


Tim Newcomb



*Pro Se*

FILED IN THE DISTRICT COURT  
OF ALBANY COUNTY, WYOMING

NOV -1 2023

STACY LAM, CLERK OF DISTRICT COURT  
, DEPUTY

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
IN AND FOR ALBANY COUNTY, WYOMING

Tim Newcomb,

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2023-CV-36100

v.

Chuck Gray, as Secretary of  
State of Wyoming.

Verified Complaint for Declaratory Judgment and Injunctive Relief

001

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RESPECTFULLY COMES, Tim Newcomb, *pro se*, to move the Court to expedite a hearing to judge his claims that Section 3 of the 14th Amendment of the United States Constitution and Article 1, §§ 6, 26, 36 and 37 and Article 5, § 10 of the Wyoming Constitution, separately and independently, preclude the names of Mr. Trump and Ms. Lummis from appearing on Wyoming ballots, take judicial notice of adjudicative facts under Rule 201 of the Wyoming Rules of Evidence, award judgment, enjoin such names from those ballots and award reasonable attorney fees and costs incurred in prosecuting this action.

Standing

The Plaintiff is a registered Wyoming voter. His interest in seeking the Court to enjoin them from Wyoming's ballot is justiciable and tangible. *See Pedro/Aspect, Ltd. v. Board of County Comm'rs*, 94 P. 3d 412, ¶ 10 (Wyo. 2004) and Plaintiff's Verified Petition, attached.

Jurisdiction

"The district court shall have original jurisdiction of all causes both at law and in equity ... courts ... shall have power to issue writs of ... injunction." Wyoming Constitution, Article 5, § 10.

"No proceeding is open to objection on the ground that a declaratory judgment or decree is prayed for." *Voss v. Goodman*, 203 P. 3d 415, 418, ¶ 4 (WY 2009).

Request for the Court to take Judicial Notice of Adjudicative Facts

Pursuant to Rules 201 (b)(2), (d), (e) and (f) W.R.E., plaintiff requests the Court to take judicial notice of adjudicative facts, as numbered below, if made relevant under Rules 401 and 402 of the W.R.E. during the proceedings. They are requested as potentially relevant to anticipated response and reply to evidence that political privilege makes plain language ambiguous. "Arguments by counsel [or *pro se* litigants] are not evidence[.]" *Stephens v. State*, 774 P. 2d 60, 75 (Wyo. 1989).

Plaintiff moves the Court to take judicial notice of adjudicative facts when relevant by Rules 201 and 402 of the W.R.E.

The Wyoming Rules of Evidence construe to “secure fairness in administration, elimination of unjustifiable expense and delay, and promotion of growth and development of the law of evidence to the end that the truth may be ascertained and proceedings justly determined.” Rule 102, W.R.E.

Rule 201 (f) authorizes judicial notice at any stage in the proceeding.

“[L]aw is not always clear and never is static ... in determining the proper scope of advocacy, account must be taken of the law’s ambiguities and potential for change.” Wyoming Rules of Professional Conduct, Rule 3.01, Comment 1.

Relevancy required by Rule 401 of the W.R.E. and the opportunity for litigants to be heard - under Rule 201 (d) and (e) and the Court’s equity powers under Article 5, Section 10 of the Wyoming Constitution - accommodate discretion to reserve judgment as to whether a claim of adjudicative fact is properly noticed under Rule 201. “Allocation of the burden of proof is a matter of law.” *JB v. State*, 2013 WY 85, ¶ 5, 305 P. 3d 1137, 1139 (Wyo. 2013).

“[D]ue process must be afforded to litigants in the form of notice and a *meaningful* opportunity to be heard.’ *Lawrence-Allison and Associates West, Inc. v. Archer*, 767 P.2d 989, 997 (Wyo. 1989) (emphasis in original).” *Sandstrom v. Sandstrom*, 880 P. 2d 103 (Wyo. 1994).

Information becomes admissible evidence to be judicially noticed, during proceedings, when relevant in response or reply to evidence that political privilege can suspend the Constitution.<sup>1</sup>

“[A]rguments by counsel [are] not evidence.” *Stephens v. State*, 774 P. 2d 60, 75 (Wyo. 1989) and advocacy accounts for law’s ambiguities and potential for change. Evidence derives from

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<sup>1</sup> See footnotes 6, 256 and 257.

information. Information is not relevant except under the W.R.E. Whether such information presents admissible relevant evidence turns on the proper scope of legal claims, responses and replies.

\* \* \*

[1] *United States of America v. Donald J. Trump*,<sup>2</sup> Indictment, Introduction[.]<sup>3</sup>

- “1. [F]orty-fifth President of the United States and a candidate for re-election in 2020.
2. Despite having lost, the Defendant was determined to remain in power. So for more than two months following election day on November 3, 2020, the Defendant spread lies that there had been outcome-determinative fraud in the election and that he had actually won. These claims were false, and the Defendant knew that they were false. But the Defendant repeated and widely disseminated them anyway — to make his knowingly false claims appear legitimate, create an intense national atmosphere of mistrust and anger, and erode public faith in the administration of the election.
4. Shortly after election day, the Defendant also pursued unlawful means of discounting legitimate votes and subverting the election result.”

[2] Section 3 of the 14th Amendment mandates that: “*No person* shall ... hold any office ... under the United States, or ... any State, who, having previously taken an oath ... to support the Constitution of the United States, shall have ... given aid or comfort to the enemies[.]” (emphasis supplied)

[3] Article 2, Sec. 1 of the United States Constitution: “The executive Power shall be vested in a President of the United States of America. He shall hold his Office during the Term of four Years,

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<sup>2</sup> [https://en.wikipedia.org/wiki/Donald\\_Trump](https://en.wikipedia.org/wiki/Donald_Trump)

(“[Defendant] Donald John Trump ... plaintiff or defendant in more than 4,000 state and federal legal actions ... six business bankruptcies.”)

<sup>3</sup> [https://www.justice.gov/storage/US\\_v\\_Trump\\_23\\_cr\\_257.pdf](https://www.justice.gov/storage/US_v_Trump_23_cr_257.pdf) See <https://www.dccourts.gov/node/345>

and, together with the Vice President, chosen for the same Term, be elected[.]”

[4] Mr. Trump swore the oath to defend and support the Constitution of the United States as President of the United States of America against domestic enemies.<sup>4</sup>

[5] Ms. Lummis swore the oath to defend and support the Constitution against domestic enemies.

Before becoming a Wyoming attorney<sup>5</sup> and, again, before becoming a United States Senator.

I do solemnly swear that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter: So help me God.”<sup>6</sup>

[6] 18 U.S.C. § 2381 (emphasis supplied) - “*Whoever, owing allegiance to the United States, levies war against them or adheres to their enemies, giving them aid and comfort within the United States or elsewhere, is guilty of treason and shall suffer death, or imprisoned and fined, and incapable of holding any U.S. office.*”

[7] 18 U.S.C. § 241 - “If two or more persons conspire to injure, oppress, threaten, or intimidate any person ... in the free exercise or enjoyment of any right or privilege secured ... by the Constitution or

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<sup>4</sup> <https://www.defense.gov/Multimedia/Photos/igphoto/2001690300/>

(“Trump ... oath of office to become ... 45th president and commander in chief[.]”)

<sup>5</sup> <https://www.brookings.edu/articles/trumps-judicial-campaign-to-upend-the-2020-election-a-failure-but-not-a-wipe-out/> (Mr. Trump lost 61 lawsuits challenging his 2020 election loss.) See [https://en.wikipedia.org/wiki/Joseph\\_N.\\_Welch](https://en.wikipedia.org/wiki/Joseph_N._Welch) (“At long last, have you left no sense of decency?”)

<sup>6</sup> <https://www.govinfo.gov/content/pkg/GPO-J6-REPORT.pdf/GPO-J6-REPORT.pdf>, page 9. See footnotes 100, 102, 105, 106, 107, 109, 110, 197, 204 and 218. Cf. [https://www.gutters.com/graphics/USA-TRUMP/LAWMAKERS\\_xepghdzvq](https://www.gutters.com/graphics/USA-TRUMP/LAWMAKERS_xepghdzvq) (“147 lawmakers who voted to overturn the U.S. election.”)



laws of the United States, or because of ... having so exercised the same \* \* \* if death results from the acts they ... may be sentenced to death.”<sup>7</sup>

[8] “Five people died either shortly before, during, or following the insurrection[.]”<sup>8</sup>

[9] “The plan spurred violent attacks on the seat of our nation’s government ... led to the deaths of several law enforcement officers.”<sup>9</sup>

[10] “[R]eckless disregard for human life implicit in knowingly engaging in criminal activities known to carry a grave risk of death represents a highly culpable mental state ... the death penalty does not offend the Eighth Amendment when applied to a felony murderer) (emphasis added).” *Tison v. Arizona*, 481 U.S. 137, 157, 107 S.Ct. 1676, 95 L.Ed.2d 127 (1987).

[11] “Petitioners argue strenuously that *they did not ‘intend to kill’* ... *We accept this as true.* \* \* \* The heart of the retribution rationale is that a criminal sentence must be directly related to the personal culpability of the criminal offender. \* \* \* [M]ajor participation in the felony committed, combined with reckless indifference to human life, is sufficient to satisfy ... culpability[.]”

[12] “Bannon’s War” against the United States Constitution.<sup>10</sup>

[13] “Trump and Putin<sup>11</sup> met one-on-one in a room for 2 hours.”<sup>12</sup>

<sup>7</sup> <https://www.congress.gov/104/plaws/publ132/PLAW-104publ132.pdf> cf. <https://www.youtube.com/watch?v=R0BulsGUE-8> (1:19 min. mark)

<sup>8</sup> <https://www.congress.gov/104/plaws/publ132/PLAW-104publ132.pdf>

<sup>9</sup> [https://en.wikipedia.org/wiki/January\\_6\\_United\\_States\\_Capitol\\_attack#:~:text=Five%20people%20died%20either%20shortly%20before%20during%20or%20following%20the%20event%3A%20one%20was%20shot%20by%20Capitol%20Police%2C%20another%20died%20of%20a%20drug%20overdose%2C%20and%20three%20died%20of%20natural%20causes%20including%20a%20police%20officer](https://en.wikipedia.org/wiki/January_6_United_States_Capitol_attack#:~:text=Five%20people%20died%20either%20shortly%20before%20during%20or%20following%20the%20event%3A%20one%20was%20shot%20by%20Capitol%20Police%2C%20another%20died%20of%20a%20drug%20overdose%2C%20and%20three%20died%20of%20natural%20causes%20including%20a%20police%20officer)

<sup>9</sup> <https://www.govinfo.gov/content/pkg/GPO-J6-REPORT/pdf/GPO-J6-REPORT.pdf> (page 40)

<sup>10</sup> <https://www.youtube.com/watch?v=UPK1rVj0VPc>

(“Bring on the Apocalypse[.]”)

<sup>11</sup> [https://en.wikipedia.org/wiki/List\\_of\\_journalists\\_killed\\_in\\_Russia](https://en.wikipedia.org/wiki/List_of_journalists_killed_in_Russia)

(“Trump and Putin met one-on-one in a room for 2 hours. Here’s why that’s a problem.”)

<sup>12</sup> <https://www.cnn.com/2018/07/17/politics/donald-trump-putin-meeting/index.html>

[14] Mr. Trump said he revealed classified secrets<sup>13</sup> to Putin, as his “absolute right.”<sup>14</sup>

[15] “The Arrest of a U.S. Spy Working as a Russian Intelligence Officer Could Tell Us a Lot About Trump and Putin[.]”<sup>15</sup>

[16] “All the times Trump said the constitution let’s him do whatever he wants[.]”<sup>16</sup>

[17] “Understanding what was said between the two could help illuminate whether Trump ever revealed sensitive information or struck any deals with the Kremlin leader<sup>17</sup> that could take the new administration by surprise.”<sup>18</sup>

[18] “Russia secretly offered Afghan militants bounties<sup>19</sup> to kill U.S. troops[.]”<sup>20</sup>

[19] “Russian journalist, writer and human rights activist Anna Politkovskaya was shot dead in the elevator of her apartment block in central Moscow ... for criticism of Vladimir Putin.”<sup>21</sup>

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<sup>13</sup> [https://en.wikipedia.org/wiki/Julius\\_and\\_Ethel\\_Rosenberg](https://en.wikipedia.org/wiki/Julius_and_Ethel_Rosenberg)

(“Convicted of espionage in 1951, they were executed by the federal government of the United States in 1953 at Sing Sing Correctional Facility in Ossining, New York, becoming the first American civilians to be executed for such charges and the first to be executed during peacetime[.]”)

<sup>14</sup> [https://www.youtube.com/watch?v=yVoD9K\\_EkIQ](https://www.youtube.com/watch?v=yVoD9K_EkIQ) (8:30 min. mark)

<sup>15</sup> <https://www.gq.com/story/us-russia-spy-arrested-trump-putin>

(“Convicted of espionage ... executed by the federal government ... the first American civilians to be executed for such charges and ... during peacetime[.]”)

<sup>16</sup> <https://www.gq.com/story/us-russia-spy-arrested-trump-putin>

(“The Arrest of a U.S. Spy Working as a Russian Intelligence Officer Could Tell Us a Lot About Trump and Putin”)

[https://www.ice-dpi.int/news/situation-ukraine-icc-judges-issue-arrest-warrants-against-vladimir-vladimirovich-putin-and#:~:text=Mr%20Vladimir%20Vladimirovich%20Putin%2C%20born,articles%208\(2\)](https://www.ice-dpi.int/news/situation-ukraine-icc-judges-issue-arrest-warrants-against-vladimir-vladimirovich-putin-and#:~:text=Mr%20Vladimir%20Vladimirovich%20Putin%2C%20born,articles%208(2))

(“Putin ... responsible for the war crime of unlawful deportation ... children) ... from ... Ukraine to the Russian Federation[.]”)

<sup>18</sup> <https://www.politico.com/news/2021/02/09/biden-can-access-trump-putin-calls-468100#:~:text=whether%20Trump%20ever%20revealed%20sensitive%20information%20or%20struck%20any%20deals%20with%20the%20Kremlin%20leader>

(“Trump hid his calls with Putin. Now, Biden has access to them.”)

<sup>19</sup> <https://www.youtube.com/watch?v=0wxczbY5KfI>

(“Gold Star Father ATTACKED by Trump[.]”) (0:10 min. mark)

<sup>20</sup> [https://en.wikipedia.org/wiki/Russian\\_bounty\\_program#:~:text=The%20Russian%20bounty%20program%20was,during%20the%20war%20in%20Afghanistan](https://en.wikipedia.org/wiki/Russian_bounty_program#:~:text=The%20Russian%20bounty%20program%20was,during%20the%20war%20in%20Afghanistan)

(“The Russian bounty program ... Russian military intelligence to pay bounties to Taliban-linked militants for killing American and ... allied service members during the war in Afghanistan.”) See footnotes 11, 28 and 29.

<sup>21</sup> [https://en.wikipedia.org/wiki/Assassination\\_of\\_Anna\\_Politkovskaya](https://en.wikipedia.org/wiki/Assassination_of_Anna_Politkovskaya)

[20] "As an informal leader of the Ukrainian opposition coalition, he was one of the two main candidates in the 2004 Ukrainian presidential election ... Yushchenko became the victim of an assassination attempt when he was poisoned[.]"<sup>22</sup>

[21] "OSCE Mission in Kosovo staff member ... died in a car accident ... Nenad Gajic, 32 ... joined the Mission in May 2004."<sup>23</sup>

[22] "OSCE Chairman shocked by sudden death of OSCE Project Co-ordinator in Ukraine[.]"<sup>24</sup>

[23] "DEATH OF HUMAN RIGHTS CHAMPION IN UKRAINE DRAWS REACTION FROM HELSINKI COMMISSION LEADERS[.]"<sup>25</sup>

[24] The late "Ambassador Nicholas ... Ukraine's strongest advocates[.]"<sup>26</sup>

[25] "Trump sides with Russia against FBI at Helsinki summit."<sup>27</sup>

[26] "President Donald Trump's administration signed a peace deal with the Taliban<sup>28</sup> ... that ... bound

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<sup>22</sup> [https://en.wikipedia.org/wiki/Viktor\\_Yushchenko](https://en.wikipedia.org/wiki/Viktor_Yushchenko)

("Yushchenko ... president of Ukraine ... 2005 to ... 2010 ... orient Ukraine towards the West, towards the European Union and NATO ... victim of an assassination attempt ... poisoned[.]")

<sup>23</sup> <https://www.osce.org/cio/47989>

<sup>24</sup> <https://www.osce.org/cio/57291>

("OSCE Chairman-in-Office ... shock and sadness on Monday over the sudden death of Ambassador David R. Nicholas, the OSCE Project Co-ordinator in Ukraine.")

<sup>25</sup>

[https://www.osce.org/international-impact/press-and-media/press-releases/death-human-rights-champion-ukraine-draws?sort\\_by=field\\_date\\_value&page=18](https://www.osce.org/international-impact/press-and-media/press-releases/death-human-rights-champion-ukraine-draws?sort_by=field_date_value&page=18)

("United States Helsinki Commission leaders today issued the following statements regarding the death of Ambassador David R. Nicholas, OSCE Project Coordinator in Kiev, Ukraine on March 13, 2005.") See footnote 57.

<sup>26</sup>

[https://www.osce.org/international-impact/press-and-media/press-releases/death-human-rights-champion-ukraine-draws?sort\\_by=field\\_date\\_value&page=18](https://www.osce.org/international-impact/press-and-media/press-releases/death-human-rights-champion-ukraine-draws?sort_by=field_date_value&page=18)

<sup>27</sup> <https://www.bbc.com/news/world-europe-44852812>

("Trump sides with Russia against FBI at Helsinki summit")

<sup>28</sup> <https://carnegieendowment.org/2019/09/09/taliban-hardly-deserve-camp-david-talks-with-president-what-was-trump-thinking-pub-79813>

("The Taliban Hardly Deserve Camp David Talks With a President. What Was Trump Thinking?") See footnotes 11, 20 and 29.

[President Biden] to withdraw U.S. troops, setting the stage for the chaos engulfing the country.”<sup>29</sup>

[27] “Kushner ... Secret Communications ... Russia[.]”<sup>30</sup>

[28] “Jared Kushner advised the prince on how to 'weather' Khashoggi<sup>31</sup> slaying[.]”<sup>32</sup>

[29] “‘I saved his a--’: Trump boasted that he protected Saudi Crown Prince Mohammed bin Salman after Jamal Khashoggi's brutal murder”<sup>33</sup>

[30] “LIV Golf is financed by ... Saudi Arabia.”<sup>34</sup>

[31] “Saudi Aramco VC Fund Joins Thiel[.]”<sup>35</sup>

[32] “Kushner requested ... Russian-encrypted communications channel ... secret communication with Russia and to circumvent safeguards<sup>36</sup> in place by the United States intelligence community”<sup>37</sup>

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<sup>29</sup> <https://apnews.com/article/joe-biden-middle-east-taliban-doha-e6f48507848act2ec849154604aa11be>  
 (“Was Biden handcuffed by Trump’s Taliban deal in Doha?”) See footnotes 11, 20 and 28.

<sup>30</sup> <https://www.npr.org/2017/05/26/530297344/report-kushner-discussed-setting-up-secret-communications-with-russia>  
 (“Report: Kushner Discussed Setting Up Secret Communications With Russia[.]”)

<sup>31</sup> [https://en.wikipedia.org/wiki/Assassination\\_of\\_Jamal\\_Khashoggi](https://en.wikipedia.org/wiki/Assassination_of_Jamal_Khashoggi)

(“Jamal Khashoggi ... Saudi dissident journalist, was killed ... at the Saudi consulate in Istanbul ... ambushed and strangled by a 15-member squad of Saudi operatives ... dismembered and disposed ... Trump disputed the CIA assessment, expressed support for bin Salman[.]”)

<sup>32</sup> <https://www.youtube.com/watch?v=rXiSafSqXAY> (0:02 min mark)

(“Putin and Saudi crown prince high-five at G20 summit[.]”) See footnotes 29 and 111.

<sup>33</sup> <https://www.businessinsider.com/trump-woodward-i-saved-his-ass-mbs-khashoggi-rape-2020-9>

(“‘I saved his a--’: Trump boasted that he protected Saudi Crown Prince Mohammed bin Salman after Jamal Khashoggi's brutal murder”)

<sup>34</sup> LIV Golf is financed by ... Saudi Arabia

<sup>35</sup> <https://www.bloomberg.com/news/articles/2023-07-18/aramco-vc-fund-joins-thiel-to-back-ai-powered-emissions-monitor#xj4y7vzke>

(“Saudi Aramco VC Fund Joins Thiel[.]”) See footnotes 28 and 111.

<sup>36</sup> <https://www.youtube.com/watch?v=CrBiaNIwUO8&t=10s>

(“‘I say this to my Republican colleagues ... ‘There will come a day when Trump is gone, but your dishonor will remain.’”)

<sup>37</sup>

[https://en.wikipedia.org/wiki/Links\\_between-Trump\\_associates\\_and-Russian\\_officials#:-:~:text=Russian%20Decrypted%20communications%20channel%20be%20set%20up%20to%20allow%20secret%20communication%20with%20Russia%20and%20to%20circumvent%20safeguards%20in%20place%20by%20the%20United%20States%20intelligence%20community](https://en.wikipedia.org/wiki/Links_between-Trump_associates_and-Russian_officials#:-:~:text=Russian%20Decrypted%20communications%20channel%20be%20set%20up%20to%20allow%20secret%20communication%20with%20Russia%20and%20to%20circumvent%20safeguards%20in%20place%20by%20the%20United%20States%20intelligence%20community)

(“Kushner requested that a direct, Russian-encrypted communications channel be set up to allow secret communication with Russia and to circumvent safeguards in place by the United States intelligence community.”)

[33] “Why<sup>38</sup> Would Peter Thiel<sup>39</sup> Meet With Russian Intelligence?”<sup>40</sup>

[34] “In the complete rare earth metals production market, China controls about 90 percent.”<sup>41</sup>

[35] “The ongoing Russian-caused crisis in Ukraine is being seen as a geopolitically driven event, but the logic of commerce (geo-economics) is a more determining factor here than the logic of conflict. \* \* \* 50,000 tonnes of lithium oxide ... in the eastern region of Ukraine ... the world’s largest lithium reserves.”<sup>42</sup>

[36] “Jared Kushner didn’t disclose business ties to George Soros, Peter Thiel, and Goldman Sachs, or that he owes \$1 billion in loans.”<sup>43</sup>

[37] “Jared Kushner ... \$172 million and \$640 million ... outside income while ... in the White House.”<sup>44</sup>

[38] “Timeline on Jared Kushner, Qatar, 666 Fifth Avenue, and White House Policy[.]”<sup>45</sup>

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\* <https://www.youtube.com/watch?v=zCG01qjnc0&t=54s>

(“[T]here is no win for Ukraine ... Russia is being very successful in their invasion ... ”We had a kind of a really pathetic display from the Ukrainian President Zelenskyy”) CAUGHT: Top Republicans Endorse Putin | #PutinsParty (0:58 - 2:15 min. marks) (see footnotes 54, 132)

—<https://www.telegraph.co.uk/business/2023/04/22/palantir-peter-thiel-putin-war-crimes/>

(“The ‘all-seeing’ tech giant mapping Putin’s war crimes Palantir”)

<sup>40</sup> <https://www.youtube.com/watch?v=c4vpRPMYj54&t=5s>

(“I spoke with Peter Thiel”) (0:04 min. mark)

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<https://baker.utk.edu/news/re-cap-how-chinas-rare-earth-monopoly-is-reshaping-the-world/#:~:text=For%20example%2C%20China%20doesn%27t,China%20controls%20about%2090%20percent>

(“In ... rare earth metals ... China controls ... 90 percent.”)

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<https://capsindia.org/ukraines-geo-economic-significance-critical-minerals-and-resources/#:~:text=Ukraine%20will%20have%20the%20world%20s%20largest%20lithium%20reserves>

(“The ongoing Russian-caused crisis in Ukraine is being seen as a geopolitically driven event, but the logic of commerce (geo-economics) is a more determining factor here than the logic of conflict. \* \* \* Ukraine ... world’s largest lithium reserves ... large untapped concentration of rare mineral[.]”) See footnote 97.

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<https://www.businessinsider.com/jared-kushner-ties-george-soros-goldman-sachs-peter-thiel-1-billion-loan-2017-5>

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<https://www.citizensforethics.org/reports-investigations/crew-investigations/jared-and-ivanka-made-up-to-640-million-in-the-white-house/#:~:text=fared%20Kushner%20and%20Ivanka%20Trump,of%20financial%20disclosures%20by%20CRF,W>

45

<https://www.justsecurity.org/69094/timeline-on-jared-kushner-qatar-666-fifth-avenue-and-white-house-policy/>

[39] “[C]ommitting \$2 billion to Mr. Kushner’s fledgling firm ... by the Saudi crown prince[.]”<sup>46</sup>

[40] “SAUDI ... PRINCE ... JARED KUSHNER ... ‘IN HIS POCKET’[.]”<sup>47</sup>

[41] “Elon Musk ordered Starlink to be turned off during Ukraine offensive[.]”<sup>48</sup>

[42] “Vladimir Putin ... Elon Musk is an ‘extraordinary person’[.]”<sup>49</sup>

[43] “The ‘all-seeing’ tech giant mapping Putin’s war crimes ... Palantir[.]”<sup>50</sup>

[44] “Palantir Technologie... specializes in big data analytics<sup>51</sup> ... founded by Peter Thiel[.]”<sup>52</sup>

[45] “ICC judges issue arrest warrants against ... Putin[.]”<sup>53</sup>

[46] “Elon Musk ... dethroned by Peter Thiel in a coup[.]”<sup>54</sup>

[47] “Russia is being very successful in their invasion ... We had a rather pathetic display from the

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<sup>46</sup> <https://www.nytimes.com/2022/04/10/us/jared-kushner-saudi-investment-fund.html>

(“Jared Kushner secured a \$2 billion investment ... Saudi crown prince ... Kushner’s newly formed ... Affinity Partners, previously undisclosed documents show.”)

<sup>47</sup> <https://theintercept.com/2018/03/21/jared-kushner-saudi-crown-prince-mohammed-bin-salman/>

(“JARED KUSHNER ... ‘IN HIS POCKET’ ... Kushner discussed the names of royal family members opposed to his power grab.”)

<sup>48</sup> <https://www.theguardian.com/technology/2023/sep/07/elon-musk-ordered-starlink-turned-off-ukraine-offensive-biography>

(“Musk told engineers to turn off communications network to hobble Ukraine drone attack on Russian warship[.]”)

<sup>49</sup> <https://www.youtube.com/shorts/IU5KYjNgEoM>

<sup>50</sup> [https://www.linkedin.com/posts/palantir-technologies\\_the-all-seeing-tech-giant-mapping-putins-activity-705561071834722713o-NDhp?url\\_public\\_profile\\_like\\_view](https://www.linkedin.com/posts/palantir-technologies_the-all-seeing-tech-giant-mapping-putins-activity-705561071834722713o-NDhp?url_public_profile_like_view)

(“The ‘all-seeing’ tech giant mapping Putin’s war crimes ... Palantir”)

<sup>51</sup> <https://www.nature.com/articles/d41586-023-02684-5>

(“A checklist derived from six neuroscience-based theories of consciousness could aid in the assessment.”) *cf.*

<https://www.scientificamerican.com/article/most-aliens-may-be-artificial-intelligence-not-life-as-we-know-it/> See

<https://wordpress.com/post/hai/blog/47> and <https://www.linkedin.com/in/tim-newcomb-a38211a5/>.

<sup>52</sup> [https://en.wikipedia.org/wiki/Palantir\\_Technologies](https://en.wikipedia.org/wiki/Palantir_Technologies)

<sup>53</sup> <https://www.icc-cpi.int/news/situation-ukraine-icc-judges-issue-arrest-warrants-against-vladimir-vladimirovich-putin-and>

(“Situation in Ukraine: ICC judges issue arrest warrants against Vladimir Vladimirovich Putin”)

<sup>54</sup> <https://www.foxbusiness.com/markets/elon-musk-dethroned-peter-thiel-coup-led-paypal-mafia>

*cf.* <https://www.bloomberg.com/news/articles/2022-12-09/peter-thiel-s-money-manager-hunts-next-paypal-for-his-own-firm>

Ukrainian President Zelenskyy earlier today[.]”<sup>55</sup> Representative Ms. Greene and Ms. Ingraham.

[48] “Vladimir Putin ... [authorized] a secret spy agency operation to support a ‘mentally unstable’ Donald Trump in the 2016 US presidential election[.]”<sup>56</sup>

[49] “PUTIN’S ASYMMETRIC ASSAULT ON DEMOCRACY IN RUSSIA AND EUROPE: IMPLICATIONS FOR U.S. NATIONAL SECURITY[.]”<sup>57</sup>

[50] “(U)REPORT OF THE REPORT 116-XX SELECT COMMITTEE ON INTELLIGENCE UNITED STATES SENATE ON RUSSIAN ACTIVE MEASURES CAMPAIGNS AND INTERFERENCE IN THE 2016 U.S. ELECTION VOLUME 5: COUNTERINTELLIGENCE THREATS AND VULNERABILITIES[.]”<sup>58</sup>

[51] “Report On The Investigation Into Russian Interference In The 2016 Presidential Election[.]”<sup>59</sup>

[52] “DNC Email Hack: Why Vladimir Putin Hates Hillary Clinton ... she compared him to Hitler and said he might not have a soul.”<sup>60</sup>

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<sup>55</sup> <https://www.youtube.com/watch?v=-zCGO1einc0&t=54s> (1:02 - 1:15 min. marks) (see footnotes 38 and 133)

<sup>56</sup> <https://www.theguardian.com/world/2021/jul/15/kremlin-papers-appear-to-show-putins-plot-to-put-trump-in-white-house>

(“Putin’s expert department recommended Moscow use ‘all possible force’ to ensure a Trump victory.)

<sup>57</sup> <https://www.govinfo.gov/content/pkg/CPRT-115SPRT28110/html/CPRT-115SPRT28110.htm>

(“PUTIN’S ASYMMETRIC ASSAULT ON DEMOCRACY IN RUSSIA AND EUROPE: IMPLICATIONS FOR U.S. NATIONAL SECURITY[.]”) See [https://en.wikipedia.org/wiki/Denver\\_Rigglesman](https://en.wikipedia.org/wiki/Denver_Rigglesman) (“The Breach”) See footnote 25.

<sup>58</sup> [https://www.intelligence.senate.gov/sites/default/files/documents/report\\_volume5.pdf](https://www.intelligence.senate.gov/sites/default/files/documents/report_volume5.pdf)

(“(U)REPORT OF THE REPORT 116-XX SELECT COMMITTEE ON INTELLIGENCE UNITED STATES SENATE ON RUSSIAN ACTIVE MEASURES CAMPAIGNS AND INTERFERENCE IN THE 2016 U.S. ELECTION ”)

<sup>59</sup> <https://www.justice.gov/archives/sco/file/1373816/download>

<sup>60</sup> <https://www.nbcnews.com/news/us-news/why-putin-hates-hillary-clinton-n617236>

[53] “Trump revealed intelligence secrets<sup>61</sup> to Russians<sup>62</sup> in Oval Office.”<sup>63</sup>

[54] “Trump Claims He Could Declassify Documents Just By Thinking About It[.]”<sup>64</sup>

[55] “Donald Trump’s decision to declassify evidence given by ex-British spy Christopher Steele over the former U.S. president’s alleged links with Russia led to the disappearance of two sources.”<sup>65</sup>

[56] “On December 8, [2020], Trump pardoned retired U S. Army General Michael Flynn who had pleaded guilty to ‘willfully and knowingly’ making false statements to the Federal Bureau of Investigation (FBI) about communications with the Russian ambassador.”<sup>66</sup>

[57] “Trump ... AT&T ... sell CNN to Rupert Murdoch[.]”<sup>67</sup>

[58] “[W]e don’t rely on American banks. We have all the funding we need out of Russia[.]”<sup>68</sup> Eric

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<sup>61</sup> <https://www.haaretz.com/israel-news/2017-11-23/ty-article-report-trump-revealed-covert-israeli-mission-in-syria-to-russians@000017fcb46-d3bc-ad7f-fb6f95830000>  
(“Trump Revealed Israeli ... Operation ... to Russians ... mission to penetrate an Islamic State cell developing bombs that could go through airports undetected[.]”)

<sup>62</sup> <https://ersreports.congress.gov/product/pdf/IF/IF11439#:~:text=Violations%20of%20FARA%20are%20subject,up%20to%20a%20%2410%2C000%20fine.&text=during%20the%202016%20election%20resulted%20in%20several%20high%2Dprofile%20FARA%20convictions>  
(“Foreign Agents Registration Act (FARA): A Legal Overview[.]”)

<sup>63</sup> <https://www.reuters.com/article/us-usa-trump-russia/trump-revealed-intelligence-secrets-to-russians-in-oval-office-officials-idUSKCN18B2MX>  
(“Trump revealed intelligence secrets to Russians in Oval Office[.]”)

<sup>64</sup> <https://www.youtube.com/watch?v=KC5555NDQng> (0:24 - 0:40 min. marks)

<sup>65</sup> <https://www.reuters.com/world/uk/trump-committed-egregious-intelligence-breach-ex-uk-spy-tells-court-2023-10-17/>

(“Trump’s decision to declassify evidence ... led to the disappearance of two sources[.]”)

<sup>66</sup> [https://en.wikipedia.org/wiki/Planning\\_of\\_the\\_January\\_6\\_United\\_States\\_Capitol\\_attack](https://en.wikipedia.org/wiki/Planning_of_the_January_6_United_States_Capitol_attack)

(“Trump pardoned multiple allies who would later participate in the D.C. rallies of January 5–6 ... Trump pardoned retired U.S. Army General Michael Flynn who had pleaded guilty to ‘willfully and knowingly’ making false statements to the Federal Bureau of Investigation (FBI) about communications with the Russian ambassador. Flynn ... QAnon[.]”)

<sup>67</sup> [https://finance.yahoo.com/news/trump-trying-to-sell-cnn-141354268.html?ocid=mailsignout&guccounter=1&guce\\_referrer=aHR0c1l1M6Jv93d3cuZ29vZ3JlLnNvbS88&guce\\_referrer\\_sig=AQAAAHMplqPkBDKN-K6l79il\\_xt6Fu/MIM9BjvxxDQSnNFKqAScD0wEs9xpBB4bVFuKk4vX40s50Fbl\\_v2atNXNlra5htObtOusu\\_ZQubPQYyevcd38fKuZ3bm039kzlfEX3RmmOmzhkuo\\_Fe\\_KD7aTCCh6rN3By5j1ldmX6R\\_e0COMI5#~:text=sell%20CNN%20to%20Rupert%20Murdoch](https://finance.yahoo.com/news/trump-trying-to-sell-cnn-141354268.html?ocid=mailsignout&guccounter=1&guce_referrer=aHR0c1l1M6Jv93d3cuZ29vZ3JlLnNvbS88&guce_referrer_sig=AQAAAHMplqPkBDKN-K6l79il_xt6Fu/MIM9BjvxxDQSnNFKqAScD0wEs9xpBB4bVFuKk4vX40s50Fbl_v2atNXNlra5htObtOusu_ZQubPQYyevcd38fKuZ3bm039kzlfEX3RmmOmzhkuo_Fe_KD7aTCCh6rN3By5j1ldmX6R_e0COMI5#~:text=sell%20CNN%20to%20Rupert%20Murdoch)

<sup>68</sup> [https://www.youtube.com/watch?v=3ZvjYrhMAQ&embeds\\_referring\\_eurl=https%3A%2Fdocs.google.com%2F&embeds\\_referring\\_origin=https%3A%2Fdocs.google.com&source\\_ve\\_path=Mig2NjY&feature=emb\\_logo](https://www.youtube.com/watch?v=3ZvjYrhMAQ&embeds_referring_eurl=https%3A%2Fdocs.google.com%2F&embeds_referring_origin=https%3A%2Fdocs.google.com&source_ve_path=Mig2NjY&feature=emb_logo)  
(0:37 - 46 min. marks)



Trump.

[59] “Justice Kennedy's Son<sup>69</sup> and Trump's Huge Deutsche Bank Loans[.]”<sup>70</sup>

[60] Deutsche Bank gives Mr. Trump a loan trophy.”<sup>71</sup>

[61] “Germany's largest bank ... uncovered a shortfall in the shares that back the depositary receipts ... the bank had issued before the Ukraine invasion. The shares have been held in Russia by a different depositary bank.”<sup>72</sup>

[62] “A reputed federal informant and whistleblower ... turned over a trove of secret files about Deutsche Bank ... found dead[.]”<sup>73</sup>

[63] “After Justice Anthony Kennedy told President Donald Trump he would relinquish his seat on the Supreme Court, the president emerged from his private meeting with the retiring jurist focused on one candidate to name as his successor: Judge Brett Kavanaugh, Kennedy's former law clerk[.]”<sup>74</sup>

[64] “Kavanaugh ... auditioned with Leo ... the Federalist Society<sup>75</sup> ... no one auditioned harder[.]”<sup>76</sup>

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<https://ersreports.congress.gov/product/pdf/IF/IF11439#:~:text=Violations%20of%20FARA%20are%20subject,up%20to%20a%20%2410%2C00%20fine.&text=during%20the%202016%20election%20resulted%20in%20several%20high%2Dprofile%20FARA%20convictions>

(“Foreign Agents Registration Act[.]”)

<sup>70</sup> <https://shero.substack.com/p/justice-kennedys-son-and-trumps-huge>

(“Justice Kennedy's Son and Trump's Huge Deutsche Bank Loans[.]”)

<sup>71</sup> <https://www.youtube.com/watch?v=Irk7ybMwAug> (10:29 min. mark)

<sup>72</sup> <https://www.reuters.com/business/finance/deutsche-bank-tells-investors-some-their-russian-shares-are-missing-2023-06-26/>

<sup>73</sup> <https://www.nbcnews.com/news/us-news/reputed-federal-informant-whistleblower-found-dead-l-reported-missing-rcna26382>

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<https://www.politico.com/story/2018/07/09/brett-kavanaugh-trump-private-meeting-706137#:~:text=After%20Justice%20Anthony%20Kennedy%20told,Kavanaugh%2C%20Kennedy%27s%20former%20law%20clerk>

(“How a private meeting with Kennedy helped Trump get to ‘yes’ on Kavanaugh[.]”)

<sup>75</sup> [https://www.youtube.com/watch?v=d6N5Ly\\_rzic](https://www.youtube.com/watch?v=d6N5Ly_rzic) (0:40 - 1:30 min. marks)

<sup>76</sup> <https://www.businessinsider.com/trump-nominates-brett-kavanaugh-supreme-court-justice-anthony-kennedy-2018-7>

(“Trump nominates Brett Kavanaugh to replace the retiring Justice Anthony Kennedy on the Supreme Court[.]”)

Senator Sheldon Whitehouse.

[65] “Trump nominates Brett Kavanaugh<sup>77</sup> to replace the retiring Justice Anthony Kennedy on the Supreme Court[.]”<sup>78</sup>

[66] “Trump planned to falsely claim victory according to Stephen Bannon.”<sup>79</sup>

[67] “Trump won’t accept election results if he loses as Clinton expands campaign into red states[.]”<sup>80</sup>

[68] “I’ve been on ten years on that bitch, right? I just beat her every day.”<sup>81</sup> Mr. Bannon.

[69] Mr. Trump pardoned Mr. Bannon.<sup>82</sup>

[70] “The Defendant ... lost the 2020 presidential election. \* \* \* Despite having lost, the Defendant was determined to remain in power. So for more than two months following election day on November 3, 2020, the Defendant spread lies that there had been outcome-determinative fraud in the election and that he had actually won. These claims were false, and the Defendant knew that they were false.” *United States of America v. Donald Trump*, Grand Jury Indictment, p.1.<sup>83</sup>

[71] Defendant Trump’s “efforts to change the outcome in any state through recounts, audits, or legal

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<sup>77</sup> <https://www.youtube.com/watch?v=ewSCGtEQeZM> (1:00 - 1:20 min. marks)

<sup>78</sup> <https://www.businessinsider.com/trump-nominates-brett-kavanaugh-supreme-court-justice-anthony-kennedy-2018-7>

<sup>79</sup> [https://www.youtube.com/watch?v=OxNoLjnxN\\_es](https://www.youtube.com/watch?v=OxNoLjnxN_es)

<sup>80</sup> <https://www.pbs.org/weta/washingtonweek/video/2016-10-trump-wont-accept-election-results-if-he-loses-as-clinton-expands-campaign-into-red-states>

<sup>81</sup> <https://www.youtube.com/watch?v=hWCXodFMH20>

<sup>82</sup> <https://www.justice.gov/file/1358426/download>

<sup>83</sup> [https://www.justice.gov/storage/1/S\\_v\\_Trump\\_23\\_cr\\_257.pdf](https://www.justice.gov/storage/1/S_v_Trump_23_cr_257.pdf)

challenges were uniformly unsuccessful. \* \* \* Shortly after election day, the Defendant also pursued unlawful means of discounting legitimate votes and subverting the election results. \* \* \* three criminal conspiracies: a. defraud the United States by using ... deceit to ... defeat ... the results of the presidential election ... 18 U.S.C. § 371 b. impede the January 6 congressional proceeding at which the collected results of the presidential election are counted and certified ... 18 U.S.C. § 1512(k); and c. against the right ... to vote and to have one's vote counted ... 18 U.S.C. § 241.” *United States of America v. Donald Trump*, Grand Jury Indictment: p. 4 a, b and c.<sup>84</sup>

[72] 18 U.S. Code § 2382 - “Whoever, owing allegiance to the United States and having knowledge of the commission of any treason against them, conceals and does not, as soon as may be, disclose and make known the same to the President or to some judge<sup>85</sup> of the United States, or to the governor or to some judge or justice of a particular State, is guilty of misprision of treason and shall be fined under this title or imprisoned not more than seven years, or both.”

[73] “Ginni Thomas, wife of Supreme Court justice, testifies before Jan. 6 panel[.]”<sup>86</sup>

[74] “Why billionaires<sup>87</sup> make sure that [Ginni Thomas] take-home pay is much, much higher<sup>88</sup> than her husband’s ... Yes, they want your husband.” *The Last Word with Lawrence O'Donnell*.<sup>89</sup>

[75] “Jim Jordan<sup>90</sup> knew more about what Donald Trump had planned<sup>91</sup> for January 6th than any other

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<sup>84</sup> [https://www.justice.gov/storage/US\\_v\\_Trump\\_23\\_cr\\_257.pdf](https://www.justice.gov/storage/US_v_Trump_23_cr_257.pdf)

<sup>85</sup> [https://en.wikipedia.org/wiki/Ginni\\_Thomas](https://en.wikipedia.org/wiki/Ginni_Thomas) cf. <https://www.youtube.com/watch?v=5NKAncZx7VY> (2:21 - 2:25 min. mark)

<sup>86</sup> <https://www.finnegan.com/~/media/finnegan-watson/press-releases/2021/01/2021-01-20-justice-clarence-thomas-not-reporting-gifts-and-vacations-crow-had-provided>

<sup>87</sup> [https://en.wikipedia.org/wiki/Harlan\\_Crow](https://en.wikipedia.org/wiki/Harlan_Crow) (“Justice Clarence Thomas not reporting ... gifts, and, vacations Crow had provided.”)

<sup>88</sup> <https://www.nbcnews.com/politics/politics-news/pompeo-s-elite-taxpayer-funded-dinners-raise-new-concerns-n1210746> (“Aito ... Gorsuch[.]”)

<sup>89</sup> <https://www.youtube.com/watch?v=Dm1Jaxrl-cl0> (0:08 - 0:33 min. marks)

<sup>90</sup> <https://www.youtube.com/watch?v=dKDBZzL6NQQ> (1:47 min. mark)

<sup>91</sup> <https://www.youtube.com/watch?v=ZCCh4uh0a8> (9:16-9:27 A 10:58-12:13 min. marks)

member of the House of Representatives.” Liz Cheney.<sup>92</sup>

[76] “Silence<sup>93</sup> is<sup>94</sup> complicity.”<sup>95</sup>

[77] “The MAGA<sup>96</sup> senators ... bullying Mitch (McConnell) ... looking for a Jim Jordan<sup>97</sup> of their own ... John Barrasso ... a Republican senator from Wyoming[.]”<sup>98</sup>

[78] “The Hill’s Coronavirus Report: [Wyoming] Sen. Barrasso says it’s too soon to consider more funding for [Wyoming][.]”<sup>99</sup>

[79] Over 1,000,000 Americans<sup>100</sup> and 2,004 Wyomingites perished under Mr. Trump’s<sup>101</sup> and Wyoming Senator Barrasso’s<sup>102</sup> watch.

[80] “Three days before the attack on the Capitol, Jim Jordan<sup>103</sup> ... admitted speaking directly with Donald Trump on January 6th and said this ‘The ultimate date of significance is January 6th[.]’<sup>104</sup>

[81] Mr. Jordan struggles to keep Mr. Trump in power.<sup>105</sup>

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<sup>92</sup> <https://www.msnbc.com/morning-joe/watch/liz-cheney-warns-of-jim-jordan-taking-over-as-house-speaker-194572357944>

<sup>93</sup> <https://www.youtube.com/watch?v=wCs1vLjSD9o&t=371s> (“duplicity” 0:40 sec. mark)

<sup>94</sup> <https://www.youtube.com/watch?v=-7gDauCXRRl> (9:57 min. mark)

<sup>95</sup> <https://www.youtube.com/watch?v=5plTpeh0uMs> (0:35 sec. mark) See footnote 68.

<sup>96</sup> [https://simple.wikipedia.org/wiki/Make\\_America\\_Great\\_Again](https://simple.wikipedia.org/wiki/Make_America_Great_Again)

<sup>97</sup> <https://news.yahoo.com/jim-jordan-misses-mark-142959280.html>

(“Kari Lake will shine brightly for Arizona,” Senate Republican Conference Chair John Barrasso of Wyoming[.]) See footnote 79, 90 and 141.

<sup>98</sup> <https://www.youtube.com/watch?v=AlYptCa6RVU> See footnote 148 and

<https://www.opensecrets.org/members-of-congress/john-barrasso/contributors?cid=N00006236&cycle=CAREER> (“Top contributors ... contributor”)

<sup>99</sup> <https://thehill.com/homenews/coronavirus-report/497160-coronavirus-daily-update/> See footnote 78.

<sup>100</sup> <https://coronavirus.jhu.edu/region/us/wyoming>

<sup>101</sup> <https://coronavirus.jhu.edu/region/us/wyoming>

<sup>102</sup> <https://www.barrasso.senate.gov/public/index.cfm/biography>

(“[T]hird-ranking member in the Senate Republican leadership as Chairman of the Senate Republican Conference.”) See footnotes 90, 97 and 141.

<sup>103</sup> <https://www.youtube.com/watch?v=0Dh1JXalgnvM> (4:10 - 4:23 min. marks)

<sup>104</sup> <https://www.youtube.com/watch?v=gNWehP0EFbQ> (1:47-2:04 min. marks)

<sup>105</sup> <https://www.youtube.com/watch?v=8l8wnn8BZ6w> (2:13 min. mark)

[82] “Jim Jordan on Newsmax the eve of January 6th explaining his scheme to have Congress vote to reject Biden electors[.]”<sup>106</sup>

[83] “Jim Jordan talked about presidential pardons for members of Congress[.]”<sup>107</sup>

[84] “Jim Jordan struggles to answer big Jan. 6th question.”<sup>108</sup>

[85] Mr. Trump struggles for Ms. Lummis to become a senator immediately.<sup>109</sup>

[86] Immigrants<sup>110</sup> “poisoning the blood of our country.”<sup>111</sup> Mr. Trump.

[87] “All great cultures ... died out<sup>112</sup> from blood poisoning.” Mein Kempf.<sup>113</sup>

[88] “Obama, Trump Together for Correspondents' Dinner”<sup>114</sup>

[89] “[A]rmed with faith in ... God<sup>115</sup> and the impenetrable stupidity of the electorate ... ‘the reconstruction of the REICH’<sup>116</sup> can now begin.”<sup>117</sup>

[90] Vladimir Mikhailovich Gundyayev,<sup>118</sup> a former KGB agent, controls the Russian Orthodox Church

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<sup>106</sup> <https://www.meadastouch.com/news/clip-of-jim-jordan-scheming-to-reject-biden-electors-on-january-6th-goes-viral> (0:04 sec. mark)

<sup>107</sup> [Jan. 6 committee witness testifies that Jim Jordan talked about presidential pardons for members of Congress - cleveland.com](#)

<sup>108</sup> [Jim Jordan can't seem to keep January 6 story straight, Brianna Keilar rolls the tape](#)

<sup>109</sup> <https://lummisforwyoming.com/endorsements/> cf. <https://www.youtube.com/watch?v=Tam3WWL8aVU> (0:20 min. mark)

<sup>110</sup> <https://www.washingtonpost.com/politics/2021/08/10/facebook-covid-immigrants-ads/>. See footnotes 82 and 141.

<sup>111</sup> <https://www.youtube.com/watch?v=5gxUMfwvV0s>(1:57 min. mark) See footnote 159.

<sup>112</sup> <https://www.adl.org/resources/hate-symbol/you-will-not-replace-us>

(“Jews will not replace us[.]”). See footnotes 113, 115, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 197, 221, 235 and 238.

<sup>113</sup> <https://gutenberg.net.au/ebooks02/0200601.txt>

See footnotes 112, 115, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 197, 221, 235 and 238.

<sup>114</sup> <https://www.youtube.com/watch?v=HCKTzaIW-qyY> (0:18 - 1:58 min. marks)

<sup>115</sup> See footnotes 112, 113, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 197, 221, 235 and 238

<sup>116</sup> <https://en.wikipedia.org/wiki/Reich> (“the term “the Reich” refers to “Germany during the period of Nazi control from 1933 to 1945[.]”)

<sup>117</sup> <https://gutenberg.net.au/ebooks02/0200601.txt>

<sup>118</sup> [https://en.wikipedia.org/wiki/Patriarch\\_Kirill\\_of\\_Moscow](https://en.wikipedia.org/wiki/Patriarch_Kirill_of_Moscow) See footnotes 112, 113, 115, 119, 120, 121, 122, 123, 124, 125, 126, 127, 197, 221, 235 and 238.

from beneath his white hat.<sup>119</sup>

[91] “Trump Stands In Front of Church Holding Bible<sup>120</sup> After Threatening Military Action Against Protesters[.]”<sup>121</sup>

[92] “Meet the Pastors<sup>122</sup> Who Support Donald Trump<sup>123</sup> ... for espousing hate ... some pastors believe in[.]”<sup>124</sup>

[93] “Angels from Africa[.]” Ms. Paula White, Mr. Trump’s spiritual advisor.<sup>125</sup>

[94] “Truly, whoever is able to make you absurd is able to make you unjust.”<sup>126</sup> François de Voltaire.

[95] “In August 1556 a 24-year-old student from the Kingdom of Naples was boiled alive in a pot of oil, pitch and turpentine in Rome’s Piazza Navona. The student’s name was Pomponio Algeri. His crime was an error of belief.”<sup>127</sup>

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<sup>119</sup> <https://balkaninMEIN.KAMPF.Hitlersight.com/wp-content/uploads/2023/09/Kirill-main-scaled-e1694032326774.jpg> See footnotes 112, 113, 115, 118, 120, 121, 122, 123, 124, 125, 126, 127, 197, 221, 235 and 238.

<sup>120</sup> <https://www.youtube.com/watch?v=MEtXG5PQn35I> (1:27 min. mark) See footnotes 112, 113, 115, 118, 119, 121, 122, 123, 124, 125, 126, 127, 197, 221, 235 and 238. Cf. <https://www.mercurynews.com/2023/03/24/peter-thiel-kept-model-who-recently-died-as-romantic-partner-report-says/>.

<sup>121</sup> <https://www.youtube.com/watch?v=0oRQF68psdY> (0:06 - 0:16 min. marks) See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 124, 125, 126, 127, 197, 221, 235 and 238.

<sup>122</sup> <https://www.youtube.com/watch?v=OSIrOBGrUjw>

(“Judgment Is Executed on COVID-19: by Kenneth Copeland”) See footnotes 112, 113, 115, 118, 119, 120, 121, 123, 124, 125, 126, 127, 197, 221, 235 and 238.

<sup>123</sup> [https://en.wikipedia.org/wiki/Kenneth\\_Copeland#cite\\_text=Copeland%20has%20amassed%20significant%20wealth.net%20worth%20of%20%24750%20million](https://en.wikipedia.org/wiki/Kenneth_Copeland#cite_text=Copeland%20has%20amassed%20significant%20wealth.net%20worth%20of%20%24750%20million) (“Copeland pastor worth of \$750 million.”) See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 124, 125, 126, 127, 197, 221, 235 and 238.

<sup>124</sup> <https://abcnews.go.com/Politics/meet-pastors-support-donald-trump/story?id=38406350> See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 123, 125, 126, 127, 197, 221, 235 and 238.

<sup>125</sup> <https://www.youtube.com/watch?v=7DlRueGU1AU> (0:30 - 1:34 min. marks) See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 123, 124, 126, 127, 197, 221, 235 and 238.

<sup>126</sup> <https://www.oxfordreference.com/display/10.1093/acref/078091843750.001.0001.g000-gd5.00011218> See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 123, 124, 125, 127, 197, 221, 235 and 238. Cf. <https://www.independent.co.uk/news/world/americas/us-election-2020/donald-trump-jr-biden-bus-texas-kamala-harris-campaign-b1482882.html> (“Don Jr. ... ‘have some fun’ ... Biden vehicles ‘rammed by armed group[.]’”) (emphasis supplied)

<sup>127</sup> <https://www.historytoday.com/archive/feature/inquisition%E2%80%99s-secret-weapon> See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 123, 124, 125, 126, 197, 221, 235 and 238.

[96] “Nazis slaughtered 16,000 people by guillotine[.]”<sup>128</sup>

[97] “Hans and Sophie ... handing out flyers at the Ludwig Maximilian University of Munich ... sentenced to death ... executed by guillotine on the same day.”<sup>129</sup>

[98] “Trump kept ... Hitler's speeches by his bed[.]”<sup>130</sup>

[99] “Hitler did ... good things[.]” Mr. Trump.

[100] “Trump ... musing about televising executions using guillotines[.]”<sup>131</sup>

[101] “Do a coup to whoever we want[.]” Elon Musk<sup>132</sup>

[102] “Elon Musk wanted to tip off Trump to secret search warrant in Jan. 6 case - A newly unsealed legal filing reveals the Special Counsel successfully gained access to the ex-president's Twitter account earlier this year—but not without a fight from the company's new, right-wing owner Elon Musk.[.]”<sup>133</sup>

[103] Mr. Jordan struggles for Ms. Lummis to become a senator immediately.<sup>134</sup>

[104] “You can't allow the Constitution to transfer power ‘peacefully.’”<sup>135</sup> House Representative Ms. Greene.

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<sup>128</sup> <https://www.dailymail.co.uk/news/article-2538973/How-Nazis-slaughtered-16-000-people-guillotine-Found-Munich-cellar-death-machine-reveals-forgotten-horror.html>

<sup>129</sup> [https://www.youtube.com/watch?v=qbZx\\_44Px5Q](https://www.youtube.com/watch?v=qbZx_44Px5Q) (0:22 min. mark)

<sup>130</sup> <https://www.businessinsider.com/donald-trumps-ex-wife-once-said-he-kept-a-book-of-hitlers-speeches-by-his-bed-2015-8>

<sup>131</sup> [https://www.westernstandardnews/news/heads-could-roll-trump-allegedly-musing-about-televising-executions-using-guillotines/article\\_4397221e-ach4-11ed-b89c-33cab6728002.html](https://www.westernstandardnews/news/heads-could-roll-trump-allegedly-musing-about-televising-executions-using-guillotines/article_4397221e-ach4-11ed-b89c-33cab6728002.html) See [https://www.worldhistory.org/Reign\\_of\\_Terror/](https://www.worldhistory.org/Reign_of_Terror/) (“The Terror ... organized by ... twelve-man Committee of Public Safety, which exercised almost dictatorial control[.]”)

<sup>132</sup> [https://www.reddit.com/r/RATM/comments/k6h31n/evo\\_morales\\_reads\\_elons\\_tweet\\_do\\_a\\_coup\\_to/](https://www.reddit.com/r/RATM/comments/k6h31n/evo_morales_reads_elons_tweet_do_a_coup_to/)

<sup>133</sup> [https://www.reddit.com/r/RepublicanValues/comments/15n7uha/elon\\_musk\\_wanted\\_to\\_tip\\_off\\_trump\\_to\\_secret/](https://www.reddit.com/r/RepublicanValues/comments/15n7uha/elon_musk_wanted_to_tip_off_trump_to_secret/)

<sup>134</sup> [https://m.facebook.com/legionoflbp/photos/courtesy-of-mvs-officer-rep-cynthia-lummis-r-wy-thus-is-a-photo-of-the-new-leader-101503779508%400%?locale=ms\\_MY](https://m.facebook.com/legionoflbp/photos/courtesy-of-mvs-officer-rep-cynthia-lummis-r-wy-thus-is-a-photo-of-the-new-leader-101503779508%400%?locale=ms_MY)

<sup>135</sup> <https://docs.google.com/document/d/12evUii3nI3E3IyyXDrkVKHoqmkI9ZLM13K9hVzWl6lMs/edit> See footnotes 38, 54.

[105] “Republican lawmakers ... asked<sup>136</sup> then-President Donald Trump for pardons<sup>137</sup> for their roles<sup>138</sup> in the effort to overturn the 2020 election.<sup>139</sup> \* \* \* Reps. Mo Brooks<sup>140</sup> of Alabama, Matt Gaetz<sup>141</sup> of Florida, Andy Biggs<sup>142</sup> of Arizona, Louie Gohmert<sup>143</sup> of Texas, Scott Perry<sup>144</sup> of Pennsylvania and Marjorie Taylor Greene<sup>145</sup> of Georgia.”<sup>146</sup>

[106] “SBN<sup>147</sup> LIVE in Cheyenne, WY: Rep. Matt Gaetz at the Wyoming State Capitol 1/28/21[.]”<sup>148</sup>

[107] “We’d all seen the videos that [Mr. Gaetz] was showing on the House floor ... *girls*<sup>149</sup> he had slept with[.]”<sup>150</sup>

[108] “There are calls to burn down your home, Mitch; to smuggle guns into DC, and to storm the Capitol. I hope that sufficient security plans are in place, but I am concerned that the instigator—the President—is the one who commands the reinforcements the DC and Capitol police might require[.]”<sup>151</sup>  
Senator Mitt Romney warns Senator Mitch McConnell.

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<sup>136</sup> <https://www.youtube.com/watch?v=1.53VBJOg8LM>

<sup>137</sup> <https://www.vanityfair.com/news/2020/12/jared-kushner-lawyer-pardon-investigation> (0:23 sec. mark - “preemptive pardons[.]”)

<sup>138</sup> [https://www.justice.gov/archives/ncr/criminal-resource-manual-923-18-usc-271-conspiracy-fraud-us#text=The%20general%20conspiracy%20statute%2C%2018\(emphasis%20added\)](https://www.justice.gov/archives/ncr/criminal-resource-manual-923-18-usc-271-conspiracy-fraud-us#text=The%20general%20conspiracy%20statute%2C%2018(emphasis%20added))

<sup>139</sup> <https://usecode.house.gov/view.xhtml?path=/prelim@title18/part1/chapter115&edition=prelim>

<sup>140</sup> <https://www.cnn.com/2022/03/23/mo-brooks-says-trump-asked-him-to-rescind-election-remove-biden.html>

<sup>141</sup> <https://www.axios.com/2022/01/06/matt-gaetz-ian-6-capitol-riot>

<sup>142</sup> <https://theintercept.com/2021/01/11/capitol-plot-andv-biggs-paul-gosar/>

<sup>143</sup> <https://www.theguardian.com/us-news/2021/jun/09/texas-republican-louie-gohmert-climate-change>

(“Texas Republican asks: can we fix the moon’s orbit to fight climate change?”) See <https://demonstrations.wolfram.com/ApparentViolationsOfBellsTheorem/>

<sup>144</sup> <https://www.politico.com/news/2022/08/10/scott-perry-trump-fbi-investigation-0005090>. See

<https://www.cnn.com/2023/10/24/politics/mark-meadows/index.html> and footnote 180.

<sup>145</sup> <https://www.rollingstone.com/politics/politics-news/marjorie-taylor-greene-pushed-loeffler-2020-election-texts-1234615070/>

(“Leaked Texts Reveal Marjorie Taylor Greene’s Private Push to Overturn 2020 Election[.]”)

<sup>146</sup> <https://www.nbcnews.com/politics/congress/jan-6-panel-names-republican-lawmakers-sought-pardons-trump-rcna35090>

<sup>147</sup> <https://www.imdb.com/news/n64091872/>

(“Rep. Marjorie Taylor Greene Defends ... Drag[.]”)

<sup>148</sup> <https://www.youtube.com/watch?v=VIK13GIwJolU> (31:01 min. mark) \*See footnotes 58, 65, 121, 143 and 173.

<sup>149</sup> <https://en.wikipedia.org/wiki/Girl>

<sup>150</sup> [https://www.youtube.com/shorts/l\\_B8p7C8oI4](https://www.youtube.com/shorts/l_B8p7C8oI4)

<sup>151</sup> <https://thehill.com/homenews/senate/4202809-mcconnell-didnt-reply-to-romneys-text-warning-about-jan-6-book/>



[109] “On January 6th 2021, Alex Jones participated in the march on the United States Capitol alongside members of the terrorist group the Proud Boys, Oath Keepers and others.<sup>152</sup> According to statements made by Alex Jones,<sup>153</sup> the White House<sup>154</sup> told me three days before ‘we are going to have you lead to march’. While using a bullhorn, Alex Jones<sup>155</sup> told the crowd ‘this is the second American Revolution[.]’<sup>156</sup>

[110] “[A] mass of people ... who ... traveled to ... the Capitol at the Defendant's direction ... advanced on the building, including by violently attacking law enforcement officers \* \* \* Defendant ... watched events at the Capitol unfold on the television in the dining room ... receiving news ... that rioters had fed the building ... advisors urged ... Defendant to issue a calming message ... Defendant refused ... repeatedly remarking that the people at the Capitol were angry because the election had been stolen ... refused ... directing rioters to leave the Capitol[.] \* \* \* Defendant ... told the Minority Leader that the crowd at the Capitol was more upset about the election than the Minority Leader[.]”  
*United States of America v. Donald Trump*, Grand Jury Indictment: pp. 39-40.<sup>157</sup>

[111] “On the evening of January 6, the Defendant and Co-Conspirator 1 attempted to exploit the violence and chaos at the Capitol by calling lawmakers to convince them, based on knowingly false claims of election fraud, to delay the certification ... Defendant ... attempted to reach two United States Senators ... Co-Conspirator 1 placed calls to five United States Senators and one United States Representative ... Co-Conspirator 6 attempted to confirm phone numbers for six United States Senators ... to enlist in

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<sup>152</sup> <https://www.courthousenews.com/georgia-prosecutors-seek-testimony-from-infowars-host-alex-jones-in-election-interference-trial/>

<sup>153</sup> [https://en.wikipedia.org/wiki/Alex\\_Jones](https://en.wikipedia.org/wiki/Alex_Jones)

<sup>154</sup> <https://www.youtube.com/watch?v=4Y7rwhcP90o>

<sup>155</sup> <https://www.courthousenews.com/georgia-prosecutors-seek-testimony-from-infowars-host-alex-jones-in-election-interference-trial/>

<sup>156</sup> <https://www.youtube.com/watch?v=1Ts5NW910AM> (8:30 - 9:05 min. marks) (*The State of Georgia v. Donald John Trump, et al.*)

<sup>157</sup> [https://www.justice.gov/storage/US\\_v\\_Tump\\_23\\_cr\\_257.pdf](https://www.justice.gov/storage/US_v_Tump_23_cr_257.pdf)

further delaying the certification ... Co-Conspirator 1 left a voicemail ... that said, "We need you, our Republican friends, to try to just slow it down so we can get these legislatures to get more information to you. And I know they're reconvening at eight tonight but the only strategy we can follow is to object to numerous states and raise issues so that we get ourselves into tomorrow—ideally until the end of tomorrow."<sup>158</sup>

[112] CoConspirator 1 repeated knowingly false allegations of election fraud, including that the vote counts certified by the states to Congress were incorrect and that the governors who had certified knew they were incorrect; that 'illegal immigrants'<sup>159</sup> had voted in substantial numbers in Arizona; and that 'Georgia gave you a number in which 65,000 people who were underage voted.'" ... Co-Conspirator 1 ... claimed that the Vice President's actions had been surprising and asked the Senator to "object to every state and kind of spread this out a little bit like a filibuster[.]"<sup>160</sup>

[113] "[W]hile Co-Conspirator 1 was calling United States Senators on behalf of the Defendant, the White House Counsel called the Defendant to ask him to withdraw any objections and allow the certification. The Defendant refused."<sup>161</sup>

[114] "Co-Conspirator 2 emailed the Vice President's Counsel ... "I implore you to consider one more ... violation [of the ECA] and adjourn \* \* \* At 3:41 a.m. on January 7, as President of the Senate, the Vice President announced the certified results ... in favor of Biden."

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<sup>158</sup> [https://www.justice.gov/storage/US\\_v\\_Trump\\_23\\_cr\\_257.pdf](https://www.justice.gov/storage/US_v_Trump_23_cr_257.pdf), p. 41.

<sup>159</sup> <https://www.washingtonpost.com/politics/2021/08/10/facebook-covid-immigrants-ads/>. See footnote 111.

<sup>160</sup> [https://www.justice.gov/storage/US\\_v\\_Trump\\_23\\_cr\\_257.pdf](https://www.justice.gov/storage/US_v_Trump_23_cr_257.pdf), p. 42.

<sup>161</sup> [https://www.justice.gov/storage/US\\_v\\_Trump\\_23\\_cr\\_257.pdf](https://www.justice.gov/storage/US_v_Trump_23_cr_257.pdf), p. 43.

[115] “Trump’s hostility to election security preparedness[.]”<sup>162</sup>

[116] “Grassley<sup>163</sup> suggests he may preside over Senate debate on Electoral College votes”<sup>164</sup>

[117] “Ron Johnson tried to hand fake elector info to Mike Pence on Jan. 6[.]”<sup>165</sup>

[118] “Pence Refusing to Get in Secret Service Car on Jan. 6 ‘Chilling’[.]”<sup>166</sup>

[119] “The Secret Service deleted text messages from Jan. 5 and 6, 2021, after an internal watchdog requested them[.]”<sup>167</sup>

[120] “Joe Biden ... to receive Secret Service protection with a new team ... replacing ... agents amid concerns that they may be politically allied with Donald Trump.”<sup>168</sup>

[121] On 20 November 2020, Pennsylvania certified its presidential electoral votes for President-elect President Biden.<sup>169</sup>

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<sup>162</sup> [https://iowacapitaldispatch.com/2021/01/CCCase 1-23-cr-00257-TSC Document 1 Filed 08/01/23 Page 1 of 45&Case 1-23-cr-00257-TSC Document 1 Filed 08/01/23 Page 1 of 45&se 1-23-cr-00257-TSC Document 1 Filed 08/01/23 Page 1 of 45](https://iowacapitaldispatch.com/2021/01/CCCase%201-23-cr-00257-TSC%20Document%201%20Filed%2008/01/23%20Page%201%20of%2045&Case%201-23-cr-00257-TSC%20Document%201%20Filed%2008/01/23%20Page%201%20of%2045&se%201-23-cr-00257-TSC%20Document%201%20Filed%2008/01/23%20Page%201%20of%2045)

<sup>163</sup> <https://www.newsweek.com/republican-says-it-doesnt-matter-if-joe-biden-accusations-are-accurate-1803897> (“Doesn’t Matter If Joe Biden Accusations Are ‘Accurate’”) Cf. <https://www.youtube.com/watch?v=hfkZWalTqIk> (0:47 min. mark “No you’re not[.]”)

<sup>164</sup> <https://iowacapitaldispatch.com/2021/01/05/grassley-suggests-he-may-preside-over-senate-debate-on-electoral-college-votes/>

<sup>165</sup> <https://www.politico.com/news/2022/06/21/jan-6-panel-trump-overturn-2020-election-00040816>

<sup>166</sup> <https://www.newsweek.com/pence-refusing-get-secret-service-car-jan-6-chilling-raskin-1700341>

<sup>167</sup> <https://www.washingtonpost.com/news/energy-environment/wp/2021/01/05/secret-service-deleted-text-messages-from-jan-5-and-6-2021-after-watchdog-requested-them/>

<sup>168</sup> <https://www.theguardian.com/us-news/2020/dec/31/joe-biden-secret-service-team-trump-loyalty>

<sup>169</sup> [https://en.wikipedia.org/wiki/2021\\_United\\_States\\_Electoral\\_College\\_vote\\_count#:~:text=Twelve%20additional%20Republican%20Senators%20and%20Senators%20Delect%20\(Ted%20Cruz%2C%20Ron%20Johnson%2C%20James%20Lankford%2C%20Steve%20Daines%2C%20John%20Kennedy%2C%20Marsha%20Blackburn%2C%20Mike%20Braun%2C%20Cynthia%20Lummis%2C%20Roger%20Marshall%2C%20Bill%20Hagerty%2C%20Tommy%20Tuberville%2C%20and%20Kelly%20oeffler%20eventually%20announced%20that%20they%20would%20join%20Hawley%27%20challenge](https://en.wikipedia.org/wiki/2021_United_States_Electoral_College_vote_count#:~:text=Twelve%20additional%20Republican%20Senators%20and%20Senators%20Delect%20(Ted%20Cruz%2C%20Ron%20Johnson%2C%20James%20Lankford%2C%20Steve%20Daines%2C%20John%20Kennedy%2C%20Marsha%20Blackburn%2C%20Mike%20Braun%2C%20Cynthia%20Lummis%2C%20Roger%20Marshall%2C%20Bill%20Hagerty%2C%20Tommy%20Tuberville%2C%20and%20Kelly%20oeffler%20eventually%20announced%20that%20they%20would%20join%20Hawley%27%20challenge)

[122] “The red wave coming is going to be like elevator doors opening up in The Shining<sup>170</sup>[.]” Joe Rogan<sup>171</sup>

[123] Joe Rogan and Elon Musk discussing the upcoming 2020 election[.]”<sup>172</sup>

[124] “Elon and Rogan could pull it off with the help of Peter Thiel[.]”<sup>173</sup>

[125] “Thiel, Russia, Saudi Arabia all conspired in Musk's twitter takeover.”<sup>174</sup>

[126] “Saudi, UAE investors plan to invest in SpaceX[.]”<sup>175</sup>

[127] Ms. Lummis refused to count those certified electoral votes from Pennsylvania because it determined the next president-elect of the United States of America.<sup>176</sup>

[128] “The allegations of fraud during this election ... left millions of Americans concerned that their votes don't count ... I will seek another forum to continue that discussion.”<sup>177</sup> Ms. Lummis.<sup>178</sup>

[129] “Trump Fires Security Chief Who Said 2020 Vote Was 'Most Secure' in US History[.]”<sup>179</sup>

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<sup>170</sup> <https://www.youtube.com/watch?v=ZCyVTq9zZGo> (0:10 - 0:20 min. marks). See [https://en.wikipedia.org/wiki/Post\\_hoc\\_ergo\\_propter\\_hoc](https://en.wikipedia.org/wiki/Post_hoc_ergo_propter_hoc) ('after this, therefore because of this' ... an informal fallacy.' (emphasis supplied))

<sup>171</sup> <https://www.youtube.com/watch?v=zL61IfuQXmMs> (0:01 - 0:03 min. marks)

<sup>172</sup> <https://www.youtube.com/watch?v=RcYjXbSjRN8> (1:25:24 min. mark)

<sup>173</sup> <https://www.youtube.com/shorts/NSjVmZmNa1E>

<sup>174</sup> <https://twitter.com/MichaelLMann/status/1634931469499117570>

<sup>175</sup> <https://www.reuters.com/business/aerospace-defense/saudi-uae-investors-plan-invest-spacex-information-2023-03-22/> See footnotes 28, 29.

<sup>176</sup> <https://www.youtube.com/watch?v=dplXR03oMYc> (11:48 - 12:04 min. marks)

<sup>177</sup> <https://www.lummis.senate.gov/press-releases/statement-from-senator-cynthia-lummis-on-electoral-college-certification-vote/>

<sup>178</sup> <https://www.youtube.com/watch?v=4vuW6tQ0218>

<sup>179</sup> <https://www.voanews.com/a/2020-usa-votes-trump-fires-security-chief-who-said-2020-vote-was-most-secure-us-history/6198503.html>

[130] “The Trump campaign paid ... \$1.5 million to investigate claims of sweeping fraud in Georgia ... Neither firm substantiated ... fraud ... Trump’s campaign buried their reports[.]”<sup>180</sup>

[131] “Wyoming’s 1st female senator-elect says Trump shouldn’t concede despite vote count[.]”<sup>181</sup>

[132] “Arizona AG faces investigations by State Bar and Gov’s Office for burying election fraud report”<sup>182</sup>

[133] “[W]ire fraud ... require[s] the use of an interstate telephone call or electronic communication made in furtherance of the scheme.”<sup>183</sup>

[134] “Trump’s campaign manager<sup>184</sup> ... Bill<sup>185</sup> Stepien<sup>186</sup> ... leading Harriet Hageman’s campaign<sup>187</sup> ... Donald Trump Jr.<sup>188</sup> ... chairing ... super PAC.”<sup>189</sup>

[135] “Peter Thiel:<sup>190</sup> Trump ... all hands on deck.”<sup>191</sup>

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<sup>180</sup> <https://www.aic.com/politics/firms-trump-hired-to-investigate-fraud-claims-could-help-fulton-da/3OP26T735FAGBGpXLZ7B5KE72E/> See footnote 144. See <https://www.youtube.com/watch?v=X9uk9lco00w> (0:46 - 0:47 min. marks)

<sup>181</sup> <https://www.youtube.com/watch?v=0RUre4xCS50>

<sup>182</sup> <https://www.dailykos.com/stories/2023/2/25/2154956-Arizona-AG-faces-investigations-by-State-Bar-and-Gov-s-Office-for-burying-election-fraud-report>

<sup>183</sup> <https://www.justice.gov/archives/jm/criminal-resource-manual-941-18-use-1343-elements-wire-fraud> See footnotes 82 and 90

<sup>184</sup> <https://www.youtube.com/watch?v=6n-SgCndBWE> (1:15 min. mark)

<sup>185</sup> <https://www.northerner.com/story/news/columnists/charles-stil/2020/07/16/bridgegate-triggered-stepien-fall-now-hes-running-trumps-campaign-5450204002>

<sup>186</sup> <https://www.cnn.com/videos/politics/2022/06/13/bill-stepien-trump-campaign-manager-team-normal-2022-january-6-hearings-vpx.cnn>

<sup>187</sup> <https://www.youtube.com/watch?v=mWCAR5Lzseo> (0:12 - 0:34 min. marks) Cf. <https://www.youtube.com/watch?v=86-G117sPi4> (1:29 min. mark)

<sup>188</sup> <https://www.bbc.com/news/world-us-canada-45079377>

<sup>189</sup> <https://www.politico.com/news/2021/09/10/trump-aides-chenev-challenger-511083> (0:47 - 0:53 min. marks)

(“Trump’s campaign manager ... Harriet Hageman’s campaign[.]”)

<sup>190</sup> [https://en.wikipedia.org/wiki/Peter\\_Thiel](https://en.wikipedia.org/wiki/Peter_Thiel)

<sup>191</sup> <https://www.cnbc.com/2016/11/09/peter-thiel-trump-has-awesomely-difficult-task-we-need-all-hands-on-deck.html>

[136] “Peter Thiel<sup>192</sup> ... influencing elections<sup>193</sup> ... favor ... Trump-aligned candidates[.]”<sup>194</sup>

[137] “We’re not a democracy[.]” Wyoming House Representative Hageman.<sup>195</sup>

[138] “‘America ... Not a Democracy’ ... Dangerous—And Wrong \* \* \* Enabling sustained minority rule at the national level is not a feature of our constitutional design, but a perversion of it.”<sup>196</sup>

[139] “Thiel’s ... Fund<sup>197</sup> Withdrew Millions From Silicon Valley Bank[.]”<sup>198</sup>

[140] “In the aftermath of the collapse, federal regulators promised to make all depositors whole, even for those funds that weren't protected by the Federal Deposit Insurance Corporation (FDIC).”<sup>199</sup>

[141] “Thiel’s Private Piggy Bank[.]”<sup>200</sup>

[142] “Stunned that one of my opponents who is a member of the Wyoming Bar ... who has sworn an oath ... to the Constitution would be in a position that somehow that what happened on January 6th was justified or that ... people have the right to ignore the rulings of the courts ... I’d be interested to know if my opponent, Ms. Hageman, is willing to say here tonight that the election wasn’t stolen. She knows it

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<sup>192</sup> [https://en.wikipedia.org/wiki/Palantir\\_Technologies](https://en.wikipedia.org/wiki/Palantir_Technologies) (“Palantir ... Peter Thiel ... Lord of the Rings)

<sup>193</sup> <https://www.youtube.com/watch?v=VMCh9pLZofQ> (0:24 sec. mark)

<sup>194</sup> <https://www.youtube.com/watch?v=MqlsPYcUFtM>

<sup>195</sup> <https://www.youtube.com/watch?v=2eLqMCOVBhic> (3:44, 21:15 and 48:02 min. marks)

<sup>196</sup> <https://www.theatlantic.com/ideas/archive/2020/11/ves-constitution-democracy/616949/>

<sup>197</sup> <https://www.gawker.com/5831434/a-facebook-billionaires-big-dumb-failure> Cf. (“[E]nriched himself while costing small investors their life savings[.]”) See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 125, 204, 221 and 235. Cf. <https://www.youtube.com/watch?v=MEaG3PQn35I> and [https://en.wikipedia.org/wiki/Jesus\\_and\\_the\\_rich\\_young\\_man](https://en.wikipedia.org/wiki/Jesus_and_the_rich_young_man):-: text=Jesus%20looked%20at%20him%20and%20entered%20the%20kingdom%20of%20heaven%20%22 (“Go, sell all that thou hast and divide it to the poor, and come, follow me.” But the rich man began to scratch his head ... it pleased him not.”)

<sup>198</sup> <https://www.bloomber.com/news/articles/2023-03-11/thiel-s-founders-fund-withdrew-millions-from-silicon-valley-bank>

<sup>199</sup> [https://www.investopedia.com/what-happened-to-silicon-valley-bank-7368676#:~:text=Silicon%20Valley%20Bank%20\(SVB\)%E2%80%94regulators%20on%20March%2010%202023.&text=In%20the%20aftermath%20of%20the%20Deposit%20Insurance%20Corporation%20\(FDIC\)200](https://www.investopedia.com/what-happened-to-silicon-valley-bank-7368676#:~:text=Silicon%20Valley%20Bank%20(SVB)%E2%80%94regulators%20on%20March%2010%202023.&text=In%20the%20aftermath%20of%20the%20Deposit%20Insurance%20Corporation%20(FDIC)200)

<sup>200</sup> <https://www.youtube.com/watch?v=enDPzDajq>

wasn't stolen."<sup>201</sup> Liz Cheney.

[143] "Special counsel<sup>202</sup> election probe ... fundraising[.]"<sup>203</sup>

[144] "The RICO statute expressly states that it is unlawful for any person to conspire to violate any of the subsections of 18 U.S.C.A. § 1962. The government need not prove that the defendant agreed with every other conspirator, knew all of the other conspirators, or had full knowledge of all the details of the conspiracy."<sup>204</sup>

[145] "Fulton County DA seeking information from 2 firms that Trump hired to look at 2020 voter fraud claims – and debunked them."<sup>205</sup>

[146] The 116th United States Congress, scattered and bloodied by Mr. Trump's terrorists, reassembled to fulfill *their* oaths to count the electoral votes commanded by the Constitution,<sup>206</sup> Congress certified the President-elect.<sup>207</sup>

[147] The Constitution survived this conspiracy<sup>208</sup> to topple it,<sup>209</sup> for now.<sup>210</sup>

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<sup>201</sup> <https://www.youtube.com/watch?v=JGD1HMK6oSQ> (0:01 - 1:4 min. marks) cf. <https://www.youtube.com/watch?v=86-C117sPt4> (04:16 min. mark)

<sup>202</sup> [https://en.wikipedia.org/wiki/Jack\\_Smith\\_\(lawyer\)](https://en.wikipedia.org/wiki/Jack_Smith_(lawyer))

<sup>203</sup> <https://www.cnn.com/2023/09/05/politics/special-counsel-election-probe-continues-fundraising-voting-equipment-breaches-sidney-powell/index.html>

<sup>204</sup> <https://www.justice.gov/archives/mc/criminal-resource-manual-10/rico-charges#:~:text=The%20RICO%20statute%20expressly%20states,the%20details%20of%20the%20conspiracy>

<sup>205</sup> <https://www.cnn.com/2023/06/02/politics/fulton-county-trump-georgia-election-probe/index.html>

<sup>206</sup> <https://www.youtube.com/shorts/Z1mBlpbV11W1> See footnotes 8, 100, 102, 106, 109, 110, 113, 115, 118, 119, 120, 221, 122, 125, 235 and 262.

<sup>207</sup> <https://www.youtube.com/watch?v=cHEApCpnmwc>. See <https://www.gutenberg.org/files/19942/19942-h/19942-h.htm> ("All that is very well," answered Candide, "but let us cultivate our garden.")

<sup>208</sup> <https://www.youtube.com/watch?v=IAo6QDBiWXA> (0:39-8:50 min. marks) See footnote 146.

<sup>209</sup> <https://www.youtube.com/watch?v=BxGlVnJqU> (1:30 min. mark)

<sup>210</sup> <https://www.youtube.com/watch?v=11s5NW910AM>

[148] “In 2023, four criminal indictments were filed against Donald Trump[.]”<sup>211</sup>

[149] “Trump claims ... his Presidential oath ... not an oath to support the Constitution.”<sup>212</sup>

[150] “‘Unfit for any office’: Cheney on Trump[.]”<sup>213</sup>

[151] “History has taught us that when terrorists don’t pay a price for their terror ... they cause more chaos and death, and more destruction ... they keep going and the costs to America ... keep rising.” (3:33 - 3:48 min. marks)

[152] “Norma Anderson, et al. v. Jena Griswold in her official capacity as Colorado Secretary of State, and Donald Trump[.]”<sup>214</sup>

[153] “CREW files amicus supporting adjudication of Section 3 of the 14th Amendment in Minnesota Supreme Court[.]”<sup>215</sup>

[154] “More states are expected to face similar legal challenges. ... I’m joined now by the secretary of state of Colorado, Jena Griswold. She’s also chair of the Democratic Association of Secretaries of State.”<sup>216</sup>

[155] “When I exited that train and met with Zelinsky, President Zelinsky, I didn’t feel alone ... I was

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<sup>211</sup> [https://en.wikipedia.org/wiki/Indictments\\_against\\_Donald\\_Trump#:~:text=An%20August%202023%20federal%20indictment,anf%20corruptly%20obstructing%20anf%20official](https://en.wikipedia.org/wiki/Indictments_against_Donald_Trump#:~:text=An%20August%202023%20federal%20indictment,anf%20corruptly%20obstructing%20anf%20official)

<sup>212</sup> <https://www.youtube.com/watch?v=O48VcWFOCI0>. See <https://twitter.com/RexHoppe/status/1717023141430509392?s=20> (0:04 min. mark)

<sup>213</sup> <https://www.youtube.com/watch?v=Ylvbgmd75nI> Liz Cheney (11:20 min. mark)

<sup>214</sup> <https://www.youtube.com/watch?v=VUOdM0dufy> (4:23 min. mark)

<sup>215</sup> <https://www.citizenforethics.org/legal-action/legal-complaints/crew-files-amicus-supporting-adjudication-of-section-3-of-the-14th-amendment-in-minnesota-supreme-court/>

<sup>216</sup> <https://www.pbs.org/newshour/show/colorados-secretary-of-state-discusses-effort-to-keep-trump-off-the-primary-ballot>

(“[V]oters have asked judges to block state officials from putting former President Donald Trump’s name on the primary ballot. \* \* \* More states are expected to face similar legal challenges.”) See footnote 151.



bringing with me the idea of America, the promise of America<sup>217</sup> ... freedom, independence and self-determination.”<sup>218</sup>

[156] “At the heart of liberty is the right to define one’s own concept of existence, of meaning, of the universe, and of the mystery of human life. Beliefs about these matters could not define the attributes of personhood were they formed under compulsion of the State.” *Lawrence v. Texas*, 539 US 558, 574(2003).

[157] “We are Groot[.]”<sup>219</sup>

158] *Norma Anderson, et al. v. Jena Griswold, in her official capacity as Colorado Secretary of State, and Donald J. Trump, et al.* \* \* \* “For all the reasons stated above, the Court DENIES Donald J. Trump’s Motion to Dismiss[.]”<sup>220</sup>

### Summary of Argument

Section 3 of the Fourteenth Amendment bars from holding office those who swore the oath to support and defend the Constitution before adhering to its enemies by giving them aid and comfort.

Mr. Trump and Ms. Lummis swore the oath of elected officials to support and defend the Constitution of the United States of America.

Section 3 of the Fourteenth Amendment holds accountable and stops from ever again holding

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<sup>217</sup> <https://www.govinfo.gov/content/pkg/GPO-CONAN-2022/pdf/GPO-CONAN-2022.pdf>

<sup>218</sup> <https://www.youtube.com/watch?v=w-lHtYpMfKA> (13:34 - 13:38 min. marks)

<sup>219</sup> <https://www.youtube.com/watch?v=VUQdM0dufYU> (4:23 min. mark)

<sup>220</sup>

[https://www.courts.state.co.us/userfiles/filhttps://www.youtube.com/watch?v=VUQdM0dufYU/Court\\_Probation/02nd\\_Judicial\\_District/Denver\\_District\\_Court/Cases%20of%20Interest/10\\_20\\_2023%20Omnibus%20Ruling%20on%20Pending%20Dispositive%20Motions.pdf](https://www.courts.state.co.us/userfiles/filhttps://www.youtube.com/watch?v=VUQdM0dufYU/Court_Probation/02nd_Judicial_District/Denver_District_Court/Cases%20of%20Interest/10_20_2023%20Omnibus%20Ruling%20on%20Pending%20Dispositive%20Motions.pdf)

office those such as Mr. Trump or Ms. Lummis.

## Argument

Section 3 of the Fourteenth Amendment bars from holding office those who swore the oath to support and defend the Constitution before adhering to its enemies by giving them aid and comfort.<sup>221</sup>

“No person shall be a Senator or Representative in Congress, or elector of President and Vice-President, or hold any office, civil or military, under the United States, or under any State, who, having previously taken an oath, as a member of Congress, or as an officer of the United States, or as a member of any State legislature, or as an executive or judicial officer of any State, to support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same, or given aid or comfort to the enemies thereof.”

Mr. Trump and Ms. Lummis swore the oath of elected officials to support and defend America’s Constitution. Mr. Trump swore to support and defend it before becoming President. Ms. Lummis swore to support and defend it against all enemies - before becoming a Wyoming attorney<sup>222</sup> and, again, before becoming a United States Senator.<sup>223</sup>

Their oaths meant nothing to the Constitution or their gods.<sup>224</sup> Mr. Trump disqualified himself from appearing on Wyoming’s ballot when he refused to defend the Constitution’s transfer of presidential

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<sup>221</sup> <https://www.youtube.com/watch?v=v7GIWtX8tUs> See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 197, 235 and 238.

<sup>222</sup> [https://en.wikipedia.org/wiki/Post-election\\_lawsuits\\_related\\_to\\_the\\_2020\\_U.S.\\_presidential\\_election](https://en.wikipedia.org/wiki/Post-election_lawsuits_related_to_the_2020_U.S._presidential_election) See [https://en.wikipedia.org/wiki/Post-election\\_lawsuits\\_related\\_to\\_the\\_2020\\_U.S.\\_presidential\\_election](https://en.wikipedia.org/wiki/Post-election_lawsuits_related_to_the_2020_U.S._presidential_election)

<sup>223</sup> <https://www.brookings.edu/articles/trumps-judicial-campaign-to-upend-the-2020-election-a-failure-but-not-a-wipe-out/> (Mr. Trump lost 61 lawsuits challenging his 2020 election loss.)

<sup>224</sup> See footnotes 8, 100, 102, 106, 109, 110, 113, 115, 118, 119, 120, 122, 125, 204, 235 and 262.

power under Article II, Section 1, adhering to its enemies. Ms. Lummis disqualified herself from appearing on Wyoming's ballot when she refused to count Pennsylvania's electoral ballots to the electoral count required by Article II, Section 1, adhering to its enemies.

### Mr. Trump

1] Mr. Trump swore the oath of elected officials to support and defend our Constitution.<sup>225</sup>

2] Mr. Trump "sat in the White House, refusing to tell [his] rioters to go home, while watching the assault on our republic unfold live on television."<sup>226</sup>

3] Mr. Trump "sat in the dining room off the Oval Office watching the violent riot at the Capitol on television." Final Report of the Select Committee to Investigate the January 6th Attack on the United States Capitol.<sup>227</sup>

4] Mr. "Trump watched the violence on television from a dining room adjacent to the Oval Office, calling Senators to urge them to help him delay the electoral count[.]"<sup>228</sup>

5] Mr. "Trump walked through the corridor from the Oval Office into the

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<sup>225</sup> <https://www.youtube.com/watch?v=v7GIWtX8us>

<sup>226</sup> <https://www.govinfo.gov/content/pkg/GPO-J6-REPORT/pdf/GPO-J6-REPORT.pdf>

<sup>227</sup> <https://www.govinfo.gov/content/pkg/GPO-J6-REPORT/pdf/GPO-J6-REPORT.pdf>

<sup>228</sup> <https://www.govinfo.gov/content/pkg/GPO-J6-REPORT/pdf/GPO-J6-REPORT.pdf>

Presidential Dining Room and sat down at the table with the television remote and a Diet Coke close at hand ... For the rest of the afternoon—as his country faced an hours-long attack—he hunkered down in or around the dining room, watching television.” Final Report of the Select Committee to Investigate the January 6th Attack on the United States Capitol.

Ms. Lummis

1] Ms. Lummis swore the oath of elected officials to support and defend our Constitution.

2] “The President of the Senate shall, in the Presence of the Senate and House of Representatives, open all the Certificates, and the **Votes shall then be counted.**” United States Constitution, Article 2 Section 1 Clause 3. (emphasis supplied).

2] Ms. Lummis refused to count Pennsylvania’s electoral votes in 2020<sup>229</sup> and even voted to acquit Mr. Trump of his second impeachment for conspiring to overthrow the Constitution.

3] “Wyoming’s 1st female senator-elect says Trump shouldn’t concede despite vote count[.]”<sup>230</sup>

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<sup>229</sup> <https://projects.fivethirtyeight.com/biden-congress-votes/cynthia-m-lummis/>

<sup>230</sup> <https://www.youtube.com/watch?v=0RUre4xCS50>

4] “Wyoming Delegation Blasts Justice Department Over Trump’s Jan. 6 Indictment[.]”<sup>231</sup>

Mr. Trump refused to defend its presidential power transfer. Ms. Lummis refused to count its electoral votes to determine the next President of the United States of America. Section 3 of the Fourteenth Amendment bars Donald Trump and Cynthia Lummis from appearing on Wyoming ballots, unless Congress removes such disability by a vote of two-thirds of each House.

“Where the language is plain and admits of no more than one meaning the duty of interpretation does not arise and the rules which are to aid doubtful meanings need no discussion.” *Caminetti v. United States*, 242 US 470, 485 (1917). “If any ... construction would render the clause inoperative, that is an additional reason for ... adhering to their obvious meaning.” *Marbury v. Madison*, 5 US 13, 175 (1803).<sup>232</sup>

“It has been said ... more important that an issue ... be settled than that it be settled right[.] But when it comes to the interpretation of the Constitution—the ‘great charter of our liberties ... we place a high value on having the matter settled right.’” *Dobbs v. Jackson Women’s Health Organization*, 597 U.S. \_\_\_, 142 S. Ct. 2228, 2262 (2022).

Section 3 of the 14th Amendment ‘settles right’ when its plain and ordinary words are given

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<sup>231</sup> [https://www.justice.gov/storage/US\\_v\\_Trump\\_23\\_cr\\_257.pdf](https://www.justice.gov/storage/US_v_Trump_23_cr_257.pdf)

<sup>232</sup> <https://www.smithsonianmag.com/smart-news/nearly-2000-black-americans-were-lynched-during-reconstruction-180975120/>

their meaning. “Nearly 2,000 Black Americans<sup>233</sup> Were Lynched<sup>234</sup> During Reconstruction.”<sup>235</sup>

“[L]ynching and torture of blacks<sup>236</sup> in the Jim Crow South<sup>237</sup> ... were religious rituals.”<sup>238</sup>

“Lynching postcards[.]”<sup>239</sup>

“[I]n every country<sup>240</sup> and in every age,<sup>241</sup> the priest<sup>242</sup> has been hostile to liberty<sup>243</sup> ... always<sup>244</sup> in alliance with the Despot<sup>245</sup> abetting his abuses<sup>246</sup> in return for protection to his own.”

President Thomas Jefferson.<sup>247</sup>

“Ku Klux Klan<sup>248</sup> ... long history of violence<sup>249</sup> ... Black Americans<sup>250</sup> ... Jewish<sup>251</sup> people, persons who have immigrated<sup>252</sup> to the United States ... the LGBTQ<sup>253</sup> community.” Ku Klux Klan | Southern Poverty Law Center.<sup>254</sup>

<sup>233</sup> <https://lynchingintexas.org/bernstein#:~:text=On%20May%202015%2C%201916%2C%20Jesse.%2D15%2C000%20screaming%2C%20cheering%20spectators>

<sup>234</sup> [https://en.wikipedia.org/wiki/List\\_of\\_lynching\\_victims\\_in\\_the\\_United\\_States](https://en.wikipedia.org/wiki/List_of_lynching_victims_in_the_United_States)

<sup>235</sup> <https://www.smithsonianmag.com/smart-news/nearly-2000-black-americans-were-lynched-during-reconstruction-180975120/> See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 197, 221, and 238.

<sup>236</sup> <https://www.youtube.com/watch?v=NUBh9GqFU3A>

<sup>237</sup> <https://www.tulsaohistory.org/exhibit/1921-tulsa-race-massacre/> (“Designating it a riot prevented insurance companies from having to pay benefits to the people of Greenwood whose homes and businesses were destroyed.”)

<sup>238</sup> <https://slate.com/news-and-politics/2015/02/jim-crow-souths-lynching-of-blacks-and-christianity-the-terror-inflicted-by-whites-was-considered-a-religious-ritual.html> See footnotes 112, 113, 115, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 197, 221 and 235.

<sup>239</sup> [https://en.wikipedia.org/wiki/Lynching\\_postcard#:~:text=Often%20%20lynching%20postcard%20would%20service%20was%20banned%20m%201908](https://en.wikipedia.org/wiki/Lynching_postcard#:~:text=Often%20%20lynching%20postcard%20would%20service%20was%20banned%20m%201908)

<sup>240</sup> <https://www.nationofchange.org/2022/07/07/opus-dei-supreme-indecency-extreme-deceit/>

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<sup>242</sup> <https://www.cambridge.org/us/universitypress/subjects/literature/european-literature/hammer-witches-complete-translation-malleus-maleficarum?format=PB&isbn=9780521747875#:~:text=The%20Malleus%20Maleficarum%2C%20first%20published%20modern%20law%2C%20religion%20and%20society>

<sup>243</sup> [https://en.wikipedia.org/wiki/Spanish\\_Inquisition](https://en.wikipedia.org/wiki/Spanish_Inquisition) See footnotes 8, 100, 102, 105, 106, 107, 109, 110, 204 and 218.

<sup>244</sup> <https://www.wsws.org/en/articles/2000/02/brun-f16.html>

<sup>245</sup> [https://penelope.uchicago.edu/~grout/encyclopaedia\\_romana/greece/paganism/hypatia.html](https://penelope.uchicago.edu/~grout/encyclopaedia_romana/greece/paganism/hypatia.html)

<sup>246</sup> <https://medium.com/exploring-history/johannes-keplers-mother-charged-with-witchcraft-fa06335d14f8>

<sup>247</sup>

<sup>248</sup> [https://en.wikipedia.org/wiki/Slave\\_breeding\\_in\\_the\\_United\\_States#:~:text=The%20function%20of%20such%20breeding%20and%20the%20Maryland%20Eastern%2DShore](https://en.wikipedia.org/wiki/Slave_breeding_in_the_United_States#:~:text=The%20function%20of%20such%20breeding%20and%20the%20Maryland%20Eastern%2DShore)

<sup>249</sup> [https://en.wikipedia.org/wiki/Thomas\\_Jefferson](https://en.wikipedia.org/wiki/Thomas_Jefferson)

<sup>250</sup> <https://www.theatlantic.com/politics/archive/2016/12/second-klan/509468/> (“The Rise and Fall of the Second Ku Klux Klan”)

<sup>251</sup> <https://www.umass.edu/legal/Hilbink/250/Garland.pdf> (“[T]he frequency with which lynch-victims were castrated, the hanging display of their nude bodies, and the exuberant sadism of much crowd behaviour ... suggest ... sexual impulses[.]”)

<sup>252</sup> [https://en.wikipedia.org/wiki/Lynching\\_of\\_Laura\\_and\\_L.\\_D.\\_Nelson](https://en.wikipedia.org/wiki/Lynching_of_Laura_and_L._D._Nelson) See [https://en.wikipedia.org/wiki/Coltax\\_massacre](https://en.wikipedia.org/wiki/Coltax_massacre)

<sup>253</sup> <https://www.youtube.com/watch?v=Yy0rw-UdJwY> (9:42 - 9:55 min. marks)

<sup>254</sup> <https://library.hccc.edu/c.php?g=366161>

<sup>255</sup> <https://www.cnn.com/2015/06/19/us/lgbt-rights-milestones-fast-facts/index.html>

<sup>256</sup> <https://www.splcenter.org/hate-map>

The purpose and meaning of the 14th Amendment<sup>255</sup> has not changed since ratified by the American people in 1868 and the people of Wyoming on July 10, 1890.

“The steps antecedent to the formation of the Wyoming Constitution are traced in the memorial of the convention to Congress, printed in 51st Cong., 1st sess., Sen. Mis. Doc. no. 23, Serial 2698, pp. 1-2.”<sup>256</sup>

“The 1890 Federal Census population schedule for Wyoming was lost to a fire, but the Veterans Schedule still exists. According to the 1890 statistics ... there were 1,171 Union Civil War veterans, 17 of whom were black, and 62 widows living in Wyoming in 1890[.]”<sup>257</sup>

“With the Renaissance began a new period in human history.<sup>258</sup> Thoughts of liberty and freedom took possession of the minds of men, first in the field of religion,<sup>259</sup> then of politics, later in the field of economics. It came to be a part of the legal philosophy of the times that ... a human being [has] certain natural, inherent and inalienable rights of which no government should, or has the right to, deprive \* \* \* in their inherent right to life, liberty and the pursuit of happiness, all members of the human race are equal[.]” *Cross v. State*, 370 P.2d 371, (Wyo. 1962).

“[C]onstitutional protections limit government rather than private intrusions. *Western Gas*, 786 P.2d at 872, n.10 (quoting *Olmstead v. United States*, 277 U.S. 438, 478, 48 S.Ct. 564, 572, 72

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<sup>255</sup> <https://www.youtube.com/watch?v=-7sDauCXRR1> (9:09 min. mark)

<sup>256</sup> <https://digitalcommons.law.uw.edu/cgi/viewcontent.cgi?article=1002&context=sclbks> See footnote 78)

<sup>257</sup> <https://wvstatearchives.wordpress.com/2013/12/11/wyomings-civil-war-legacy/> See footnote 1.

<sup>258</sup> <http://www.bl.uk/restoration-18th-century-literature/articles/the-enlightenment#:~:text=The%20Enlightenment%20of%20the%2018th%20century%20was%20a%20great%20Age,the%20Napoleonic%20Wars%20and%201815> (“‘reason’ ... Enlightenment”). See <https://www.gutenberg.org/cache/epub/28233/pg28233-images.html>

<sup>259</sup> [https://press-pubs.uchicago.edu/founders/documents/amend1\\_religions40.html](https://press-pubs.uchicago.edu/founders/documents/amend1_religions40.html) (“It is error alone which needs the support of government. Truth can stand by itself.” cf. <https://en.wikipedia.org/wiki/Ozymandias>)

L.Ed. 944, 956 (1928) (Brandeis, J., dissenting)) (emphasis altered) (“[The constitutional framers] conferred, as against the government, the right to be left alone — the most comprehensive of rights and the right most valued by civilized men.”). *Howard v. Aspen Way Enterprises, Inc.*, 2017 WY 152, ¶ 23, 406 P.3d 1271, 1277 (Wyo. 2023). Sec. 18 of the Wyoming Constitution guarantees “liberty of conscience”.

“[The constitutional framers] conferred, as against the government, the right to be left alone — the most comprehensive of rights and the right most valued by civilized men.” *Howard v. Aspen Way Enterprises, Inc.*, 406 P. 3d 1271, ¶ 23 (Wyo. 2017).

“[E]quality in the enjoyment of natural and civil rights is only made sure through political equality, the laws of this state affecting the political rights and privileges of its citizens shall be without distinction of race,<sup>260</sup> color, sex, or any circumstance or condition whatsoever other than individual incompetency, or unworthiness duly ascertained by a court of competent jurisdiction.” Wyoming Constitution, Article 1 Sec. 3.<sup>261</sup>

The appearance of the names of Mr. Trump on Wyoming’s ballot and Ms. Lummis on Wyoming’s ballot corrupts Wyoming’s election integrity and violates Sec. 3 of the 14th Amendment and Article IV, Sec. 4 of the Constitution<sup>262</sup> and Article 1, Secs. 26 and 27. “When the words used convey a specific and obvious meaning, we need not go farther and engage in statutory construction.” *Campbell County Board of Commissioners v. Wyoming Horse Racing, LLC*, 2023

<sup>260</sup> [https://en.wikipedia.org/wiki/Rock\\_Springs\\_massacre](https://en.wikipedia.org/wiki/Rock_Springs_massacre) (“The massacre in Rock Springs[, Wyoming] touched off a wave of anti-Chinese violence, especially in the Puget Sound area of Washington Territory.”)

<sup>261</sup> [https://www.google.com/books/edition/Journal\\_And\\_Debates\\_Of\\_The\\_Constitutiona/uhrlzwlEACAAJ?hl=en](https://www.google.com/books/edition/Journal_And_Debates_Of_The_Constitutiona/uhrlzwlEACAAJ?hl=en) (“Journal And Debates Of The Constitutional Convention Of The State Of Wyoming: Begun At The City Of Cheyenne On September 2, 1889”)

<sup>262</sup> “The United States shall guarantee to every State in this Union a Republican Form of Government, and shall protect each of them against Invasion, and on Application of the Legislature, or of the Executive (when the Legislature cannot be convened) against domestic Violence.



WY 10 ¶ 17 (Wyo. 2023).

“[W]e give effect to the plain and ordinary meaning of the words and do not resort to the rules of statutory construction. \* \* \* Moreover, we must not give a statute a meaning that will nullify its operation if it is susceptible of another interpretation[.]” *Aland v. Mead*, 2014 WY 83, ¶ 11, 327 P.3d 752, 758-759 (2014).

Mr. Trump and Ms. Lummis swore oaths to defend the Constitution but adhered to its enemies attacking the Capitol in order to stop Congress from implementing its Article 2 Section 1 Clause 3.

Mr. Trump betrayed his oath - to *his* god<sup>263</sup> - when he refused to defend the Constitution. Ms. Lummis betrayed her oath - to *her* god<sup>264</sup> - when she refused to count its electoral vote.

“We hold these truths to be self-evident, that *all ... are endowed by their* Creator<sup>265</sup> *with ... the pursuit of Happiness.*” Preamble to the Declaration of Independence. (emphasis added) “[T]he singular-plural distinction turns on the circumstances.” *Jones v. United States*, 526 US 227, 238 (1999).

“The conception of happiness held by the Founders had deep historical roots and included elements of enjoyment, fulfillment and civic virtue \* \* \* The idea of the pursuit of happiness as a natural right to be protected by government ... was ... the ... purpose of government.” Prof. Ryan Rynbrandt, *The Pursuit of Happiness*, Prepared for the Western Political Science Association 2016 Annual

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<sup>263</sup> [https://www.jamesmadison.gov/system/files/assets/teach-the-constitution/lessons/01\\_FoundersFreedomReligion.pdf](https://www.jamesmadison.gov/system/files/assets/teach-the-constitution/lessons/01_FoundersFreedomReligion.pdf) (“Federalists argued that religious tests were ‘useless, tyrannical, and peculiarly unfit for the people of this country.’”)

<sup>264</sup> [https://www.youtube.com/watch?v=oaVKypt\\_EYE](https://www.youtube.com/watch?v=oaVKypt_EYE) (0:11 min. mark “Thank *God* for Bitcoin[.]”) (emphasis supplied) See footnotes 58, 65, 79, 95, 97, 98, 99, 100, 101, 120, 121, 143, 160, 161, 197, 216.

<sup>265</sup> Rather than ‘The’ Creator. See footnotes 8, 100, 102, 106, 109, 110, 113, 115, 118, 119, 120, 122, 125, 204 and 235.

Conference in San Diego, CA, March 25, 2016.

“[O]ur Constitution undertook to secure conditions favorable to the pursuit of happiness. They recognized the significance of man's spiritual nature, of his feelings and of his intellect. They knew that only a part of the pain, pleasure and satisfactions of life are to be found in material things. They sought to protect Americans in their beliefs, their thoughts, their emotions and their sensations. They conferred, as against the government, *the right to be left alone — the most comprehensive of rights and the right most valued by civilized men.*” *Olmstead v. United States*, 277 US 438, 478 (1928).

“At the heart of liberty is the right to define one's own concept of existence, of meaning, of the universe, and of the mystery of human life. Beliefs about these matters could not define the attributes of personhood were they formed under compulsion of the State.” *Lawrence v. Texas*, 539 US 558, 574 (2003).

The Constitution speaks for itself. Words have meaning. “[W]ords must be given ... plain and ordinary meaning.” *Jahn v. Burns*, 593 P. 2d 828, 830 ¶ 2 (Wyo. 1979).

Section 3 of the Fourteenth Amendment means to hold accountable and stop individuals such as Mr. Trump or Ms. Lummis from ever again holding office.

#### Conclusion

RESPECTFULLY, for these reasons and those others of the Court, plaintiff moves the Court to expedite a hearing to judge his claims that Section 3 of the 14th Amendment of the United States Constitution and Article 1, §§ 6, 26, 36 and 37 and Article 5, § 10 of the Wyoming Constitution,

separately and independently, preclude the names of Mr. Trump and Ms. Lummis from appearing on Wyoming ballots, take judicial notice of adjudicative facts under Rule 201 of the Wyoming Rules of Evidence, award judgment, enjoin such names from those ballots and award reasonable attorney fees and costs incurred in prosecuting this action.

RESPECTFULLY SUBMITTED this 1st day of November 2023.

Tim Newcomb

Tim Newcomb



*Pro Se*

CERTIFICATE OF SERVICE

On the 1st day of November 2023, the foregoing Verified Complaint for Declaratory Judgment and Injunctive Relief was served by placing a true and correct copy of the same, postage prepaid and addressed to:

Hon. Bridget Hill  
Attorney General of Wyoming  
109 State Capitol  
200 W. 24th Street  
Cheyenne, WY 82002

Tim Newcomb

Tim Newcomb

*Pro Se*

VERIFICATION UNDER OATH

I, Tim Newcomb, do hereby swear under penalty of law, that the foregoing Verified Petition for Verified Complaint for Declaratory Judgment and Injunctive Relief is true and correct to the best of my knowledge.

SO SWORN this 1st day of November, 2023.

[Handwritten Signature]

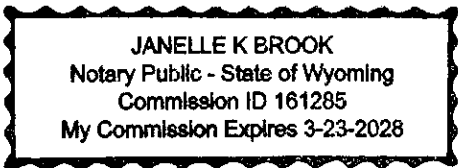
(Signature of Tim Newcomb)

STATE OF WYOMING )

) SS.

COUNTY OF ALBANY )

Subscribed and sworn to before me by Tim Newcomb, this 1st day of November, 2023.



[Handwritten Signature]  
Notary Public

My commission expires: 3/23/2028