

State of Minnesota

County: Le Sueur
Le Sueur County Courthouse
88 S. Park Ave, Le Center MN 56057

District Court

Judicial District: First
Court File Number: _____
Civil Action

JOHN DOE, individually, and in behalf of:
The DOE FAMILY REVOCABLE LIVING TRUST, and
The CITIZENS OF LE SUEUR COUNTY MINNESOTA,

Plaintiffs,

vs.

VERIFIED COMPLAINT

MINNESOTA FIRST JUDICIAL DISTRICT COURTS,

Defendant.

I, pro se plaintiff John Doe, individually, and in behalf of my five children and the citizens of Le Sueur County, seek an expedited settlement of the claims alleged herein, including a declaration of default judgment and other relief in case #40-CV-14-1149 (*see first cause of action herein*); or, if not settled, sue the defendant for money damages in an amount greater than \$50,000 for defendant's unlawful dismissal of said case and the resulting delay, and state:

DEMAND FOR JURY TRIAL

- 1. Unless settled (*see first cause of action herein*), plaintiffs demand a jury trial.

PARTIES

- 2. I, plaintiff JOHN DOE, am representing myself and my family's trust pro se; my mailing address is 123 Any Street, Any Town, MN 00000.
- 3. The DOE FAMILY REVOCABLE LIVING TRUST is my family's trust set up to receive settlements and jury awards for the benefit of my five children and myself; I am not representing my children in this action, just the family trust as its trustee.
- 4. The CITIZENS OF LE SUEUR COUNTY MINNESOTA are also victims of the defendant's actions; a local bank account will be set up to receive settlements and jury awards for the citizens; I am not representing the citizens in this action, just acting as their agent for the sole purpose of setting up their bank account.
- 5. Defendant MINNESOTA FIRST JUDICIAL DISTRICT COURTS are responsible for dispensing justice in the counties of Carver, Dakota, Goodhue, Le Sueur, McLeod, Scott and Sibley; and are currently overseen by chief judge Terrence E. Conkel, McLeod County Courthouse, 830 11th Street East, Glencoe, MN 55336.

JURISDICTION AND VENUE

- 6. A Minnesota court in this district has jurisdiction under Minn. Const. art. VI, § 3 to declare default judgment in case # 40-CV-14-1149 pursuant to Minn. R. Civ. P. 55.01, and to move the case along to a jury trial for damages pursuant to Minn. Const. art. I, § 4; however, the

following district court judges are disqualified and cannot adjudicate this case: Richard C. Perkins, M. Michael Baxter, Mark C. Vandelist, Martha Simonette, Kathryn D. Messerich, Edward I. Lynch, and Terrence E. Conkel.

7. This district is the proper venue because the events alleged herein occurred in one of its counties, namely Le Sueur County.

STATEMENT OF THE CASE

8. I reallege all preceding paragraphs of this pleading as if fully incorporated herein.

9. On December 1, 2014, I filed suit in this district (see Le Sueur County case #40-CV-14-1149) in behalf of the same plaintiffs as in this action, against my ex-wife, Jefferson County Child Support Services (“Jeffco-CSE”) and Jefferson County Colorado, to fully resolve a 7-year child support controversy caused by those defendants in Minnesota; *see file*.

10. Our VERIFIED COMPLAINT was filed along with an EXHIBIT BOOK containing 168-pages of documentary evidence to prove most of our claims therein, including but not limited to:

- a. That my child support obligations are paid-in-full;
- b. That the Colorado child support order is void;
- c. That the arrears balance is zero;
- d. That my ex-wife and her accomplices had committed a massive fraud upon the Colorado courts to influence the divorce orders, including the child support order.
- e. That my ex-wife and Jeffco-CSE had committed a massive fraud upon the Minnesota courts to first obtain registration of the support order and arrears balance for enforcement, and then to stalk me and otherwise oppress me under color of Minnesota law.
- f. That my ex-wife, Jeffco-CSE, and numerous officials in Minnesota had committed several very serious crimes against me in support of the oppression campaign.
- g. That the Minnesota order registering the Colorado instruments is automatically void;
- h. That all Minnesota judicial decisions, including the jury verdict, are automatically void;
- i. That our claims have never been disputed in either state;
- j. That our claims have never been adjudicated in either state;
- k. And much more.

11. On December 8, 2014, judge Mark C. Vandelist found my claims to be not frivolous and granted my *in forma pauperis* application; *see file*.

12. The defendants failed to answer our complaint in the time and manner prescribed by Minnesota law.

13. Therefore, on January 6, 2015, I moved the court to enter default judgment against the defendants pursuant to Rule 55.01 of the Minnesota Rules of Civil Procedure; *see file*.

14. On January 8th, I submitted a motion for an order lifting the hold on my ability to obtain a Minnesota driver's license; *see file*.

15. On January 12th, court administration set a default hearing in the case; *see file*.

16. On January 13th, judge Vandelist found my claims to be frivolous and entered his

“ORDER FOR DISMISSAL”; *see file*.

17. Judge Vandelist also ordered the Le Sueur County Sheriff to serve his ORDER FOR DISMISSAL upon me at the expense of the citizens of Le Sueur County.

18. Obviously feeling empowered to continue their oppression campaign against me in Minnesota following Vandelist's wrongful dismissal of my claims against them, my ex-wife continued to deny all my contact and visitation with our children, and Jeffco-CSE continued to leave the child support controversy unresolved and to bill me for undue child support, and took action to re-suspend my driver's license in Colorado; *see file*.

19. My appeal of judge Vandelist's ORDER FOR DISMISSAL – my *tenth* appeal in Minnesota – was filed at the Minnesota Court of Appeals on January 27, 2015; *see file*.

20. Unbeknownst to me, court administration failed to file my Motion and Affidavit for Proceeding In Forma Pauperis in the Court of Appeals, which was attached to my STATEMENT OF THE CASE pursuant to Minn. R. App. P. 109.02; *see file*.

21. On January 28, 2015, the Court of Appeals – despite receiving another copy of my IFP application, and acknowledging and knowing from my Affidavit of Service that I had submitted it to the district court along with my appeal paperwork – dismissed my appeal; *see file*.

22. Because Minnesota's appellate courts had already wrongly dismissed nine previous appeals in a similar fashion, I decided to sue this district in federal court, see case #15-cv-01203-DWF-TNL, but that case was also wrongly dismissed.

23. Had judge Vandelist pronounced default judgment in plaintiffs' favor, as he is obligated to do by law, I would have been reunited with my children in January 2015, and would have permanently moved back to Colorado shortly thereafter.

FIRST CAUSE OF ACTION: SETTLEMENT

24. I reallege all preceding paragraphs of this pleading as if fully incorporated herein.

25. This cause of action seeks expedited settlement of this lawsuit.

TERMS OF SETTLEMENT:

26. By no later than 5:00pm on Friday September 18, 2015, defendant shall:

- a. Have a *qualified* district court judge pronounce default judgment in favor of the plaintiffs in case 40-CV-14-1149;
- b. Schedule hearings on the matters presented in the first, seventh and eighth causes of action of plaintiffs' complaint, and in Mr. Doe's motion regarding his driver's license;
- c. Schedule a jury trial to determine damages;
- d. Pay \$119,842.00 to me¹ for my lost income and expenses - *see Exhibit MFJD-1*;
- e. Pay \$150,000.00 (\$25,000 for each victim) to the Doe Family Revocable Living Trust²; and
- f. Pay \$10,000.00 to the Citizens of Le Sueur County³.

27. If the foregoing terms of settlement are fulfilled by the deadline, I will dismiss this action and forgive and forget the crimes committed in this instance.

¹ Mail a Cashier's Check payable to John Doe to me at 123 Any Street, Any Town, MN 00000, postmarked by the deadline.

² Mail a Cashier's Check payable to the Doe Family Revocable Living Trust to me, postmarked by the deadline.

³ Mail a Cashier's Check payable to the Citizens of Le Sueur County to me, postmarked by the deadline.

28. If the foregoing terms of settlement are not fulfilled by the deadline, this case will proceed to a jury trial for money damages; and, in addition, I will file civil and criminal complaints against the individuals involved in the wrongful dismissal of case #14-1149.

29. If this case is delayed or dismissed, in addition to my civil and criminal actions against the individuals involved, this district will be sued for a substantial portion of its funding.

SECOND CAUSE OF ACTION: NEGLIGENCE

30. I reallege all preceding paragraphs of this pleading as if fully incorporated herein.

31. In the event the defendant fails to fulfill the terms of settlement pursuant to the first cause of action herein, this cause of action seeks compensatory and punitive damages – as part of the overall damages accruing in my family's “MASTER CIVIL COMPLAINT”ⁱ – to be determined by a jury for the defendant's negligent acts in case 40-CV-14-1149.

32. Defendant owed plaintiffs a legal duty to pronounce default judgment in plaintiffs' favor pursuant to Rule 55.01 of the Minnesota Rules of Civil Procedure, which states:

When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend within the time allowed therefor by these rules or by statute, and that fact is made to appear by affidavit, judgment by default shall be entered against that party ...

[NOTE TO JURY: The word “shall” removes all discretion by the judge and makes the pronouncement of default judgment in case 40-CV-14-1149 mandatory under the circumstances.]

33. Defendant also owed plaintiffs a legal duty to provide a jury trial in which to determine damages pursuant to the 7th Amendment of the Constitution of the United States, which states:

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

and also pursuant to Article I, Section 4 of Minnesota's Constitution, which states in part:

Trial by jury. The right of trial by jury shall remain inviolate, and shall extend to all cases at law without regard to the amount in controversy.

[NOTE TO JURY: The word “shall” removes all discretion by the judge and makes the provision of a jury trial in case 40-CV-14-1149 mandatory under the circumstances.]

34. Defendant also owed plaintiffs a legal duty to adjudicate plaintiffs' demands for preliminary relief in the first cause of action of their complaint, to adjudicate the plaintiffs' requests for injunctive and declaratory relief and for replevin in the seventh and eighth causes of action of their complaint, and to adjudicate plaintiff John X. Xxxxxx' motion for an order lifting the hold on his ability to obtain a Minnesota driver's license, pursuant to numerous state and federal laws, rules, precedents, codes of judicial conduct, etc.

35. By dismissing plaintiffs' case, defendant breached its duties in this instance.

36. As direct and proximate results of defendant's negligence in this instance, plaintiffs were injured in several different ways, including but not limited to:

- a. I am still indigent, unemployed, unemployable (as a contractor), and without a driver's license;
- b. My five children and I have missed out on 9 more months of family life, 4 more birthdays, another Spring Break, another Easter, another high school graduation, another summer vacation, and other events, have suffered further substantial harm by

- the defendants in case 14-1149, will continue to suffer irreparable harm until this district does its duties, and will suffer irreparable harm for the rest of our lives; and
- c. The Citizens of Le Sueur County are still footing the bill for Jeffco-CSE's shenanigans in Minnesota, are still paying for my health insurance, and are still losing tax revenue as a result of my unemployment.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs pray for the following relief against the defendant:

- i. A jury verdict adjudging the defendant liable to me for my lost income and expenses;
- ii. A jury verdict adjudging the defendant liable to my five children and me for our losses of family life and all it's benefits, and for the continued abuses by the defendants in case 40-CV-14-1149; and
- iii. A jury verdict adjudging the defendant liable to the citizens of Le Sueur County for their continued expenses.

Money damages for the Xxxxxx Family – XXXXXX Revocable Living Trust:

- i. For my lost income and expenses since January 13, 2015: Compensatory damages in the amount of \$119,842.00, plus interest, plus prospective lost income and expenses until all claims in this case and in case 40-CV-14-1149 are fully resolved, plus punitive damages in an amount the jury deems just to deter other judicial districts from similar misconduct;
- ii. For my five children's and my losses of family life and all it's benefits since January 13, 2015: Annual compensatory damages in the amount of three percent (3%) of the Minnesota First Judicial District Courts' total annual funding and revenues from all sources, until all claims are settled and jury awards are paid by Minnesota in my family's MASTER CIVIL COMPLAINT, plus punitive damages in an amount the jury deems just to deter other judicial districts from knowingly engaging in similar egregious misconduct against an American family or the citizens it serves;
- iii. For the continued abuse of my five children and me by the defendants in case 40-CV-14-1149 since January 13, 2015: Compensatory damages commensurate with the damages prayed for in case 40-CV-14-1149, plus punitive damages in an amount the jury deems just to deter other judicial districts from ignoring the claims of suffering families; and
- iv. Such other and further relief the jury deems appropriate under the circumstances.

For the Citizens of Le Sueur County:

- v. Aggregate compensatory and punitive damages in an amount the jury deems just to deter other judicial districts from similar misconduct.

VERIFICATION

I, plaintiff John Doe, verify under penalty of perjury pursuant to 28 U.S.C. § 1746 that this complaint is true and correct to the best of my knowledge.

DATED this 27th Day of August 2015.

By Plaintiff: _____
John Doe
123 Any Street
Any Town, MN 00000
Phone: 000-000-0000

ⁱ In my family's federal MASTER CIVIL COMPLAINT – *see at www.federalmcc.webs.com* – nine government defendants are named, including the State of Minnesota, against whom we seek damages in the amount of several billion dollars and against whom damages are accruing at a rate of \$4.932 million per day.

If this case goes to trial, I will ask the jury to penalize Minnesota's First Judicial District Courts by awarding my children and me (and the citizens of Le Sueur County) a substantial portion of Minnesota's accrued damages since January 2015.

The following is a summary of the injuries my family has suffered:

- a. My five children and I have been separated from each other since May 2007;
- b. We have been cutoff from all communications with each other since August 2008;
- c. We have missed out on: 1000s of hours of my parenting time; 9 Thanksgivings; 9 Christmases; 10 Spring Breaks; 9 summer vacations; 53 birthday parties; hundreds of school activities, hundreds of sporting events, numerous Girl Scout and Church events, many award ceremonies and celebrations; over 3000 family suppers and thousands of evening sports sessions; over 5000 homework sessions; hundreds of teaching opportunities to pass along my faith in God, my skills as a home-builder and contractor, and my abilities as a father; hundreds of “park-hopping” trips and other family outings; about 45 camping trips, 45 snowmobiling trips, 45 skiing trips, and 45 boating trips; our long-awaited once-in-a-childhood Disney trip; thousands of hugs, kisses, and high-fives; thousands of phone calls, texts, emails, and talks; and all other moments that are typically shared, in person or electronically, by parents and their children;
- d. My 4 sons and I have missed out their entire high school experiences and their graduations;
- e. In 2005, my kids witnessed the intentional destruction of their family by our own government; and, for over 10 years now, they have been subjected to ongoing and relentless attacks on their family by an army of corrupt government officials; they have been subjected to intense and relentless government-sanctioned brainwashing, “Parental Alienation,” denials of visitation and contact, and other emotional child abuses by their mother and her sisters and friends; they have witnessed many things that would be traumatic for an adult and have been subjected to true domestic terror for many years; they have been totally brainwashed against me; they have had each of their relationships with me totally sabotaged; they have been forced by their mother and our government to grow up in a fatherless environment filled with greed, hatred, and crime; they each lost 10 years of childhood; and they do not know what reality is anymore;
- f. In 2005, I witnessed the intentional destruction of my family by Colorado's case fixing criminals, everything I had from 25-years of backbreaking work was stolen from me with the stroke of a corrupt divorce judge's pen, and then, despite all involved knowing that my child support obligations are paid-in-full, I was strung up with a child support order that was more than I was earning at the time; and, for over 10 years now, I have been subjected to ongoing and relentless attacks on my family by an army of corrupt government officials in Colorado and Minnesota and Washington D.C. because of my evidence of their wrongdoing; I have been stripped of all my rights as if I was a Jew in Nazi Germany during WWII; I have been repeatedly denied access to our courts; I have been repeatedly denied protection by law enforcement; I have been repeatedly denied my rights to redress, due process, honest services, equal protection, answers to complaints, adjudication, and the administration of the law; I have been subjected to intense and relentless government-sanctioned harassment and stalking by my ex-wife and her new friends in child support enforcement and child protective services; I have had my relationships with each of my children totally sabotaged; I have been denied my right to be a parent; and I have lost 10 years of parenthood;
- g. I have missed out on over 10 years of what is most precious to me in life: my family and my 5 relationships with my children; I lost my parental right to the care, custody, companionship, and love of my 5 children, and to all the fruits of the happy family I once had; and each of my children lost their right to my care, custody, companionship and love, and to all the fruits of the happy family they once had;
- h. For over 10 years, my children and I have suffered from the intentional inflictions of emotional distress by our government and by my ex-wife and her accomplices; I, and likely each of my children, have experienced severe and ongoing emotional distresses, including but not limited to suffering, fright, horror, nervousness, grief, worry, anguish, shock, and anxiety;
- i. For over 10 years, I, and likely each of my children, have suffered grievously from fatigue and helplessness; have suffered through hundreds of sleepless or restless nights; have suffered from many bouts of depression in varying degrees, have suffered from an indescribable longing or yearning or heartache that

is a persistent dull but terrible pain; have suffered from lack of concentration and flashbacks to past good and bad times; have suffered from fear of my ex-wife's next abuse or crime, fear of my ex-wife's sisters' next abuse or crime, and fear of my ex-wife's friends' next abuse or crime, have suffered from fear of the next abuse or crime by our government, fear of the next visit by police, fear of my next arrest, fear of the next false order by a judge, and fear of losing even more; and have suffered from fear of the future;

- j. I have been falsely arrested 10 times and falsely imprisoned for over 9 months; I was tased during one of the arrests, suffered for months with recurring migraine headaches, and was diagnosed with high blood-pressure for the first time in my life; and I was hospitalized for several days with bleeding ulcers and was told that I would likely have to medicate my ulcers for the rest of my life;
- k. I have been deprived for over 10 years of my right to educate my children and pass on my talents to them, as I had planned all through my career; and my children have been deprived of my knowledge and instruction through most of their adolescence;
- l. My children and I have suffered for years from the stigma caused by my being falsely cast in public by my ex-wife and by our government as a "Deadbeat Dad" and other titles designed to portray me in public in a false light; I have suffered from defamation of my character in news articles; I have suffered greatly from the resulting humiliation and disgrace, and have lost a great amount of the respect and love of my children, my relatives, my friends and my supporters; and my children have lost the truth and have been forced to live in a web of deceit;
- m. I have missed out on over 30 years of parent/child relationship with my first child, who was murdered by my ex-wife; each of my five children has missed out on a relationship with their older brother or sister all their lives; and collectively, we have missed out on all the good things that go along with the lost familial relationships.
- n. For over 10 years, because neither my ex-wife nor the government would step forward with the truth, I have been separated from my home, my business headquarters and my tools and work equipment; I have been without a driver's license since December 2006; have been indigent and supported by relatives since January 2007; I have been unemployed since October 2007; and I have been forced to work double-time hours fighting against a never-ending pursuit in Colorado and Minnesota of my payment of child support *for the second time* so the states can profit from federal funding in the Child Support Enforcement Program; in addition, although my child support obligations are paid-in-full, I would have paid more if I could so my children would have had some extras, but because of the ongoing deceit, my children have suffered the loss of my extra support and I have suffered the disgrace of being supported by relatives;
- o. My children and I continue to suffer substantial damages including great pain and emotional distress; and we will grievously suffer until our family is reunited;
- p. We will suffer from irreparable injuries for the rest of our lives; and
- q. We will never be the same.