain raw SIGINT for not more than five years after the information is first collected by NSA, unless the continued retention for up to an additional five years is approved in writing by the head of the recipient element as necessary to protect national security<sup>1</sup> and also approved by the DNI to the extent required under PPD-28 and any implementing policies. In no event, however, may a recipient element retain raw SIGINT beyond the time that NSA may retain it. A recipient IC element is responsible for ensuring compliance with applicable retention periods for any raw SIGINT transferred to its information systems. For any raw SIGINT that NSA provides to a recipient element, NSA must inform the recipient element of the applicable retention period.

**B. (U) Foreign communications that have been minimized.** Foreign communications to, from or about U.S. persons or data related to such communications may be permanently retained only:

1. (U) If processed so as to eliminate any USPI; or
2. (U) If dissemination of such communications without elimination of reference to such U.S. persons would be permitted under section VI below.

**(U)** Any retention must also be permitted under paragraphs D and E below.

**C. (U) Domestic communications.** Domestic communications inadvertently retrieved during the selection of foreign communications will be promptly destroyed upon recognition unless the Attorney General determines that the contents indicate a threat of death or serious bodily harm to any person.

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<sup>1</sup> (U) Such approval must comply with section 309(b)(3)(B)(vii) of the 2015 Intelligence Authorization Act codified at 50 U.S.C. § 1813.

**D. (U) Communications between U.S. persons.** Communications solely between U.S. persons inadvertently retrieved during the selection of foreign communications will be destroyed upon recognition, except:

1. (U) When the communication contains significant foreign intelligence or counterintelligence, the head of the recipient IC element may waive the destruction requirement and subsequently notify the DIRNSA and NSA's OGC; or
2. (U) When the communication contains evidence of a crime or a threat of death or serious bodily harm to any person, or anomalies that reveal a potential vulnerability to U.S. communications security, the recipient IC element will notify NSA's OGC, which will review it according to the applicable NSA procedures and policies.

**E. (U) Communications with government employees.** Unless otherwise permitted by section IV, communications to or from any officer or employee of the U.S. Government or of any state, local, or tribal government, who are U.S. persons or located in the United States, will not be intentionally selected during the selection of foreign communications. Inadvertent retrieval of such communications solely between persons in the United States will be treated in accordance with paragraph C above. The inadvertent retrieval of any other communications to or from any officer or employee of the U.S. Government or of any state, local, or tribal government (including those between foreign targets and U.S. officials) will be treated in accordance with paragraph D above.

**F. (U) Immediate notice required.** When a recipient IC element identifies a communication requiring destruction under paragraph C, D, or E, the element will notify the DIRNSA's designee and NSA's OGC immediately upon recognition.

## (U) SECTION VI - DISSEMINATION

### A. (U) Consistency with other requirements

1. (U) Other laws. All disseminations under these Procedures must be permissible under the Privacy Act, 5 U.S.C. § 552a, if applicable, and other laws.
2. (U) Memorandum of agreement. All disseminations under these Procedures must be permissible under IC policy and the MOA concluded between NSA and the recipient IC element under paragraph II.D.1.

**B. (U) Criteria for dissemination of USPI.** Subject to paragraph A and to paragraphs C, D, and E below, an IC element may disseminate USPI derived solely from raw SIGINT covered by these Procedures only if one of the following conditions is met, and

if a high-level official as specified in the MOA determines that the recipient has a need for the USPI in the performance of his or her official duties:

1. (U) Consent. The U.S. person has consented to the dissemination of (i) communications to, from, or about him or her, (ii) data related to such communications, or (iii) information about him or her, and has executed an appropriate consent form.
2. (U) Publicly available. The USPI is publicly available information.
3. (U) Understanding foreign intelligence or counterintelligence. The USPI is necessary to understand the foreign intelligence or counterintelligence information or assess its importance. The following nonexclusive list contains examples of the type of information that meets this standard:
  - a. (U) The information indicates that the U.S. person may be a foreign power or an agent of a foreign power or an officer or employee of a foreign power;
  - b. (U) The information indicates that the U.S. person may be engaged in the unauthorized disclosure of classified information;
  - c. (U) The information indicates that the U.S. person may be engaged in international narcotics trafficking activities;
  - d. (U) The information indicates that the U.S. person may be the target of hostile intelligence activities of a foreign power;
  - e. (U) The information is pertinent to a possible threat to the safety of any person or organization, including those who are targets, victims or hostages of international terrorist organizations; or
  - f. (U) The identity is that of a senior official of the Executive Branch of the U.S. Government. In this case, normally only the official's title will be disseminated. A high-level official of the recipient IC element will ensure that domestic political or personal information that is not necessary to understand foreign intelligence or counterintelligence or assess its importance is not retained or disseminated.
4. (U) Evidence of a crime. The information is evidence of a possible commission of a crime and reported as provided in the Memorandum of Understanding: Reporting of Information Concerning Federal Crimes, or any successor documents.
5. (U) Required disseminations. The dissemination is required by statute; treaty; executive order; Presidential directive; National Security Council directive; Homeland Security Council directive; or policy, memorandum of understanding, or agreement approved by the Attorney General.

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**C. (U) Disseminations to foreign governments or government-sponsored international entities.** In addition to the other requirements of this section, the DIRNSA or a designee (who may be an official of another IC element) must approve any disseminations of information obtained under these procedures to a foreign government or a government-sponsored international entity. The approving official must determine that the disclosure is consistent with applicable international agreements and foreign disclosure policy and directives, including those requiring analysis of potential harm to any individual.

**D. (U) Dissemination of raw SIGINT prohibited.** An IC element receiving raw SIGINT under these Procedures may not further disseminate the raw SIGINT it obtains. If a recipient IC element wishes to disseminate raw SIGINT, it must request authorization from the DIRNSA. The DIRNSA or a high-level designee may authorize the dissemination if he or she finds, after consulting with NSA's General Counsel, that the dissemination is permissible under the procedures applicable to NSA.

**E. (U) Other disseminations.** NSA's OGC, in consultation with the National Security Division of the Department of Justice and DoD's OGC, must approve any dissemination that does not conform to the requirements of these Procedures. Such approval will be based on a determination that the proposed dissemination complies with applicable law, executive orders, and Presidential and IC directives.

## **(U) SECTION VII - TRAINING, AUDITING, AND OVERSIGHT**

**A. (U) Training.** All IC element personnel who have access to raw SIGINT under these Procedures will receive training on these Procedures. IC elements will develop this training in coordination with NSA, and pursuant to training standards developed by ODNI in consultation with DoD. The training will include, if applicable, the avoidance of selection terms associated with U.S. persons or a person in the United States; the use of selection terms based on content; the need to consult with a supervisor about selection terms whose use may not be appropriate because of the communications to, from, or about U.S. persons likely to be retrieved; other processing, retention, and dissemination requirements; and the proper use and dissemination of metadata in accordance with paragraph IV.F.

**B. (U) Auditing.** An IC element obtaining access to raw SIGINT must have auditing capabilities and requirements that are comparable to NSA's and meet the following minimum standards:

- 1. (U) Access.** Access to raw SIGINT will be monitored, recorded, and audited by supervisory or other appropriate personnel;

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2. (U) *Queries*. All queries or other search terms will be monitored and recorded, and supervisory or other appropriate personnel will audit and review the use of such terms. The recipient IC element's compliance program will specify the periodicity of the audits which, at a minimum, will be comparable to NSA's. The results of the audits will be provided to the officials conducting reviews under section VII.G; and
3. (U) *Retrievals*. Retrievals, or samples of retrievals, from repositories of raw SIGINT will be reviewed for compliance with these Procedures and for their relevance to the authorized mission or function for which access has been provided.

**C. (U) IC element oversight and compliance programs.** Each IC element, in coordination with the IC element's legal, oversight, compliance, and privacy and civil liberties officials (and the DoD SIOO in the case of a DoD IC element), will establish an oversight and compliance program for handling raw SIGINT provided under these Procedures. The IC element's oversight and compliance program will be reviewed and approved by the DNI's Civil Liberties Protection Officer, in consultation with NSA, to ensure that the program is comparable to NSA's for similar activities. This program will:

1. (U) Implement the training and auditing required by subsections A and B;
2. (U) Ensure that the element uses selection terms and processes raw SIGINT, including metadata, in accordance with section IV;
3. (U) Ensure that the element does not improperly retain and/or disseminate USPI; and
4. (U) Include oversight and compliance measures comparable to those used by NSA in similar circumstances.

**D. (U) Assistance to recipient IC elements.** NSA will assist recipient IC elements in establishing oversight and compliance programs to meet the requirements of these Procedures. NSA will also make available training material required for, and prior to, access to raw SIGINT.

**E. (U) Questionable intelligence activities.** An IC element will report in writing to the DIRNSA's designee (and, in the case of DoD IC elements, to the DoD SIOO) any questionable intelligence activity (including compliance incidents or other violations of these Procedures) by IC element personnel concerning raw SIGINT obtained under these Procedures. Such reporting will be completed immediately upon recognition. The report will also be included in the IC element's normal intelligence oversight reporting to, among others, the President's Intelligence Oversight Board and the ODNI.

**F. (U) Other reporting responsibilities.** These Procedures do not supersede or replace reporting responsibilities required by law, executive order, directive, regulation, policy, or other guidance, including E.O. 13462.

**G. (U) Reviews**

1. (U) *Reviews by the IC element and ODNI.* Appropriate oversight, compliance, and privacy and civil liberties officials of an IC element receiving raw SIGINT, in coordination with the DNI's Civil Liberties Protection Officer (and the DoD SIOO in the case of a DoD IC element), will in accordance with the applicable MOA periodically, but not less than every three years, evaluate practices for protecting USPI, the adequacy of the oversight and compliance activities conducted in accordance with these Procedures, and the adequacy and timeliness of the reporting required by these Procedures. The IC element will promptly correct any deficiencies identified. The DNI's Civil Liberties Protection Officer will report major deficiencies to the head of the IC element, the DIRNSA, and the DNI.
2. (U) *ODNI assessment of overall IC implementation of these Procedures.* Based on the reviews jointly conducted by IC elements and ODNI in paragraph 1 above and the reporting of questionable intelligence activities, the DNI's Civil Liberties Protection Officer will periodically, but not less than every three years, review how the IC is implementing these Procedures, the gravity of any compliance incidents across the IC, and the frequency, trends, or patterns of the incidents across the IC to assess whether programmatic adjustments to the way these Procedures are implemented are warranted, or whether any additional action is needed. The DNI's Civil Liberties Protection Officer will report major deficiencies to the DNI, the Secretary of Defense, and the DIRNSA.
3. (U) *NSA's authority to review.* Nothing in these Procedures is intended to preclude NSA, in accordance with the responsibilities of its Director under sections 1.3(b)(12)(A)(i) and 1.7(c) of E.O. 12333, from reviewing a recipient IC element's handling of raw SIGINT made available under these Procedures. Recipient IC elements must comply with NSA's requests for information in support of any such review. If NSA determines that an IC element has failed to comply with the requirements of E.O. 12333 or these Procedures, DIRNSA's designee may terminate the IC element's access to raw SIGINT without notice.

**(U) SECTION VIII - USE IN LEGAL PROCEEDINGS**

(U) A recipient IC element may not use, or permit the use of, raw SIGINT made available under these Procedures, or information derived from such information, in any legal or administrative proceeding without the prior approval of NSA's OGC.

**(U) SECTION IX - GENERAL PROVISIONS**

**A. (U) Correspondence.** The DIRNSA, or a designee, will be included as an addressee on all significant official correspondence on matters pursuant to these Procedures.

**B. (U) Delegation.** When these Procedures require a specific official to approve an activity or take some other action, only that official, or an official at a higher level in the chain of command, may take that action. When these Procedures permit an official to delegate responsibility for an action, the official may delegate the responsibility to one or more appropriate officials in accordance with IC element or department policy, unless specifically limited to a single designee.

**C. (U) Interpretation.** NSA will refer all questions relating to the interpretation of these Procedures to NSA's OGC. NSA's OGC will consult with the Assistant Attorney General for National Security, ODNI's OGC, and DoD's OGC regarding any novel or significant interpretations of these Procedures. IC elements receiving raw SIGINT under these Procedures will refer all questions relating to the interpretation of these Procedures to the appropriate legal office in the IC element (and, in the case of DoD IC elements, also to DoD OGC). The appropriate legal office will consult with the Assistant Attorney General for National Security and the ODNI, NSA, and DoD OGCs regarding any novel or significant interpretations of these Procedures. NSA's Civil Liberties and Privacy Office, the DNI's Civil Liberties Protection Officer, and DoD's Privacy and Civil Liberties Office will be informed of any novel or significant interpretation of these Procedures.

**D. (U) Departures.** The ODNI General Counsel and the Assistant Attorney General for National Security, after consultation with NSA's General Counsel, must approve any departures from these Procedures. If there is insufficient time for such approval because of the immediacy or gravity of a threat to the safety of persons or property or to the national security, the head of an IC element or the head's senior representative present may approve a departure from these Procedures. The General Counsel of NSA will be notified as soon thereafter as possible. The IC element will provide prompt written notice of any such departures to the General Counsel of NSA, the Assistant Attorney General for National Security, the ODNI General Counsel, and to the DoD General Counsel. The NSA General Counsel will notify the DoD General Counsel and the Assistant Attorney General for National Security of any such departures that are not otherwise reported. Notwithstanding this paragraph, all activities in all circumstances must be carried out in a manner consistent with the Constitution and laws of the United States.

**E. (U) Internal Guidance.** These Procedures are set forth solely for the purpose of internal U.S. Government guidance. They are not intended to, do not, and may not be relied on to create any rights, substantive or procedural, enforceable at law or in equity, by any party against the United States, its departments, agencies, or entities, its officers,

employees, or agents, or any other person, nor do they place any limitation on otherwise lawful investigative and litigative prerogatives of the United States.

**F. (U) Review of these Procedures.** The DNI will complete a review of these Procedures and their implementation within five years after they are established. This review will consider the implementation of these Procedures from both the information sharing and the civil liberties and privacy perspectives. The DNI will conduct this review in coordination with the Attorney General and Secretary of Defense and will consider whether any findings from the review warrant amendments to these Procedures.

**(U) SECTION X - DEFINITIONS**

**A. (U) Agent of a foreign power** means:

1. (U) Any person, other than a U.S. person, who:
  - a. (U) Acts in the United States as an officer or employee of a foreign power, or as a member of a group engaged in international terrorism or activities in preparation therefor, irrespective of whether the person is in the United States;
  - b. (U) Acts for, or on behalf of, a foreign power which engages in clandestine intelligence activities in the United States contrary to the interests of the United States, when the circumstances indicate that such person may engage in such activities, or when such person knowingly aids or abets any person in the conduct of such activities or knowingly conspires with any person to engage in such activities;
  - c. (U) Engages in international terrorism or activities in preparation therefor;
  - d. (U) Engages in the international proliferation of weapons of mass destruction, or activities in preparation therefor; or
  - e. (U) Engages in the international proliferation of weapons of mass destruction, or activities in preparation therefor, for or on behalf of a foreign power, or knowingly aids or abets any person in the conduct of such proliferation or activities in preparation therefor, or knowingly conspires with any person to engage in such proliferation or activities in preparation therefor; or
2. (U) Any person, including a U.S. person, who:
  - a. (U) Knowingly engages in clandestine intelligence gathering activities for, or on behalf of, a foreign power, which activities involve, or may involve, a violation of the criminal statutes of the United States;

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- b. (U) Pursuant to the direction of an intelligence service or network of a foreign power, knowingly engages in any other clandestine intelligence activities for, or on behalf of, such foreign power, which activities involve or are about to involve a violation of the criminal statutes of the United States;
- c. (U) Knowingly engages in sabotage or international terrorism, or activities that are in preparation therefor, for or on behalf of a foreign power;
- d. (U) Knowingly enters the United States under a false or fraudulent identity for or on behalf of a foreign power or, while in the United States, knowingly assumes a false or fraudulent identity for or on behalf of a foreign power; or
- c. (U) Knowingly aids or abets any person in the conduct of activities described in paragraphs a through c or knowingly conspires with any person to engage in those activities.

**B. (U) Communicant** means a sender or intended recipient of a communication.

**C. (U) Communications about a U.S. person** are those in which the U.S. person is identified in the communication. A U.S. person is identified when the person's name, unique title, address, or other USPI is revealed in the communication in the context of activities conducted by that person or activities conducted by others and related to that person. A mere reference to a product by brand name or manufacturer's name, e.g., "Boeing 707" is not an identification of a U.S. person.

**D. (U) Communications metadata** means the dialing, routing, addressing, or signaling information associated with a communication, but does not include information concerning the substance, purport, or meaning of the communication. The two principal subsets of communications metadata are telephony metadata and electronic communications metadata:

- 1. (U) Telephony "metadata" includes the telephone number of the calling party, the telephone number of the called party, and the date, time, and duration of the call. It does not include the substance, purport, or meaning of the communication.
- 2. (U) For electronic communications, "metadata" includes the information appearing on the "to," "from," "cc," and "bcc" lines of a standard e-mail or other electronic communication. For e-mail communications, the "from" line contains the e-mail address of the sender, and the "to," "cc," and "bcc" lines contain the e-mail addresses of the recipients. "Metadata" also means (i) information about the Internet-protocol (IP) address of the computer from which an e-mail or other electronic communication was sent and, depending on the circumstances, the IP address of routers and servers on the Internet that have handled the communication during transmission; (ii) the exchange of an IP address and e-mail

address that occurs when a user logs in to a web-based e-mail service; and (iii) for certain logins to web-based e-mail accounts, inbox metadata that is transmitted to the user upon accessing the account. "Metadata" associated with electronic communications does not include information from the "subject" or "re" line of an e-mail or information from the body of an e-mail.

**E. (U) Contact chaining** is a process by which communications metadata is organized. It shows, for example, the telephone numbers or e-mail addresses that a particular telephone number or e-mail address has been in contact with, or has attempted to contact. Through this process, computer algorithms automatically identify not only the first tier of contacts made by the seed telephone number or e-mail address, but also the further contacts made by the first tier of telephone numbers or e-mail addresses and so on.

**F. (U) Counterintelligence** means information gathered and activities conducted to identify, deceive, exploit, disrupt, or protect against espionage, other intelligence activities, sabotage, or assassinations conducted for or on behalf of foreign powers, organizations, or persons, or their agents, or international terrorist organizations or activities.

**G. (U) Dissemination** means the transmission, communication, sharing, or passing of information outside an IC element by any means, including oral, electronic, or physical means. Dissemination therefore includes providing any access to information in an IC element's custody to persons outside that IC element.

**H. (U) Domestic communication** means any communication where the sender and all intended recipients are located in the United States and that was acquired under circumstances in which a person has a reasonable expectation of privacy and a warrant would be required for law enforcement purposes.

**I. (U) Foreign communication** means a communication that involves a sender or an intended recipient who is outside the United States.

**J. (U) Foreign intelligence** means information relating to the capabilities, intentions, or activities of foreign governments or elements thereof, foreign organizations, foreign persons or international terrorists.

**K. (U) Foreign power** means any of the following:

1. (U) A foreign government or any component thereof, whether or not recognized by the United States.
2. (U) A faction of a foreign nation or nations, not substantially composed of U.S. persons.

3. (U) An entity that is openly acknowledged by a foreign government or governments to be directed and controlled by such foreign government or governments.
4. (U) A group engaged in international terrorism or activities in preparation therefor.
5. (U) A foreign-based political organization, not substantially composed of U.S. persons.
6. (U) An entity that is directed and controlled by a foreign government or governments.
7. (U) An entity not substantially composed of U.S. persons that is engaged in international proliferation of weapons of mass destruction.

**L. (U) IC element** is as defined in section 3.5(h) of E.O. 12333.

**M. (U) International terrorism** means activities that (i) involve violent acts or acts dangerous to human life that violate federal, State, local, or tribal criminal law or would violate such law if committed in the United States or a state, local, or tribal jurisdiction; (ii) appear to be intended to intimidate or coerce a civilian population; to influence the policy of a government by intimidation or coercion; or to affect the conduct of a government by assassination or kidnapping; and (iii) occur totally outside the United States, or transcend national boundaries in terms of the means by which they are accomplished, the persons they appear intended to coerce or intimidate, or the locale in which their perpetrators operate or seek asylum.

**N. (U) Publicly available information** means information that has been published or broadcast for public consumption, is available on request to the public, is accessible on-line or otherwise to the public, is available to the public by subscription or purchase, could be seen or heard by any casual observer, is made available at a meeting open to the public, or is obtained by visiting any place or attending any event that is open to the public.

**O. (U) Questionable intelligence activity** means an intelligence activity that may violate the law, E.O. 12333, any other executive order or Presidential directive, or applicable policy of the IC element, including these Procedures.

**P. (U) Raw SIGINT** is any SIGINT and associated data that has not been evaluated for foreign intelligence purposes and/or minimized.

**Q. (U) Selection**, as applied to manual and electronic processing activities, means the intentional insertion of a name, cable address, telex number or answer back, address, telephone number, email address, or other alphanumeric device or identifier into a

computer scan dictionary or manual scan guide for the purpose of identifying messages or information of interest and isolating them for further processing.

**R. (U) Selection term** means the composite of individual terms used to effect or defeat selection of particular communications or information. It comprises the entire term or series of terms so used, but not any segregable term contained therein. It applies to both electronic and manual processing.

**S. (U) Unevaluated SIGINT** is SIGINT that has not been evaluated to determine whether it contains foreign intelligence or counterintelligence information.

**T. (U) United States.** When used in a geographic sense, means the land area, internal waters, territorial seas, and airspace of the United States, including U.S. territories, possessions, and commonwealths.

**U. (U) Unminimized SIGINT** is SIGINT that has not been reviewed to delete or mask USPI not meeting the standards for permanent retention and dissemination under the Classified Annex to Department of Defense Procedures Under E.O. 12333, these Procedures, or other procedures approved by the Attorney General.

**V. (U) U.S. person.** The term "U.S. person" means any of the following:

1. (U) A U.S. citizen;

2. (U) An alien known by the IC element concerned to be a permanent resident alien.

3. (U) An unincorporated association substantially composed of U.S. citizens or permanent resident aliens.

4. (U) A corporation incorporated in the United States, except for a corporation directed and controlled by a foreign government or governments. A corporation or corporate subsidiary incorporated abroad, even if partially or wholly owned by a corporation incorporated in the United States, is not a U.S. person.

(U) In applying paragraph 3, if a group or organization in the United States that is affiliated with a foreign-based international organization operates directly under the control of the international organization and has no independent program or activities in the United States, the membership of the entire international organization shall be considered in determining whether it is substantially composed of U.S. persons. If, however, the U.S.-based group or organization has programs or activities separate from, or in addition to, those directed by the international organization, only its membership in the United States will be considered in determining whether it is substantially composed of U.S. persons.

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(U) A person or organization in the United States is presumed to be a U.S. person, unless specific information to the contrary is obtained. Conversely, a person or entity outside the United States, or whose location is not known to be in the United States, is presumed to be a non-U.S. person, unless specific information to the contrary is obtained.

W. (U) **U.S. person information (USPI).** USPI is information that is reasonably likely to identify one or more specific U.S. persons. USPI may be either a single item of information or information that, when combined with other information, is reasonably likely to identify one or more specific U.S. persons. Determining whether information is reasonably likely to identify one or more specific U.S. persons in a particular context may require a case-by-case assessment by a trained intelligence professional. It is not limited to any single category of information or technology.

(U) Depending on the context, examples of USPI may include names or unique titles; government-associated personal or corporate identification numbers; unique biometric records; financial information; and street address, telephone, and Internet Protocol address information.

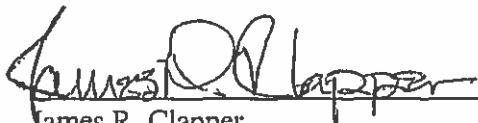
(U) USPI does not include:

A reference to a product by brand or manufacturer's name or the use of a name in a descriptive sense, as, for example, "Ford Mustang" or "Boeing 737;" or

Imagery from overhead reconnaissance or information about conveyances (*e.g.*, vehicles, aircraft, or vessels) without linkage to additional identifying information that ties the information to a specific U.S. person.

~~SECRET//SI//REL TO USA, FVEY~~

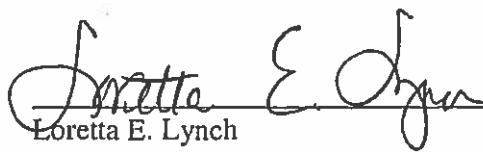
(U) I establish the foregoing Raw SIGINT Availability Procedures in accordance with section 2.3 of E.O. 12333.

  
\_\_\_\_\_  
James R. Clapper  
Director of National Intelligence

15 Dec 2016

Date

APPROVED:

  
\_\_\_\_\_  
Loretta E. Lynch  
Attorney General

3 January 2017

Date

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~~SECRET//SI//REL TO USA, FVEY~~

*Proof of SERVICE attached*  
**CERTIFICATE OF SERVICE**

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

A TRUE AND CORRECT COPY OF THE:

Petition for Review of Complain for Cannon Lawyer of CERT.

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

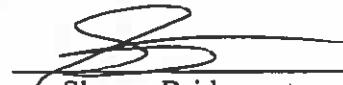
ROYAL OAK POLICE DEPARTMENT  
AGENCY # 6371400  
221 E. 3<sup>rd</sup> Street  
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

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

THE STATE OF MICHIGAN  
44<sup>TH</sup> 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 6<sup>th</sup> day of June 2017 in Detroit, Michigan.

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

UNITED STATES DISTRICT COURT

for the

District of Columbia

Sharon Bridgewater

Petitioner

Plaintiff

v.

Donald Trump in his official capacity as United States  
President

Defendant

The White House

1600 Pennsylvania Ave NW  
Washington, DC 20500 et al

Civil Action No. 1:2017-cv-00169(R.B.W.)

Respondent

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Donald Trump his official capacity as United States President  
The White House  
1600 Pennsylvania Ave NW  
Washington DC 20500 et al  
[REDACTED] Respondent [REDACTED]

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: Sharon Bridgewater

18592 Dale Street  
Detroit, MI 48219  
[REDACTED] Petitioner [REDACTED]

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. \_\_\_\_\_

**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:

**PROCESS RECEIPT AND RETURN**

See "Instructions for Service of Process by U.S. Marshal"

PLAINTIFF  
Sharon Bridgewater

*Petitioner*

COURT CASE NUMBER

*1:2017-cv-00169(R.B.W.)*

DEFENDANT  
Donald Trump in his official capacity as United States President

TYPE OF PROCESS

*Habeas Corpus*

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN  
**SERVE** { Donald Trump in his official capacity as United States President  
**AT** { ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  
The White House - 1600 Pennsylvania Ave. NW - Washington DC 20500

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW

Number of process to be served with this Form 285

*1*

Sharon Bridgewater  
18592 Dale Street  
Detroit, MI 48219

Number of parties to be served in this case

*1*

Check for service on U.S.A.

XXXX

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service):

Fold

Fold

Signature of Attorney other Originator requesting service on behalf of

PLAINTIFF

TELEPHONE NUMBER

DATE

DEFENDANT

313-47-8714

*6/1/2017*

**SPACE BELOW FOR USE OF U.S. MARSHAL ONLY– DO NOT WRITE BELOW THIS LINE**

I acknowledge receipt for the total number of process indicated.  
(Sign only for USM 285 if more than one USM 285 is submitted)

Total Process

District of Origin  
No. \_\_\_\_\_

District to Serve  
No. \_\_\_\_\_

Signature of Authorized USMS Deputy or Clerk

Date

I hereby certify and return that I  have personally served,  have legal evidence of service,  have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the individual, company, corporation, etc. shown at the address inserted below.

I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)

A person of suitable age and discretion then residing in defendant's usual place of abode

Address (complete only different than shown above)

Date

Time

am  
 pm

Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal* or (Amount of Refund*)
					\$0.00

REMARKS:

DISTRIBUTE TO: 1. CLERK OF THE COURT  
2. USMS RECORD  
3. NOTICE OF SERVICE  
4. BILLING STATEMENT\*: To be returned to the U.S. Marshal with payment, if any amount is owed. Please remit promptly payable to U.S. Marshal.  
5. ACKNOWLEDGMENT OF RECEIPT

PRIOR EDITIONS MAY BE USED

**PROCESS RECEIPT AND RETURN**

*See "Instructions for Service of Process by U.S. Marshal"*

PLAINTIFF Sharon Bridgewater	<i>Petitioner</i>	COURT CASE NUMBER <i>1:2017-cv-00169(L.B.W.)</i>
DEFENDANT Donald Trump in his official capacity as United States President		TYPE OF PROCESS <i>Habeas Corpus</i>
NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN		
SERVE AT	Donald Trump in his official capacity as United States President	
	ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)	
	The White House - 1600 Pennsylvania Ave. NW - Washington DC 20500	
SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW		Number of process to be served with this Form 285
<input type="checkbox"/> Sharon Bridgewater 18592 Dale Street Detroit, MI 48219		1
		Number of parties to be served in this case
		1
		Check for service on U.S.A.
		XXXX

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (*Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service*):

Fold

Fold

Signature of Attorney other Originator requesting service on behalf of:	<input checked="" type="checkbox"/> PLAINTIFF	TELEPHONE NUMBER	DATE
<i>[Signature]</i>	<input type="checkbox"/> DEFENDANT	313-47-8714	<i>6/6/2017</i>

**SPACE BELOW FOR USE OF U.S. MARSHAL ONLY-- DO NOT WRITE BELOW THIS LINE**

I acknowledge receipt for the total number of process indicated. <i>(Sign only for USM 285 if more than one USM 285 is submitted)</i>	Total Process	District of Origin No. _____	District to Serve No. _____	Signature of Authorized USMS Deputy or Clerk	Date
--	---------------	---------------------------------	--------------------------------	--	------

I hereby certify and return that I  have personally served,  have legal evidence of service,  have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the individual, company, corporation, etc. shown at the address inserted below.

I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)	<input type="checkbox"/> A person of suitable age and discretion then residing in defendant's usual place of abode	
Address (complete only different than shown above)	Date	Time <input type="checkbox"/> am <input type="checkbox"/> pm
	Signature of U.S. Marshal or Deputy	

Service Fee	Total Mileage Charges including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal* or (Amount of Refund*)  <b>\$0.00</b>
-------------	--	----------------	---------------	------------------	--

REMARKS:

DISTRIBUTE TO:	1. CLERK OF THE COURT 2. USMS RECORD 3. NOTICE OF SERVICE 4. BILLING STATEMENT*: To be returned to the U.S. Marshal with payment, if any amount is owed. Please remit promptly payable to U.S. Marshal. 5. ACKNOWLEDGMENT OF RECEIPT	PRIOR EDITIONS MAY BE USED
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PROCESS RECEIPT AND RETURN

See "Instructions for Service of Process by U.S. Marshal"

PLAINTIFF Sharon Bridgewater	<i>Petitioner</i>	COURT CASE NUMBER <i>1:2017-cv-00169 (R.B.W.)</i>
DEFENDANT Donald Trump in his official capacity as United States President		TYPE OF PROCESS <i>Habeas Corpus</i>
NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN		
SERVE AT <b>Donald Trump in his official capacity as United States President</b> ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  <b>The White House - 1600 Pennsylvania Ave. NW - Washington DC 20500</b>		
SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW		Number of process to be served with this Form 285  <i>1</i>
Sharon Bridgewater 18592 Dale Street Detroit, MI 48219		Number of parties to be served in this case  <i>1</i>
		Check for service on U.S.A.  <i>XXXX</i>

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (*Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service*):

Fold

Fold

Signature of Attorney other Originator requesting service on behalf of:  <i>[Signature]</i>	<input checked="" type="checkbox"/> PLAINTIFF	TELEPHONE NUMBER	DATE <i>6/6/2017</i>
	<input type="checkbox"/> DEFENDANT	313-47-8714	

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Signature of U.S. Marshal or Deputy		

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2. USMS RECORD  
3. NOTICE OF SERVICE  
4. BILLING STATEMENT\*: To be returned to the U.S. Marshal with payment, if any amount is owed. Please remit promptly payable to U.S. Marshal.  
5. ACKNOWLEDGMENT OF RECEIPT**

PRIOR EDITIONS MAY BE USED

**PROCESS RECEIPT AND RETURN**  
See "Instructions for Service of Process by U.S. Marshal"

PLAINTIFF  
Sharon Bridgewater [REDACTED]

COURT CASE NUMBER  
1:2017-CV-00169(R.B.W.)

DEFENDANT  
Donald Trump in his official capacity as United States President

TYPE OF PROCESS  
[REDACTED] Habeas Corpus

SERVE { NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN  
AT { Donald Trump in his official capacity as United States President  
ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  
The White House - 1600 Pennsylvania Ave. NW - Washington DC 20500

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW	Number of process to be served with this Form 285	1
Sharon Bridgewater 18592 Dale Street Detroit, MI 48219	Number of parties to be served in this case	1
	Check for service on U.S.A.	XXXX

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (*Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service*):

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Fold

Signature of Attorney other Originator requesting service on behalf of:	<input checked="" type="checkbox"/> PLAINTIFF	TELEPHONE NUMBER	DATE
	<input type="checkbox"/> DEFENDANT	313-47-8714	6/16/2017 417717

**SPACE BELOW FOR USE OF U.S. MARSHAL ONLY-- DO NOT WRITE BELOW THIS LINE**

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					\$0.00

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2. USMS RECORD  
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5. ACKNOWLEDGMENT OF RECEIPT

PRIOR EDITIONS MAY BE USED

**PROCESS RECEIPT AND RETURN**

See "Instructions for Service of Process by U.S. Marshal"

PLAINTIFF  
Sharon Bridgewater

*Def. Trump*

COURT CASE NUMBER

1:2017-cv-00169 (P.B.W.)

DEFENDANT  
Donald Trump in his official capacity as United States President

TYPE OF PROCESS

*Habeas Corpus*

**SERVE AT** { NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN  
Donald Trump in his official capacity as United States President  
ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)  
The White House - 1600 Pennsylvania Ave. NW - Washington DC 20500

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW

Number of process to be served with this Form 285

Sharon Bridgewater  
18592 Dale Street  
Detroit, MI 48219

Number of parties to be served in this case

Check for service on U.S.A.

XXXX

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service):

Fold

Fold

Signature of Attorney other Originator requesting service on behalf of:

PLAINTIFF  
 DEFENDANT

TELEPHONE NUMBER  
313-47-8714

DATE  
6/6/2017  
4/17/17

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(Sign only for USM 285 if more than one USM 285 is submitted)

Total Process

District of Origin  
No. \_\_\_\_\_

District to Serve  
No. \_\_\_\_\_

Signature of Authorized USMS Deputy or Clerk

Date

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am  
 pm

Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges including endeavors	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal* or (Amount of Refund*)
					\$0.00

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1. CLERK OF THE COURT
2. USMS RECORD
3. NOTICE OF SERVICE
4. BILLING STATEMENT\*: To be returned to the U.S. Marshal with payment, if any amount is owed. Please remit promptly payable to U.S. Marshal.
5. ACKNOWLEDGMENT OF RECEIPT

PRIOR EDITIONS MAY BE USED

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
SEPTEMBER TERM 2017 A.D.**

---

**IN RE 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**

**Respondent**

---

**Removal from THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE COURT OF THE STATE OF  
MICHIGAN, 400 EAST 11 MILE ROAD ROYAL OAK, MI 48067- Case# 17RO05807**

---

**[PROPOSED DECLARATORY JUDGMENT**

---

**Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above**

*l4v*

## **DECLARATORY JUDGMENT**

This case was tried without a jury. This case has ripened beyond an abstract question into an actual controversy and that is otherwise within its jurisdiction . This cause heard on the motion of Sharon Bridgewater Petitioner in the above entitled action, for enjoining and/or restraining Donald Trump in his official capacity as United States President from executing and/or enforcing the Executive Order Protecting the Nation from Foreign Terrorist Entry into the United States. It is Declared that the Executive Order and/or acts or omissions of Donald Trump is Unconstitutional, and Donald Trump must be restrained and/or enjoined from executing and/or enforcing the Executive Order. The Petitioner is entitled to immediate declaratory and/or injunctive relief.

Dated: \_\_\_\_\_

Beryl Alaine Howell  
Chief Judge for the United States District  
District Court for the District 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: declaratory Judgment

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. 3<sup>rd</sup> Street  
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

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

THE STATE OF MICHIGAN  
44<sup>TH</sup> 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 6<sup>th</sup> 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

Case # 1:2017-CV 00169(B.A.H) & (R.B.W.)

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
SEPTEMBER TERM 2017 A.D.**

---

**IN RE 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**

**Respondent**

---

Removal from THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE COURT OF THE STATE OF  
MICHIGAN, 400 EAST 11 MILE ROAD ROYAL OAK, MI 48067-  
Case# 17RO05807

---

**MOTION FOR TEMPORARY RESTRAINING ORDER**

---

Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above



**TO ALL PARTIES AND TO ATTORNEYS OF RECORD:**

TAKE NOTICE that on Date: TBA, at Time: TBA, or as soon after that times as the matter can be heard, in Courtroom #6600 of the United States District Court for the District of Columbia located at 333 Constitution Ave. NW, Washington, DC 20001 will move for a temporary restraining order . This motion is based on the Plaintiffs mem and points and affidavant in support of . A Proposed Order accompanies this motion.

**I**

**GROUND FOR REQUESTED RELIEF**

Plaintiff and/or Petitioners relies on the affidavant and supporting brief filed concurrently with this motion for a temporary restraining order agains the above named Defendant Donald Trump in his official capacity as President, his agents, servants, attorneys and privies, pending the hearing and decision of the Plaintiff motion for a preliminary injunction, enjoning them from

**A. THE PLAINTIFF HAS A LIKELIHOOD OF SUCCESS ON THE MERITS:**

Sharon Bridgewater Plaintiff/Petitioner/Appellant/Claimant, claims asserted in this lawsuit have a substantial likelihood of success on the merits:. This is an amirality and maritime claim and money and/or property is due and now owing.

(2)

**B. Irreparable Injury will occur if permanent injunction Temporary Restraining Order is not granted**

Sharon Bridgewater, has been damaged and continues to be damaged and face irreparable injury and will continue to face irreparable injury, if the temporary restraining order is not granted. The Petitioner et al “faces,” death if not granted.

**C. The balance of equities tips in his/her favor**

The balance tips in the Plaintiff favor. Donald Trump et al faces no harm or prejudice.

**D. The granting of the injunction would not harm the public interest.**

This is a case of public importance and granting a injunction would serve public interest. The Supreme Court has pointedly ruled that where “the public interest is involved. . . those equitable powers assume an even broader and more flexible character than when only a private controversy is at stake.” Porter v. Warner Holding, Co., 328 U.S. 395, 398 (1946).

**E. No bond is required of**

Sharon Bridgewater is not required to post bond due to her inability to afford one.

## MEM AND POINTS

A person who has a substantial likelihood of success on the merits; will suffer irreparable injury; and/or the injury to Plaintiffs outweighs the harm an injunction may cause Defendants and/or the granting of an injunction would not harm the public interest, permits a court to restrain and/or enjoin "acts or omissions," of Donald Trump et al. Wherefore, the Plaintiff request that this court grant the Plaintiff motion for a temporary restraining order and further,

### Remedy Requested

1. That this court issue a Writ of Certiorari in this cause requiring Appellee to file The record of all matters relating to this decision with the Court.
2. Declare that the Administrative Agency Action and/or Donald Trump's action March 6, 2017 are nearly identical to the acts of the Jan. 27, 2017 and is unconstitutional and is discriminatory the Petitioner "religious rights."
3. Declare that the Administrative Agency Action and/or Donald Trump's action of Jan. 27, 2017 as mentioned in the above infringes on one or more of the Appellant 9<sup>th</sup> and/or 10th US Constitutional rights.
4. That the Court review the decision of the Donald Trump that and that the final Administrative decisions be reversed.
5. That the Court issue an emergency stay of enforcement of the decision pending Review on the merits in this cause and pending the final disposition of the case.
6. Declare that Trump Executive Order violates the "50 States" and/or the Appellant 9<sup>th</sup> and/or tenth amendment US Constitutional rights.
7. Temporarily restrain and/or enjoin Donald Trump et al from executing and/or enforcing the Executive Order of March 6, 2017 - the ~~Plaintiffs~~ Sharon Bridgewater has (1) a substantial likelihood of success on the merits; (2) will suffer irreparable injury; (3) the injury to ~~Plaintiffs~~ outweighs the harm an injunction may cause Defendants; and (4) that granting the injunction would not harm the public interest, and the ~~Plaintiffs~~ is not required to post bond.

4

8. That Plaintiff have such other and further relief as deemed l be proper and that this Court.

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 6<sup>th</sup> day of June 2017 in Detroit, Michigan

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

3:30 p.m. TIME

6-6-2017 DATE



## CERTIFICATE

I certify that actual notice of the time of the making the application and copies of all pleading and papers filed in the action to date o to be presented this court and that actual notice of the time of amaking the application and copies of all pleadings and papers field in the action to date have been furnished to the adverse party and that I have made efforts to the other party to give such notice and furnished copies.

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  
Plaintiff/Petitioner/Appellant/Claimant  
18952 Dale Street  
Detroit, MI 48219  
313-471-8714  
[sbridge11@yahoo.com](mailto:sbridge11@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:  
Motion for TRO & Certificate

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  
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Washington DC 20530- Certified mail#7015-1730-0000-4700-3707

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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

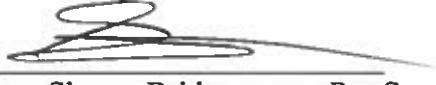
ROYAL OAK POLICE DEPARTMENT  
AGENCY # 6371400  
221 E. 3<sup>rd</sup> Street  
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

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

THE STATE OF MICHIGAN  
44<sup>TH</sup> 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

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the foregoing is true and correct. Executed 6<sup>th</sup> day of June 2017 in Detroit, Michigan.



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

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
SEPTEMBER TERM 2017 A.D.

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IN RE 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

Respondent

---

Removal from THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE COURT OF THE STATE OF  
MICHIGAN, 400 EAST 11 MILE ROAD ROYAL OAK, MI 48067-  
Case# 17RO05807

---

**[PROPOSED] TEMPORARY RESTRAINING ORDER**

---

Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above

641 14

## TEMPORARY RESTRAINING ORDER

This cause came to be heard on the motion of Sharon Bridgewater, the Plaintiff in the above-entitled cause, for an interlocutory injunction against Donald Trump in his official capacity as United States President, et al the Defendant in the above cause, on the affidavit of Sharon Bridgewater dated June 6<sup>th</sup>, 2017. Because it appears to this court that the affidavit seeks an interlocutory injunction restraining the enforcement and/or operation and/or execution of the Protecting the National from Foreign Terrorist entry into the United States entered on March 6, 2017 by restraining the acts of Donald Trump in his official capacity as United States President , Donald Trump in his official capacity as United States President, Jeff Session in his official capacity as Attorney General of the United States, Rex Tillerson in his official capacity as Secretary of State for the United States, John Kelly in his official capacity as Director of Homeland Security United States Department of Homeland Security and Thomas E. Brandon in his official capacity as Acting Director of the United States Bureau of the Alcohol, Tobacco and FireArms and Explosives(ATF), in the enforcement," of an Executive Order made by Donald Trump in his official capacity as United States President, acting pursuant to Protecting the National from Foreign Terrorist entry into the United States, on the ground of the unconstitutionality of the state, as provided by Executive Order # 13780 and which involves "Statewide legislation" and section 2284 of Title 28 of the United States Code, and it further appearing that immediate and irreparable damage will cause tto Plaintiff by reason

Of Donald Trump's acts or omissions, unless a temporary restraining order is issued against Defendant until the hearing of the application for an interlocutory injunction, it is ordered that Donald Trump in his official capacity as United States President, Donald Trump in his official capacity as United States President, Jeff Sessions in his official capacity as Attorney General of the United States, Rex Tillerson in his official capacity as Secretary of State for the United States, John Kelly in his official capacity as Director of Homeland Security United States Department of Homeland Security and Thomas E. Brandon in his official capacity as Acting Director of the United States Bureau of the Alcohol, Tobacco and Firearms and Explosives(ATF), be enjoined from enforcing Executive Order # 13780 until hearing on the application for an interlocutory injunction.

Dated: \_\_\_\_\_

Beryl Alaine Howell  
Chief Judge for the United States District  
District Court for the District 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:

Proposed TRD

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-  
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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

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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 Pennyslvania 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

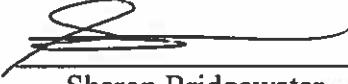
ROYAL OAK POLICE DEPARTMENT  
AGENCY # 6371400  
221 E. 3<sup>rd</sup> Street  
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

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

THE STATE OF MICHIGAN  
44<sup>TH</sup> 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 6<sup>th</sup> day of June 2017 in Detroit, Michigan.



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

CASE # 1:2017-CV 00169(B.A.H) & (R.B.W.)

---

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
SEPTEMBER TERM 2017 A.D.

---

IN RE 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

Respondent

*Removal From*

THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE  
COURT OF THE STATE OF MICHIGAN, 400 EAST 11 MILE ROAD ROYAL OAK, MI 48067-  
Case# 17RO05807

---

NOTICE OF MOTION

---

Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above

*exh 3*

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

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

**To: Jeff Sessions in his official capacity as United States Attorney General**

United States Department of Justice  
950 Pennsylvania Ave, N.W.  
Washington, D.C. 20530-0001,

TAKE NOTICE on Date: TBA, at Time: TBA, or as soon after that times as the matter can be heard, in Courtroom – #6600 located at 333 Constitution Ave. NW, Washington, the attached motion of Sharon Bridgewater for Declaratory Judgement to appoint a Special Prosecutor will be present to the United States Court of District Court of Columbia, 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 6<sup>th</sup> day of June 2017 in Detroit, Michigan



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

CASE # 1:2017-CV 00169(B.A.H) & (R.B.W.)

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IN THE UNITED STATES DISTRICT COURT  
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*Removal From*



THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE  
COURT OF THE STATE OF MICHIGAN, 400 EAST 11 MILE ROAD ROYAL OAK, MI 48067-  
Case# 17RO05807

---

MOTION FOR DECLARATORY JUDGMENT TO APPOINT A SPECIAL PROSECUTOR

---

Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above

*PSA*

**MOTION FOR DECLARATORY JUDGMENT TO APPOINT A  
SPECIAL PROSECUTOR**

1. Comes now Sharon Bridgewater Plaintiff/Petitioner pro se, respectfully petition this court for declaratory Judgment to appoint a Special Prosecutor. The Plaintiff relies on petition for habeas corpus and/or other pleadings filed concurrently and further in support of this petition the Petitioner state as follows:

**INTRODUCTION**

2. The nature of the controversy arising between Sharon Bridgewater defendants [REDACTED] *Donald Trump* *in his official capacity as President* [REDACTED] *and James B. Comey* [REDACTED] between the parties exist in that there is complete diversity in federal citizenship, inasmuch as plaintiffs are citizens of the State of Michigan, whose address is 18592 Dale Street, Detroit, Michigan and the defendant Jeff Sessions is an citizen of the states of Virginia and/or Maryland and/or Delaware.

3. Jeff Sessions in his official capacity as United States Attorney General with his principle place of business and/or office located at 950 Pennsylvania Ave. Street, Washington, DC is found, resides and/or conduct resides and/or conduct business in this District of Columbia and this court have authority to hear cases via Jeff Sessions "unlawful, illegal" exercising his powers contrary to the "50 States Constitution," and/or the United States Constitution, and/or international laws and/or treaties and further this court have jurisdiction to hear all cases and/or writs necessary to the complete exercise of its jurisdiction" via 28 USC section 1651 "All Writs." Further jurisdiction is invoked pursuant to one or more: 42 U.S.C. Sections 1983, 1985, 1986, 1988, D.C.Code § 16-3501 and/or Under § 16-3502, and/or under D.C.Code § 16-3503, to issue Writs of Quo Warranto, Jeff Sessions in his official

capacity who usurps, intrudes into, or unlawfully holds or exercises the Office of the United States Attorney General; one or more: 42 USC Section 2000a-1, 42 USC Section 2000 a-2 , 42 USC Section 2000 a-3, 42 USC section 2000d; one or more 2241, 2254 or 2255, Habeas Corpus Jurisdiction, and further jurisdiction is invoked pursuant to one or more, 28 USC sections 1333 to 1364; the the second ninth, tenth, and fourteenth amendments thereto. This Court further have authority to declare the rights, obligations and/or legal duties between the disputing parties and to issue a declaratory judgment and order other relief thatis just and proper pursuant to 28 U.S.C. §§ 2201 and 2202 and/or Admiralty and Maritime jurisdiction within the meaning of 9(H); 28 USC 2254; 42 USC section 1985(2) and 1985(3)(Conspiracy to interfere with civil rights); 42 USC section 1986(action for neglect to prevent conspiracy);28 U.S.C. §1343(a), and (iii) D.C. Code, Special maritime and territorial jurisdiction, extra-territorial jurisdiction, foreign corrupt practice act jurisdiction, Anti-Trust jurisdiction(Sherman Act, Clayton Act, illegal monopoly), of the United States for acts committed against the Plaintiff class outside the jurisdiction of “states” with respect to offense(s) by and/or against the the Plaintiffs a citizen of the United States.” Foreign Corrupt Practice Act, Alien Tort Act, one or more 15 U.S.C. §§ 78j (b) & 78ff; 17 C.F.R. § 240.10b-5; 18 U.S.C. §§ 371, 1343, 1344, 1346 & 2 and contempts in violation of national security or concurrent jurisdiction, via Rome Statue International criminal court for Human rights violations. Torture, Genocide, war crimes, Slavery and Peonage, crimes of aggression, “and other international crime,” human trafficking, sexual exploitation, in violation of international treaties, and in violation of the Declaration for human rights as signed via the United Nations. Criminal provisions affecting, involving, or relating to the national security via 2 U.S.C. § 192 (Contempts of Congress Related to National Security and/or 8 U.S.C. § 1185(b) (Travel Controls of Citizens) and/or 18 U.S.C. § 219 et seq and further this court has matter jurisdiction over Plaintiffs' claims under the Federal Racketeer Influenced and Corrupt Organizations Act of 1970 42 U.S.C. Sections 1981, 1982, 1983 and 1985; and (4) 42 U.S.C. Section 1983, for violation of the First, Fourth, Fifth, Sixth, Eighth, Thirteenth and Fourteenth Amendments to the Constitution of the United States.

Injunctive relief for violations of the federal antitrust laws and/or 18 U.S.C. Section 1964 (c), 42 U.S.C. Section Sections 1331, and 15 U.S.C. Sections 15 and 26. U.S.C. §§ 1 and 2 *et seq* (Sherman Anti-Trust Act); and 15 USC §§ 15, 16, 22, 26 (Clayton Anti-Trust Act); one or more, 28 USC sections 1331, 1332, 1335, 1343, 1345, 1349, 1346, Civil remedies for international terrorism, torture, violations of human rights, etc. The Petitioner is a person unlawful held in violation of International/Federal/State/ law and petitioner this court for immediate injunctive relief. The Plaintiff and/or Petitioner has been damaged in business, person or property and is unable to drive, work and make a living to support herself, and enjoy all the privledges and immunities as every other US and/or International person enjoys, the Petitioner continues to be injured and damaged and continues to be damaged in person, business and/or property.

Donald Trump Jr  
and for James B. Ceney

5. An actual controversy exists between plaintiff and defendant Jeff Sessions in his official capacity as United States Attorney General and the Plaintiff/Petitioner/Appellant concerning their respective rights and duties in that plaintiff contends she is unlawfully held in violation of the United States Constitution and/or International laws and/or treaties, whereas defendant Jeff Sessions in his office disputes these contentions and contends that he can enage in a pattern of Racketeering Activity, fail to disclose conflict of ineteres and/or adopt the acts of Loretta Lynch his predecessors, and/or unlawfully hold the Plaintiff to peonage and/or slavery and commit other over acts againt the Plaintiffs business, person and/or property. Plaintiff desires a judicial determination of Jeff Sessions in his official capacity as United States Attorney General and/or Sharon Bridgewater regarding the rights and duties, and a declaration as to Jeff Session is not qualified as US Attorney General and/or is in conflict of interest, and/or that the Petitioner is unlawful held in violation of the United States Constitution and/or international laws and/or treaties. A judicial declaration is necessary and appropriate at this time under the circumstances in order that plaintiff may be "released" from constructive custody and is



entitled to a Special Prosecutor. The Plaintiff/Petitioner/Appellant has exhausted all available remedies and/or have no other adequate remedies at law.

**INCOMPETENCE OR WORSE: JEFF SESSION IN HIS OFFICIAL CAPACITY AS UNITED STATES ATTORNEY GENERAL HAS FAILED TO DO HIS LEGAL DUTY AS UNITED STATES ATTORNEY GENERAL AND THE PETITIONER CONTINUES TO SUFFER FROM HARM AND DAMAGE IN BUSINESS, PERSON OR PROPERTY.**

The Committee and Oversight commence a congressional investigation in case # 1:12 CV -1332(ABJ) into “an illegal gun running operation,” on or about Aug. 13, 2012, and since that time “no one has complied with the Congressional investigation,” and other have acted in joint participation to obstruct justice, and even further “no one has been prosecuted for these “overt” acts. Such a blatant failure is “gross negligence,” and/or constitute non-professionalism.

**MEMBER OF THE DOJ AND OTHER HAVE PARTICIPATED IN THE UNLAWFUL CONDUCT JEFF SESSIONS THE AND THERE IS CONFLICT OF INTEREST, WITHIN THE DEPARTMENT OF JUSTICE WHICH NECESSITATE THE APPOINTMENT OF A SPECIAL PROSECUTOR TO INVESTIGATE POSSIBLE CRIMINAL WRONGDOING DURING THE FAST AND FURIOUS INVESTIGATION**

Member of the DOJ and other have participation in the unlawful conduct, and the appointment of a Special Prosecutor can occur at any stage in a case, even before formal criminal charges are filed. See Baxter vs. Peterlin, 156 III App. 3d. 564, 566(3d Distr. 1987). Thus, special prosecutors have frequently been appointed to investigate allegations of criminal wrongdoing. See, e.g. People v. Pawlaczyk, 189 III, 2d 177(2000); Matter of Special Prosecutor, 164 III App. 3d 183(5<sup>th</sup> Distr. 1987)(Judgment later vacated on related grounds); People v. Sears, 49 III. 2d 14(1971). The courts’s jurisdiction under the Special Prosecutor statute may be invoked by the court, by the Sharon Bridgewater and/or by a private citizen or group of citizens. See Baxter, 156, 156 III App. 3d 566; In re Appointment of Special State’s Attorney, 305 III. App. 3d. petitions this court to adjudicate this matter and appoint Special Prosecutors.

**CONFLICT OF INTEREST WITHIN THE DEPARTMENT OF JUSTICE NECESSITATE  
THE APPOINTMENT OF A SPECIAL PROSECUTOR TO INVESTIGATE POSSIBLE  
CRIMINAL WRONGDOING VIA THE FAST AND FURIOUS INVESTIGATION, THE  
DESTRUCTION OF E-MAIL, AND ACTS OR OMISSIONS OF DONALD TRUMP ALLEGED  
INVOLVEMENT WITH RUSSIAN OFFICIALS – AND NATIONAL SECURITY REQUIRES  
THE APPOINTMENT OF A SPECIAL PROSECUTOR**

Jeff Session is in conflict of interest as shown in the Plaintiffs motion for summary judgment which accompanies this motion. Even further Jeff Sessions stated that he would rescue himself from the Russians investigation and appoint a Special Prosecutor, and as of today;s date Sessions has not appointed a Special Prosecutor.

**CONCLUSION**

For the forgoing reason, Petitioner request that this Court appoint Special Prosecutors to investigate the allege above acts or omissions of Jeff Sessions et al. WHEREFORE, the Plaintiff/Petitioner/Appeallant prays for declaratory judgment that the Plaintiff/Petitioner/Appeallant is entitled to a declaratory judgment for the appointment of a Special Prosecutor and unlawful held in violation of the United States Constitution and/or international laws and treaties and further is entitled to and any other relief as deemed just and appropriate by this court.

①

## MEM AND POINTS

A special prosecutor and lawyer from outside the government appointed by this court is needed to investigate a government official for misconduct while in office. The reasoning for such an appointment is that the all have participated to defraud the US Government, obstructed justice, failed to do legal duties as required, and violated their oath of offices. A special prosecutor generally is a lawyer from outside the government appointed by the United States, by Congress to investigate a government official for misconduct while in office. Jeff Sessions has failed to do his legal duties and obligations, thus a Special Prosecutor may be appointed from outside the Government. Wherefore the Petitioner request this court to appoint a special prosecutor.

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 6/1/ day of June 2017 in Detroit, Michigan.



Sharon Bridgewater -Pro Se  
[REDACTED] Petitioner [REDACTED]  
18952 Dale Street  
Detroit, MI 48219  
313-471-8714  
[sbridge11@yahoo.com](mailto:sbridge11@yahoo.com)  
ATTORNEY FOR THE ABOVE



## *CERTIFICATE OF SERVICE*

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

A TRUE AND CORRECT COPY OF THE: Judgment  
Notice and motion to Appoint A Special Prosecutor

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:

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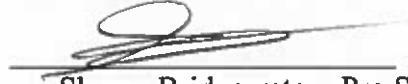
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AND

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

THE STATE OF MICHIGAN  
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Sharon Bridgewater –Pro Se  
Petitioner  
18952 Dale Street  
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[sbridge11@yahoo.com](mailto:sbridge11@yahoo.com)  
ATTORNEY FOR THE ABOVE

CASE # 1:2017-CV 00169(B.A.H) & (R.B.W.)

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IN THE UNITED STATES DISTRICT COURT  
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SEPTEMBER TERM 2017 A.D.

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Respondent

*Removal from*

THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE  
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Case# 17RO05807

---

DECLARATORY JUDGMENT

---

Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above

*Exhibit 1*

**[PROPOSED] DECLARTORY JUDGMENT**

This Action was tried by the Honorable \_\_\_\_\_ without a jury and the following decision was reached:

It is Declared that:

This case has ripened beyond an abstract question into an actual controversy and that is otherwise within its jurisdiction and as follows:

1. This court declares that Jeff Session in his official capacity is in conflict of interests, *and/or James B. Comey has failed to do his legal duties as FBI Director, And Robert Mueller is in Conflict of interest.*
2. It is further declared that Jeff Sessions in his official capacity as United States Attorney General has failed to do his legal duties and/or obligations as United States Attorney General. Has neglected his duties as United States Attorney General.
3. This court declares that the Plaintiff is granted further relief as deemed just and proper under the circumstances, and declares that the Plaintiff and/or is declared that the Plaintiff is entitled to injunctive relief.

**IT IS SO ORDERED, AND/OR IT IS SO DECLARED.**

Date: \_\_\_\_\_

United States District Judge

10

# *CERTIFICATE OF SERVICE*

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

A TRUE AND CORRECT COPY OF THE:

Declaratory Judgment

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:

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National Security Counsel  
The White House  
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OFFICER

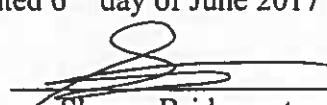
ROYAL OAK POLICE DEPARTMENT  
AGENCY # 6371400  
221 E. 3<sup>rd</sup> Street  
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

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

THE STATE OF MICHIGAN  
44<sup>TH</sup> 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 6<sup>th</sup> day of June 2017 in Detroit, Michigan.

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

CASE # 1:2017-CV 00169(B.A.H) & (R.B.W.)

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

**SEPTEMBER TERM 2017 A.D.**

**IN RE 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**

**Respondent**

*Removal From*

THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE  
COURT OF THE STATE OF MICHIGAN, 400 EAST 11 MILE ROAD ROYAL OAK, MI  
48067 Case# 17RO05807

**NOTICE OF MOTION**

Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above

*[Handwritten signature]*

CASE # 1:2017-CV 00169(B.A.H) & (R.B.W.)

---

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
SEPTEMBER TERM 2017 A.D.

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IN RE 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  
Respondent

*Removal from*

[REDACTED] - THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE  
COURT OF THE STATE OF MICHIGAN, 400 EAST 11 MILE ROAD ROYAL OAK, MI 48067-  
Case# 17RO05807

---

**PETITION FOR REVIEW/ PETITION FOR WRIT OF HABEAS CORPUS  
AND SUPPLIMENTAL COMPLAINT FOR COMMON LAW WRIT OF CERTIORARI FOR  
DECLARATORY AND INJUNCTIVE RELIEF**

---

**MOTION FOR SUMMARY JUDGMENT [REDACTED] FOR SPECIAL  
PROSECUTOR**

---

Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above

*Exh A*

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE, that on Date: TBA, at Time: TBA, or as soon after that times as the matter can be heard, in Court Room# TBA United States District Court for the District of Columbia E. Barrett Prettyman United States Courthouse 333 Constitution Ave, N. W. Washington, D.C. 20001 or soon afterward can be heard in Courtroom *Petition*. Plaintiff will move for SUMMARY JUDGMENT, ON THE APPELLANT MOTION FOR DECLARATORY JUDGMENT FOR SPECIAL PROSECUTORS and on grounds "that there is no genuine issue as to any material fact and the Appellant is entitled to judgment as a matter of law." Fed. R. Civ. P. 56(c). Which is based on the, which is based on the memorandum of points and authorities.

Plaintiff herein is submitting a separate statement of undisputed facts as well as *Petition* request for judicial notice of the adjudicated facts that the Plaintiff has been injured and damaged, and continues to be damaged in business, person or property and is unlawfully held in violation of the United States Constitution and/or International laws and/or is *Petition* entitled to a Special Prosecutor. The Plaintiff submits these separate statement of undisputed facts, request for judicial notice, mem and points, and declaration as well as the brief filed concurrently in this court today, which is done to make an offer of proof that not only will Appellant prevail in this case and that there is no genuine issue as to *Donald Trump*, any material fact and that there are no defenses to the James B. Comey and/or Jeff

Sessions et al acts or omissions. It is plaintiff's contention that Jeff Sessions in his official capacity and/or James Comey acts or omissions constitute a conspiracy to engaged in a pattern of RICO activity and/or is among the probable cause.

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 6<sup>th</sup> day of ~~May~~ <sup>June</sup> 2017 in Detroit, Michigan.



Sharon Bridgewater –Pro Se  
~~Appellant Petitioner~~  
18952 Dale Street  
Detroit, MI 48219  
313-471-8714  
[sbridge11@yahoo.com](mailto:sbridge11@yahoo.com)  
ATTORNEY FOR THE ABOVE

## *CERTIFICATE OF SERVICE*

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

A TRUE AND CORRECT COPY OF THE:

*notice & motion for*

*Summary Judgment for special Prosecution*

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

**CASE # 1:2017-CV 00169(B.A.H) & (R.B.W.)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
SEPTEMBER TERM 2017 A.D.

IN RE Sharon Bridgewater  
Petitioner

vs.

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

THE STATE OF MICHIGAN 44<sup>TH</sup> DISTRICT STATE  
COURT OF THE STATE OF MICHIGAN, 400 EAST 11 MILE ROAD ROYAL OAK, MI 48067-  
Case# 17RO05807

**PETITION FOR REVIEW/ PETITION FOR WRIT OF HABEAS CORPUS  
AND SUPPLEMENTAL COMPLAINT FOR COMMON LAW WRIT OF CERTIORARI FOR  
DECLARATORY AND INJUNCTIVE RELIEF**

## STATEMENT OF UNDISPUTED FACTS

Sharon Bridgewater  
Pro Se  
18592 Dale Street  
Detroit, Michigan 48219  
Phone #1-313-471-8714  
Petitioner  
Attorney for the above

## UNDISPUTED MATERIAL FACT SUPPORTING EVIDENCE

### UNDISPUTED FACTS

Plaintiff submits the following separate of undisputed material facts with reference to supporting evidence in support of her motion for summary judgment pursuant to FRCP 56.

1. Sharon Bridgewater and/or James S. Bridgewater were competitor with Donald Trump, and/or Jeff Hillary R. Clinton and/or Bill Clinton et al from 2001 and continuing thru to approx.. 2013.
2. On or about May 15, 2015 and/or continuing thur present Hillary Clinton destroy in excess of 32,000 e-mails after being served a subpeana and violated a courts order.

. 18, Section 2071 establishes the concealment or destruction of some government records as a crime, and that public officeholders who violate the code are to be disqualified from "holding any office under the United States":

- (a) Whoever willfully and unlawfully conceals, removes, mutilates, obliterates, or destroys, or attempts to do so, or, with intent to do so takes and carries away any record, proceeding, map, book, paper, document, or other thing, filed or deposited with any clerk or officer of any court of the United States, or in any public office, or with any judicial or public officer of the United States, shall be fined under this title or imprisoned not more than three years, or both.
- (b) Whoever, having the custody of any such record, proceeding, map, book, document, paper, or other thing, willfully and unlawfully conceals, removes, mutilates, obliterates, falsifies, or destroys the same, shall be fined under this title or imprisoned not more than three years, or both; and shall forfeit his office and be disqualified from holding any office under the United States.

3. Loretta Lynch and Bill Clinton “meet at the airport and/or takes a Plane ride together and talk with each other and was prohibited by law to talk to Bill Clinton, while a criminal investigation was pending against his wife Hillary Clinton.

4. July 5, 2016 James Comey had legal duties and responsibilities to recommend prosecution and/or to Prosecute Hillary Clinton and his Statement on July 5, 2016 stated – Clinton, “extremely careless in their handling of very sensitive, highly classified information,” he said no charges are appropriate in this cause. “

5. James Comey had a legal duty and/or responsibility as FBI director to prosecute Hillary R. Clinton and failed to which makes him criminal liability for the acts of Clinton.

6. On or about April 24, 2015 Loretta Lynch is the first African American female United States Attorney General of the United States of America. She graduated from the Harvard Law School, in 1984. She and Sharon Malone Holder attended Harvard together and were at that time probably the two only African American females who were students at Harvard. They are friends. Loretta Lynch served as a board member for the Federal Reserve Bank of New York. From 1984-1990 she was the Litigation associate at New York law firm Cahill, Gordon & Reindel. From March 1990 – she was a trial prosecutor for the U.S. Attorney's office in the Eastern District of New York, which includes Brooklyn, Queens, Staten Island and Long Island. From 1994-1998 – she served as chief of the Long Island office. From March 1998 – she was chief assistant to U.S. Attorney Zachary W. Carter. From 1999-2001 she was appointed by President Bill Clinton, and served as U.S. Attorney for the Eastern District of New York. In January 2002 she joined Hogan & Hartson LLP as a partner. In 2005 she served as special counsel to the prosecutor at the International Criminal Tribunal for Rwanda. On January 20, 2010 she was nominated by President Barack Obama to be the U.S. Attorney for the Eastern District of New York, the job she previously held from 1999 to 2001. On April 22, 2010 she was Lynch is unanimously confirmed by the Senate, and takes office on May 3, 2010. In May 2010 she is appointed to the Attorney General's Advisory Committee of U.S. Attorneys (AGAC). [Eric Holder Jr.]. In September 7, 2011 she became vice chair of AGAC. In January 2013 - U.S. Attorney General Eric Holder appointed Lynch the chair of AGAC. On November 8, 2014 Barry Soertoes{AKA Barak H. Obama] nominates Lynch to be the next U.S. Attorney General. On December 3, 2014, U.S. Attorney General Eric Holder announced that the Justice Department will lead a civil rights investigation into the death of Eric Garner in New York and that Lynch will lead the investigation. On January 28-29, 2015 Lynch's confirmation hearing for the U.S. Attorney General position was held. On February 26, 2015 the

Senate Judiciary Committee approved Lynch as the next attorney general. On April 23, 2015 Loretta Lynch is confirmed by the Senate, 56-43. On May 18, 2015 in response to civil unrest and addressing one of her main priorities, Lynch announces the launch of a "Community Policing Tour," to showcase programs deemed collaborative, programs that are "designed to advance public safety, strengthen police-community relations and foster mutual trust and respect." Over the course of a year, the tour expands to two phases and 13 cities. Despite this there has been many killings and shooting The recent police shootings of African Americans by police officers Lynch has failed her legal

7. On or about November 8<sup>th</sup> Donald Trump a republican canandite ran for President of the United and won the Presidency, and hired Micheal Flynn as National Security Advisor, and Jeff Sessions as United States Attorney General.

8. The Appellant Sharon Bridgewater and/or James and/or the Committee and Oversight repeatedly commenced complaints and/or civil investigation and demanded documents and/or the return of property illeglly and unlawful taken, is injured and damaged and contiuines to be damage.

9. The Appealant is likely to succeed on the merits, suffers irreparable harm, the balance and the "balance of equities" supports the challenger, and an injunction is in the "public interest."

10. One or more of the Defendants appointed Robert Mueller former Bush employee who is a Defendant in this action, Robert Mueller APPOINTED AS Special Prosecutor on or about May 15, 2017 is not qualified & his appointment constitute conflict of interest.

#### PROOF OF FACTS

1. Sharon Bridgewater and/or James S. Bridgewater(consumers)and once competitiors with Hillary R. Clinton and/or Bill Clinton et al from 2001 and continuing thru to approx.. 2013 is no longer in business due to unlawful conspiracies of Hillary Clinton, Bill Clinton, Obama et al unfair, fraudulent business practices. The plaintiff was injured and damaged and continues to be damaged in business, person and/or property.

2. Hillary R. Clinton is ineligible to Hold Office as the United States President do to destruction of email in excess of 32,000 in violation of 8 USC section 2071.

3. Loretta Lynch knew or should have known she was not suppose to talk and/or "meet at the airport and/or take a Plane ride together and talk with while a criminal investigation was pending against his wife Hillary Clinton, Lynch violated her oath of office, violated "ethic,". Loretta Lynch actions appears to be in violation of 201(Bribery).

4. Comey failed to do his legal duty as FBI Director to prosecute Hillary.

5. James Comey is criminal liability for the acts of Clinton.

6. Loretta Lynch in her official capacity as United States Attorney General constitute conflict of interest and/or disqualification as Prosecutor.

7. On or about November 8<sup>th</sup> Donald Trump a republican President appointed public officials Micheal Flynn resigns(who accepted money from Russia) as National Security Advisor, and Jeff Sessions as United States Attorney General, lied to Congress and failed to disclose conflict of interest.

8. The Appellant Sharon Bridgewater and/or James and/or the Committee and Oversight is injured and damaged and contiuines to be damage in business, person or property.

9. The Appellant is entitled to immediate declaratory and injunctive relief.

10. *Robert Mueller as Special Prosecutor is not qualified/or is in conflict of interest*

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~~ <sup>the</sup> day of ~~May~~ <sup>June</sup> 2017 in Detroit, Michigan.

•

  
Sharon Bridgewater –Pro Se  
Appellant Petitioner  
18952 Dale Street  
Detroit, MI 48219  
313-471-8714  
[sbridge11@yahoo.com](mailto:sbridge11@yahoo.com)  
ATTORNEY FOR THE ABOVE

# CERTIFICATE OF SERVICE

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

A TRUE AND CORRECT COPY OF THE:

Statement of undisputed facts

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 Pennyslvania Ave. N.W. Washington, DC 20500  
Certified mail#7015-1730-0000-4700-3721