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Sovereign Citizens and Your Local Government

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Judith El Masri
Executive Vice President
The Randle Law Office
Houston, Texas

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Sovereign Citizens and Your Local Government

1. The Sovereign Citizen Movement

What is a Sovereign Citizen?

Sovereign citizens are anti-government extremists who believe that even though they physically reside in this country, they are separate or "sovereign" from the United States. As a result, they believe they don't have to answer to any government authority, including courts, taxing entities, motor vehicle departments, or law enforcement.

The FBI defines sovereign citizens as "individuals who openly reject their US citizenship status, believe that most forms of established government, authority, and institutions are illegitimate, and seek, wholly or in part, through unlawful acts of force or violence, to further their claim to be immune from government authority.[1]

The current sovereign citizen movement can be traced back to far-right groups that were predominantly tax protestors. The Anti-Defamation League reports that in the 1970's the Posse Comitatus protestors appeared in increasing numbers spreading their belief that the existing U.S. government is illegitimate, and they set out to restore minimalist government ("posse comitatus" power under common law is the power of the Sheriff to summon citizens to aid in law enforcement and currently may be authorized in the U.S. under state law or as a residual power under common law)[2]. 'Posse Comitatus' means 'power of the people within the country. Posse members must be white and they do not acknowledge State and Federal rights to enact laws.[3] They believe that U.S. counties and their sheriffs formed the highest U.S. authority and were responsible for protecting citizens from the wrongdoings of the federal government. Followers believe that 'common law' (based on interpretations of the Bible), as opposed to federal law, provides the only valid laws for Americans. This movement is distinct and unlike earlier movements in the 20th century; specifically earlier groups attempted to align with the government or governmental authority both state and federal. (e.g. Ku Klux Klan of the 1920's to the anticommunist groups of the 1950's and 1960's).

The movement itself originated in the Civil War era when certain individuals held the belief that there had been a conspiracy that the U.S. government had been infiltrated. Sovereign citizens believed at the time (and currently) that the

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[1] "Domestic Terrorism and the Sovereign Citizen Movement", FBI, April 13, 2010

[2] A separate 1956 federal law exists known as the federal Posse Comitatus Act, *18 U.S.C. § 1385*, which prohibits any part of the U.S. military from being used as a posse or called to the aid of local law enforcement unless specifically authorized by law.

[3] U.S. Department of Justice Abstract; *National Sheriff* Volume: 35 Issue: 5 Dated: (October-November 1983) Pages: 10-16,18-20.

government was infiltrated, and the laws were replaced with tyrannical laws somehow replacing the true government in the 1860's, and that the new (infiltrated government) was designed to enslave people. Thus "Sovereign citizens" declared sovereignty, and they contend the existing government had/has neither authority nor jurisdiction over them.[4] The Posse Comitatus resurgence in the 1970's and 1980's preceded a warning from the Southern Poverty Law Center (SPCL) to Attorney General Janet Reno, in 1994 during the Bill Clinton presidency. SPLC warned of the rise of armed groups fueled by hate.

Six months after this warning in 1995, the deadliest attack ever by domestic U.S. terrorists was carried out by men both disturbed by the government raid in Waco, Texas, and obsessed with the rhetoric and conspiracy theories of the militias. The bombing in Oklahoma City of the Alfred P. Murrah Federal Building "literally brought home the impact of terrorism for Americans."[5]

Each of these groups subscribe to the beliefs held by sovereign citizens, the Aware Group, Washitaw Nation, the Republic of United States of America, Freeman, Freemen on the Land, Sons of Liberty, and the Aryan Nation.[6] In the last few decades the Patriot Movement has grown and fueled the sovereign citizen membership, and they have gained mainstream attention particularly since the January 6, 2021 insurrection. The members of this far-right movement views the federal government as too powerful and overreaching into the lives of Americans specifically regarding Constitutional liberties, taxation and guns.

In the past three decades there has been a large increase in African American sovereign citizens, and many can be traced to the Moorish Science Temple of America (MSTA), a religious sect that has existed since 1913. There have been instances of sovereign citizens claiming to be members of MSTA[7] in an attempt to disguise criminal activity[8].

According to the Southern Poverty Law Center: "Moorish sovereigns espouse an interpretation of sovereign doctrine that African Americans constitute an elite class within American society with special rights and privileges that convey on them a sovereign immunity placing them beyond federal and state authority."[9] SPLC quotes MSTA "black Moors were America's original inhabitants and are therefore entitled to self-governing, nation-within a nation status".[10] In 2021 there was a standoff between police and 11 members of the group "Rise of the Moors"

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[4] "Extremism, Terrorism, and Bigotry", ADL, June 26, 2017.
[5] US Department of Justice, Responding to Terrorism Victims; October 2000.
[6] *A Quick Guide to Sovereign Citizens*, UNC SCH. GOV'T 1 (Sept. 2012).
[7] U.S. District Court Northern District of Texas, Dallas, Division; Case No. 3:20-mc-53-E-BN; *Moorish Science Temple of America Asiatic Nation of America v. United States, et al.*, August 11, 2020
[8] Couple in Washington DC repeatedly attempt to take ownership of empty mansions claiming their ancestors owned the land. NBC News Washington 2017
[9] Southern Poverty Law Center, Moorish Sovereign Citizens
[10] Southern Poverty Law Center, Sovereigns in Black, August, 2011

in which arrests occurred, after a 9 hour standoff. Their website declares Moors "are not sovereign citizens" but Moors are the "original sovereigns" of America and therefore immune to the law.[11]

Upon the election of President Obama, the growing presence of militia groups fueled by hatred surged. In 2009 the Southern Poverty Center published a paper "The Second Wave Return of the Militias", arguing what distinguished the resurgence of political dissenters and anti-government groups was the election of President Obama.[12] Arguably, former President Trump empowered and encouraged not only an ultra-conservative movement in the United States, but his presidency was the impetus for a new wave of militants. This new wave certainly shares his methodology and dogma that consists of impugning authority particularly when it serves to further a political purpose. The anti-government sentiment that spiked due to Covid-19 measures and restrictions certainly impacted the ideology. Whether his call to arms and his political methods increased the numbers of sovereign citizens and their ideology is yet to be determined.

The rather amorphous group known as sovereign citizens or those that share the same ideals identify themselves as sovereign citizens, freeman, freeman of the land, sons of liberty, Aryan nation, constitutionalists, citizens of the universe, galactic citizens. Similarities between the groups are not a factor of membership in a group, but rather the shared firm stance that they are not subject to laws.

2. Sovereign Citizen Threat

Should the Sovereign Citizen Movement Cause Concern at the Municipal Level?

> *Quick Answer: Yes, and the Movement is growing due to impetus gained by the pandemic, the current political climate, and fueled by internet access and social media.*

Sovereign Citizens have been watched by the federal government for several decades but in 2010 the FBI disclosed that in addition to monitoring the threat of eco-terrorists, and lone conservative (far right) terrorists, the FBI began referring to sovereign citizens as a third category of domestic terrorists. Increasing violence and the uptick in "paper terrorism" has brought attention to sovereign citizen activity across the country. The extraordinary amount of time (administrative, municipal, judicial, law enforcement), and expense incurred by cities, counties, states due to the sovereign citizen "tactics" continues to grow. Despite the government monitoring, and watch-dog monitoring, it is difficult to determine the

[11] "Rise of the Moors", July 10, 2021 https://abcnews.go.com/US/rise-moors-group-affiliated-11-men-arrested-massachusetts/story?id=78731313

[12] Southern Poverty Law Center, The Second Wave, August 1, 2009.

exact number of individuals that subscribe to the movement or specifically describe themselves as sovereign citizens; there are estimates that there are a half million sovereign citizens according to the Southern Poverty Center[13]. The prevalence of smart phones and widespread access to the internet has surely fueled the increase in both attention to the movement, and the spread of ideology. SPLC lists the sovereign citizen groups they have identified as of 2021 and it includes thirty (30) groups.[14] In my state they have identified the group, Republic of Texas. In Canada there is a group called "Freeman-on-the-Land"[15], a "Natural Persons" movement, and there are sympathizers aligned with "First Nations" in British Columbia; they fly the flag "Sovereign Squamish Government"---interestingly they have no website as it has been suspended.

There are numerous "self-help" websites and publications guiding would-be sovereign citizens on how to navigate the judicial, municipal, federal and law enforcement system. There are several listed in this paper. There is no quantified methodology to determine with any accuracy the numbers but the ideology is certainly on the rise, and with increasing access to the internet followers aid other followers with plenty of information on "how to" file fake liens, fake judgments, bring fraudulent legal actions and more.

The "how to" forms, online videos, and self-help websites exist to aid sovereign citizens but despite an abundance of research, writing, and legislative changes across the Country the methodology to combat the paper terrorism or sovereign citizen tactics is difficult to find. There are notably an increasing number of watchdog groups and members of academia making their findings and research available to the public regarding sovereign citizens, their activities, and their beliefs. The groups include the Anti-Defamation League (**ADL**), the Southern Poverty Law Center (**SPLC**), the Program on Extremism at George Washington University, and the National Consortium for the Study of Terrorism and Responses to Terrorism (**START**) at the University of Maryland.

There are International entities doing research as well; such as the Institute for Strategic Dialogue[16] ("**ISD**") a think tank which has studied and written about sovereign citizens. In addition to research from these groups, in writing this paper I was able to find information regarding sovereign citizens from law journal articles written at the following schools: Georgetown Law School, University of North Carolina Law School, University of South Carolina Law School, Penn State, University of Maryland, and University of Montana, and I was fortunate to communicate with, and read numerous articles written by Associate Professor of Social Work and Criminology, Christine M. Sarteschi, PhD, LCSW at Chatham

[13] Southern Poverty Law Center, Sovereign Citizens Movement
[14] *Id.*
[15] FreeMan Society of Canada; "*Freedom is just a word unless you have control of yours*!?!?!"
[16] The ISD focuses on examining and forging solutions in 3 key areas; disinformation; extremism and polarization & hate.

University.

Growing Presence Indicates We Are More Likely to Encounter Sovereign Citizens, but are Encounters with Sovereign Citizens Cause for Legitimate Concern for the Judiciary, Courts, and Municipal Entities?

According to a 2020 **START** research brief, 30% of all far-right extremists, in their Profiles of Individual Radicalization in the United States (PIRUS)[17] database identify as sovereign citizens. The **START** brief is easy to find online.[18] The growth in the movement reflects the prevalence of sovereign citizens in society and the increased odds of encountering sovereign citizens in court, in government offices and in law enforcement encounters.

The growing presence of sovereign citizens is not just an American phenomenon. The **ADL** has reported Sovereign citizens have been tracked in Australia, Canada, United Kingdom, Scotland, Republic of Ireland, Northern Ireland, New Zealand, New South Whales, and South Africa. Countries around the world are taking notice and examining the sovereign citizen movement and have discovered it is an international phenomenon.[19] According to the ISD; in the United Kingdom sovereign citizens have entered hospitals and vaccination clinics after the Covid-19 pandemic and they harass medical staff and politicians. Similarly, in Canada with the rise of anti-government sentiment, sovereign citizens are disrupting court proceedings. Many are members of the group known as the Freeman and they first appeared in 2000, and they like many other groups have their own Facebook page for their membership.[20]

The U.S. federal government has labeled sovereign citizens as domestic terrorists, and an increasing number of federal laws reflect that determination. In 2001 federal law was revised and domestic terrorism was defined in Section 802 of the Act titled; "Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism" (USA Patriot Act)[21]. A person engages in domestic terrorism if they do an act "dangerous to human life" that is a violation of the criminal laws of a state or the United States, if the act appears to be intended to: (i) intimidate or coerce a civilian population; (ii) influence the policy

[17] National Institute of Justice sponsored study Profiles of Individual Radicalization in the United States (PIRUS): *An Empirical Assessment of Domestic Radicalization authored by START at University of Maryland.*
[18] https://www.start.umd.edu/pubs/START_PIRUS_ResearchBrief_May2020.pdf
[19] BBC News, August 5, 2020, What is a sovereign Citizen?
[20] International Journal of Cultic Studies, Vol. 6, 2015; Stephen A. Kent, Department of Sociology, University of Alberta, Canada
[21] 18 USC 1 Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act).

of a government by intimidation or coercion; or (iii) to affect the conduct of a government by mass destruction, assassination, or kidnapping.

Many of the acts taken by extremists, and particularly those that identify as sovereign citizens clearly fall under this definition. The sole purpose of paper terrorism is intimidation of the courts, court staff and the judicial system generally. Sovereign citizens attempt to use the forum, whether it be the court room, or in an encounter with law enforcement or any municipal authority, and thereby any proceeding is intentionally drawn out for as long as possible. Filing fake liens, judgments, deeds, lawsuits is all a targeted method of intimidation in defiance of proper procedure.

Texas Department of Public Safety, the State agency responsible for statewide law enforcement and driver license administration describes sovereign citizens similarly and generalizes that much of the activity of sovereign citizens involves fraudulent acts, but DPS recognizes that many sovereign citizens are capable of and will resort to violence as a justified response to their perceived abuses by the government.[22]

Another group, noticeably on the rise since 2016, in the U.S. that shares many of the ideals of sovereign citizens is the Constitutional Sheriff Movement[23] The Constitutional Sheriffs and Peace Officers Association (CSPOA) claims to be supported by 400 Sheriffs. CSPOA is an extreme, far-right group that calls itself "the last line of defense standing between the overreaching government and your Constitutionally guaranteed rights."[24] The Constitutional Sheriffs assert that they have the power to determine the constitutionality of the laws they are entrusted with enforcing, and to refuse to enforce any law that they believe is unconstitutional.[25] The pandemic and the restrictions imposed on individuals, municipalities and businesses by virtue of a community health disaster provided impetus for the growth of this movement. Certainly, January 6, 2021 and the events of that day support this. CSPOA has a website (cspoa.org) for members containing the byline "*Join & Become Part of the CSPOA Posse*".

City attorneys, city prosecutors, law enforcement, municipal court staff, elected municipal officials, and municipal staff will likely encounter a sovereign citizen, and it is increasingly possible municipal employees may follow the ideology. In municipal court, and most other courts sovereign citizens likely will be Pro Se. Ideally, an encounter in your city with a CSPOA Posse member will not occur, or

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[22] Texas Domestic Terrorism Threat Assessment, January 2020, Texas DPS.
[23] Southern Poverty Law Center, June 13, 2016, Line in the Sand.
[24] *Id.*
[25] Georgetown Law, Institute for Advocacy and Protection, Constitutional Sheriffs and Elections, 2022.

with luck Sheriff members will be a county or state employee and not a city/municipal employee.

Because a sovereign citizen refutes the authority of the government including municipal government and therefore recognizes no authority in judges, law enforcement officers, attorneys, local municipal government, nor the legal procedural system an encounter can be a challenge. At the municipal level an encounter with a sovereign citizen may not appear on its face dangerous but it can be if unreasonable behavior ensues or the individual retaliates. The pattern of behavior which includes refusing to confirm identity with a driver's license (or some other official identifying document), refusal to pay fees, fines, or recognize any municipal or law enforcement authority may appear benign. Overall it is the ideology that is known to be shared with extremists, and it is documented that extremists have resorted to violence in furtherance of their beliefs.

Sovereign citizens believe they alone decide what laws to obey or ignore leaning heavily to actively ignoring laws. The immediate consequence of an encounter in court or any governmental encounter results in an inordinate expenditure of time, the secondary consequence is the inability to complete or progress with the necessary procedural or administrative steps to resolve the issue that brought the sovereign citizen to the attention of the judiciary, municipality, law enforcement or administrative agency. More importantly many of the tactics are designed to intimidate and frighten their victims. Intimidation is a direct and intended result of filing fake documents such as liens, deeds or court filings. It is a viable risk for those that work for the government, and enforce the laws of the government at every level; state, county, city or municipality to likely be targeted.

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How will you cross paths with a sovereign citizen?

Courts:	**Law Enforcement**:
Paper Terrorism Fraudulent Liens, Fraudulent Deeds, Fraudulent Orders, Fraudulent License Plates, Fraudulent Registration, Fraudulent Mortgages, Fraudulent UCC Statements. Filings from purported and false judicial or administrative bodies. (Fraudulent yet simulate genuine paper documents).	Traffic stops, violent crime (assaults, improper gun usage, gun ownership and open carry), squatters due to fraudulent documents/evictions, warrants, process of service or service of warrants, trespass onto municipal property or hospitals; mass gatherings; Constitutional Sheriffs. Law Enforcement engagement and encounters with sovereign citizens on your streets and as uncooperative, disruptive, and possibly violent residents
Municipalities:	**Municipal Court**:
Interference with the business of elected officials in open meetings, election and polling interference, Utilities, difficulty in opening a municipal utility account without proper identification. Permitting difficulties, Zoning violations & enforcement; collection nightmare if a nonentity opens a municipal utility account and never pays the bill. 1st Amendment auditors videoing in city hall in municipal buildings, numerous and broad public information act requests. Municipal. Harassment Filings against public officials.	No proof of identification, no license, no insurance, no vehicle registration, no license plates or fraudulent documents, refusal to execute documents with anything other than "X" or some other symbol. Filing of complaints against the prosecutor, the municipal court judge and excessive filings or encounters with court administrative staff and the judge.

Sovereign Citizen Activities, Schemes, and Strategies:

Paper Terrorism

●Filing of false suits or claims, bogus liens, deeds, conveyances, or other similar documents in order to encumber the property of their enemies in retaliation for some perceived wrongdoing; The Real Estate Fraud Prosecution Unit of the San Bernardino (California) District Attorney's office, for example, has estimated that their current case load consists of 85% sovereign citizen cases. Common practice includes filing liens against the homes and land of public officials who participated in or were complicit in their legal proceedings. Intentional filings that are based on tactics to delay, complicate, question, rebel, and obstruct.

●Fraudulent UCC filing of financing statements and the majority of all false UCC financing statements also share another important characteristic: They indicate that the debtor is a transmitting utility.[26] This term is used to refer to "any person who is primarily engaged in the railroad, street, railway or trolley bus business, the electric or electronic communications transmission of electricity, steam, gas, or water, or the provision of sewer service." Fraudulent filers, particularly sovereigns, use this designation in an attempt to ensure that their financing statements remain indefinitely on file. Under UCC Section 9, transmitting utility filings do not lapse.

●Filing of legitimate IRS forms to harass officials; fake 1099's that indicate the individual targeted has collected large amounts of money in interest income or payments.[27]

●Real Estate and mortgage fraud; move into repossessed homes or empty buildings, file fake quick deed transfers or documents conveying a real property interest, and claim the property as their own. Improper or fraudulent liens against the real property owned by the authorities, state, county, city, judicial. Fake deeds are used to apply for subsidized Section 8 Housing assistance through HUD[28] and often will move into vacant housing and change the locks. Judges and public officials have

[26] A Report for State Business Filing Agencies, National Association of Secretaries of State, April 2014
[27] FBI News 2017; https://www.fbi.gov/news/stories/sovereign-citizens-sentenced
[28] https://www.hud.gov/sites/documents/SOVEREIGNCITIZENSCAMSV2.PDF

liens filed against their homes when a sovereign citizen has encountered that judge in court (see appendix).

●Credit repair schemes where sovereign citizens from Texas and California fraudulently open credit repair business report to credit agencies identity theft and then use that identity to open bank accounts and credit cards and loans and create real estate portfolios in the credit repair clients' names. The illegal credit repair companies had several names including *KMD Credit, KMD Capital* and *Jeff Funding* Upon arrest the sovereign citizens sent letters to the court refusing to recognize the court's authority.[29]

●School Boards, across the U.S. have recently been targeted with incessant unnecessary filings and parent groups are showing up and disrupting meetings to force political or anti-political or religious beliefs. The group "Let Them Breathe" created in part due to mask mandates during the pandemic elected false board members and continually disrupted meetings in Poway, California.[30] There are several groups funding and educating conservatives on how to protest at school board meetings prompted by the conservative movement to remove critical race theory or any teaching about racism from schools.

●Fabricated, false arbitration rulings by some of the following organizations:

> Sitcomm Arbitration Association[31]
> HMP Arbitration Association (also known as the Healing My People Arbitration Association, HMP Dispute Resolution, and Healing My People Ministries, among other names) run by Robert Dale Presley a California sovereign citizen. In 2021 Tarrant County, Texas judges ruled on a foreclosure and were targeted; Presley was jailed for 4 months after ignoring the judge's order to appear in court involving one of his fake arbitrations.

●Sovereign Citizens Courts that issue illegal warrants for judges and law enforcement officers and issue fraudulent manufactured judgments. Common law courts, courts of the Continental United States[32] The common law derives from the American Revolution, which freed the colonists from the British monarchy and

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[29] https://www.justice.gov/usao-sdtx/pr/california-ringleader-charged-multi-layered-fraud-scheme Nina Saavedra, *3 arrested in massive multistate mortgage fraud, credit repair and government loan fraud scheme* (July 22, 2022).

[30] A look at the groups supporting school board protesters nationwide, NPR 10/2021; https://www.npr.org/2021/10/26/1049078199/a-look-at-the-groups-supporting-school-board-protesters-nationwide.

[31] "*Federal District Courts are uniformly skeptical about the validity of the Sitcomm Arbitration Association and its decisions.*" Per Curiam Opinion Appeal to U.S. Supreme Court from U.S. Court of Federal Claims; *Mark Wayne Nation et al v. U.S. 2022-1256*

[32] *People of the State of Colorado vs. Bruce Doucette, et al*; District Court; City of Colorado Denver. Bruce A. Doucette;the self-appointed "Superior Court Judge of the Continental United States of America"

made each colonist sovereign over his own property. Under this definition of common law, no court ruling, or government statute or regulation can deprive a citizen of his common law rights, particularly with regard to property. The theory followed by sovereign citizens is that common law refers to a separate system of laws, designed to protect individual property rights.[33]

●Peace Officer that refuses to recognize the State of Texas or the United States; in order to be sworn in have to swear to protect the Texas Constitution and enforce laws of the State of Texas. (My encounter with a sovereign citizen).

●Sovereign Citizen stopped by police for traffic violation; let go due to the fact too much time and the annoyance of having to arrest the driver that refuses to identify himself or provide documents that identify driver or reflect insurance or registration regarding Texas Transportation Code violations. (I have encountered this scenario more than once). The time consumed during a traffic stop by local law enforcement across the U.S. quite likely leads to either releasing the driver or an arrest due to the failure to properly identify.

●Refusal to pay taxes local, state and federal, municipal fees, deposits, to complete necessary municipal permit applications. IRS has created a department solely to deal with problem filings likely contrived by militia groups and sovereign citizens by design; including misuse of non-profit status.[34] IRS is also sharing information and processes regarding tax filings with the FBI and other federal agencies.[35]

3. Solutions

Traditional methods of dealing with sovereign citizens, such as sanctions, criminal charges, contempt, and general penalties are the solutions that effectively serve as a deterrent for individuals that recognize the legitimacy of the legal system. Sovereign citizens do not possess this recognition and therefore traditional solutions are not successful. An exponentially increasing number of court opinions are written that include rulings or definitions referencing sovereign citizen theories.[36] Court rulings and dicta provide the precedence necessary to guide new rulings or determinations involving sovereign citizens, but also provide valuable guidance for judicial and municipal policy creation.

U.S. Magistrate Judge, David L. Horan in Case No. 3:20-cv-03299-D-BN cites *Westfall v. Davis, No. 7:18-cv-23-O-BP, 2018 WL 2422058, at *2* (N.D. Tex. May

[33] Pitcavage Mark: *Common law and uncommon courts: overview of the common law court movement: hidden history as justification.* The Militia Watchdog, July 25, 1997
[34] ADL, *Extremist and Hate Groups May be Abusing Non-Profit Status*, June 28, 2021.
[35] IRS and Terrorist-Related Information Sharing, October 2002.
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4, 2018) "So-called sovereign citizens argue that, though they are born and reside in the United States, they are their own sovereigns and are not United States citizens. They claim as grounds for this belief the Uniform Commercial Code, maritime and admiralty law, the idea of strawman trusts, and Bible verses. Sovereign citizens often attempt to use these beliefs to 'avoid paying taxes, extinguish debts, and derail criminal proceedings.' However, these citizens cannot claim to be sovereigns independent of governmental authority while they simultaneously ask the judicial system to grant them recourse." (citations omitted)), rec. accepted, 2018 WL 2414794 (N.D. Tex. May 29, 2018).

Many states are passing harsher laws and civil and criminal penalties to address a major tool used by sovereign citizens, paper terrorism. These include pre-filing remedies and post-filing judicial relief. But what about remedies and solutions to achieve cooperation from the sovereign citizen for the period of time he or she is in front of you and any department or individual in your municipality? Keep in mind there is no typical "sovereign citizen", nor do they identify explicitly as a sovereign, but what does become evident is the expression of a core theme of beliefs that individuals share and it principally centers on the view they are not subject to the law or subject to a higher set of laws.

Since writing about sovereign citizens in a 2022 blog our office gets, on average, one phone call a day from individuals seeking guidance on how to become a sovereign citizen, a citizen of the universe or simply seeking information regarding the sovereign citizen views and tactics.

Solutions and the methods to deal with sovereign citizens are a key consideration for municipal agencies and the court system because the tactics of sovereign citizens invariably include obstruction, noncompliance, and a total lack of cooperation. Often sovereign citizens in court or in any governmental setting are disrespectful due to their view that the government is illegitimate. In addition, many are argumentative and disruptive in court, or generally display these traits on any occasion they encounter members of the governmental system they refute.

Legal and psychological experts emphasize the importance of fair processes and fair treatment when sovereign citizens encounter the "system". Ideally no additional effort is necessary to illustrate the inherent fairness of any process, but explaining how the "system" is fair when sovereign citizens are encountering the municipal, judicial or any administrative system, the belief that the court or municipality or system is illegitimate must be overcome. Municipal Court and law enforcement training materials emphasize staying calm, avoid escalation and some go as far to include anger management guidelines.[37]

[37] Andy Quittner, "*Contending with Obstruction Advocacy: Dealing with Difficult Sovereign Citizens"*, Texas Municipal Education Center, 2012.

The recommended approach for encounters with sovereign citizens must not include the loss of patience, or ridicule of their beliefs; despite their purposeful intent to be difficult and argumentative and to generally "push back". "Fair processes and treatment may provide the necessary incentive to not reoffend and may even signal the legitimacy of the judiciary—at least to the extent that sovereigns believe that courts will not summarily strip citizens' rights as a matter of course."[38]

Even when sovereign citizens achieve no success when arguing their position and essentially lose in court, or fail to gain a favorable ruling or result, if treated without bias the sovereign citizen may feel the outcome was fair. Essentially fair treatment on its face will act as a deterrent. Indeed, if a judge is reasonably fair with a sovereign citizen and ultimately decides that she should be barred from filing with the court in the future, this outcome, though unfavorable for the sovereign, may be accepted as fair.[39]

Sovereign citizens believe in anti-government conspiracy theories and these conspiracies are historically rooted in racism. Sovereign citizens intentionally frustrate law enforcement agencies, judges, judicial staff, and elected officials as well as municipal employees. In addition, sovereign citizens have proven to be capable of terrible violence and no person that purports to be a sovereign citizen should be underestimated regarding such capability or simply the possibility of violence. A key element of paper terrorism is most commonly the ability of sovereign citizens to intentionally hold up court proceedings and public meetings with incomprehensible jargon, theories, and argument and when attempts to manipulate the system fail they resort to harassing public officials with the same tactics; including filing suit, fake liens, or fake deeds. As early as 1995 the Central Texas Counterterrorism Group began writing articles on domestic terrorists and paper terrorism following events in Waco, Texas and Oklahoma City and a key purpose of the group is to partner with high-technology communities as Texas is particularly vulnerable to domestic terrorist groups.[40]

U.S. Courts are employing pre-emptive and preventative measures such as pre-filing injunctions, also known as "gatekeeper orders," to prevent litigants from filing new lawsuits or other filings without leave of court. Federal Courts have the inherent authority to issue these injunctions to prevent abuse of the judicial system and to protect other parties from frivolous or malicious lawsuits. The All Writs Act (28 U.S.C. § 1651(a)) authorizes federal district courts to withhold judicial access from parties who repeatedly file frivolous suits.[41]

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[38] Tom R. Tyler, Why People Obey the Law 5 (1990).
[39] 93 N.C.L.Rev. 1106 (2015) pg. 1137.
[40] FBI Law Enforcement Bulletin Volume 64: Issue 3 (March 1995) NCJ Number 154478.
[41] 93 N.C.L.Rev. 1106(2015) pg. 1132.

4. Practical Tools & Solutions to Aid in Sovereign Citizen Encounters & Understanding Sovereign Citizens

Understanding the mindset and theories behind the sovereign citizen movement provides utility for any that will encounter sovereign citizens. In other words; if you can't beat them at least try and understand them. This is certainly not a complete list but it provides sources for general information to gain an understanding of the ideology.

Suggested reading to gain an understanding of the militia and sovereign citizen mindset and to prepare for methods and tactics used by both:

1. The Citizens Rule Handbook which includes "The Unanimous Declaration"
   https://famguardian.org/Publications/CitRulebook/rulebook.htm#anchor14

2. "*Title 4 Flag Says You're Schwag! The Sovereign Citizen's Handbook: Version 3.2*" (November 11, 2013), by H.I.R.M. J.M. Sovereign: Godsent™, published by CreateSpace Independent Publishing Platform; available on Amazon.com.
3. Discharge-Debt.com. Sections on how to use sovereign citizen methods to counter financial responsibilities; "*You can Get out of Debt & it May Even be Free*"; "*MANS Law vs. Gods Law*" (www.newenergybooks.com); "*Once Upon a Time There Was No Money*" website that offers training packets and a Sovereign Citizen Preparatory Course.
   Sovereign-Citizen.net.

4. Continental United States of America Marshalls, https://afreecountry.com/?q=cusa-marshals. "*The sheriff is the highest law enforcement officer elected by the people in each county. No other law enforcement officer is permitted to operate within the county without the authority of the sheriff. This applies to city, state and federal law enforcement agents*."

5. National Liberty Alliance, a national sovereign citizen movement and their website includes a "how to" on how to "win in court" [42]

   https://www.nationallibertyalliance.org/how-we-people-will-win

[42] https://www.splcenter.org/fighting-hate/extremist-files/group/national-liberty-alliance

6. "Rise of the Moors" a group based in Rhode Island recently involved in a Massachusetts standoff with law enforcement and arrests when a heavily armed group of men travelled to Maine for "training". riseoftheMoors.org.

7. Amazon.com: Nearly every item a sovereign citizen desires or needs may be purchased on Amazon, including, fake license plates[43], sovereign citizen kit ("as seen on T.V.")[44], sovereign citizen pocket constitution[45], and countless written publications.

Other Resources:

U.S. Department Homeland Security Digital Library (HSDL) provides public access to numerous documents and bulletins related to homeland security policy and strategy. (www.hsdl.org)

These documents include:

- U.S. Department of Housing and Urban Development Office of Inspector General: "Attention HUD REO Contractors, Property Inspectors, Section 8 Administrators, and Realtors: Watch out: Sovereign Citizen Scams".

- Naval Postgraduate School, 2016; "Uncommon Law: Understanding and Quantifying the Sovereign Citizen Movement".

- Naval Postgraduate School, 2018 "Weapons of Mass Distraction: Strategies for Countering the Paper Terrorism of Sovereign Citizens".

- Naval Postgraduate School, 2015, "Posse Comitatus/Sovereign Citizens: A brief bibliography.

If you Google "database of sovereign citizens" an Excel spreadsheet comes up apparently prepared by or posted on the HSDL website, but I was unable to locate the spreadsheet on the website.

Texas Judicial Branch List of Vexatious Litigants subject to a Prefiling Order https://www.txcourts.gov/judicial-data/vexatious-litigants/. The Texas judiciary signs court orders upon proper motion labelling litigants as "vexatious" and bars them from access to Texas courts. Similar lists are created across the U.S.

[43] Traveler license plate
[44] Sovereign Citizen Cut Out Book
[45] Pocket constitution

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APPENDIX

State Laws to Combat False and Fraudulent Filings[46]

Florida

Title XLVI Crimes; Chapter 817 Fraudulent Practices
817.535 Unlawful filing of false documents or records against real or personal property.

Georgia

Georgia, under the Georgia Code (GA §44-2-43),stealing houses by recording fraudulent or counterfeit real estate deeds is a felony. Witnesses who help perpetrate Georgia deed fraud are subject to the same potential penalties.

Illinois

False title-clouding a felony:
https://www.isba.org/ibj/2013/11/lawpulse/stiflingsovereigncitizenstougherpen
Section 720 ILCS 5/32-13 of the Illinois Criminal Code a felony level offense resulting from the creation of a cloud on title that either (a) has a value in excess of $10,000, or (b) results from a second or subsequent offense, due to the recording or filing of a document which you know to be without a basis in legitimate legal theory.

Michigan

MLC 600.2907a(1), a person who encumbers 'property through the recording of a document without lawful cause with the intent to harass or intimidate any person is liable to the owner of the property encumbered for all of the following:

- All of the costs incurred in bringing a legal action, including actual attorney fees.
- All damages the owner of the property may have sustained as a result of the filing of the encumbrance.
- Exemplary damages.

MCL 565.108; Slander of Title

- "No person shall use the privilege of filing notices hereunder for the purpose of slandering the title to land, and in any action brought for the purpose of quieting title to land, if the court shall find that any person has filed a claim for that reason only, he shall award the plaintiff all the costs of such action, including such attorney fees as the court may allow to the plaintiff, and in addition, shall decree that the defendant asserting such claim shall pay to plaintiff all damages that plaintiff may have sustained as the result of such notice of claim having been so filed for record."

[46] Partial List based on my findings while researching sovereign citizens and in no way complete.

New York

New York City's Department of Finance (DOF) now also lets people sign up for alerts and published a Deed Fraud Booklet which provides notice when liens for unpaid debts and other documents are filed against property. The DOF urges New York City residents to take a number of actions to protect themselves.

North Carolina

North Carolina, Chapter 14 Criminal Law, Art. 20 Frauds, §14-118.6. Filing false lien or encumbrance. Will place a mark on the document:
THE CLAIM ASSERTED IN THIS DOCUMENT IS FALSE AND IS NOT PROVIDED FOR BY THE GENERAL LAWS OF THIS STATE
Adopted 2012 last amended 2019.

Pennsylvania
Protective policy-making has occurred in the city of Philadelphia, which now offers the Deed Fraud Guard system. People can register to be notified of filings on their properties — and look at the documents for free.

Tennessee

Several counties have set up a method to sign up to receive deed alerts after various fraudulent mailings were received by property owners leading them to believe they would lose their property, most recently in Nashville. September 2020, Tennessee's Washington County Register of Deeds launched a tool to send free property fraud alerts to those who entrust their deeds to the county recorder.

(https://www.deeds.com/articles/real-estate-law-enforcement-catching-up-to-deed-fraudsters/

Texas

Texas Government Code; Title 2 Judicial Branch, Subtitle D. Judicial Personnel and Officials, Subchapter J. Certain Fraudulent Records or Documents, Chapter 51 Clerks; Section 51.901 Fraudulent Document or Instrument. Section 51.902 Action on Fraudulent Judgment Lien.

Initially Adopted in 1997 and last revised in 2007. The Statute is meant for Clerks at every level of court including Municipal Courts. Requires "reasonable basis" and "good faith belief" that a document is fraudulent. Requires ***action*** *by the Clerk*

within two (2) days of filing of a fraudulent instrument/document or within 2 days after the Clerk becomes aware the document may be fraudulent.

Texas Penal Code Section 37.10 Tampering with a Governmental Record. Criminal offense if person knowingly makes a false entry in or false alteration of a governmental record.

Virginia

Code of Virginia, Title 182 » Chapter 6. Crimes Involving Fraud » Article 7. Miscellaneous False and Fraudulent Acts » § 18.2-213.2. Filing false lien or encumbrance against another.

Wisconsin

Slander of title (Wis. Stat. s. 706.13)
It is against the law for any person to record or file a lien against real or personal property knowing some or all of its contents to be false or frivolous, and is liable to any owner of the impaired property for punitive damages of $1000 plus any actual damages caused.

The rest of this page is intentionally left blank.

Affidavit of Status Submitted by a Sovereign Citizen to the Courts

P. 8/16

AFFIDAVIT OF STATUS
of [redacted]

TEXAS STATE)
)ss
HARRIS, COUNTY)

Comes now, [redacted]
your Affiant, being competent to testify and being over 18 years of age, after first being duly sworn accordingly to law to tell the truth to the facts related herein states that she has firsthand knowledge of the facts stated herein and believes these facts to be true to the best of my knowledge.

1. I [redacted] Affiant is a living breathing Natural Private people created by God who reserve all her Natural rights a living Soul born on the land and not the sea who's domicile is TEXAS STATE

2. I [redacted] is a Natural Private Soul created by God therefore is not and cannot be any ARTIFICIAL PERSON and, therefore, cannot be assumed or presumed to be a STATUTORY CITIZEN who domicile is in the DISTRICT OF COLUMBIA Washington D.C. and therefore, cannot be LITIGATED, PROSECUTE or EXECUTED and FALSELY IMPRISONED under the COLOR OF LAW codes, statute, policies or given a STATUTORY CITIZEN IDENTIFICATION STATUS.

3. I [redacted] are born of the People of the land and reserve all my NATURAL PRIVATE RIGHTS and DO NOT CONSENT for my NATURAL PRIVATE RIGHTS TO BE CONVERTED TO STATUTORY RIGHTS.

4. I [redacted] am not an ARTIFICIAL FICTION created by the Government therefore I DO NOT CONSENT for my NATURAL PRIVATE NAME to be CONVERTED into the all cap name [redacted] this a ARTIFICIAL FICTIONAL NAME that is not my NATURAL PRIVATE NAME [redacted]

5. I [redacted] is a creation of God and who's domicile is the Natural Land created by God in which I was born on the soil of the Constitutional TEXAS STATE.

6. I [redacted] under my Natural Private Universal Rights given by my God the creator under a SWORN OATH OF OFFICE All courts and Judges in every state shall be bound thereby any Thing in the Constitution or Laws of any State

P. 3/14

P. 9/66

to the Contrary notwithstanding

7. I [redacted] is given a Public Notice to all Public Officials, Federal Agencies, Police departments, State, City, and County Officials, Judges, Courts, County Clerks, DMV, IRS, Secretary of State, U.S. FBI, CIA, Homeland Security that I am not a UNITED STATE CITIZEN, that I am not a STATUTORY CITIZEN, that I am not a 14 AMENDMENT CITIZEN, and I am not under the assumption or presumption or implied that my domicile is in the jurisdiction of the DISTRICT OF COLUMBIA, Washington D.C.

8. I [redacted] am a NATURAL PRIVATE LIVING BREATHING PEOPLE OF THE LAND of God's creation who's domicile is the Constitutional TEXAS STATE and reserving all my NATURAL PRIVATE RIGHTS given by GOD.

9. I [redacted] DO NOT CONSENT TO NO CONTRACT IMPLIED OR ASSUMED OR PRESUMED OR WITHOUT MY KNOWLEDGE TO BE NULLIFIED AND VOIDED.

10. I [redacted] DO NOT CONSENT to have my NATURAL PRIVATE RIGHTS CONVERTED TO STATUTORY RIGHTS therefore, STATUTORY LAWS, CODES, AND STATUES do not apply to my NATURAL PRIVATE LIVING BREATHING SOUL OF THE LAND.

11. I [redacted] is given notice that as a matter of Public Officials lawful compliance to the Constitution any of the People, while functions in any Public compactly, in return for the trust of the People, are granted limited delegated authority of and by the People, with specific duties delegated in accordance therefore, shall only do so pursuant to a lawfully delegated, sworn and subscribe OATH OF OFFICE and any and all bonds required thereof.

12. I [redacted] notices that the only court authorized by the referenced Constitution to hear matters of the People is a court that conforms to and functions in accordance with Article III Section 2 of the referenced Constitution in which all officers of the court abide by their sworn and subscribe OATH OF OFFICE and support and defend the Rights of the People, and are heard "ONLY" Trial by Jury and In accordance with all aspects of due process of law.

13. I [redacted] notices that pursuant to this Supreme Law of the Land and the God given Rights secured and guaranteed therein, this Constitution is established to ensure that the deciding granted by God to all People, on this land shall endure and ensure forever that this People on this land be free from any and all slavery, tyranny and oppression under color of law, Statues, Codes, Policy, procedures, or of any other type.

P. 4/1f

p. 16/66

14. I [redacted] father notices in pursuant to this Constitution, Affiant cannot be compelled, manipulated, extorted, tricked. Threatened, placed under duress, or coerced, or so effected under color of law by any Natural Person who individually, or in any compactly as or under any Artificial Person, agency, entity, Officer, or party into the waiving of any of Affiant's Rights or to act in contradiction therefore, or to act in opposition of the moral conscience and Dominion granted Affiant by God, nor can Affiant be deprived of any of these rights privileges except by lawful process in accordance with the Law, without that Natural and/or Artificial Person, in whatever capacity, in so doing, causing injury to your Affiant and thereby committing numerous crimes, requiring lawful punishment therefrom.

Affiant All Rights Reserved

By:_____
Affiant autograph

I [redacted] older than 18 of sound mind under perjury under Oath swear to the best of my Knowledge all statements are true.

Sworn before me _____day of

_____20____

By_____
Affiant
_____ SEAL

_____
Date Commission Expire

P. 5/14

Fwd: DECLARATION OF INDIGENOUS ABORIGINAL

[redacted]

Fri 5/6/2022 9:12 AM

To: Ods00061Cpc <ods00061cpc@officedepot.com>

[CAUTION: EXTERNAL SENDER]

---------- Forwarded message ---------

From: [redacted]

Date: Thu, May 5, 2022, 10:58 PM

Subject: DECLARATION OF INDIGENOUS ABORIGINAL

To: [redacted]

CAUSE NO. _____

IN THE DISTRICT COURT

_____JUDICIAL DISTRICT

OF HARRIS COUNTY, TEXAS

[redacted]

plantiff)

v.)SS.

JUDGE [redacted]

JUDGE [redacted]

defendant's

STATE OF TEXAS

COUNTY OF HARRIS

DECLARATION OF POLITICAL STATUS PRIVATE INDIGENOUS ABORIGINAL BORN AMERICAN

AFFIDAVIT OF FACTS

1. My name is [redacted]
2. I [redacted] is a Living Breathing Soul created by God
3. I [redacted] Bleeds when my Flesh is cut.
4. I [redacted] born on the soil of the land
5. I [redacted] is not a resident of District of Columbia
6. I [redacted] am not the ALL CAP TYPED STYLED NAME [redacted]
7. I [redacted] is a Indigenous to the soil and land of Turtle Island/North America
8. I [redacted] Reserve All My Living Breathing Without Prejudice living on this land
9. I [redacted] "Do Not Consent" to no Contract without with any Entity without my full knowledge

and understand and a meeting of the minds.
10. I [redacted] Type Style Name is [redacted]

Signed on_____day of _____2022

INDIVIDUAL ACKNOWLEDGEMENT

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared the person know by me to be [redacted] who, after being by me fully sworn, testified as follows:

My Name is [redacted] I am over the age 18 and I am competent to testify to these matters. I have personally knowledge of all such facts are true and correct.

/s/ [redacted]

_____

[redacted] Affiant

All Rights Reserved
Without Prejudice

SUBSCRIBE AND SWORN TO before me on

_____
Date

_____
Notary Public

SEAL

Fwd: ACKNOWLEDGEMENT

[redacted]

Fri 5/6/2022 9:14 AM

To: Ods00061Cpc <ods00061cpc@officedepot.com>

[CAUTION: EXTERNAL SENDER]

---------- Forwarded message ---------

[redacted]

Date: Thu, May 5, 2022, 10:39 PM
Subject: ACKNOWLEDGEMENT

[redacted]

TEXAS STATE)
)ss
HARRIS, COUNTY)

Come now, [redacted] your Affiant, being competent to testify and being over the age of 21years of age, after first being duly sworn according to law to tell the truth to the facts related herein states that he has firsthand knowledge of the facts stated herein and believes these facts to be true to the best of his knowledge

All Rights Reserved
Without Prejudice

/s/ [redacted] (Affiant)
By:_____
Declaring A Private Living
Breathing Status

_____
date

INDIVIDUAL ACKNOWLEDGEMENT

TEXAS STATE.)
COUNTY, HARRIS)SS.

I certify that I know or have satisfactory evidence that [redacted] is the individual(s) who appear

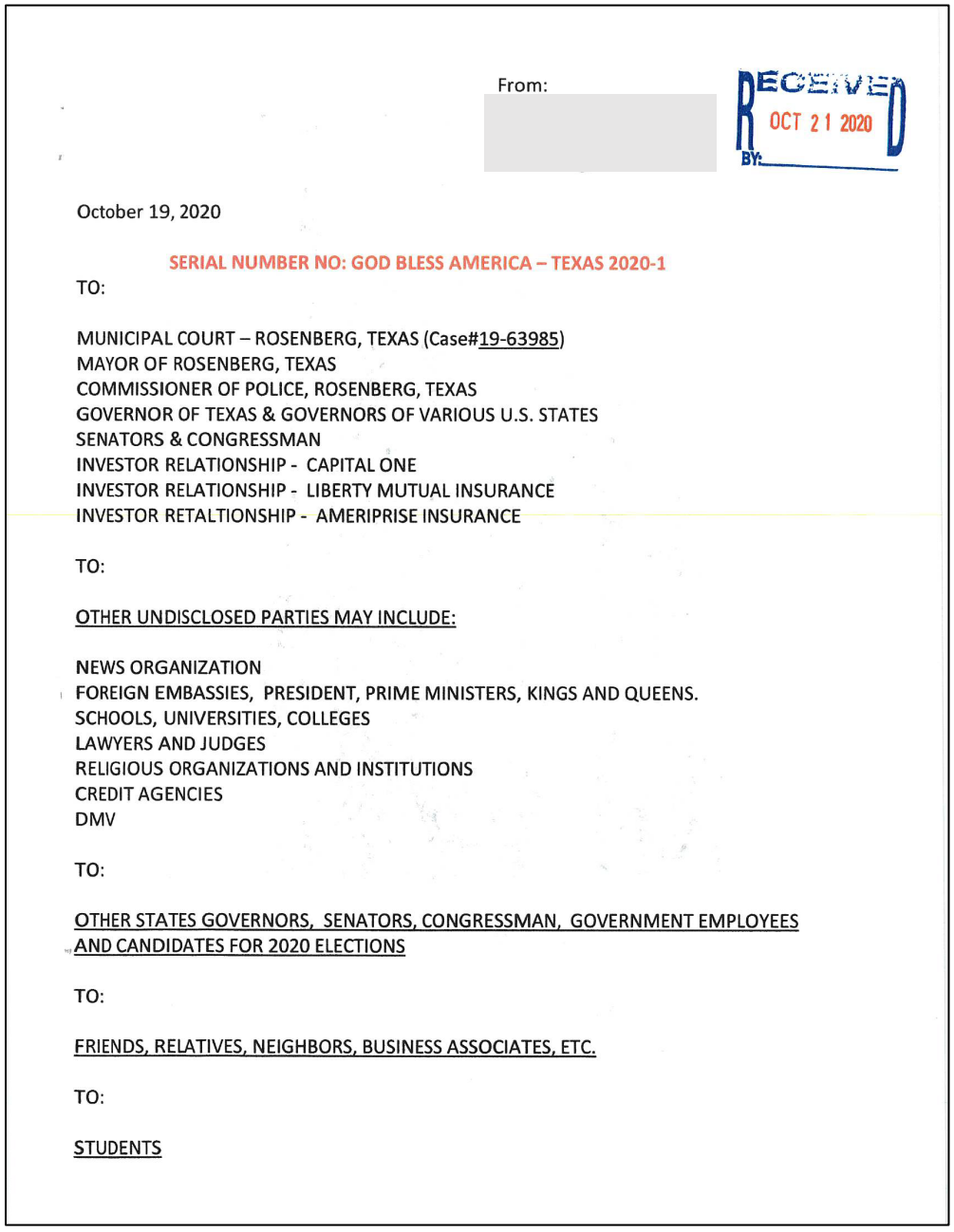
before me, and who acknowledged that he/her/their free and voluntary act for the uses and purposes mentioned in the instrument.

Dated_____

Sign_____
Notary Public for Texas

My Appointment expires
_____

Letter from Sovereign Citizen to Municipal Court Protesting Paying a Ticket



From:

RECEIVED
OCT 21 2020
BY:

October 19, 2020

SERIAL NUMBER NO: GOD BLESS AMERICA – TEXAS 2020-1

TO:

MUNICIPAL COURT – ROSENBERG, TEXAS (Case#19-63985)
MAYOR OF ROSENBERG, TEXAS
COMMISSIONER OF POLICE, ROSENBERG, TEXAS
GOVERNOR OF TEXAS & GOVERNORS OF VARIOUS U.S. STATES
SENATORS & CONGRESSMAN
INVESTOR RELATIONSHIP - CAPITAL ONE
INVESTOR RELATIONSHIP - LIBERTY MUTUAL INSURANCE
INVESTOR RETALTIONSHIP - AMERIPRISE INSURANCE

TO:

OTHER UNDISCLOSED PARTIES MAY INCLUDE:

NEWS ORGANIZATION
FOREIGN EMBASSIES, PRESIDENT, PRIME MINISTERS, KINGS AND QUEENS.
SCHOOLS, UNIVERSITIES, COLLEGES
LAWYERS AND JUDGES
RELIGIOUS ORGANIZATIONS AND INSTITUTIONS
CREDIT AGENCIES
DMV

TO:

OTHER STATES GOVERNORS, SENATORS, CONGRESSMAN, GOVERNMENT EMPLOYEES AND CANDIDATES FOR 2020 ELECTIONS

TO:

FRIENDS, RELATIVES, NEIGHBORS, BUSINESS ASSOCIATES, ETC.

TO:

STUDENTS

SERIAL NUMBER NO: GOD BLESS AMERICA – TEXAS 2020-1

TO:

MUNICIPAL COURT – ROSENBERG, TEXAS (Case#19-63985)
MAYOR OF ROSENBERG, TEXAS
COMMISSIONER OF POLICE, ROSENBERG, TEXAS
GOVERNOR OF TEXAS & GOVERNORS OF VARIOUS U.S. STATES
SENATORS & CONGRESSMAN
INVESTOR RELATIONSHIP - CAPITAL ONE
INVESTOR RELATIONSHIP - LIBERTY MUTUAL INSURANCE
INVESTOR RETALTIONSHIP - AMERIPRISE INSURANCE

TO:

OTHER UNDISCLOSED PARTIES MAY INCLUDE:

NEWS ORGANIZATION
FOREIGN EMBASSIES, PRESIDENT, PRIME MINISTERS, KINGS AND QUEENS.
SCHOOLS, UNIVERSITIES, COLLEGES
LAWYERS AND JUDGES
RELIGIOUS ORGANIZATIONS AND INSTITUTIONS
CREDIT AGENCIES
DMV

TO:

OTHER STATES GOVERNORS, SENATORS, CONGRESSMAN, GOVERNMENT EMPLOYEES AND CANDIDATES FOR 2020 ELECTIONS

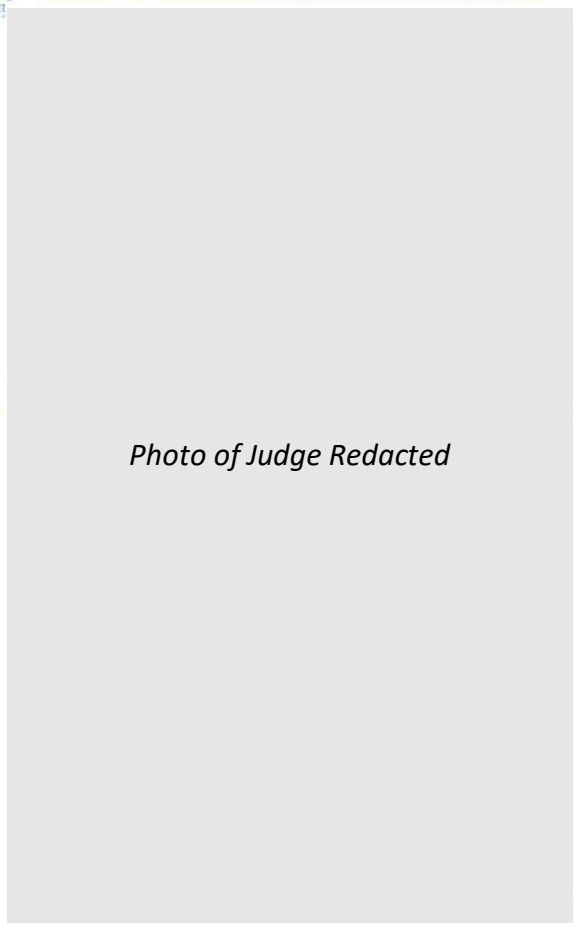
TO:

FRIENDS, RELATIVES, NEIGHBORS, BUSINESS ASSOCIATES, ETC.

TO:

STUDENTS

DISHONEST, IMMORAL & UNJUST



1. Please send tape recording of conversation of first and second court visit.
2. Please send time of my entry and out
3. Please send recording of speeding and also adjacent cars taken by Police.

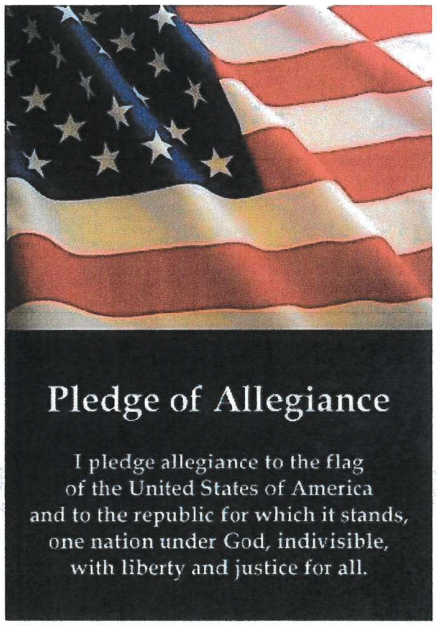
4. How you comprised "Driving Safety Course" ?
5. How you comprised the "Driving History"?
6. Do you know my Profession?
7. I want all my correspondences back in Municipal Court Letter with your signature.
8. What was sent in Certified Mail 7019 1640 0001 0090 3443 under U.S. Government PS Form 3800 costed $ 6.95 dated May 12, 2020
9. You know the meaning of "Judge"

Judge - definition of judge by The Free Dictionary

www.thefreedictionary.com/judge

a. One who makes estimates as to worth, quality, or fitness: a good **judge** of used cars; a poor **judge** of character.

10. You are in violation of "Pledge of Allegiance".



First visit - Paid for 15 minutes - $ 134

Second visit – Paid for 10 minutues - $ 206

SCAN THIS CODE
TO MAKE YOUR
PAYMENTS ONLINE

ROSENBERG MUNICIPAL COURT
PO BOX 32
2110 4TH STREET
ROSENBERG, TX 77471
www.rosenbergtx.gov/municipal court/
832-595-3450

REC#: 2038932 8/28/2020 3:23 PM
OPER: LJ TERM: 005
REF#: RC
PAID BY:

ACCT #: XXXXXXXXXXXXXXXX
AUTH #: 001982
TRAN #: 000000000367
TYPE: PURCHASE

TRAN: 500.0000 COURT PAYMENTS
LODHIA, MOHAMMED IQBAL
00361313 -01 206.00CR
PAID

TOTAL BALANCE: 0.00

TENDERED: 206.00 CREDIT CARD
APPLIED: 206.00-

CHANGE: 0.00

AVOID THE WAIT! GO ONLINE TO MAKE
YOUR PAYMENTS QUICKLY AND EASILY AT
municipalonlinepayments.com/rosenbergtx

SENIOR CITIZEN -