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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 Michael Little,
12 Ryan Bundy,
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Plaintiff's

vs.

UNITED STATES OF AMERICA;
Joseph Robinette Biden; Department of
Interior; Department of Justice; Federal
Bureau of Investigation; Bureau of Land
Management; National Parks Service,
Bureau of Alcohol, Tobacco and
Firearms, DOES 1-30 and ROES
1-100,

Defendant's

CASE NO. _____

**COMPLAINT FOR:
DECLARATORY AND
INJUNCTIVE RELIEF, A
CEASE-AND-DESIST ORDER
AND A PROTECTIVE ORDER**

**RATIFICATION AND VINDICATION
OF THE UNITED STATES
CONGRESSIONAL ACT
OF 1866 JUXTAPOSED AGAINST
THE ANTIQUITIES ACT OF 1906**

Comes now, Plaintiff's Michael Little and Ryan Bundy and allege as follows:

INTRODUCTION

1. The following Complaint lays out the historical facts of government incompetence, apathy, corruption and fraud by both federal and State actors.

1 2. This Complaint for DECLARATORY and INJUNCTIVE RELIEF, A CEASE-AND-
2 DESIST ORDER and A PROTECTION ORDER is extraordinary in that it exposes and
3 demonstrates systemic government malfeasance/corruption that includes longarm, stealth and
4 intrinsic/extrinsic fraud¹; and makes claim that the congressionally delegated authority as
5 provided for within the ANTIQUITIES ACT OF 1906, (*See EXHIBIT 1. Antiquities Act of 1906*)
6 pertaining to National Monuments, which may be placed upon federal *unappropriated* public land
7 was unlawfully applied by Joseph Robinette Biden on March 23, 2023, at PRESIDENTIAL
8 PROCLAMATION 10533 - Establishment of the *Avi Kwa Ame National Monument* [hereinafter
9 “**MONUMENT**”]. Whereas said application of THE ANTIQUITIES ACT OF 1906 is being used in
10 violation of federal law², as well as in violation of the United States Constitution whereas the
11 MONUMENT represents an overt act of federal fraud. (*See EXHIBIT 2. Presidential Proclamation*
12 *10533 - Establishment of the Avi Kwa Ame National Monument*).

13 3. The *MONUMENT* was/is located upon a certain piece of land within the alleged
14 designated physical boundaries of the State of Nevada where said certain piece of land is derived
15 from within a greater parcel of land that consists of 11,530,000 acres and whereas, said greater
16 parcel of land ceased to be federally owned *unappropriated* territorial public land on May 5, 1866.
17 Thereinafter said greater parcel did become non-federally owned *appropriated* land designated to
18 reside within a newly created boundary of the State of Nevada by cause of the United States
19 Congress to wit: THE UNITED STATES CONGRESSIONAL ACT OF 1866 (1867) THIRTY-
20 NINTH CONGRESS Sess. 1 Ch. 71,72,73 Chap. LXXIII. (*See EXHIBIT 3. THE UNITED STATES*
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28 ¹ “Fraud destroys the validity of everything into which it enters.” *Nudd v. Burrows*, 91 U.S. 426 (1875). “Fraud vitiates everything.” *Boyce v. Grundy*, 3 U.S. (Pet.) 210 (1830).

² Because it involves several departments of government and is interstate, it also violates the RICO Act (see 18 USC 1961, et. seq.).

1 CONGRESSIONAL ACT OF 1866 (1867) THIRTY-NINTH CONGRESS Sess. 1 Ch. 71,72,73
2 Chap. LXXIII) [**“THE ACT”**].

3
4 4. THE ACT represents a separate and distinct stand-alone contract between the United
5 States and the people of the State of Nevada pertaining to a specific parcel of land that was/are
6 not lands contained, nor expressly provided for, within certain other contracts between the United
7 States and the people of Nevada, which said contracts are identified as (1) an ACT OF CONGRESS
8 (1864) ENABLING THE PEOPLE OF THE STATE OF NEVADA TO FORM A CONSTITUTION AND STATE
9 GOVERNMENT (approved March 21, 1864) and (2) the CONSTITUTION OF THE STATE OF NEVADA
10 (signed Oct. 31, 1864). (See EXHIBITS 4-5, the NEVADA ENABLING ACT OF 1864 AND THE NEVADA
11 STATE CONSTITUTION; *ARTICLE 14. BOUNDARY* respectively).

12
13 5. Therefore, said certain piece of land which has been dedicated for the purpose of the
14 **MONUMENT** is part of this greater parcel of land (11,530,000 acres) and, therefore, is land that
15 has been incorrectly classified as federal- “unappropriated land” within the alleged designated
16 boundaries of the State of Nevada. Said certain piece of land was and is, in fact, - “appropriated
17 land” within the alleged designated boundaries of the State of Nevada as provided for within
18 THE ACT.

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20 6. Therefore, said piece of appropriated land has been incorrectly classified by the
21 Defendants as being United States *unappropriated* territorial public land and classified as land
22 subject to the ANTIQUITIES ACT OF 1906 for the purpose of PRESIDENTIAL PROCLAMATION 10533
23 - Establishment of the **MONUMENT**.

24
25 7. Therefore, because of this *deliberate* land misclassification (malversion³) by the
26 Defendants and because of THE ACT, PRESIDENTIAL PROCLAMATION 10533 which established
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³ This is a derivative of the word *“Malversation,”* which is defined by the Miriam-Webster Dictionary as: (1) misbehavior and especially corruption in an office, trust, or commission; (2) corrupt administration

1 the **MONUMENT** has been placed upon privately owned *appropriated* land that does not consist
2 of federal *unappropriated* lands that could be subject to the ANTIQUITIES ACT OF 1906.

3
4 8. Therefore, said certain piece of alleged federal *unappropriated* public land within the
5 alleged designated boundaries of the State of Nevada identified as the **MONUMENT** now rests
6 upon *appropriated* privately held land. Therefore, the **MONUMENT** is an unlawful exercise of
7 the ANTIQUITIES ACT that has been illegally and unconstitutionally placed upon lands over which
8 the Defendants have NO authority or jurisdiction. Therefore, the **MONUMENT** violates the sum
9 and substance of the ANTIQUITIES ACT OF 1906.
10

11 9. Therefore, the Defendants having been previously been put on notice, by and through
12 a recorded legal filing in the Nevada federal district court by the Plaintiffs (See **EXHIBIT 6; United**
13 **States Of America v. Cliven D. Bundy, Ryan C. Bundy, Ammon E. Bundy and Ryan W. Payne;**
14 **Case No 2:16-16-cr-046-GMN-PAL; document _____; Motion to Dismiss in the Alternative;**
15 **P. _____, vs. _____**), of the existence of THE ACT, knew or should have known that the
16 establishment of the **MONUMENT** was/is an overt act of fraud being committed by Defendant
17 Joseph Robinette Biden. This federal monument, being an act of fraud was executed and
18 facilitated through **PRESIDENTIAL PROCLAMATION 10533** improperly, illegally, and
19 unconstitutionally to create the **MONUMENT**. This presidential proclamation now constitutes a
20 trespass in violation of Nevada and federal law that invokes the original common law as preserved
21 for the people in such a case at NRS 1.030 and the Ninth and Tenth Amendments, which the
22 People so reserved.
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25 10. The Plaintiffs, the Bundy(s), for decades have attempted to bring this matter before
26 the courts to reveal this fraud and in this effort have been slandered, arrested, tortured and
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1 imprisoned by the defendants for simply exposing THE TRUTH. The Bundys' rights have never
2 been accurately articulated and judicially presented by the people (attorneys) that were either
3 representing them or assisting them with their fight for the truth prior to 2017. Even then, the
4 Bundys had to demand that their attorney set forth their legal arguments regarding THE ACT.
5

6 11. Plaintiff Michael Little provided Cliven Bundy historical documents in 2017,
7 including a copy of THE ACT that was ultimately submitted into the Bundy case record in the
8 form of a Motion to Dismiss or, in the Alternative. As a result of the Nevada State governments'
9 failure to claim land ownership upon THE ACT lands for the last 78 years (1946-2024), Little
10 recognized this land (11,530,000 acres) to be a unique piece of property that was not legally
11 owned by the United States (as a result of THE ACT) nor was it legally owned by the State of
12 Nevada (as the result of 78+ years of possessory abandonment and through a multitude of party
13 admissions) and, as such, Nevada's claim to these lands was in fact constitutionally and statutorily
14 vacated, without any legal government ownership or jurisdiction. As a result of this fact, Little,
15 then filed a claim on the land (See EXHIBIT 5-1) so that he could legally take possession and
16 convey the land back to the benefit of the 99% of the people for community reinvestment⁴ and to
17 stop the land from being coveted and expropriated by corrupt state and/or federal governments.
18 Little disclosed to Cliven Bundy the state and federal fraud and the fact that the State of Nevada
19 had statutorily abandoned the land provided for within THE ACT on or around 1946, and that
20 Little did on December 5, 2022, legally place a claim upon THE ACT lands; which removed them
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26 ⁴ Currently, the only investment in America or in Nevada Citizens that the Federal government is making is taking
27 US citizens' tax dollars and giving them to foreign nationals who are illegally crossing our borders in massive
28 numbers. Meanwhile, the social security recipients, who are struggling to exist on their monthly checks which they
paid into for years, are not even a consideration. This is where we are today. This raises the question that every
American needs to ask, "Is this what we get from our bought and paid for politicians that we elect?" The same
politicians that we send to represent us, who become multimillionaires while in office? While the American Misery
Index (Mortgage Usuary) exponentially expands the homeless and hopeless problem of Americans.

1 from the public domain so that these lands could be redistributed as compensation to the people
2 of Nevada who have been defrauded/damaged by the state and federal government through their
3 illegal and *ultra vires* acts. Which, said claims and public notice made by Michael Little is a
4 historical document, date and time certain, of a holder's possessory title and land ownership
5 transfer in a chain of title, in conformance to the law and a Constitutional guarantee to the people
6 under the Common Law, as well as the Ninth Amendment and Tenth Amendments of the United
7 States.
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10 12. The Defendants have perpetrated a *fraud* on the court, in order to maintain a
11 racketeering operation. This fraud by reason of which "there was, in fact, no adversary trial or
12 decision of issue in the case; where there has never been a real contest in the trial or hearing of
13 the case." *Villalon v. Bowen*, 70 Nev. 456, 469, 273 P3d 409 (1954); citing *United States v.*
14 *Throckmorton*, 98 U.S. 61 (1878). Fraud has been held to exist when the unsuccessful party is
15 kept away from the court by a false promise or compromise, **or such conduct as prevents a real**
16 **trial upon the issues involved**, or any other act or omission which procures the absence of the
17 unsuccessful party at trial. Further, it consists of fraud by the other party to the suit, which
18 prevents the losing party either from knowing about his rights or defenses, or from having a fair
19 opportunity of presenting them upon the trial," *Murphy v. Murphy*, 65 Nev. 264, 271, 193 P2d
20 850 (1948), quoted with approval in *Colby v. Colby*. 78 Nev. 150, 396 P2d 1019 (1962).
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23 13. In the case of *U.S. v. Bundy*, this fraud (land ownership) was perpetuated upon the
24 plaintiffs (Bundys) by the federal magistrate and federal district court adhering to a set of false
25 facts presented to the court by the federal government's representatives and argued by the
26 Defendants.
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1 14. The Defendants and the United States District Court, District of Nevada was informed
2 of this legal land ownership conflict regarding THE ACT by and through Plaintiffs court filings
3 in their criminal case of *United States v. Bundy* in a Motion to Dismiss in the Alternative. The
4 court upon consideration of THE ACT initially made a ruling denying Bundys' Motion to Dismiss
5 citing the 1848 TREATY OF GUADALUPE HILDALGO as evidence of federal land ownership,⁵ only
6 to later set aside said ruling by circling back to previously dismissed exculpatory issues and
7 thereafter manufactured a decision that permitted the court to sidestep the land ownership issue
8 completely and bury THE ACT in its findings. This position of circling back is supported by the
9 government's own party admissions through Elizabeth O. White, Appellate Chief and Assistant
10 U.S. Attorney, who on appeal argued that the Court had previously visited the proposition
11 regarding the alleged misconduct of the FBI/BLM and held the exculpatory issues
12 inconsequential. (See EXHIBIT 7; Governments Opening Brief *U.S. v. Cliven D. Bundy, et al*,
13 Case No 18-10287; P. 20, ls. 4-6). Ironically, Elizabeth White, in filing this appeal violated her
14 oath of office because she knew or should have known that THE ACT lands eliminated federal
15 jurisdiction over the Bundy's grazing their cattle on land which the federal government DOES
16 NOT OWN! Ms. White was complicit in the effort to negate the Congressional Act of 1866/67,
17 as well as her efforts to secure (*i.e.*, steal) Nevada land on behalf of the 1% elite ruling class that
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24 ⁵ Federal Judge Gloria Navaro's holding that the federal government owns THE ACT lands because they were
25 acquired under the Treaty of Gudalupe-Hildalgo is an absurdity for two reasons: (1) It ignores THE ACT as though
26 it was never passed into law by Congress and (2) it ignores the party admissions by the federal government that they
27 do not own THE ACT lands as evidenced when the U.S. purchased 80 acres of land from Nevada to build Hoover
28 Dam and also the land upon which the Lehman Caves are situate were acquired by the statutory acquiescence of the
State of Nevada. In other words, if you own land, you don't need to pay someone else for it and you don't need
permission from another party to own or occupy it. So, Judge Gloria Navaro's decision is based upon the federal
government's unclean hands in making the feckless TREATY OF GUADALUPE-HILDALGO argument, which said
argument ignores the facts, federal law, and the truth. Therefore, the government's argument is an intentional
misrepresentation to the Court and therefore a violation of their oath of office and a *prima facie* case of malversation.

1 now controls/dictates bad behavior and in Washington, D.C.. In addition to Ms. White violating
2 her oath of office, she violated her duty, as a prosecutor, to SEEK JUSTICE.

3
4 15. The court's final ruling to reintroduce previously discarded tangential exculpatory
5 issues in this case, in effect, circumvented plaintiffs filed venue/jurisdictional challenge (that of
6 legal land ownership) resulting in THE ACT being completely diminished and intentionally
7 discarded in the final ruling as is evidenced as follows: (See **EXHIBITS 8 & 9, *United States v.***
8 ***Bundy; United States District Court District of Nevada Case No. 2:16-cr-00046-GMN-PAL (D.***
9 ***Nev. Dec. 20, 2016) Peggy A. Leen United States Magistrate Judge; Order-And-Report Of***
10 ***Findings And Recommendations) and United States Of America v. Cliven Bundy; Case No. 2:16-***
11 ***cr-46-GMN-PAL ORDER January 2017 by Gloria M. Navarro, Chief Judge United States District***
12 ***Court, District of Nevada; respectively.*** THE ACT was filed, recorded, and presented by the
13 Plaintiffs in Bundy's criminal case of ***United States v. Bundy*** and on information and belief,
14 because of tangential judicial circumvention and lawfare, the conflict between THE ACT and the
15 decision of federal judge Gloria Navaro (Bundy's judge) citing land ownership being derived
16 from the Guadalupe Hidalgo Treaty remains incorrectly decided and Navarro failed to resolve the
17 challenged law of the case. Subsequently, Defendant's fraudulent land dealings have continued in
18 Nevada that now includes the theft of 506,814 additional acres of land illegally used to create the
19 MONUMENT (***Avi Kwa Ame***) and is the impetus of this Complaint.
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23 16. This previous notification and "notice" of THE ACT to the Defendants by and through
24 the Honorable Federal District Court as having been previously described by federal prosecutors
25 as "the law of the case." THE ACT was presented, reviewed *de novo*, initially ruled upon and in
26 consideration of THE ACT re-reviewed causing the court to set aside the land ownership issue in
27 the courts initial ruling (ORDER) in what Plaintiffs believe to be the more substantive reason of
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1 materiality [THE ACT], that the matter of *United States v. Bundy* was dismissed with prejudice
2 by the Honorable Judge Navarro. The Honorable Judge Navarro cited tangential exculpatory
3 issues⁶ committed by the Defendants as being improper and/or corrupt to dismiss this matter
4 where said dismissal served to circumvent the Bundy's accurate claim that the federal government
5 did not legally own or control these lands. The court's lawfare maneuvering prevented the Court
6 from having to make or enter a ruling regarding THE ACT, which would have exposed the federal
7 government's fraud and liability. Thus, THE ACT remains in direct conflict of Judge Gloria
8 Navaro's decision, where Judge Gloria Navaro's decision (ORDER) effectively legislated from
9 the bench and negated a Congressional Act of Congress. (See EXHIBIT 9. *United States Of*
10 *America v. Cliven D. Bundy, Ryan C. Bundy, Ammon E. Bundy and Ryan W. Payne; Case No*
11 *2:16-16-cr-046-GMN-PAL; ORDER*).

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14 17. Subsequently, Defendants corruption and the Honorable court's final decision which
15 made no mention of THE ACT and therefore purposely and intentionally negated the
16 Congressional Act and served to evade the entire issue of land ownership. Therefore, the court
17 did not resolve plaintiffs previous Constitutional claim in *United States v. Bundy* and because of
18 this unresolved claim it has now taken the nature of this COMPLAINT to wit: the parcel of land
19 provided for within THE ACT is not owned by the United States with the exception of land that
20 has been allegedly legally purchased and/or legally conveyed by a Nevada county to the United
21 States as evidenced at Nevada Revised Statutes NRS 328.210, NRS 328.220, NRS 328.340, NRS
22 328.360, NRS 328.370 and NRS 328.380 (see EXHIBIT 10) **NRS 328.210, NRS 328.220, NRS**
23 **328.340, NRS 328.360, NRS 328.370 and NRS 328.380** where said conveyances demonstrates
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28 ⁶ A Violation of *Brady v. Maryland*, 373 U.S. 83, ___ S.Ct. ___ (1963), wherein the government failed to release exculpatory (meaning tending to prove the defendant's innocent). Navarro's Order cites government corruption in the language of her final order of dismissal with prejudice.

1 the required legal transfer of THE ACT lands to the federal government. History indicates that
2 these statutes were required of the State of Nevada to effectuate them with the United States, in
3 order that the United States would be legally recorded as the landowner in the lawful chain of title
4 respectively. The State of Nevada was and has been reckless regarding the legal ownership set
5 forth in THE ACT lands beginning in 1867 (See Governor Blasdel's First Biennial Message); and
6 then again, in 1946 when the BLM was created and lastly, by Nevada's Constitutional
7 Amendment, in 1979 (passed in 1981), *aka*: Question No. 5. (See EXHIBIT 11 – QUESTION NO.
8 5).⁷
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11 18. The fact that the Defendants and the Federal court were made aware by legal notice
12 of said Congressional Act in 2017 and with this knowledge the Court chose not to include THE
13 ACT in its final decision demonstrates extrinsic fraud and malversion by Defendants with regard
14 to PRESIDENTIAL PROCLAMATION 10533-Establishment of the *MONUMENT* and cast a dark
15 shadow upon the court's purpose and proceedings regarding *U.S. v. Bundy* specifically pertaining
16 to THE ACT. Consequently, this dark shadow impugns the integrity of the federal judiciary as a
17 whole, diminishes the public trust and exposes the entire *Bundy* case as a color of law, lawfare,
18 police state inquisition conducted by the Department of Justice [DOJ] that was orchestrated by
19 former Nevada U.S. Senator Harry Reid and complicit with the assistance of elected Nevada
20 politicians and State law enforcement. As a result of this Complaint, Nevada politicians will no
21 longer continue to benefit from this fraud and the lie, they (Nevada U.S. representatives) must
22 now decide whether to represent the people of Nevada and support this complaint, recognize THE
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27 ⁷ This vote was grossly unconstitutional because the vote on **Question 5** allowed the inhabitants of THE ACT lands
28 (meaning outside of the Constitutional boundaries the State of Nevada) to vote on the measure. As the inhabitants
of THE ACT lands were not within the Constitutional boundaries of the State, they had no voting right or authority
on this issue. Therefore, **Question 5** is void *ab initio* as a matter of law – no matter how you look at it.

1 ACT, and accept the truth or continue to promote the lie of the elite 1% ruling class in
2 Washington, D.C. that now includes the MONUMENT.

3
4 19. Whereas this trespass by the Defendants, as to the *Bundy* case and the MONUMENT
5 must now be corrected by this Honorable Court to maintain the integrity of the Courts' and their
6 oaths of office to support and defend the United States Constitution and the Law of the Land; and,
7 to resolve Plaintiff's unanswered Nevada land ownership claim exercising the Court's unspoken
8 authority as a function of its Article III judicial power which is "the duty to maintain the
9 supremacy of federal law."
10

11 20. Therefore, PRESIDENTIAL PROCLAMATION 10533 - Establishment of the *MONUMENT*
12 is a federal act which is null and void, constituting trespass in violation of federal and State law,
13 as well as a violation of the Constitution of the United States, that is a Presidential Proclamation
14 outside its Constitutionally delegated authority under the ANTIQUITIES ACT OF 1906; and
15 therefore, a violation of the Separation of Powers Doctrine. Whereas the President of the United
16 States under Article 2, does not have the authority to set aside or negate Acts of Congress.
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18 21. Whereas, the Executive Branch has been using the ANTIQUITIES ACT OF 1906 in
19 Nevada beginning in 1922⁸ to illegally overreach their lawful authority by obfuscating the legal
20 limits of their authority of the real and/or actual land ownership in order to commit fraudulent and
21 *ultra vires* acts.
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23 22. Therefore, the Executive Branch, knew or should have known that the Congressionally
24 delegated authority under the ANTIQUITIES ACT OF 1906 did not legally convey congressional
25 authority to the executive branch exercised through PRESIDENTIAL PROCLAMATION 10533 -
26 Establishment of the *MONUMENT*.
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⁸ With the alleged federal acquisition of the Lehman Caves located in White Pine County (Nevada).

1 23. Therefore, the application of the ANTIQUITIES ACT OF 1906 has been used by the
2 Executive Branch to obfuscate legal land ownership that is easily and factually cognizable and
3 therefore is recognized as an intentional act of malversion.
4

5 24. Defendant(s) have used a Presidential Proclamation (Presidential Executive Order),
6 illegally, to obtain land ownership under a fraudulent pretense in violation of federal and State
7 law and the United States Constitution.

8 25. This Presidential Proclamation (PRESIDENTIAL PROCLAMATION 10533 - Establishment
9 of the *MONUMENT*) constitutes an overt violation of the Separation of Powers Doctrine by
10 attempting to negate or dismiss a Congressional Act through Executive Action (*aka: executive*
11 *legislation amending a Congressional Act*).

12 26. This Executive Act was intentional, deliberate, illegal and constitutes an Executive act
13 of fraud, extrinsic fraud and constitutes malversion by the Defendants and therefore falls
14 legitimately within the purview of the RICO ACT.
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16 27. Therefore, as Chief Justice John Marshall explained in *Marbury v. Madison: The*
17 *courts may invalidate “an Act of Congress only if the lack of Constitutional authority to pass*
18 *the act in question is clearly demonstrated.*” This, therefore, also applies to Presidential
19 Proclamations and Presidential Executive Orders, that violates the separation of powers doctrine
20 and countermand Congressional Acts. Even so, the executive branch cannot negate a
21 Congressional Act only the Courts can.
22

23 28. THE ACT was created with plenary power at Article VI and is an Act of federal power
24 woven from the fabric of the Supremacy Clause that forecloses any application of the
25 ANTIQUITIES ACT OF 1906 for use and particularly PRESIDENTIAL PROCLAMATION 10533-
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1 Establishment of the *MONUMENT* on land NOT OWNED by the United States, nor having
2 exclusive jurisdiction over same.

3 29. Therefore, PRESIDENTIAL PROCLAMATION 10533 - Establishment of the *MONUMENT*
4 being executed outside the required congressional delegated authority within the ANTIQUITIES
5 ACT OF 1906 represents a clear demonstration of an Act in violation of federal law and a violation
6 of the Constitution by way of the Supremacy Clause. A clear violation of the Separation of Powers
7 Doctrine constituting federal overreaching consistent with the position and courts authority
8 described by Chief Justice John Marshall.
9

10 30. Therefore, this Honorable court has the authority and the duty to invalidate the
11 ANTIQUITIES ACT OF 1906 for its illegal implementation and application in support of
12 PRESIDENTIAL PROCLAMATION 10533 - Establishment of the *MONUMENT*.
13

14 31. This Honorable court, by invalidating the illegal use and unlawful application of the
15 ANTIQUITIES ACT OF 1906 regarding this matter will effectively invalidate PRESIDENTIAL
16 PROCLAMATION 10533 - Establishment of the *MONUMENT* and make a finding that the federal
17 government DOES NOT OWN or have authority over the property upon which *THE*
18 *MONUMENT* was established or formed.
19

20 32. Therefore, any and all federal land claim(s), that are similarly situate to PRESIDENTIAL
21 PROCLAMATION 10533 - Establishment of the *MONUMENT* including, but not limited to, the
22 following examples: the Lake Mead National Recreational Area (Nevada side); the Cottonwood
23 Cove Marina; the Searchlight Airport; the Coyote Springs Master Planned Community; the Red
24 Rock Canyon National Conservation Area; the Mount Charleston Toiyabe National Forest, and
25 the Gold Butte National Monument (and any other dealings which are located upon lands within
26 THE ACT); and which all have been established upon appropriated non-federal lands claimed
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1 and owned by Michael Little and/or lands not lawfully conveyed to the United States *in due*
2 *course* within the alleged designated physical boundaries of the State of Nevada. The exception
3 to this would be military lands, which are currently not being challenged in this complaint. At all
4 times following THE ACT of 1866-7, these lands were exclusively subject to THE ACT. For
5 example, The National Park Service [NPS] maintains that they have lawful authority over the
6 Cottonwood Cove Marina area (lands specifically contained within THE ACT) through the
7 Organic Act of August 25, 1916, ch. 408, 39 Stat 535 codified as amended and scattered in
8 sections of 54 U.S.C. and yet this Organic Act as referred to within the NPS's lease agreement
9 fails to cite the genesis of any legal land ownership or legal authority. Further under the Nevada
10 Revised Statutes, the parties (being the federal government and the defrauded leasee(s)), in order
11 to present a legal land conveyance to tenants, have failed to cite any lawful authority which
12 exhibits legal land ownership and jurisdictional authority. This land ownership disclosure is
13 absent and missing from all management contracts or lease agreement(s) between the United
14 States / the State of Nevada or the current land- owner Michael Little with regard to THE ACT
15 land upon which the NPS now illegally states they control and occupy. Therefore, any NPS
16 contracts upon THE ACT lands are a nullity and void *ab initio*. Therefore, since these NPS
17 contracts are all void, Michael Little is the person who has a secured interest in converting these
18 management contracts and lease agreements to his name.

23 33. The fact is that the 1922 NPS *Lehman Caves*, the 1936 NPS *Boulder Dam*
24 *Recreational Area*, the 1947 BLM *Lake Mead National Recreational Area [LMNRA]* and a
25 multitude of other putative land deals have all been illegally established on lands [within THE
26 ACT] not legally owned by the United States. This cited so-called Organic Act as evidenced in a
27 LEASE agreement between the United States and Lake Mead Mohave Adventures (LMMA) as
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1 presented and applied was/is, in fact, an act of fraud. (see **EXHIBIT 12. LEASE between**
2 **UNITED STATES DEPARTMENT OF AMERICA UNITED STATES DEPARTMENT OF**
3 **INTERIOR NATIONAL PARK SERVICE and THE LAKE MEAD MOHAVE ADVENTURES**
4 **for the Premises known as COTTONWOOD COVE MARINA AND RESORT NPS Lease L-**
5 **LAKE001-2023.**

7 **IN SUPPORT OF INTRODUCTION**

8 34. THE ACT converted and conveyed approximately 11,530,000 acres of federal
9 *unappropriated* public territorial land without the constitutional boundaries of the 1864 STATE OF
10 NEVADA (AS SET FORTH IN NEVADA’S ENABLING ACT) and as memorialized at the 1864 NEVADA
11 STATE CONSTITUTION IN ARTICLE 14. – **Boundary**, into 11,530,000 acres of *appropriated* non-
12 federal land that was intended to geographically redefine the “constitutional” boundaries of the
13 State of Nevada (See **EXHIBIT 13. Nevada Map**) which provides evidence that in 1866 by means
14 of a United States Congressional Act [THE ACT], that the State of Nevada Legislature accepted
15 by voice vote said 11,530,000 acres at which time said 11,530,000 acres ceased to be legally
16 owned or subject to the jurisdiction of the federal government.

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19 35. THE ACT being an Act of Congress with plenary power as provided for at Article VI,
20 paragraph 2 of the United States Constitution, where “plenary power” is to mean the Supremacy
21 Clause. (See **EXHIBIT 14, United States Constitution Article VI, paragraph 2**)

22
23 36. The 1864 Nevada State Constitution establishes State Sovereignty that includes certain
24 lands within the boundary of the State of Nevada without the Nevada Disclaimer Clause **Sec 4.**
25 **Third Authorization to form a constitution and state government; limitations.** as provided
26 for and contained within the NEVADA ENABLING ACT of 1864.
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1 37. Whereas, State Sovereignty forecloses the United States from all federal government
2 land ownership claims, interests, and rights without a recorded chain of legal land title regarding
3 the land provided for within THE ACT, without due course of law.
4

5 38. In *Heath v. Alabama*, 474 U.S. 82, 106 S.Ct. 433, 88 L.Ed.2d 387 (1985), which states
6 as follows:

7 . . . the states are separate sovereigns with respect to the federal government.

8 The United States Supreme Court in *American Banana Co. v. U.S. Fruit*, 213 U.S. 347 at
9 357-58, 29 S.Ct. 511 (1909), has made it perfectly clear that the Legislative authority of the
10 federal government is NOT in a State. In *American Banana Co.*, the court stated succinctly, “**All**
11 **federal legislation is prima facie territorial.**” What exactly does this mean? In *U.S. v. Spelar*,
12 338 U.S. 217, 222, 70 S.Ct. 10 (1949) this was explained as follows (See head note 6):
13

14 There is a canon of legislative construction which teaches Congress that, unless a
15 contrary intent appears (legislation) is meant to apply only within territorial
16 jurisdiction of the United States. (emphasis added)

17 What is the territorial jurisdiction of the United States? This is answered in the decision in
18 *Caha v. U.S.*, 152 U.S. 211, 14 S.Ct. 513 (1894), where the United States Supreme Court stated,
19

20 “**The laws of Congress** in respect to those matters do not extend into the territorial
21 limits of the States, but **have force only in the District of Columbia, and other**
places that are within the exclusive jurisdiction of the national government.”

22 Special attention should be paid to the words used in *Caha* and those words are “*exclusive*
23 *jurisdiction.*” Does the Federal government have exclusive jurisdiction within the boundaries of
24 a State?

25 It is a *fortiori* that the Federal government has **NO Police Powers** in a State. **Police powers**
26 **are reserved exclusively to the States.** This is made absolutely and abundantly clear in the
27 following decision,
28

1 **The police power is vested in the States and not the federal government.** See
2 *Wilkerson v. Rahrer*, 140 U.S. 545, 554, 11 S.Ct. 865, 866 (1891) (**the police power**
3 **"is a power originally and always belonging to the States, not surrendered to**
4 **them by the general government, nor directly restrained by the constitution of**
5 **the United States, and essentially exclusive.**"); *Union National Bank v. Brown*,
6 101 Ky. 354, 41 S.W. 273 (1897); *John Woods & Sons v. Carl*, 75 Ark. 328, 87
7 S.W. 621, 623 (1905); *Southern Express Co. v. Whittle*, 194 Ala. 406, 69 So.2d
8 652, 655 (1915); *Shealey v. Southern Ry. Co.*, 127 S.C. 15, 120 S.E. 561, 562
9 (1924) (**"The police power under the American constitutional system has been**
10 **left to the states.** It has always belonged to them and was not surrendered by them
11 to the general government, nor directly restrained by the constitution of the United
12 States Y **Congress has no general power to enact police regulations operative**
13 **within the territorial limits of a state.**"); and *McInerney v. Ervin*, 46 So.2d 458,
14 463 (Fla. 1950).

15 Where then can the Federal government exercise police powers? In *Berman v. Parker*, 348
16 U.S. 26, 31, 75 S.Ct. 98, 102 (1954); and *Cincinnati Soap Co. v. United States*, 301 U.S. 308,
17 317, 57 S.Ct. 764, 768(1937), the Courts stated,

18 **Within the territories and possessions of the United States,** the federal
19 government possesses power similar to that of a State legislature;

20 This means that the United States Congress has police powers within Washington, D.C. (a
21 territory), Puerto Rico (a territory), Guam (a territory), the American Virgin Islands (a territory)
22 and American Samoa (yet another Territory). Congress also has police powers on military bases
23 and **other possessions**, such as U.S. embassies in foreign countries. The United States Supreme
24 Court has been consistently clear that the police powers are vested in the States only, not the
25 federal government.

26 The Plaintiffs now find it necessary to address the use of *federal police power* in this
27 complaint because they have witnessed the naked aggression of federal authorities in the
28 unauthorized exercise of police powers without the jurisdictional boundaries of the federal
 government, where these police powers (executed by a collective of administratively created state
 and private constabulary forces) were clearly on open display (in Bunkerville, Nevada) to exhibit

1 extreme measures in enforcing what “they” *believed* to be the law; *e.g.*, government agents were
2 witnessed slamming to the ground Cliven Bundy’s 57 year old sister, who was recovering from
3 throat cancer, while exercising her 1st Amendment Right on *non-federal* land. Government
4 agents employed snipers⁹ (with the color of law authority to kill those that supported the Bundys
5 in the exercise of their Constitutional Rights), that included tazing individuals, employing attack
6 dogs and brandished weapons (pointed at citizens), constituting an assault which was an act
7 purposely intended to provoke a weaponized defensive response from the citizens. The
8 government also conducted measures in which government agents employed military drones to
9 conduct reconnaissance in which they labeled these Americans as a 2nd Amendment Militia. The
10 government operating under the color of law¹⁰ of which the Court stated that the actions of the
11 assembly of Americans did not present the slightest offense to the court in Bundys’ cases and
12 subsequently the court dismissed the Bundy cases because the Federal Court was alleged to have
13 been incensed that government agents (human resources) were inserted into the Bundy ranch as
14 spies and “provocateurs” (as was done on January 6, 2020 in Washington D.C.) in an attempt to
15 agitate and inflame what the government now labels as the “ 2nd Amendment militia,” a
16 euphemism for “domestic terrorist,” and used this term (domestic terrorist) for the intended
17 purpose of influencing and inflaming public opinion against the Bundy’s for their defiance of
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23 ⁹ Although the NPS attempts to use the euphemism of “marksman” for what are clearly “snipers,” the Plaintiffs would
24 submit that this is the same thing as calling a “prostitute” “a woman of negotiable affection” and is simply yet another
25 attempt to conceal the true intent of the NPS to escalate the force continuum to its penultimate objective (execution
26 of the target).

27 ¹⁰ The shooting of the Bundy’s cattle (private property) from helicopters and burying Bundy’s cattle in a mass grave,
28 was shocking to the conscience; in that, the destruction of the Bundy’s property was committed by an NGO who was
paid by the Federal Government to destroy private property without compensating the Bundys. Clearly a taking under
the United Constitution. The federal government engaged in a contract with the company/person(s) that killed the
cattle and a livestock company to process and sell the meat. However, when the cattle were shot from the helicopter
and then buried the BLM ceased the round up and the taxpayers were still on the hook to pay the livestock company
(NGO’S) for doing “NOTHING.” The genius of this government contract is demonstrative of the totalitarian and
abusive mindset of Washington, D.C. In other words, stupidity has become the rule as opposed to the exception and
is rewarded continuously with congressional budget increases.

1 Washington, D.C.. This euphemism was intended to allow government agents justification for
2 the use of deadly force (under their alleged subject matter jurisdiction). The government's
3 position in particular Harry Reid in labeling individuals at the Bundy standoff as "domestic
4 terrorist" or a rogue militia group was completely and offensively in conflict with **NRS 412.026**,
5 *et. seq.*, which states,

7 **NRS 412.026 Composition of MILITIA.**

- 8 1. The militia of the State is composed of the Nevada National Guard and, when
9 called into active service by the Governor, reservists to the Nevada National
10 Guard and any volunteer military organizations licensed by the Governor.
11 2. The Nevada National Guard is an organized body of enlisted personnel
12 between the ages of 17 and 64 years and commissioned officers between the
13 ages of 18 and 64 years, divided into the Nevada Army National Guard and the
14 Nevada Air National Guard.
15 3. ***If a volunteer military organization is formed*** and becomes licensed by the
16 Governor, ***it shall consist of an organized body of able-bodied residents of the***
17 ***State between the ages of 17 and 64 years*** who are not serving in any force of
18 the Nevada National Guard and who are or who have declared their intention to
19 become citizens of the United States.

20 It should be noted that the grammar of this statute requires the condition precedent for a volunteer
21 organization to first (1) gather and then to (2) become organized; before it attempts to (3) obtain
22 a license from the Governor. Only AFTER approval from the Governor can a group officially
23 obtain the title of a "militia" under Nevada Law.¹¹ Until such time that the Governor officially
24 licenses any organized volunteer group, they are simply people who are gathering under their
25 First Amendment Right of freedom to associate and exercising their 2nd Amendment Right to
26 keep and bear arms (which includes training and practicing with firearms). It is important to
27 recognize that the Nevada Governor only has executive authority over land provided for within
28 the 1864 Nevada Constitution, which means that the Governor has no authority to license a militia

¹¹ **NRS 412.010**, *et seq.*, was changed in 2013 by the Legislative Counsel Bureau [LCB] (completely eliminating the
organized Nevada National Guard Reserve - militia) and the previous language set forth that every able bodied citizen
between the ages of 17 and 64 were part of the unorganized militia. This was the traditional definition of militias in
Nevada until 2013.

1 outside of the Constitutional boundaries of the State of Nevada – which license is not applicable
2 regarding THE ACT lands. Not one thing that the group at the Bunkerville event did should be
3 in any way offensive to government as it was ALL legal and sanctioned as a RIGHT inherent to
4 the citizens of the United States and the State of Nevada. If the word “militia” was a word that
5 implied a violent overthrow of the government then the Nevada State Constitution and Statutes
6 would not provide for a “Militia.” A history of the term “Militia,” and “Minute Men” can be
7 obtained from a study of the revolutionary war and the Militia Act of 1862 as being an essential
8 element to a “FREE STATE.” So, by implication, if militias are essential to a “FREE STATE,
9 then if state militias are outlawed, the State would no longer be considered a “FREE STATE.”
10
11

12 It is a *fortiorari* the government has shown that its position in resolving situations that are
13 deemed contentious is to simply prosecute with lawfare, remove, kidnap or even murder for what
14 they perceive as the leadership (Lavoy Finicum) of any opposition group(s)/individual(s) (with
15 the exception of the illegal aliens and drug cartels currently invading our country). Yet the Biden
16 administration has a policy that protects and rewards illegal aliens who commit a felony in
17 crossing our nation’s borders illegally and only seem to have a negative and aggressive policy
18 toward law abiding American citizens *e.g.* (school boards and churches). As such, the Plaintiffs
19 need protection from the government agents (defendants) and/or private contractors (that when
20 assembled represent an unconstitutional administrative state standing army) who are resolved
21 by the collection and utilization of their badges and guns under the Color of Law to dispose of
22 people in body bags, if these people engage in the act of exercising their Constitutional rights to
23 challenge illegal government actions being committed by the defendants. At the time of the
24 writing of this document federal agents executed a clandestine raid (6:00 AM) on a private citizen
25 in Little Rock, Arkansas that resulted in the death of Bryan Malinowski. Mr. Malinowski was
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1 awakened by what he believed to be burglars, armed himself, and after these federal agents kicked
2 in the door without announcing themselves, and having concealed their identities by putting tape
3 over the Ring Video monitor, Mr. Malinowski justifiably opened fired at these armed unknown
4 intruders and was shot in the head and killed by what was later identified as a federal agent. Mr.
5 Malinowski was in fear for his/his family's lives and exercised his constitutional right to defend
6 himself and his wife. It was later discovered that none of these federal agents were wearing body
7 cameras, so that their criminal conduct could not be documented. This warrant could have been
8 executed at any other time with a simple knock on the door and the unnecessary death of Mr.
9 Malinowski could have been completely avoided. The criminal activities of the federal
10 government as evidenced with their handling of the Brian Malinowski incident shows that the
11 Alphabet Agencies have become nothing more than a state sponsored gang of thugs, marauders,
12 and murderers. Therefore, the people now know that any target of the alphabet agencies is
13 presumed to be one of five options: (1) Enemies of the State, (2) armed and dangerous
14 insurrectionists, (3) domestic terrorists, (4) 2nd Amendment Militia members or (5)
15 Constitutionalist. The people now realize that they must protect themselves from a rouge federal
16 government that murders innocent Americans such as Bryan Malinowski and Ashli Babbitt and
17 that only results in endless Congressional hearings with no punishment and no accountability.
18 Not a single person deemed (1-5) are now considered citizens with Constitutional Rights, rather
19 targets to be eliminated. The police state that is now primarily comprised of thugs, marauders,
20 and murderers simply allege that they are immune from prosecution from criminal acts including
21 the above forementioned murder, claiming that immunity flows from *color of law* through
22 administrative policies.
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1 The proper exercise of police powers of federal government agents is not left up to the
2 agencies to determine through policy. It is up to the courts and responsible “non-partisan” Judges.

3
4 Toward this end, the Courts have been resolute, to wit:

5 **Determination by the legislature of what constitutes proper exercise of police**
6 **power is not final or conclusive but is subject to supervision by the courts.**
7 *Meyer v. Nebraska*, 262 U.S.390, 399-400 (1923), See *Pierce v. Society of Sisters*,
8 268 U.S. 510 (1925)(invalidating compulsory public school attendance); *Truax v.*
9 *Raich*, 239 U.S. 33, (1915)(invalidating state limitation of employment of aliens).
See also *Loving v. Virginia*, 388 U.S. 1, 12 (1967); *Griswold v. Connecticut*, 381
U.S. 479 (1965); *Aptheker v. Secretary of State*, 378 U.S. 500 (1964).

10 Therefore, the Plaintiffs have every right to seek and obtain a ruling from this Court as to the
11 proper exercise of this police power and to ask for protection from said illegal, unlawful and *ultra*
12 *vires* exercise of the police powers of rogue federal agencies and their agents. It is then incumbent
13 upon this Court to grant relief to the Plaintiffs in this regard as otherwise it will surely result in
14 one or more Plaintiffs being murdered by and/or through the Defendants in Plaintiffs attempt to
15 recover THE ACT lands and resolve this Court filing with finality.

16
17 The record is clear that the Plaintiffs have every right to request and receive protection from
18 the Court as the federal agencies and agents involved here are exercising unlawful authority on
19 NON-FEDERAL LANDS where federal agents HAVE NO AUTHORITY WHAT-SO-EVER.
20 Any failure to grant the requested relief would not only be considered an abuse of discretion, it
21 would be an erroneous Constitutional standard.

22
23 39. Historic records evidence legal due course land transfers that ultimately occurred
24 between 1922 through 1945 when the United States did putatively purchase and/or acquire several
25 small pieces of non-military related appropriated land from the State of Nevada that were carved
26 out of a greater parcel of land containing 11,530,000 acres where said greater parcel of land is
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1 identified and recorded by legal survey as to be Nevada State *appropriated* land as provided for
2 within THE ACT.

3
4 40. These small pieces of 1922-1945 non-military related land purchases and/or land
5 transactions represent a legal land transfer process in due course subject to Nevada law (*See*
6 **EXHIBIT 15. CHAPTER 321. Sec. 7. NRS 321.7353 1. Upon receipt of a notice of realty action**
7 *from the United States concerning the purchase by the Federal Government of private land, or*
8 *the exchange of public land for private land, the State Land Use Planning Agency shall give*
9 *written notice of the proposed action to the governing body of each county or city affected within*
10 *1 week after its receipt of the notice.*

11
12
13 41. The State of Nevada, by failing to record any further putative land transfers after the
14 time which the BLM was established in 1946, constitutes a formal and very public party
15 admission of abandonment of the lands subject to THE ACT. Further, the State of Nevada's
16 failure to record any land transactions after 1945 constitutes a very public abandonment of these
17 lands (but still does not constitute a legal and proper land transfer *back to* the United States).

18
19 42. This is evidenced, recorded and memorialized by links in a chain of title at Nevada
20 Revised Statutes **NRS 328.210, NRS 328.220, NRS 328.340, NRS 328.360, NRS 328.370** and
21 **NRS 328.380.**

22
23 43. Nevada Revised Statutes **NRS 328.210** and **NRS 328.220** describe with specificity
24 and clarity the United States to be the PURCHASER and not the OWNER of the land provided
25 for within THE ACT of which a smaller piece (80 acres) of land was carved from and then sold
26 to the PURCHASER, to wit.

27
28 **NRS 328.210 Sale of real property authorized for site of Hoover Dam
reservoir (1933).**

1 1. The Board of Capitol Commissioners of the State of Nevada is hereby
2 authorized and empowered to sell and convey the SE 1/4 of NE 1/4, the E 1/2 of
3 SW 1/4 of NE 1/4, and the E 1/2 of NE 1/4 of SE 1/4 of section 33, T. 16 S., R. 68
4 E., M.D.B. & M., containing 80 acres in the county of Clark, State of Nevada, to
5 the United States of America for the price fixed by the appraised value thereof, and
6 which has been offered therefor by the officials of the United States Bureau of
7 Reclamation.

8 2. The net amount of money received from the sale of such land, after
9 payment of all necessary costs of conveyance, shall be placed in the General Fund
10 of the State.

11 [1:27:1933] + [2:27:1933]

12 **NRS 328.220 Sale of real property authorized (1941).**

13 1. The Board of Control of the State of Nevada is hereby authorized and
14 empowered to sell and convey and do all things whatsoever necessary or
15 incident to effect the conveyance to the United States of America of the E
16 1/2 of the SW 1/4 of the NE 1/4; E 1/2 of the NE 1/4 of the SE 1/4; and the
17 SE 1/4 of the NE 1/4 of section 33, T. 16 S., R. 68 E., M.D.B. & M.

18 2. The title to the land shall be conveyed to the United States by deed in such
19 form as the Attorney General shall prescribe, and shall have the Great Seal of the
20 State of Nevada affixed by the Secretary of State.

21 3. The price to be paid by the United States for the lands, as fixed and
22 determined, is the sum of \$600, which shall be deposited in the General Fund of the
23 State.

24 44. Nevada Revised Statutes: NRS 328.210, NRS 328.220, NRS 328.340, NRS 328.360,
25 NRS 328.370 and NRS 328.380, represent repeated party admissions by the United States Bureau
26 of Reclamation by and through an agency of the United States Department of Interior that as of
27 1945 and before the establishment of the BLM, the United States was the land
28 PURCHASER/RECIEVER and not the land OWNER/HOLDER of THE ACT lands, as has been
fraudulently misrepresented in PRESIDENTIAL PROCLAMATION 10533 - Establishment of the
MONUMENT.

 45. Therefore, these Nevada Revised Statutes refute and disprove decades of nefarious
and false pretenses, including federal district court judge Gloria Navaro's citing that THE ACT
lands are legally owned by the United States because of the GUADALUPE HILDALGO TREATY.
These *faux* legal arguments created by agents and/or special interest persons on behalf of and/or

1 subject to the United States (being the principal) and identified as the defendants to create an
2 appearance, including collaborative/collusive federal judicial support of a United States legal
3 fiction grounded in fraud and has been used repeatedly to intentionally obfuscate legal land
4 ownership over said *appropriated* 11,530,000 acres of lands as provided for within THE ACT.
5

6 46. Whereas these fraudulent pretenses represent unsupported federal claims that are in
7 conflict with actual historical facts, such as NRS 328.210 and NRS 328.220 which the federal
8 courts have either ignored, set aside, held for naught, chosen not to rule upon or simply violate.
9 The plaintiffs are concerned that due to corruption the federal government has morphed into a
10 medieval kingship and feudal land holdings construct, for which the courts are now serving as a
11 Star Chamber necessary to maintain the *status quo* under the *Color of Law*. This can only be
12 accomplished using LAWFARE and an administrative army (force). All of this is conducted and
13 maintained to the exclusive benefit of the One Percent Ruling Class. Nevada U.S. elected
14 Representatives have anointed themselves to be Washington D.C. Nobility in Nevada, with
15 Nevadans serving as serfs and being privileged to usury slavery (*i.e.*, 30-year mortgages) on the
16 land that they once owned and that the federal government and Nevada Representatives that
17 continually steal from the people. *e.g.* (Dina Titus H.R. 6751 the Avi Kwa Ame National
18 Monument Act of 2022, juxtaposed against THE ACT, THE CORTEZ MAESTRO SOUTHERN
19 NEVADA ECONOMIC AND CONSERVATION ACT 2024, again juxtaposed against THE ACT
20 and of course the Steven Horsford H.R.8108-117th Congress 2022 that includes THE ACT lands)
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24 47. Whereas this land ownership fraud, upon THE ACT, has been maintained, by and
25 through erroneous arguments and repeatedly cited in numerous federal judicial cases.¹² These
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28 ¹² Fraud upon the court has no statute of limitations. This would apply to the Court which has also committed fraud
itself. Therefore, the doctrine of laches does not apply to this complaint, because the decades of stealth fraud has
been maintained as the Status Quo by the Courts themselves.

1 case citing's have been intentionally used by deliberately taking these cites of historical facts and
2 law out of context where said context has been presented as being established federal *stare decisis*.
3 All of which said acts constitute malversion.
4

5 48. Whereas these fraudulent federal claims are being used to circumvent the legal land
6 ownership of the land provided for within THE ACT.

7 49. Therefore, these fraudulent federal claims represent "acts" of malversion in that these
8 claims have been carefully and intentionally crafted to conceal a fraud that is being used to
9 circumvent federal law, State's Rights, and the Rights of the Citizens of the State of Nevada by
10 subjecting them to laws that are wholly foreign to the true facts and inapplicable. This can only
11 be accomplished by violating the United States and the Nevada Constitutions, as well as our
12 public servants violating their oaths of office.
13

14 50. One such example of federal fraud (constituting malversion and obfuscation by federal
15 claim) is that "the United States has owned these 11,530,000 acres of land since 1848, when the
16 entire parcel of land was acquired from the nation of Mexico under the 1848 TREATY OF
17 GUADALUPE HIDALGO and has never relinquished ownership "(See **EXHIBIT 16. COMPLAINT,**
18 ***United States vs, Bundy; Case No 2:16-mj-00127-PAL (Document 1 Filed 02/11/16 Page 10 of***
19 ***32 paragraph15, Lines 6-10 and paragraph 16, Lines 11-16).*** Nevada Revised Statures: **NRS**
20 **328.210, NRS 328.220, NRS 328.340, NRS 328.360, NRS 328.370 and NRS 328.380** irrefutably
21 proves this specific federal government claim to be false. Further, it completely discredits the
22 opinion of U.S. Magistrate Peggy Leen and the ruling made by federal district judge Gloria
23 Navaro. Not to mention the jump on the publicity band wagon and resume' appeal for public
24 notoriety purposes of Appellate Chief and Assistant U.S. Attorney Elizebeth O. White. In other
25 words "Self-Aggrandizement."
26
27
28

1 51. Other examples of federal malversion and obfuscation by the making of fraudulent
2 federal claims is that the United States owns these 11,530,000 acres as provided for within THE
3 ACT because the land conveyance was "anticipated" in: (1) the ACT OF CONGRESS (1864)
4 ENABLING THE PEOPLE OF NEVADA TO FORM A CONSTITUTION AND STATE GOVERNMENT
5 (approved March 21, 1864), and again at (2) the CONSTITUTION OF THE STATE OF NEVADA (signed
6 Oct. 31, 1864). Nevada Revised Statutes: **NRS 328.210, NRS 328.220, NRS 328.340, NRS**
7 **328.360, NRS 328.370** and **NRS 328.380** again irrefutably discredits the government's
8 "anticipation" theory of federal land ownership and show it to be an absolutely false and
9 disingenuous legal argument.
10
11

12 52. It seems to reason that if the Federal government's position, which is that the parcel
13 of land that was conveyed within the 1848 TREATY OF GUADALUPE HIDALGO containing the
14 11,530,000 acres of land (which is the subject of this lawsuit) which is alleged to have remained
15 *unappropriated* federal territorial public lands owned by the United States from 1848 forward
16 was true, that these 11,530,000 acres of land have never been relinquished (as is alleged by the
17 United States) then there would not exist irrefutable contra veiling evidence to the contrary. See
18 Nevada Revised Statutes: **NRS 328.210, NRS 328.220, NRS 328.340, NRS 28.360, NRS**
19 **328.370** and **NRS 328.380**. Each of these statutes renders the United States land [THE ACT]
20 ownership arguments an absurdity and a falsehood.
21
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23 53. These claims by the United States upon the land provided for within THE ACT are
24 supported by half-truths and blatant lies exposed which have been completely discredited by the
25 facts and evidence supported through a chain of title and record of required legal transfer which
26 are memorialized in the Nevada Revised Statutes to wit: **NRS 328.210, NRS 328.220, NRS**
27 **328.340, NRS 328.360, NRS 328.370** and **NRS 328.380**. These statutes are irrefutable evidence
28

1 that the government's claims are not only false but intentionally false. As such, this constitutes
2 malversion.

3
4 54. These Nevada Revised Statutes, particularly the 80-acre purchase agreement for the
5 Hoover Dam land, establishes a SELLER/PURCHASER relationship as late as 1945 that occurred
6 well after 1848 and 1864 regarding multiple parcels of land. It is therefore *a fortiori* that all said
7 pieces of land were carved out of the same parcel which the United States accepted and
8 acknowledged (constituting a party admission) to be the land provided for within THE ACT and
9 that all said pieces were purchased and or legally conveyed to the United States from the State of
10 Nevada as required and recorded as per Chapter 321, Section 7, **NRS 321.7353** where said
11 required recordings ceased after 1945.
12

13 55. It is a literal oxymoron then that the Federal government would have to purchase these
14 parcels of land *from themselves*, and the facts are clear that they did not – they purchased and/or
15 negotiated these parcels from the State of Nevada.
16

17 56. Therefore, beginning on May 5, 1866, through 1945 said 11,530,000 acres of land
18 within THE ACT are recognized by the United States to be appropriated land no longer owned or
19 belonging to the United States and therefore required these lands [THE ACT] to be purchased or
20 otherwise acquired through a legal land transfer. The federal genesis, presumption of fact and
21 contravening land ownership, began in 1946 which corresponds with the establishment of the
22 Bureau of Land Management [BLM]. Therefore, defendants have adopted and created these *faux*
23 facts that: (1) the 1848 TREATY OF GUADALUPE HIDALGO and (2) the Act Of Congress (1864)
24 ENABLING THE PEOPLE OF THE STATE OF NEVADA TO FORM A CONSTITUTION AND STATE
25 GOVERNMENT (approved March 21, 1864), and (3) the CONSTITUTION OF THE STATE OF NEVADA
26 (signed Oct. 31, 1864) establish that the land within THE ACT somehow transferred, without
27
28

1 legal conveyance of said land, back to (and therefore has always belonged to) the United States
 2 and therefore is land legally owned by the United States. This created the *modus operandi* under
 3 which the government now operates, by simply applying State¹³ and federal force and obfuscating
 4 the historical recorded fact(s). Contrary to the government's fractured fairy tale, including but
 5 not limited to, the irrefutable evidence in the Nevada Revised Statutes, the Defendants' actions
 6 constitute an intentional act of malversion to unlawfully implement the ANTIQUITIES ACT OF 1906.
 7 This can only be accomplished by ignoring and/or disregarding THE ACT.
 8

9
 10 57. Plaintiff submits that defendants *Modus operandi* and the Nevada Revised Statutes are
 11 in direct conflict with each other and as such the United States must now produce legally filed
 12 and recorded land conveyance documents in due course, time certain establishing the United
 13 States as a legal link in a chain of title after 1945 for the remaining balance of the 11,530,000
 14 acres of land acquired, without passage through the Nevada Revised Statutes' requirements. The
 15 United States claims to own THE ACT lands, including the land on which the MONUMENT and
 16 everything else that the Defendants currently occupy. The United States currently claims it owns
 17 these lands, so now Plaintiff's through this complaint require Defendant's to prove it! Proof
 18 means the production of specific land conveyance records and/or documents in a chain of title
 19 according to law and consistent with the NRS as existed between 1931 and 1945.
 20
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 22

23
 24 ¹³ The use of State resources to enforce federal law as was done by then Sheriff Lombardo (now Nevada Governor)
 25 violates several legal concepts: (1) it violates State Sovereignty; (2) it creates a jurisdictional authority conundrum;
 26 (3) it illegally forces the State to delegate their police powers to the federal government which are non-delegable,
 27 *Public Service Co. Of Okl. v. Caddo Electric Coop, Okl.*, 479 P.2d 572, 575 (1971); finally, (4) using state agents
 28 to enforce federal law violates **18 U.S.C §912**, which defines impersonating a federal officer as,

Officer or employee of the United States, "Whoever falsely assumes or pretends to be an officer or
 employee acting under the authority of the United States or any department, agency or officer thereof,
 and acts as such, or in such pretended character demands or obtains any money, paper, document, or
 thing of value, shall be fined under this title or imprisoned not more than three years, or both."

In the Bunkerville, Nevada, incident, Sheriff Joe Lombardo (now Governor of Nevada) violated all four legal
 concepts and went on to give perjured testimony against the Bundy family.

1 58. Plaintiff submits that this Honorable Court has subject matter jurisdiction over the
2 Defendants in this complaint as the Defendants and/or the United States believes that it has a
3 claim to the land in dispute. This complaint pursuant to *Twombly*¹⁴ and its progeny requires the
4 Plaintiff's to prove through substantial evidence (not theories supported with LAWFARE terms
5 such as "anticipation" and "flexibility") to this Honorable Court that the land is not owned by the
6 United States. This substantial evidence is provided in the Nevada Revised Statutes which
7 provides and establishes irrefutable fact which is even superior to substantial evidence to wit: (1)
8 Nevada Revised Statutes record a land transaction at **NRS 328.210** and **NRS 328.220** describing
9 Nevada as the owner of a parcel of land identified as the 1867 land or THE ACT lands from which
10 80 acres was purchased by the United States for the construction of Hoover Dam. (2) Nevada
11 **NRS 328.340** records a land conveyance in 1922 regarding the Lehman Caves National
12 Monument that was mistakenly dedicated as a national monument upon THE ACT lands and that
13 was not owned by the United States. In 1922 President Warren Harding by and through a
14 Presidential Proclamation citing the authority of the ANTIQUITIES ACT OF 1906 unlawfully
15 dedicated the LEHMAN CAVES NATIONAL MONUMENT that 23 years later required the application
16 of **NRS 328.370** as a legal land transfer, under the auspice of a survey correction. A survey
17 correction wouldn't be necessary if the United States owned ALL the land. (3) Nevada **NRS**
18 **328.380** exchanged lands located within THE ACT (in White Pine County) with the United States
19 (citing the TAYLOR GRAZING ACT of 1934) in that the United States did not own certain desired
20 1866 Nevada lands. The requirement of *Twombly* is easily satisfied by the Nevada Revised
21 Statutes in and of themselves.
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¹⁴ *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007).

1 59. Historic records show that in 1945 Frank W. Johnson acting as the last commissioner
2 of the United States General Land office and later the first Director of the BLM discovered that
3 the Nevada land of which the 1922 LEHMAN CAVES NATIONAL MONUMENT was established upon
4 was - in fact – THE ACT land and land not owned by the United States. This discovery required
5 a discrete post-legal land conveyance (survey correction) of title from the State of Nevada to the
6 United States that exists as a memorialized record at **NRS 328.370**.

8 60. These historically recorded facts establish that the United States DID NOT own the
9 1866 land or the 1867 land (THE ACT) as exhibited on the Nevada Map **EXHIBIT 13**, as of 1945.

11 61. After 1945 the Nevada Revised Statutes have no other recorded land transactions
12 between the State of Nevada and the United States regarding THE ACT land. Again the year that
13 the BLM was created.

14 62. Therefore, it is *a fortiori* that the balance of said land within THE ACT is not owned
15 by the United States. The burden of proof regarding legal ownership of the land provided for
16 within THE ACT requires the defendants to defeat the Nevada Revised Statutes with specificity,
17 ***CHAPTER 321.Sec. 7. NRS 321.7353 1. Upon receipt of a notice of realty action from the***
18 ***United States concerning the purchase by the Federal Government of private land, or the***
19 ***exchange of public land for private land, the State Land Use Planning Agency shall give written***
20 ***notice of the proposed action to the governing body of each county or city affected within 1***
21 ***week after its receipt of the notice.***

24 63. Whereas, said documents and notice of realty action(s) are required to be recorded
25 date and time certain by Nevada State Law and made public in the Nevada Revised Statutes.
26 Plaintiff Little's land ownership and legally recorded claim forecloses any post-political
27

1 state/federal backdoor, State of Nevada to United States, land conveyances that may result from
2 this COMPLAINT as was the case with **NRS 328.370 (Lehman Caves)**.

3
4 64. Defendant Joseph Robinette Biden in 2023 has replicated exactly what was done by
5 President Warren G. Harding in 1922 with PRESIDENTIAL PROCLAMATION 10533 - Establishment
6 of the **MONUMENT**. President Warren Harding committed his infraction in 1922 with
7 PRESIDENTIAL PROCLAMATION 1618 Establishment of the Lehman Caves Monument (see
8 **EXHIBIT 17) PRESIDENTIAL PROCLAMATION 1618 Establishment of the LEHMAN CAVES**
9 **NATIONAL MONUMENT**, of which both Harding and Biden unlawfully cited the ANTIQUITIES ACT
10 OF 1906 to establish a National Monument on land the United States did/does not own in either
11 instance. These are irrefutable facts.

12
13 65. Ironically, the United States has many illegal federal land deals regarding THE ACT
14 lands that rely upon the ANTIQUITIES ACT OF 1906 to underpin federal fraud. In Nevada some of
15 those other fraudulent deals within THE ACT are identified as Presidential Proclamation –
16 Establishment of the BASIN AND RANGE NATIONAL MOUMENT and the GOLD BUTTE
17 NATIONAL MONUMENT. (*see EXHIBITS 18 AND 19*).

18
19 66. Thus, the jurisdiction of this Honorable Court is that of subject matter jurisdiction over
20 the Defendants and not venue jurisdiction over the land (*in Personam, as opposed to In Rem, and*
21 *subject matter jurisdiction*). “. . . jurisdiction is a threshold matter in every case.” See *Steel Co.*
22 *v. Citizens for a Better Environment*, 523 U.S. 83. 94-95, 118 S.Ct. 1003, 140 L.Ed.2d 210
23 (1998). “Subject matter jurisdiction may be challenged at any time by the parties and by the
24 court *sue sponte*.” *Folden v. U.S.*, 379 F.3d 1344. 1354 (Fed. Cir. 2004); See also *Arbough v. Y*
25 *& H Corp.*, 546 U.S. 500, 126 S.Ct. 1235, 163 L.Ed.2d 1097 (2006). *Ford v. U.S.*, 101 Fed. Cl.
26 234 (2011). A question of jurisdiction cannot be waived. Jurisdiction should affirmatively appear,
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1 and the question may rise at any time. *Grace v. American Central Ins. Co.*, 109 U.S. 278, 33 S.
2 Ct. 207, 27 L.Ed. 932 (1833); *Mansfield C & L.M. Railway Co. v. Swann*, 111 U.S. 379, 382, 4
3 S.Ct. 510, 28 L.Ed. 462 (1884); *Mattingly v. Northwestern Virginia railroad Co.*, 158 U.S. 53,
4 57, 15 S.Ct. 725, 39 L.Ed. 894 (1895). When jurisdiction is challenged, the party moved against
5 must controvert the challenge. Failure to do so is fatal to the opposition of the party moved
6 against. *Kelly v. Kelly*, 85 Nev. 317, 454 P.2d 85 (1969).
7

8 67. The major issue here will be that of venue jurisdiction. The Plaintiffs are alleging and
9 averring that the United States government's claims that it owns certain vacant and unclaimed
10 public land within Clark County, the southern tip of Nye County and the eastern portions of
11 Lincoln, White Pine and Elko counties of Nevada is in error and constitutes long arm fraud.
12

13 68. The Plaintiffs further provide the matter of *United States Of America v. Cliven D.*
14 *Bundy, Ryan C. Bundy, Ammon E. Bundy and Ryan W. Payne* EXHIBIT 9, SUPRA., *Case No*
15 *2:16-16-cr-046-GMN-PAL; (ORDER)* in which THE ACT was presented to the Nevada U.S.
16 District Court in a venue (land ownership) jurisdictional challenge. The court initially recognized
17 a legal opinion by U.S. Magistrate Peggy Leen that was contrary to THE ACT itself and the
18 evidence set forth in the NRS. Subsequently, upon further examination and review the court
19 clearly recognized that the United States did not own the land provided for within THE ACT and
20 alternatively made a tangential ruling to dismiss the accompanying inferior subject matter
21 criminal charges citing the failure of the government to produce *exculpatory evidence* regarding
22 the illegal acts committed by the government. Wherein, the Court issued a scathing order (after
23 THE ACT was provided to the Court) and drafted a final order in such a way as to make a finding
24 regarding evidence that was supporting self-defense because of government provocation.
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1 69. The actions (findings) of the court represent an implied party admission by the court
2 that the land provided for within THE ACT is land not owned by the United States and therefore
3 THE ACT being superior law superseded the subject matter jurisdiction opinion that U.S.
4 Magistrate Peggy Leen offered to the court stating that THE ACT represents nothing more than a
5 “novel argument,” in an attempt to negate THE ACT.
6

7 70. The Plaintiff(s) contend that they hold a superior land ownership claim as provided
8 for within this Complaint and that if the United States is unable to produce contravening evidence
9 of legal land ownership regarding 11, 530,000 acres that being the land provided for within THE
10 ACT as required by Nevada State law, this Honorable court is required by law and its judicial
11 duty to grant Plaintiff’s COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, A CEASE AND
12 DESIST ORDER AND A PROTECTIVE ORDER.
13

14 71. The granting of said Complaint will, in effect, invalidate PRESIDENTIAL
15 PROCLAMATION 10533 - Establishment of the *MONUMENT* by invalidating the unlawful
16 application of the ANTIQUITIES ACT OF 1906, including the application of any PUBLIC LAWS,
17 directly or indirectly, such as with the following examples, *e.g.*, Public Law 99-565-Oct. 27, 1986
18 and S854 Public Land No. 100-275 (1988), and including all other unlawful past land dealings
19 upon land provided for within THE ACT.
20

21 72. The Nevada Revised Statutes as of 1945 extinguish the several different specious land
22 ownership claims made by the United States beginning in 1922 including a host of erroneous
23 judicial rulings that have been cited out of context regarding the legal land ownership as was
24 ceded by THE ACT. Previous to this case, the governments arguments set forth in the *Bundy’s*
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1 cases was not *stare decisis*¹⁵ but rather law of the case. Under the "law of the case" doctrine," a
2 court is generally precluded from reconsidering an issue that has already been decided by the
3 same court, or a higher court **in the identical case.**" *Thomas v. Bible*, 983 F.2d 152, 154 (9th
4 Cir.)(*cert. denied* 508 U.S. 951, 113 S.Ct. 2443, 124 L.Ed.2d 661 (1993)). The doctrine is not a
5 limitation on a tribunal's power, but rather a guide to discretion. *Arizona v. California*, 460 U.S.
6 605, 618, 103 S.Ct. 1382, 1391, 75 L.Ed.2d 318 (1983). A court may have discretion to depart
7 from the law of the case where: 1) the first decision was **clearly erroneous**; 2) an intervening
8 change in the law has occurred; 3) the **evidence on remand is substantially different**; 4) other
9 changed circumstances exist; or 5) a **manifest injustice would otherwise result**. Failure to apply
10 the doctrine of the law of the case absent one of the requisite conditions constitutes an abuse of
11 discretion. *Thomas v. Bible*, 983 F.2d at 155 (1993). Here, Bundy was not an identical case as
12 the land being addressed was not part of the 1864 creation of the State of Nevada, it was part of
13 THE ACT (1866). Therefore, applying the law of the case constituted the opposite and was an
14 abuse of discretion.
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18 73. These federal land ownership claims (pretenses) that are cited as U.S. Magistrate
19 Peggy Leen's legal opinion in the *Bundy* cases speaks specifically to and addresses lands provided
20 for within THE ACT and are as follows: (1) the 1848 Treaty of Guadalupe Hidalgo; (2) the 1864
21 Nevada Enabling Act, "Disclaimer Clause;" (3) the 1864 State of Nevada Constitution; (4)
22 federal judicial precedents in *stare decisis*; and (5) the opinion and historic inaccuracy of a book
23 authored by that of former Nevada Secretary of State (former U.S. Nevada Senator Dean Heller)
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28 ¹⁵ The *stare decisis* referred to in the *Bundy* decision was making reference to the *Garner* case (107 F.3d at 1317 9th
Cir) addressing lands in the 1864 lands – not the lands associated with the 1866 lands. The Garner lands have nothing
to do with the *Bundy* case and are inapposite.

1 being one in the same and the unwarranted reliance on his historical “opinion” contrary to historic
2 facts as recorded by the Nevada Revised Statutes and THE ACT.

3
4 74. This Complaint presents that the Defendants are operating under a dark shadow
5 (meaning unlawful) conspiracy out of Washington, D.C. (a territory which is not subject to the
6 Constitution of the United States and is exclusively controlled by Congress through Article 4,
7 Section 3, Clause 2 as evidence in the January 6, 2020, inquisition). Therefore, this conspiracy
8 constitutes a criminal cartel that can/does politically weaponize the federal judiciary on demand.
9 This *de facto* political judiciary violates the Separation of Powers Act in order to conduct federal
10 enforcement of judicial orders obtained through said unconstitutional political direction of a
11 legislative majority to legitimize federal force. This force can only be described as a *de facto*
12 mercenary military special forces arm of the Federal Bureau of Investigation [FBI] exercising
13 police powers within the exclusive jurisdiction of a state which is, in fact, the very definition of
14 an insurrection and attack on the sovereignty of the People of Nevada. It is also called “tyranny,”
15 because the United States Supreme Court stated that, “Where the law ends, tyranny begins.” See
16 *Merritt v. Welsh*, 104 U.S. 694, 702 (1881). This comingling of Power is emblematic of a Banana
17 Republic. This, illegal police power is used to enforce congressional acts upon non-federal
18 enclaves such as is evidenced with THE ACT. When in fact, the United States Supreme Court in
19 *American Banana Co. v. U.S. Fruit*, 213 U.S. 347 at 357-58 S.Ct. 511 (1909), has made it
20 perfectly clear the Legislative authority of the federal government is NOT in a State. In *American*
21 *Banana Co.*, the court stated succinctly, “All [federal legislation] is *prima facie* territorial.”
22 Therefore, unless “specifically” stated by Congress all Congressional law ONLY applies to the
23 Territories and Possessions [including federal enclaves and military bases] of the United States.
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1 75. The Defendants are able to utilize the Federal lower courts as in the Bundy case to
 2 obfuscate the true ownership of the lands within THE ACT and in doing so the courts have
 3 conveyed the appearance of *ultra vires* permission upon Federal agencies that then illegally
 4 exercise federal police powers where they have none. Only a CEASE AND-DESIST ORDER
 5 will dissuade Defendants actions and return some semblance of integrity to the Nevada federal
 6 courts in the matter concerning the lands within THE ACT.
 7

8 76. The Defendants are operating an illegal gambit that has been repeated over and over
 9 which qualifies this illegal conduct as a "criminal act" under State and federal RICO racketeering
 10 statutes that exposes an unconstitutional double standard in the federal justice system. This
 11 double standard is recognized to be malversion through a federal governmental anarchy. It is now
 12 incumbent for the people to bring forth a common law grand jury indictment to quash this anarchy
 13 that now exists through a "uni-party" takeover of our federal government as evidenced in the
 14 United States Senate's failure to comply with the Constitutional requirements and try the Articles
 15 of Impeachment forwarded to them by the United States Congressional House on Homeland
 16 Security Secretary Alejandro Mayorkas.¹⁶ Further, the DOJ refuses to prosecute the United States
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21 ¹⁶ In the event that the current administration's reasons and purposes of allowing an invasion of aliens who illegally
 22 entered into the United States turns out to be for nefarious or other illegal purposes, then this would elevate their
 23 conduct from malversion to treason. As any violation of the Constitution by a public official means that he has
 24 declared war on the Constitution. See *Cooper v. Aaron*, 358 U.S. 1, 78 S.Ct. 1401 (1958), to wit,

25 "No state legislator or executive or judicial officer **can war against the Constitution without**
 26 **violating his undertaking to support it.**" The constitutional theory is that we the people are the
 27 sovereigns, the state and federal officials only our agents." *Cooper v. Aaron*, 358 U.S. 1, 78 S.Ct.
 28 1401 (1958).

As the Constitution is the People's document, warring against the Constitution is warring against the people, refusing
 to take jurisdiction where it is warranted or denying the same where it has not been described succinctly in *U.S. v.*
Will, 449 U.S. 200, 216, 101 S.Ct. 471, 66 L.Ed.2d 392, 406 (1980); *Cohens v. Virginia*, 19 U.S. (6 Wheat.) 264,
 404, 5 L.Ed. 257 (1821), as

"We [judges] have no more right to decline the exercise of jurisdiction which is given, than to usurp
 that which is not given. **The one or the other would be treason to the Constitution.**" (Emphasis
 added).

Therefore, the U.S. Senate has committed *treason* against the People of the United States in refusing to hear the
 Article of Impeachment regarding Mayorkas for his refusal to enforce federal laws regarding the border of the United

1 Attorney General on contempt charges filed by Congress, therefore the people can clearly see a
2 judicial double standard. The people are guaranteed their Constitutional prosecutorial power to
3 impeach, whereas Congress has now been negated by other branches of government or lawfare
4 within the same branch preventing the people in the exercise of their impeachment powers.
5 Essentially these powers (rightfully belonging to the people) have been stolen by those that have
6 our proxy. This double standard in conjunction with the border crisis now requires the State and
7 the people to do what the current federal administration and U.S. representative are refusing to
8 do, that being to perform their constitutional responsibilities and protect America from enemies
9 both foreign and domestic. (domestic now means Washington D.C., Wall Street, and the ghosts
10 of the 1%).

13 77. When a majority of any of the three branches of federal government are no longer able
14 or unwilling to adhere to the constitutional requirements/boundaries, such as impeachment of the
15 defendants or of individuals aligned with the defendants, this unwillingness demonstrates the
16 influence of the dark shadow government and the precursor to moral anarchy (aka: *deep state*
17 *conspiracy*). To simply refuse to perform a lawfully required duty by refusing to conduct the trial
18 in the case of Alejandro Mayorkas (the Secretary of Homeland Security – a cabinet seat) or refuse
19 to prosecute Merrick Garland (U.S. Attorney General) regarding contempt for treasonous conduct
20 and actions committed as it relates to the border, election interference, public safety, and national
21 security. The citizens of the State are now legally allowed (required as an American duty) to
22 organize armed groups in Nevada either under Nevada statutory law or the common law before
23 seeking license from the Governor (if applicable) pursuant to **NRS 412.010, et. seq.** and such a
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28 States. Further the DOJ has committed “Treasonous Acts” by refusing to prosecute Merrick Garland, our discredited
and compromised United States Attorney.

1 group cannot be called or referred to as a "militia" until the Governor authorizes them to be called
2 so. Until that time these groups lawfully exist under the Nevada Revised Statutes and the United
3 States Constitution, under the First and Second Amendments. Any interruption of these said
4 organizations by the Defendants shall be recognized and considered as a DECLARATION OF
5 WAR against the Constitution. As the Constitution belongs to the people, this then is a declaration
6 of war on the people of the United States.
7

8 78. These illegal acts of fraud, committed by the Defendants, in the exercise of an unlawful
9 police power within the State of Nevada, including criminal acts of physical force, violence and
10 federal detainment (aka: *kidnapping*), the filing of superseding complaints, as well as the use of
11 the Defendants' influence and control of the news and social media as was used to publicly
12 humiliate and marginalize the Bundy's lawful conduct (*i.e.*, "deadbeat rancher not paying grazing
13 fees") represent a concerted and premeditated attack. The defendants continued *Modus Operandi*
14 must be stopped by a CEASE-AND DESIST ORDER or by the God given right and duty of the People
15 to protect themselves and to protect the Constitution against its usurpers, that includes elected
16 representatives and a federal judiciary whose collective conduct is clearly recognized as Marxist
17 in utilizing thuggery, marauders and murder.
18
19

20 79. It is incumbent upon this Court to prevent another federal government Bunkerville or
21 January 6, 2020, provocateur initiated event from occurring, which could result in bloodshed
22 under the current administration as was evidenced by past administrative agencies in the unlawful
23 and unnecessary conduct by the defendants of burning alive and the killing of 76 Branch
24 Davidians (mostly women and children in Waco, Texas), killing Vicki Weaver & her son Samuel
25 Weaver (Ruby Ridge, Idaho), killing Ashli Babbitt (in Washington, D.C.), killing LaVoy Finicum
26 (in Oregon), killing John McAfee (CIA suicided in Spain), killing Bryan Malinowski (Little Rock,
27
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1 Arkansas) and scores of other politically motivated murders both domestic and foreign. The
2 Defendants are notorious in deploying and embedding human resources to conduct such
3 unconscionable acts as were demonstrated at Bunkerville, Nevada in the persecuting of Nevada
4 rancher Cliven Bundy, his family and other Americans in attendance for defending their rights
5 enumerated in the State and Federal Constitutions.
6

7 80. Plaintiffs believe that defendants will initiate the same deployment and embedding of
8 human resources that was used to instigate the January 6, 2020, Nancy Pelosi “staged event” in
9 Washington, D.C. that ultimately included the murder of Ashli Babbitt in what is now recognized
10 as a political coup. Plaintiffs believe and have every reason to believe the same will occur again
11 as a result of this complaint and that without a CEASE-AND-DESIST ORDER and a PROTECTIVE
12 ORDER the Plaintiffs have no reason to expect that the defendants will not engage in this illegal
13 police conduct that could easily re-ignite a local conflict which could spill over into another
14 potential armed conflict between the people and the federal government. If the Courts will not
15 protect the people, then of necessity the people must then protect themselves. In light of the
16 current political situation with Texas, the Border and the weaponization of the justice department
17 against Donald Trump and his supporters in a construct known as MAKE AMERICA GREAT
18 AGAIN [MAGA],¹⁷ it is all the more reason why this Court has a duty to provide the relief
19 requested so that this complaint does not fan the current flames of political discord.
20
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22

23 VENUE AND JURISDICTION

24 81. This court has jurisdiction over this case under **28 USC 1331** (Federal Question); **28**
25 **USC 1346(f)** (interest in real property in which an interest is claimed by the United States); **28**
26

27 ¹⁷ Joe Biden (acting as president of the United States) has declared all MAGA supporters as enemies of the United
28 States government, this declaration now includes retaliation in the form of debanking American Citizens for
exercising their political rights that disagree with acts being effectuated by Biden, that have the *prima facie*
appearance of treason.

1 **USC 1357** (injuries under federal law); **28 USC 1366** (Construction or reference to laws of the
2 U.S. or Acts of Congress); **28 USC 1361** (Action to compel an officer of the United States to
3 perform his duty); **28 USC 1402(c)** (Any civil action against the United States . . . in which the
4 event occurred); **28 USC 1402(d)** (Any civil action *in re* an interest in real property in which an
5 interest is claimed by the United States).
6

7 82. This court has authority to grant **DECLARATORY AND INJUNCTIVE RELIEF, A CEASE**
8 **AND-DESIST ORDER AND A PROTECTIVE ORDER** to set aside and cause to prevent unlawful agency
9 actions by the Defendants to include retaliatory judicial and other legal actions upon Plaintiffs as
10 well as to compel the United States to take ministerial and non-discretionary steps either
11 unlawfully withheld or unreasonably delayed under the Declaratory Act or, the Injunctive Act
12 which are clearly within the court's inherent equitable powers. See **FRCP 57** (Declaratory
13 Judgments) and **FRCP 65** (Injunctions & Restraining Orders).
14

15 83. Venue is proper in this district court under **28 U.S.C. 1390(a)** (General Venue); **28**
16 **USC 1391(a)(1)** (Venue generally); **28 USC 1391(b)(1) – (2)** (Venue in general); **28 USC**
17 **1391(c)(1)** (Residency of parties); **28 USC 1391(e)(1)(b)-(c)** (Actions where defendants are an
18 officer or employee of the United States).
19

20 84. The 1906 **ANTIQUITIES ACT** is an Act of Congress that as used by Joseph Robinette
21 Biden violates the separation of powers doctrine by establishing a federal Memorial known as the
22 **MONUMENT** which is in direct conflict with **THE ACT**.
23

24 85. This clear conflict exercised by the Executive Branch is without lawful or
25 congressionally delegated authority and therefore, at a minimum, constitutes malversion.
26

27 86. This Honorable court has a duty and responsibility to invalidate the Presidential
28 Proclamation of Joseph Robinette Biden and issue a **CEASE-AND-DESIST ORDER** to prevent

1 further immediate and future violations as well as the ceasing and desisting of all unlawful actions
2 being conducted by the Defendants upon said certain lands which are not legally owned by the
3 United States.
4

5 87. A CEASE-AND-DESIST ORDER and A PROTECTIVE ORDER is necessary to protect the
6 Plaintiffs, to preserve peace and tranquility, and to prevent the commencement of unlawful
7 retaliatory actions which most certainly will to be brought in the form of unlawful police actions
8 by the federal executive authorities being exercised outside of a federal enclave. These police
9 actions will be recognized as a declaration of war upon the constitution and people by the
10 defendants. See, *Wilkerson v. Raheer*, 140 U.S. 545, 554, 11 S.Ct. 865 (1891). “The police power
11 is vested in the States and not the federal government [within the territorial boundaries of the
12 State].” See *New York v. United States*, 505 U.S. 144, 155 (1002) (“[N]o one disputes the
13 proposition that ‘[t]he Constitution created a Federal Government of limited powers’”) (quoting
14 *Gregory v. Ashcraft*, 501 U.S. 452, 457 (1991); *Maryland v. Wirtz*, 392 U.S. 183, 196 (1968);
15 *NLRB v. Jones & Laughlin Steel Corp.*, 301 U.S. 1, 37 (1937) *Cf. Chisholm v. Georgia*, 2 Dall.
16 419, 435 (1793) (Iredell. J.).
17
18

19 88. This Washington, D.C. political criminal cartel can only exist in the absence of Judicial
20 intervention. It is the purpose of this complaint to peel back the false veneer and expose this
21 illegal criminal organization. *The courts may invalidate “an Act of Congress only if the lack of*
22 *Constitutional authority to pass the act in question is clearly demonstrated.” (United States v.*
23 *Harris)*. Therefore, the Court’s previous invalidation of THE ACT¹⁸ was improper and an extra
24 judicial act as Congress did have the power to pass the 1866 Act.
25
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28 ¹⁸ *U.S. v. Bundy*, 2:16-cr-00046-GMN-PAL; Document 1353 (filed 01/18/2017) Order, Page 5, lis. 16-17, wherein the Court states, “Because the Court finds that the land in question is owned by the United States, this objection necessarily fails.”

PARTIES

1
2 89. Plaintiff **Michael Little** is a resident situated within the United States Congressional
3 Act of 1866 pertaining to the State of Nevada over the legal age of 18 years that has filed a legal
4 possessory title claim in a Nevada State Court (*See EXHIBIT 20. Dec. 5, 2022, AMENDED*
5 *MOTION TO DISMISS FOR LACK OF VENUE JURISDICTION USCA 1866*) in accordance with
6 the 9th and 10th Amendment and subsequently holds a legally recorded *de facto* possessory claim
7 of title upon all the abandoned appropriated land without exception whereas said claimed land is
8 provided for within THE ACT. (11,530,000 acres).
9
10

11 90. Plaintiff Michael Little holds a legal claim, all patent rights and all and every interest
12 upon certain lands identified as THE ACT lands within the alleged boundaries of the State of
13 Nevada that includes all the land of which the *MONUMENT* now unlawfully rests.
14

15 91. Plaintiff Michael Little submits that any venue jurisdictional dispute(s) regarding legal
16 land ownership (with Nevada) that may arise regarding said certain *de facto* land ownership
17 claim(s) by Plaintiff Michael Little upon the appropriated abandoned “public trust” land within
18 THE ACT is not a matter of this complaint or before this Honorable court. The land ownership
19 question before this Honorable court is, “Does THE ACT convert said lands from *federal*
20 *unappropriated* land into *non-federal appropriated* lands as evidenced by the NRS and when or
21 how did THE ACT lands legally return to the United States after the sale of the Hoover Dam 80
22 acres after 1945?
23

24 92. Plaintiff Michael Little holds legal *de facto* possessory title and land patent rights of
25 approximately 11,530,000 acres of the 1866, 1867 [THE ACT] lands within certain designated
26 boundaries of the State of Nevada including all the estimated 506,814 acres of land described as
27 the *MONUMENT*.
28

1 93. Plaintiff Ryan Bundy is a Nevada resident over the legal age of 18 years and a victim
2 of criminal actions committed by the Defendants and/or their agents on land provided for within
3 THE ACT for exercising Plaintiff Ryan Bundy's 1st, 2nd, 9th and 10th Amendment Constitutional
4 Rights.
5

6 94. Plaintiff Ryan Bundy was kidnapped, incarcerated, tortured and denied a litany of
7 Constitutional rights by the Defendants for asserting his rights and performing his required duty
8 to protect and defend the Constitution regarding unlawful and fraudulent federal activities upon
9 certain appropriated land provided for within THE ACT.
10

11 95. Plaintiff Ryan Bundy spent two years being unlawfully held as a federal prisoner by
12 means of judicial malversion that included a no bond detention by order of a Federal District
13 Judge/magistrate.
14

15 96. Plaintiff Ryan Bundy has been conveyed legal possessory title of certain pieces of land
16 as contemplated by Plaintiff Michael Little that are contained within the lands situate within THE
17 ACT, which the Defendants said land assignment is within the described "Allotment" and the
18 "LMNRA." These certain pieces of land reflect gifts in-part intended to offset United States
19 criminal actions and real damages that Ryan Bundy suffered by the unlawful and illegal acts at
20 the hands of the Defendants and/or their agents and as such, Ryan Bundy holds an interest in said
21 land and this Complaint.
22

23 97. Defendant JOSEPH ROBINETTE BIDEN is putatively employed by the United States
24 acting as a sitting President of the United States was, at all times relevant hereto the Complaint a
25 federal employee sworn to protect the United States Constitution from all enemies foreign and
26 domestic.
27
28

1 98. The DEPARTMENT OF INTERIOR [DOI] is a political subdivision of the United States
2 was, at all times relevant to this Complaint a federal agency and a director sworn to protect the
3 United States Constitution from all enemies foreign and domestic.
4

5 99. The DEPARTMENT OF JUSTICE [DOJ] is a political subdivision of the United States
6 and a federal agency and a director sworn to protect the United States Constitution from all
7 enemies foreign and domestic, at all times relevant to the Complaint.
8

9 100. The FEDERAL BUREAU OF INVESTIGATION [FBI] is a political subdivision of the
10 United States is a federal agency and a director sworn to protect the United States Constitution
11 from all enemies foreign and domestic, at all times relevant to the Complaint.\

12 101. The BUREAU OF LAND MANAGEMENT [BLM] is a political subdivision of the United
13 States is a federal agency and a director sworn to protect the United States Constitution from all
14 enemies foreign and domestic, at all times relevant to the Complaint.
15

16 102. The NATIONAL PARKS SERVICE [NPS] is a political subdivision of the United States
17 is a federal agency and a director sworn to protect the United States Constitution from all enemies
18 foreign and domestic, at all times relevant to the Complaint.
19

20 103. The BUREAU OF ALCOHOL, TOBACCO AND FIREARMS is a federal agency and a
21 director sworn to protect the United States Constitution from all enemies foreign and domestic,
22 at all times relevant to the Complaint.
23

24 104. DOES 1-30 are unknown individuals or entities sworn to protect the United States
25 Constitution from all enemies foreign and domestic, at all times relevant to the Complaint.
26

27 105. ROES 1-100 are unknown entities sworn to protect the United States Constitution
28 from all enemies foreign and domestic, at all times relevant to the Complaint.

STANDING

[CURRENTLY, WE FIND EVIDENCE WHICH CLEARLY DEMONSTRATES THE DEFENDANT’S PRIOR, CURRENT AND ONGOING BAD ACTS THAT PAINT A MOSAIC OF ADMINISTRATIVE POLICIES DEMONSTRATING THE DEFENDANTS’ INTENT TO VIOLATE AND/OR DEFEAT THE CONSTITUTION AND THEIR OATHS OF OFFICE].

106. There is a plethora of evidence documenting a history of criminal activity surrounding Defendant, Joseph Robinette Biden that now includes Presidential Executive Order(s) that include the MONUMENT as juxtaposed against THE ACT. Evidence of corruption as Vice-President with quid-pro-quo dealings in Ukraine that have been and are being suppressed by the DOJ and FBI. It is through the violation of THE ACT which is a *prima facie* showing of the breach of his Oath of Office, which morphs into malfeasance, misfeasance and malversion. Joseph Robinette Biden demonstrates no regard for the American People that are not politically aligned or subservient to his or his handler’s stated purpose which is to fundamentally destroy the culture of America and cater to special interest groups. He calls his political adversaries’ enemies of the State, domestic terrorists and insurrectionists parroting political talking heads and political criminals such as former Nevada U.S, Speaker of the Senate Harry Reid and Former California U.S. Speaker of the House Nancy Pelosi. Biden criminally prosecutes his political opponents just as Reid and Pelosi have done with rancher Cliven Bundy and Donald Trump respectively, by weaponizing a corrupt DOJ. Biden promotes and supports pedophilia through his policies at the border. Biden has stated and implemented policies showing his intent to cancel white voters and turn them into a minority in their own Country. Biden’s reckless policies are turning America into a tribal culture where laws are constantly in flux and controlled by the militarized ruling class (*aka*: Marxism, fascism¹⁹). These policies are becoming a fertile breeding ground for genocide.

¹⁹ By taking over the banking and corporate institutions and creating a political, orthodox and Zionist financial corporate capitalistic market system as opposed to a free capitalistic system. Where the taxpayer is always left holding the bag for the Marxist spending of borrowed money and having to live in a Mortgage Misery Usury Index.

1 Defendant Biden has declared this war on Americans by enforcing acts under the Color of Law
2 that ONLY American citizens are required to follow, while the government and special interests
3 are not. Defendant Biden demonstrates the characteristics of an incoherent narcissist with a
4 penchant for making his own (his handlers) law have become apparent. Meanwhile under the
5 Biden/Biden handlers' laws non-citizens are given greater rights and are EXEMPT from laws that
6 Americans citizens must follow. Individuals who illegally enter our country are immediately
7 excused from a federal felony violation and the Biden/Biden Handlers' red carpet is rolled out
8 for them. According to federal law, these people are criminals and as a result of the current
9 Biden/Biden handlers' and federal uni-party anarchy in Washington, D.C. these people (federal
10 criminals) are EXCUSED FROM and PROVIDED WITH:

- 13 • Needing Identification for using public transportation on airplanes
- 14 • Needing identification for using public transportation for buses.
- 15 • Excused from going through airport security and walked right around it.
- 16 • Provided with cost free air flights from the city of their origin to the United States city of
17 the current administration's choice.²⁰
- 18 • Provided with cost-free bus travel to the city of the current administration's choice.
- 19 • Provided with a credit card that provides them with a U.S. taxpayer assisted stipend;
20 (which many send back to their country of origin and in many cases constitute nothing
21 more than the federal government laundering money through the immigrants to the Drug
22 Cartels [who may be holding their families hostage], as payment to the Drug Cartels,
23 whose coyotes assisted them in their journey to America. This implicates the defendants
24 of executing a criminal business model, which appears to be modeled after Ukraine).
- 25 • Provided with free housing.
- 26 • Provided with free meals.

27 ²⁰ These cities all appear to be Democratic targeted cities which are instituting Marxist policies from which thousands
28 of people are now fleeing to Republican States. Because of this loss of population, these Democratic Cities/States
will technically lose Congressional seats and electoral votes. These illegal aliens, by all appearances, are being
brought in to secure the Democratic Party's power structure. This constitutes refugee jerryandering and a form of
election interference through refugee voter fraud.

- 1 • Allowed to purchase firearms with their stipend.
- 2
- 3 • Allowed to purchase a firearm without a background check.
- 4
- 5 • And they are now being given shortcut paths to citizenship, which is an insult to those
immigrants that have chosen to follow the laws of the United States.
- 6
- 7 • Allowed to attack American Citizens and be released without bail.
- 8
- 9 • Allowed to attack Law Enforcement and be released without bail.
- 10
- 11 • Allowed to obtain State driver's licenses, which in many states is the only requirement to
register to vote.
- 12
- 13 • Providing undocumented and unregistered illegals with Immigration Green Cards.
- 14
- 15 • A path to becoming a registered Democrat vote has been expedited at the cost of the
American Taxpayer to cancel or water down their opposing political party as well as
expand the democratic representation in congress through the increased population
measured by the census, employing geographic refugee jerrymandering to destabilize
congress with foreign extremism. *e.g.* (Ilhan Abodullahi Omar).
- 16
- 17 • The defendants utilize the United Nations (a foreign power) in participation with radical
extremists in this equation through providing money to NGO's (particularly corrupt and
unscrupulous churches) who act to undermine the will of the American Taxpayer and their
elected representatives in Congress under the guise of "compassion."
- 18
- 19 • It is unquestionable that these above super-ultra benefits are all funded with taxpayer
money and are only the tip of the iceberg, which is an outrage to every tax paying and
struggling American citizen, who can't get help from the government or the help that they
do get is so appreciably diminished that it is practically worthless.
- 20
- 21
- 22 • Further, the current administration has determined that it is more important to financially
support and house these illegal aliens (all who committed a felony by coming here
illegally) and pay lip service to the homeless and hopeless Americans who are now living
in our streets.
- 23
- 24
- 25 • Finally, the greatest insult of all to the American People is that the benefits being given to
non-citizens are significantly greater than the Social Security Retirement Benefits
received by tax paying Americans who have contributed into said benefit program for
decades and are now struggling against the ever-expanding hidden tax of inflation called
Bidenomics.
- 26
- 27
- 28

1 As such, the current administration has shown American Citizens that they aren't even a
2 consideration in the exercise of their powers, because the financial contributions of the American
3 People to their elected officials cannot possibly compete with the concentration of the special
4 interest 1% corporate contributions and therefore, it is these special interests, and not the People,
5 that are literally in control of the federal government. Quite simply, politics and politicians are
6 now just about the "Benjamins." Defendant Biden has ignored our veterans, our poor, our
7 homeless, the consequences and costs of his inflationary policies, and has given preference to the
8 special interest, banks, wall street, foreign wars and illegal non-citizens. Biden's policies, and his
9 Russophobia handlers send billions of taxpayer hard earned' money to foreign countries in
10 support of corrupt regimes and oligarchs, such as Ukraine on behalf of special interest, political
11 tidings and of course 10% kickbacks. It has been made abundantly clear to those American's who
12 still stand for Freedom, Nationalism and Sovereignty that they and their Judeo- Christian values
13 are no longer relevant in their own Country and, as such, said Americans have been targeted
14 politically, judicially, financially or in the case of the elderly for termination. (the Covid 19 shot,
15 is now recognized as a bio-weapon in the State of Arizona). American citizenship is now
16 considered a violation of the Biden pedophilia preference and the child grooming "woke culture".
17 Americans are now required under Biden's policies and federal police force to allow the
18 establishment of a potential foreign army (a Trojan Horse Fifth Column) consisting of millions of
19 illegal aliens on America soil through his reckless border policies that should result in Defendant
20 Biden's prosecution for not just malversion -- but for TREASON.
21
22
23
24

25 107. The Plaintiffs have experienced nothing but judicial bias every time that they have a
26 difference of opinion on an issue with the government. The Bundys have experienced this judicial
27 bias in the Nevada federal court where the submission of THE ACT, as evidence, that the federal
28

1 government does not own any significant unappropriated public lands within said ACT within the
2 physical boundry of Nevada, is dismissed as “a novel argument” when juxtaposed against the
3 Government’s incorrect and fraudulent history of the State of Nevada. As THE ACT was provided
4 to the Bundys by Michael Little and in providing this to Cliven Bundy was made part of a
5 contractual agreement. Therefore, any ruling that does not provide full faith and credit to THE
6 ACT, prevents Little from being paid on the contract and constitutes contractual interference.
7

8 108. Plaintiff Little also has first-hand knowledge of this judicial bias in the Nevada Court
9 system in many cases, to wit: *Little v. State*, 414 P.3d 304 (2018). Arguing that the State of
10 Nevada Governor’s Office was prohibited from donating or loaning money to any private
11 company in violation of the Nevada Constitution because it picked the winners and losers in the
12 economy and that this constituted cronyism; See also. *Nv. S.Ct. Docket No.’s: 64022 (2013);*
13 *64022 (2015); 68762 (2015); 69481 (2015)* (Where the Nevada Supreme Court refused to grant
14 Little access to the Writ of Mandamus/Prohibition where he was requesting relief from the lower
15 courts commission of fraud and falsified documents). This was accomplished by simply changing
16 the definition of terms from those in the statutes to achieve the desired political outcome. Little
17 was forced to go to the Nevada Supreme Court no less than four times in an attempt to stop lawfare
18 and the color of law being applied to his lawful conduct. Little’s request for relief was denied
19 each time. Therefore, state and federal judicial bias has shown itself to be systemic.
20
21
22

23 **ABANDONED AND LEGAL CLAIM UPON**
24 **CERTAIN LANDS LOCATED WITHIN**
25 **THE ALLEGED DESIGNATED PHYSICAL**
26 **BOUNDARIES OF NEVADA**

27 109. The State of Nevada has statutorily abandoned and has notoriously made public this
28 abandonment of said certain “public lands” within the four corners of THE ACT which coincided
with the establishment of the Bureau of Land Management [BLM] in 1946 (as set forth above).

1 110. The Nevada State Legislature in 1867 agreed to accept the lands provided for in THE
2 ACT thus fulfilling the federal agreement within and without THE ACT and then failed to legally
3 formalize and place a legal claim upon said land by means of a referendum to the people of
4 Nevada, as required by law, for the purpose of amending the Nevada Constitution and thereby
5 expanding Nevada Constitutional boundaries (constitutional jurisdiction) to those of the physical
6 boundaries. This failure to formalize the grant left THE ACT lands without the legal jurisdiction
7 of the United States and without the legal jurisdiction of the State of Nevada.
8

9 111. Although the Nevada State Legislature in 1979 amended the Nevada Constitution to
10 change the constitutional boundaries of the state of Nevada, this amendment only pertained
11 specifically to the 1867 boundaries and not the land of the State of Nevada (Clark County,
12 southern portion of Nye County and southern portion most portion of Lincoln County). This
13 measure completely failed to amend the Nevada Constitution to include those portions on the
14 eastern border (the 1866 land northeastern portion of Lincoln County, the northeastern portion of
15 White pine County and the northeastern portion of Elko County).
16
17

18 112. The Nevada State Legislature to date has never legally amended the Nevada State
19 Constitution to change the boundaries of the State of Nevada specifically to reflect the 1866
20 portion of Nevada which is referenced in THE ACT. Therefore, that portion of land is outside
21 the four corners of the of the 1864 Nevada Constitution and without the Constitutional boundaries
22 of the State of Nevada and as of 1866 is no longer United States territorial land.
23

24 113. Clark County, Nevada has made public that Clark County has abandoned all rights
25 and claims upon THE ACT lands. Clark County made this party admission when they returned
26 rancher Cliven Bundy's payment for grazing fees (See **EXHIBIT 21**, reserved for returned grazing
27 check made out to Clark County, which will be later produced) stating that the lands were lands
28

1 not owned by the State of Nevada. Every sale of any of THE ACT lands conducted by a Defendant
2 after 1945 is yet another party admission of ownership and jurisdictional abandonment by the
3 State of Nevada. Therefore, Plaintiff Michael Little's claim is validated by each and every illegal
4 sale or unchallenged claim of THE ACT lands by the United States that the State of Nevada has
5 allowed and continues to allow.
6

7 114. Plaintiff Michael Little claims to be the legal landowner and holder of possessory
8 title, patent rights and holder of all interest of certain abandoned lands (THE ACT) within the
9 physical boundaries of the State of Nevada by the authority of the United States 9th and 10th
10 Amendment (*See EXHIBIT 22 & 23. 9th and 10th Amendments*) and that the land is no longer
11 public trust land, rather was *restless* unclaimed land that lay abandoned by the State of Nevada
12 beginning in 1946 until legally claimed by Plaintiff Little on December 5, 2022, that places Little
13 in the chain of title as the current legal land owner.
14

15 115. Therefore, any land dispute that may exist or arise regarding said certain *de facto* land
16 ownership claim(s) by Plaintiff Michael Little regarding the abandoned "public trust" land (THE
17 ACT lands) within the physical boundaries of the State of Nevada is without this complaint and
18 would be a legal matter of the State of Nevada recognizing **NRS 1.030** and in recognition of the
19 9th and 10th Amendment of United States Constitution. However, the UNITED STATES
20 CONSTITUTION, Art. III, Section 2, sets forth that in all cases where the State is a party to a conflict,
21 the United States Supreme Court shall have original jurisdiction.
22

23 116. Plaintiff Michael Little claims that the United States is constitutionally foreclosed
24 from land ownership claims upon certain abandoned land within the boundaries of the State of
25 Nevada and is statutorily foreclosed under Nevada state law (without a record of legal
26 conveyance) where said certain abandoned land is contained and expressly provided for within
27
28

1 THE ACT and subject to the supremacy clause and the sovereignty of the State of Nevada and
2 the equal footing Doctrine.

3 117. Plaintiff Michael Little being a person as being described within the 9th and 10th
4 Amendments as “the people” (in the plural) maintains that these Amendments of the United States
5 Constitution provides Plaintiff Michael Little as a person (as the “people” in the singular) the
6 right to constitutionally acquire, own and hold conveyed land and patents upon said appropriated
7 abandoned land which is all the land provided for within THE ACT.
8

9 118. Plaintiff Michael Little claims that the United States is constitutionally foreclosed as
10 of May 5, 1866, from land ownership claims upon certain abandoned land within and without
11 the boundaries of the State of Nevada without proof of legal conveyance where said certain
12 abandoned land is contained and expressly provided for within THE ACT.
13

14 119. Plaintiff Michael Little did serve notice upon Nevada Governor Brian Sandoval via
15 certified mail on March 16, 2016 (*See EXHIBIT 24. certified mail #7014 3490 0001 7860 7079*)
16 and the Federal District Court, District of Nevada in 2017 at *United States v. Cliven Bundy* via
17 Motion to Dismiss in the Alternative that said land was lands not belonging to the United States
18 by cause of THE ACT. It is suspicious that Nevada Governor Sandoval had previously served as
19 a Nevada Federal District Judge and refused to act or respond to Little’s certified letter.
20

21 120. Plaintiff Michael Little also notified former Nevada Attorney General, Adam Laxalt,
22 who was apprised by the Doctrine of Respondent Superior of this fact – through then Nevada
23 Governor Sandoval, and Laxalt also refused to act or intercede and place claim upon said land
24 and demand that the federal government recognize THE ACT as the controlling law and instruct
25 the federal government to CEASE-AND-DESIST its unlawful activities on non-federal lands.
26
27
28

1 121. Plaintiff Michael Little considers Cliven and Ryan Bundy's kidnapping,
2 incarceration, and denial of a plethora of Constitutional rights by the Defendants as pre-conviction
3 punishment for asserting their rights and required duties to protect and defend the Constitution
4 and the exercise of their rights under the Common law, the 9th and 10th Amendments. The Nevada
5 State Governor Brian Sandoval, Nevada State Attorney General Adam Laxalt and Sheriff Joe
6 Lombardo abdicated and refused to intercede concerning the unlawful actions of the federal
7 government therefore, abdicating that the land **did not** belong to Clark County, Nevada or to the
8 State of Nevada. This land is clearly described in Plaintiff Michael Little's aforementioned letter
9 describing the non-federal land ownership provided for within THE ACT as the controlling law.
10

11
12 122. At no time regarding Plaintiff's Cliven and Ryan Bundy's ordeal did the State of
13 Nevada make claim upon said land or take action through the Sheriff's office (Joe Lombardo) to
14 protect its citizens and maintain peace and tranquility, to wit: protect Cliven and Ryan Bundy
15 and/or other Nevadans or act to prevent the federal government from violating both Nevada State
16 and United States Constitutions and/or other State laws. In fact, former Sheriff Lombardo acted
17 in violation of state and federal law allowing Deputy Sheriffs under his command and federal
18 agents to utilize K-9 and Taser force upon a group of individuals that had legally gathered upon
19 nonfederal land to express in public their grievance against their government's corruption.
20 Lombardo's actions as recorded on video and available for viewing on Youtube represent a
21 complete ignorance of Nevada law and his administrative implementation of the police state
22 under the color of law in violation of the constitutional Bill of Rights and the rule of law.
23

24
25 123. Sadly, former Sheriff Lombardo not only violated State and Federal law he gave false
26 testimony against the Bundy's that could have very easily resulted in the Bundy's spending the
27 balance of their lives being federally incarcerated for the fraud the State of Nevada and the United
28

1 States are committing. Joe Lombardo conspired with and was complicit in the federal
2 governments illegal gambit (theft of state land).

3
4 124. At no time proceeding from 2016 to 2019 did Nevada Governor Brian Sandoval,
5 former Nevada Attorney General Adam Laxalt or Nevada Sheriff Joe Lombardo, intercede to stop
6 the Defendants from unlawful criminal activities under State law or place a claim upon said land.
7 Ironically, Defendant Biden was then acting United States Vice-President at this time, under then
8 President Obama, who has also violated the U.S. Constitution and Nevada State law by
9 fraudulently citing the ANTIQUITIES ACT OF 1906 at Presidential proclamations (1) the BASIN AND
10 RANGE NATIONAL MONUMENT (July 10, 2015) and (2) GOLD BUTTE NATIONAL MONUMENT
11 (December 28, 2016). (*see EXHIBITS 18. AND 19. the BASIN AND RANGE NATIONAL*
12 *MONUMENT AND GOLD BUTTE NATIONAL MONUMENT*) Where both of the Obama National
13 Monuments, as with Biden's National Monument, are National Monuments established upon
14 Appropriated Land without the authority of the ANTIQUITIES ACT OF 1906 and which land was
15 not owned by the United States at the time of their implementation.
16
17

18 125. The granting of relief from this Complaint will prevent future Presidents and all U.S.
19 Nevada representatives from continuing to violate the Constitution regarding THE ACT as has
20 been done by Warren Hardy in 1922, Lyndon Johnson in 1964, Ronald Regan in 1988, Barak
21 Obama in 2015 and 2017 and Joseph Robinette Biden in 2023. This continuing federal fraud
22 must stop and this complaint charges this Honorable Court with that duty.
23

24 **NEVADA, THE ACT, THE LCB AND WHY NEVADA HAS**
25 **NO AUTHORITY TO CLAIM THE 1866 [THE ACT] LANDS**

26 126. From 1958 to 1979 there were both legal and political activities regarding whether
27 or not Clark County, Nevada, was actually part of the State of Nevada. The land in which Clark
28 County lies was part of [THE ACT]. There were arguments stating that because Clark County

1 was without the jurisdictional boundaries of the Nevada State Constitution and taken from the
2 remanent of the Arizona Territory it was an independent territory akin to being “never-never”
3 land and therefore could mint its own money, to wit: Gold Coins. It was the proponent’s position
4 that gold back currency would put the independent territory (Clark County) on the world map
5 and make its economy explode. These were all interesting arguments that were supported by
6 interesting and somewhat compelling data. However, the most important argument of all was
7 that the Nevada Constitution upon its passing contained jurisdictional boundaries for its
8 effectuation and application. This created a considerable conundrum, in that, if the Nevada
9 Constitution had no authority or application in all of Clark County, any legal or quasi-legal actions
10 taken by any governmental entity outside of the authority of the Nevada Constitution would
11 therefore be done or committed under the color of law, illegally superseding the rule of law.
12 Nevada State Government actions taken without the delegated authority of the Nevada
13 Constitution are all illegal and *void ab initio*.

14
15
16
17 127. This “never-never” land and legal disposition was particularly disturbing with regard
18 to jurisdiction regarding criminal cases²¹ in which Clark County had prosecuted individuals
19 pursuant to the Nevada Revised Statutes. These individuals had concerns that they were
20 unconstitutionally prosecuted absent the existence of the constitutionally delegated authority of
21 the State of Nevada, which because of the language in the Nevada Constitution at those times was
22 limited to the original 1864 geographical areas, meaning that Clark County didn’t exist and
23 therefore lacked the Constitutional authority to prosecute them and/or charge them under Nevada
24 law (NRS).
25
26
27

28

²¹ (1) *Kuk v. State*, 392 P. 2d 630, 80 Nev. 291 (Nv. S.Ct. 1964) ; (2) *Surianillo v. State*, 553 P. 2d 942, 92 Nev. 492 (Nv. S.Ct. 1976); *People, ex. rel., Schultz v. Lombard*, 398 N.Y.S.2d 932 (1977).

1 128. Because of the concern and the legal fact that the State of Nevada lacked
2 constitutional legal authority was not just some tangential legal argument, the Nevada judiciary
3 made the decision that the lands outside of those over which the Nevada Constitution authorized
4 Constitutional powers was merely a “legislative housekeeping oversight.” However, the judge in
5 the case stated that “If I recognized the law [THE ACT] this would put Las Vegas in “never,
6 never” land. However, the judge was without Constitutional Authority to Legislate from the
7 Bench (his decision effectively illegally amended the Nevada Constitution).
8

9 129. In fact, only the citizens of Nevada can amend the Nevada State Constitution, which
10 had not occurred at that time. So, the arguments in these cases were accurate and the Legislative
11 Counsel Bureau [LCB] (a private corporation that drafts and advises the Legislature on legislative
12 matters) in 1979 determined that they needed to draft ballot Question No. 5, which was placed on
13 the state ballot to amend the Nevada Constitution. The drafting of Question No. 5, acknowledged
14 that the judge’s decision was *extra-judicial* in nature and without authority. The purpose of this
15 question was to correct/amend the Nevada Constitution to extend the authority of the Nevada
16 Constitution to the areas known as Clark County, the southern tip of Nye County and the southern-
17 most portion of Lincoln County or more accurately described as land ceded by Congress in THE
18 ACT (specifically regarding the 1867 portion), which constituted lands south of the 37th parallel.
19
20
21

22 130. The lands subject to ballot Question No. 5, were literally all THE ACT lands, within
23 the physical boundaries of the State, south of the 37th parallel, which was written by the LCB, in
24 which the LCB makes several errors in the drafting of this question and their explanation of what
25 the question accomplishes. Particularly disturbing are the allegations contained therein that the
26 1864 Nevada Constitution provided the “*flexibility*” for the eastern and western boundaries of the
27 state to accommodate future Acts of Congress (future land acquisitions through the federal
28

1 government) without a Nevada referendum. This statement by the LCB is intentionally inaccurate
2 and was an attempt to circumvent the actual language in the Nevada Constitution which permitted
3 the resurveying to correct miscellaneous errors of the State's 1864 western and eastern boundaries
4 with California, Utah and Arizona respectively and not *flexibility* in the acquisition of land
5 through the further Acts of land grants from Congress without the formal acceptance required by
6 Nevada law. In particular the use of the term "flexibility" negates and eviscerates the legal land
7 transfer processes that are set in place. As such, the eastern lands which were granted to the State
8 of Nevada after the original 1864 lands were NEVER Constitutionally added due to a "deficiency
9 and vagueness" issue within the language of the 1864 Nevada Constitution. This so-called
10 flexibility issue is not just a misnomer, it is an intentional misrepresentation of the vague language
11 of the Nevada Constitution and therefore, a fraud. This allegation of "flexibility" intentionally
12 fails to take into consideration the law which is in place for the legal transfer of lands between
13 the federal government and the State of Nevada. Therefore, this misrepresentation is an
14 intentional and purposeful attempt at misguiding and/or misleading the Nevada voters and
15 constitutes intentional fraud and malversion. Further, the LCB's interpretation of the vague
16 language represents the Status Quo, in support of the ongoing fraud which has been directed at
17 the people of Nevada.

21
22 131. However, the LCB cannot be held liable under the same standard as the Nevada
23 Legislators as it appears that the LCB is a private corporation, a corporation whose ownership is
24 literally unknown. The LCB was contacted by the Plaintiff and a copy of their stockholders was
25 requested. This request was denied, and Mr. Little was informed that the LCB was a private
26 corporation and did not have to release this information EVEN THOUGH they (LCB) control the
27 Nevada Legislature through their revision of the codified version of Nevada Law. Since their
28

1 inception, the LCB has been busy working nefariously behind the scenes. A prevailing priority
2 was to pass a statute which they allege amended²² the Nevada Constitution's directive (Article 5,
3 Sec. 20) that the Secretary of State [SOS] is the Repository of the Executive and Legislative
4 Records. While these records were in the possession of the SOS they were *public records* and
5 could be obtained through simply requesting them (NRS 225.100). The Legislative records are
6 now in the physical possession of the LCB, a private corporation, and now the Legislative Records
7 are "PRIVATE." (See EXHIBIT 25, a prolix 28-page Letter to a Reporter requesting from the
8 LCB explaining why they are exempt from disclosing *public records*). The LCB now operates
9 in secret by preventing what they consider prying eyes from obtaining Legislative records which
10 will assist these prying eyes in understanding the legislative history of matters in the State of
11 Nevada and which show illegal legislative conduct. Plaintiffs believe the LCB working in
12 conjunction with BLM has falsified records and documents to conceal the fraud regarding THE
13 ACT that includes Question No.5..
14
15
16

17 132. See NRS 218F.150(3), which prevents ANYONE (including a political reporter from
18 the Associated Press) from subpoenaing or suing and attempting to obtain information through
19 the discovery process from the LCB. Thus, the SOS permitted public documents to become
20 private so that illegal acts committed by the Legislature could be concealed. This is a violation
21 of NRS 239.320, to wit:
22

23 **An officer who** mutilates, destroys, **conceals**, erases, obliterates or falsifies **any record**
24 **or paper appertaining to his office**, is guilty of a category C felony and shall be
25 punished as provided in NRS 193.130.
26

27
28 ²² "A statute cannot amend the Constitution." *Pennsylvania v. Union Gas Co.*, 491 U.S. 1, 109 S.Ct. 2273 (1989)(overturned on other grounds); See also, *Dellmuth v. Muth*, 491 U.S. 223, 109 S.Ct. 2397 (1989). And, "As I have previously insisted: 'A statute cannot amend the constitution.'" *Seminole Tribe of Florida v. Florida*, 517 U.S. 44, 116 S.Ct. 1114 (1996).

1 Further, this exacerbates the SOS's duty under **NRS 225.100** which sets forth that the Secretary
2 has a,

3 **Duty to furnish certified copies of law, records and instruments.** The secretary of
4 State **shall furnish, on request, to any person** who has paid the proper fee for it, **a**
5 **certified copy of all or any part of any law, act, record or other instrument** of writing
6 on file or deposited with the Office of the Secretary of State of which a copy may properly
7 be given.

8 As the Secretary of State has violated its sacred oath by permitting its constitutionally delegated
9 authority to be delegated to a "Private" entity which is not subject to the Nevada Revised Statutes
10 requirements of full disclosure. The SOS' participation and complicity in this privatization of the
11 State's public records is an act of malfeasance for which simple removal from office is insufficient
12 as a punishment.

13 139. The LCB was instrumental in illegally relieving the SOS of its Constitutional duties
14 through violating the Nevada Constitution. This now insulates crooked politicians from being
15 held accountable on their illegal conduct, such as referenced in *Little vs. State*,²³ denied for lack
16 of standing.²⁴ The LCB now has absolute control over the entire Legislature of Nevada, that
17 includes cutting Legislative payroll and paychecks²⁵ and have made themselves responsible for
18 all of the collateral legislative functions, *e.g.*, they now operate the State printing office, they are
19 in charge of the retirement fund of the State employees, they control all of the marijuana tax
20 money, they control the lobbyists and much, much more. Further, the LCB has passed statutes
21 which permit them to alter, amend or change any Nevada Revised Statute that they want, at any
22
23
24

25 ²³ Nevada Supreme Court; No. 72641; Decided March 23, 2018. Dismissed for lack of standing.

26 ²⁴ This holding found that the taxpayers had no right to bring an action for the State laundering taxpayer money
27 through the Counties, to determine the winners and losers in the marketplace. The winners received tax payer dollars
28 and these winners were selectively and politically chosen (special interest/kickbacks). A circumvention of the Nevada
Constitution which the Legislature, nor the Governor could legally perform.

²⁵ As the Legislators paychecks come from the LCB, that is who they work for. The Legislators are supposed to be
a part of the State and they are not, they are effectively a part of a private corporation whose stock holders are secret
and unknown.

1 time, without the Legislature's interaction or permission. (See book: **TYRANTS OF TYRANNY**,
2 which documents all of this very nicely and is available on Amazon and can be accessed at
3 tyrantsofyranny.com). Essentially, the LCB has granted or delegated to itself, legislative
4 capabilities that cannot be delegated. See *State, ex rel. Bull v. Snodgrass*, 4 Nev. 524 (1869)
5 which states,
6

7 As such, **the legislative powers may not be delegated** to another branch of government.
8 Nev. Const. art. 3, § 1.

9 If the legislative powers cannot be delegated to another branch of government, how then, can such
10 power be granted to a non-government entity? It cannot. Therefore, the LCB is an embedded
11 criminal enterprise, that operates in lockstep with Washington, D.C.'s controlling cabal.
12

13 140. However, all other criminal acts by the LCB aside, the most pronounced intentional
14 obfuscation regarding the Nevada Constitution and the 1866 land is that the LCB NEVER
15 mentions that the 1866 land was granted to the State of Nevada from Congress in Question No.
16 5. This intentional failure to even mention the 1866 Act permits the Plaintiffs access to certain
17 presumptions. One of those is set forth in *U.S. v. Tweel*, 550 F.2d 297, 299 (1977); quoting *U.S.*
18 *v. Prudden*, 424 F.2d 10221, 1021 (1879), which states,
19

20 **Silence can only be equated with fraud** where there is a legal or moral duty to speak or
21 where an inquiry left unanswered would be intentionally misleading.

22 141. So, the entire issue as to the extension of the Constitutional boundaries to the physical
23 boundaries of the State of Nevada was intentionally and fraudulently obfuscated by the LCB by
24 the omission of THE ACT. We can now recognize the LCB as the sword and shield of the Nevada
25 Legislature, presumably protecting state and federal legislators from their illegal acts, including
26 the legality of Nevada's land issues which have become so compromised that it has permitted
27 federal and state actors to engage in illegal land transfers and illegal acts constituting cronyism.
28

1 This Lawsuit is intended to end all of this illegal conduct and to restore some semblance of legal
2 sanity as to these issues.

3
4 142. As such, the intentional obfuscation at Question No. 5 by the LCB was so vague that
5 it failed to fully inform the voter as to what the issue being presented consisted of. This therefore,
6 does not constitute any viable legal conclusion. If in fact, the LCB is not an agency or Bureau of
7 the State and is actually a private corporation that has privatized the public records (See **EXHIBIT**
8 **25**, Letter from LCB to Associated Press reporter explaining why all Legislative Records are
9 “Private”). As such, the Public has no reason to place any trust in anything that comes from the
10 Nevada Legislators or the LCB. The reason for this is that the LCB is clearly acting on behalf of
11 their own private concerns and the private concerns of their shareholders, unknown ghosts.²⁶ So,
12 literally, this so-called “flexibility” of the Nevada Constitution as to THE ACT lands added to the
13 physical boundaries of the State of Nevada is not based upon any historical or legal facts. It is
14 based purely upon newspeak which is manufactured and based upon a highly speculative legal
15 assumption (Citing “anticipation” and “flexibility” *Color of Law* theories,), which is a vague
16 condition unsupported by any substance whatsoever.

17
18
19
20 143. Now this leads us to some very interesting legal facts regarding the southern and
21 eastern boundary of the State. The eastern boundary(ies) was changed in the Congressional Acts
22 of 1866 and 1867, and has since suffered what will become known as the malfeasance and
23 misfeasance of State Legislators, Governors, Attorney Generals and Secretaries of State during
24 these times when the land issues arose. However, the actions today regarding THE ACT lands as
25
26
27

28

²⁶ The list of potential shareholders could contain any one of the names in the news such as Barack Obama, Michael Obama, Hunter Biden, Harry Reid, Rory Reid, China, Blackrock, Vanguard, etc. The list could go on and on.

1 enforced under the color of law, supports these illegal acts or failures to act, being nothing short
2 of Malversion (Def: "Corrupt behavior in a position of trust, especially in public office.").

3
4 144. Here's what we now know. Question No. 5 seemingly cured the issue that Clark
5 County was operating for over 72 years (1909-1981) with no Constitutional legal authority. In
6 other words, since the Nevada Constitutional boundaries, which are set forth in the Nevada
7 Constitution, only included the lands ceded by Congress in 1864, when the State of Nevada was
8 originally formed; then, everything that Clark County has done since July 1, 1909, was *void ab*
9 *initio* and any legislation concerning Clark County was without any delegation of Nevada's
10 constitutional powers. THE ACT land included all lands within Nevada south of the 37th Parallel.
11 This land includes the most southern portion of Lincoln County, the southern tip of Nye County
12 and all of Clark County. In other words, until 1981 Clark County did not even legally exist and
13 was not legally a political subdivision of the State of Nevada. Once the Constitutional boundaries
14 in the State of Nevada were allegedly legally extended with Question No. 5, this legal recognition
15 of THE ACT constitutes a party admission that all of the land south of the 37th Parallel was not
16 availed of or covered by the Nevada Constitution. Even so, the description set forth in Question
17 No. 5, only discusses Clark, Nye and Lincoln Counties (south of the 37th parallel).
18
19
20

21 145. However beneficial the result of Question No. 5 was to the LCB and BLM the lands
22 located south of the 37th Parallel (1867), it did not address the issue of the eastern additions to the
23 physical boundaries of the State (1866). This leaves us with an enigma. Since the eastern lands
24 were not included in Question NO. 5, how does this apply to the eastern boundary lands which
25 were ceded by the Congress in THE ACT? The answer is that the additions on the eastern physical
26
27
28

1 boundaries of Nevada on May 6, 1866²⁷ have still not been constitutionally incorporated into our
2 Nevada Constitution by the people. In other words, every single alleged legal act committed by
3 any governmental entity in Elko County, White Pine County and that portion of Lincoln County
4 located above the 37th Parallel, within THE ACT lands, have therefore operated under color of
5 law and without Nevada Constitutional authority. Now in consideration of the facts, the
6 conveyance of land to the LEHMAN CAVES MONUMENT by White Pine County was tacitly illegal
7 and that conveyance, as well as the monument was tacitly illegal and therefore, as a matter of law,
8 the LEHMAN CAVE MONUMENT lands has never been properly ceded to the United States.
9
10

11 146. The federal government's specious self-serving argument is that all lands ceded to
12 the State of Nevada after 1864, were also ceded under the same premise as the Act ceding the
13 original property to the State for its formation. That premise is that all public unappropriated
14 lands ceded to the State were being withheld and belonged to the federal government. However,
15 this is only a presumption on behalf of criminal elements within the government. A thorough
16 reading of THE ACT which ceded the lands to the eastern border of Nevada, shows that no public
17 lands were withheld or reserved by the federal government. So, this argument is absolutely
18 baseless. There exists no legal nexus between the 1864 lands and the 1866 lands that eliminates
19 the constitutional requirements of a State referendum to be waived.
20
21

22 147. To date THE ACT lands along Nevada's eastern border (north of the 37th parallel)
23 have never been brought within the Constitutional jurisdiction of the State of Nevada. Therefore,
24
25

26 ²⁷ Governor Blasdel speaks about the 1866 land on the eastern border in his first biennial message of Governor H.G.
27 Blasdel. Stating we need to vote on this issue right away so prevent any misapprehensions. Blasdel asked for a
28 Referendum or an Act to be passed accepting these eastern lands into the physical boundaries of the State of Nevada.
However, even though Blasdel pressed for this the State never acted on it this constitutional requirement. In his
biennial message Governor Blasdel warned that without doing 'something' that the eastern area would be without
Nevada's Constitutional Authority. (See Jan. 10, 1867; Biennial Message; Pg. 13 under heading "Eastern and
Southern Boundaries." See EXHIBIT 26.

1 these lands **ARE NOT** within the Constitutional boundaries of the State and, as the first Governor
2 of the State of Nevada (H.G. Blasdel) stated,

3 “ . . . the establishment of **boundary lines by the Constitution would seem to leave the**
4 **Legislature without present authority to bind the State** in the premises.” (Biennial
5 Message Jan. 10, 1867).

6 And

7 In order that no misapprehension may arise from a failure to comply with the Act, I
8 suggest the propriety of immediate legislative acceptance as therein contemplated. **In**
9 **order to legally and fully extend the jurisdiction of the State over the ceded**
10 **territory, I suggest the propriety of proposing and submitting to the people, for their**
11 **ratification, an amendment to the Constitution conforming our southern boundary**
to the lines designated in the grant. (Emphasis added)

12 This misapprehension is now exactly what has occurred and was attempted to be concealed in
13 1979 by ballot Question No. 5. Again, the absence of reference to THE ACT in discussing
14 Question 5, constitutes “silence” and is therefore an act of fraud. See again, “Silence can only be
15 equated to fraud, where there is a duty to speak.”

16
17 148. As the facts are set forth, the Legislators at the time (1867) were much too busy to
18 take the advice of Nevada’s first Governor (who was actually much more honest than the ones
19 we have today). This biennial message from Governor Blasdel constitutes a party admission by
20 the State of Nevada that the State of Nevada has no legal authority regarding lands in the eastern
21 boundary of Nevada (to wit: Elko, White Pine and Lincoln (north of the 37th parallel in THE
22 ACT lands)) or the lands south of the 37th Parallel, which constitutes all of Clark and the southern
23 portion of Nye and Lincoln County.
24

25 149. In conclusion, the federal government legally owns very little if any lands within
26 either THE ACT lands (1866 or the 1867) and, although Question No. 5 expanded the
27 Constitutional boundaries of the State of Nevada to the physical boundaries of the State south of
28

1 the 37th parallel, there is no Nevada Constitutional authority in the eastern lands ceded to the State
2 of Nevada. So, to be perfectly clear, all eastern lands (1866 ACT lands) north of the 37th Parallel
3 is free from Nevada's Constitutional jurisdiction. This means that THE ACT lands within the
4 counties of Elko, White Pine and that portion of Lincoln County north of the 37th parallel are all
5 outside of Nevada's constitutional power. Therefore, since Nevada has already made a party
6 admission that they own none of the public lands in either of the 1866 or 1867 ACT lands and by
7 cause of the Supremacy Clause and/or the Separation of Powers Doctrine demonstrating that the
8 federal government does not own said public lands which are the subject of this Complaint. And
9 therefore, these ACT lands are literally unclaimed by the state of Nevada and foreclosed from
10 ownership by the federal government. Thus, making Michael Little's claim superior in the chain
11 of title to these lands and who is now the *de facto* owner of all of THE ACT lands. They say you
12 cheat; you get caught; you lose! The Doctrine of laches or the status quo, or any other cleverly
13 created legal theory can set aside fraud as stealth fraud has no statute of limitations.
14
15
16

17 **A CHRONOLOGICAL SUMMARY**
18 **OF NEVADA'S HISTORICAL TIMELINE,**
19 **NECESSARY FOR THE APPLICATION OF LEGAL**
20 **STANDARDS (BEGINNING IN 1848 TO PRESENT)**

21 150. In 1848 the United States established a treaty with the nation of Mexico identified as
22 the 1848 TREATY OF GUADALUPE HIDALGO.

23 151. In 1850 Mormon Immigrants first discovered gold in the then Utah Territory near the
24 area now known as Dayton, Nevada.

25 152. In 1855 the Mormons establish the Las Vegas Mormon settlement and Mormon Fort.

26 153. In 1857 the Mormons abandon the Las Vegas Mormon settlement and Fort due to pre-
27 colonial tribes attacking the Mormons and the fall out from the Mormon American war. (pre-
28 colonial is a more accurate description of what has been commonly misidentified first as Indians

1 and second as Indigenous peoples which through science and DNA are in fact Eurasians and
2 certainly not Indians or Indigenous People).

3
4 154. In 1859 the Comstock lode was discovered near Dayton that is now known as Virginia
5 City, Nevada.

6 155. With the Virginia City discovery in 1859 and in consideration of the 1849 California
7 Gold Rush, Washington, D.C. decided to create the State of Nevada for three politically motivated
8 reasons. These reasons are: (1) federal greed and a desire for exclusive special interest control
9 involving mineral deposits within the then Utah Territory; (2) to prevent the Mormons and the
10 Mormon Church from acquiring wealth from these newly discovered mineral deposits within the
11 Utah Territory; (3) in a quid pro quo with President Lincoln to obtain electoral votes in the 1864
12 election.
13

14 156. In 1860 U.S. Troops occupy the Mormon Fort.

15
16 157. In 1861 the Nevada Enabling Act of 1864 was initiated establishing and creating the
17 original boundaries of the Nevada Territory to achieve these three (3) ends.

18 158. In 1862, the United States passed the HOMESTEAD ACT.

19
20 159. In 1862, Congress expanded the Territory of Nevada to include a section of the Utah
21 Territory.

22 160. In 1862 the Pacific Railroad Act was passed.

23 161. On March 21, 1864, Congress enacted the NEVADA ENABLING ACT, "authorizing a
24 convention to draft a state constitution for ratification by the residents of the newly created State
25 from the *"Nevada Territory."*

26
27 162. "As a condition of statehood, the NEVADA ENABLING ACT of 1864 required that the
28 convention adopt an ordinance to establish a clear land title, agreeing and declaring that the

1 inhabitants (existing at that time) of the newly created *Nevada territory* would ‘forever disclaim
2 all right and title to the unappropriated public lands lying within the *said territory*, and that the
3 same shall be and remain at the sole and entire disposition of the United States.’ Thus, this enabled
4 the Nevada Territorial land being conveyed to the State of Nevada free from pre-existing
5 (territorial inhabitant) liens.

7 163. Despite not having the required population qualification to legally become a state, in
8 July 1864 the convention adopted the 1864 NEVADA STATE CONSTITUTION and complied with
9 Congress’ directive in the NEVADA ENABLING ACT 1864 by adopting an ordinance disclaiming on
10 behalf of the territorial inhabitants all right and title to the unappropriated public lands within the
11 boundaries of the 1864 Nevada State Constitution being the then *said territory*, as a condition
12 precedent to becoming a sovereign state.

14 164. On October 31, 1864, Nevada the State was admitted to the Union and President
15 Lincoln was informed that he had received Nevada’s electoral votes as had been agreed to in a
16 quid pro quo for additional State land.

18 165. The United States therefore has held alleged *de facto* possessory title to all of Nevada’s
19 unappropriated public lands as reserved within the 1864 State of Nevada constitution identified
20 as and being the then *said territory* that arguably creates an irreconcilable constitutional legal
21 conflict with CHAP. XXXVI Section 1. ACT OF CONGRESS (1864) ENABLING THE PEOPLE OF
22 NEVADA TO FORM A CONSTITUTION AND GOVERNMENT approved March 21, 1864, that reads “*the*
23 *state, when formed, shall be admitted into the Union upon an equal footing with the original*
24 *states, in all respects whatsoever*”.

1 166. This conflict and the land provided for within the 1864 Nevada State Constitution is
2 not a matter of consideration in this complaint and is not to be confused with the land provided
3 for within THE ACT.
4

5 167. Therefore, the reserved *said territory* speaks specifically to the unappropriated
6 territorial lands within the described geographic Boundaries of the 1864 State of Nevada
7 constitution, as adopted, at Nevada State Article 14. and whereas in 1864 the Nevada *said*
8 *territory* does not provide for territorial land without said Nevada territory.
9

10 168. In 1865 Octavius Gass occupied the Mormon Fort then located in the Arizona Territory
11 and presented it to be his and naming it the Los Vegas ranch. Octavius never legally purchased
12 the land nor filed federal territorial claims or homesteaded this land and therefore could not legally
13 convey the land to the Stewarts who in turn could not legally sell the land to the Union Pacific of
14 whom the majority owner was William Clark. Therefore Clark could not legally sell or convey
15 the land.
16

17 169. On May 5, 1866, the United States Congress approved “An Act Concerning the
18 Boundaries of the State of Nevada” THE ACT.
19

20 170. THE ACT represents two new additional portions of federal territorial lands identified
21 as the 1866 and 1867 portions of land ceded to the State of Nevada in the form of a land grant,
22 thereafter constituting State land that has never been Nevada territorial land.
23

24 171. On July 2, 1866 the Morill Act is passed.
25

26 172. On January 10, 1867 Governor H.G. Blasdel in a historic document delivers the first
27 biennial message to the Nevada Legislature that clearly records the land provided within THE
28 ACT to be lands similarly situated to the 7th, 8th and 9th sections of the Enabling Act. (See EXHIBIT

1 26. Page 12 lines 14-25 *Biennial Message, State of Nevada, Executive Department. Carson City,*
2 *January 10th, 1867).*

3
4 173. These two portions of land (1866-1867) were never a part of the Nevada Territorial
5 Lands and therefore were without the *said territory* as geographically described in the 1864
6 Nevada State Constitution and subsequently not land subject to the 1864 Nevada Enabling Act.

7
8 174. The first portion known as the 1866 portion added to Nevada was withdrawn from the
9 Utah Territory along the eastern border as a political act of retribution against the Mormons for
10 allegedly going to war against the United States from 1857 to 1858.

11
12 175. By 1863 the Mormons had asked the United States on three occasions to accept the
13 Utah territory into the Union as a state. All of which were denied.

14
15 176. In 1864 the civil war was moving toward a final resolution and T.B.H. Stenhouse asked
16 Lincoln what policy was to be pursued regarding the Mormons and Lincoln stated, "I propose to
17 just let them alone".

18
19 177. The 1864 general reform plan in Washington, D.C. after the civil war included in part
20 eradicating polygamy which placed the Utah Territory and the Mormons in the crosshairs of
21 Washington, D.C.

22
23 178. On July 4, 1864, the State of Nevada Constitution is ratified, and Nevada becomes a
24 State.

25
26 179. On October 31, 1864 Nevada gives Lincoln its electoral votes.

27
28 180. In 1865 President Lincoln was assassinated.

181. On May 5, 1866, the State of Nevada received a grant of ceded land estimated to be
approximately 11,530,000 acres as memorialized by Nevada's first Governor in his first biennial
message of THE HONORABLE GOVERNOR H.G. BLASDELL, delivered to the legislature of

1 Nevada, January 10, 1867, EASTERN AND SOUTHERN BOUNDARIES page. (See EXHIBIT
2 26. Pages 13-14 Biennial Message, State of Nevada, Executive Department, Carson City,
3 January 10th, 1867).
4

5 182. In 1866 United States Senator Benjamin Wade introduced a Bill aimed at destroying
6 plural marriages, the Mormon church, and the Utah territory altogether.

7 183. In 1869 United States Congressman James Ashley introduced the Ashley Bill that best
8 reflects the general attitude, disposition and direction that Washington D.C. had planned for the
9 Mormons including the dissolution of the Utah Territory as evidenced with THE WADE BILL in
10 1866.
11

12 184. The western portion of the Utah Territory that was given to the State of Nevada in 1866
13 represents the first Act by Washington, D.C. intended to eradicate polygamy, punish the Mormon
14 church and to minimize or even eliminate the Utah Territory entirely.
15

16 185. The Eastern Border of Nevada identified as the 1866 portion of the Act can better be
17 described as federal territorial lands removed from the Utah Territory and made part of the State
18 of Nevada consistent in the common knowledge and public understanding of the time that the
19 Utah territory and the Mormons were to be damaged if not destroyed by Washington D.C.
20 altogether.
21

22 186. This alleged historic understanding has been described by the government in the future
23 tense as “anticipated,” which is so tenuously vague in an effort to deflect the reality of common
24 knowledge at that time that the Utah territory was to be carved up and pieced out due to polygamy,
25 the Utah (Mormon) War and the federal hatred for the Mormon church. This alleged “flexibility”
26 is synonymous with “vagueness.”
27
28

1 187. This 1866 eastern portion of Nevada represented the then general animus in
2 Washington D.C. toward the Mormons at that time. Therefore, “anticipated” is not a valid legal
3 argument that can defeat the aforementioned Nevada Revised Statutes between 1922-1945 in
4 respect to legal land ownership of the land provided for within THE ACT.
5

6 188. The entire “anticipated” argument is defeated and laid to rest by the Federal
7 government’s purchase of the 80 acres on the Nevada side of the Colorado River for the
8 Boulder/Hoover Dam site and the Lehman Caves which are both party admissions that the Federal
9 government did not own the land which is the subject of this complaint and the above cited
10 Congressional Act which relinquished federal land ownership, as well as any Federal authority
11 and/or jurisdiction over it.
12

13 189. In 1872 the United States Congress passed the General Mining Act.

14 190. A northeast portion of the Utah Territory was carved out in 1876 to serve as the
15 Wyoming territory that in 1890 became the State of Wyoming.
16

17 191. An eastern portion of the Utah Territory was carved out and combined with land from
18 within the Louisiana purchase that became the territory of Colorado in 1861.

19 192. Surprisingly, there existed another group of individuals that the United States
20 (Washington D.C.) despised more than the Mormons that had taken up residence south of the
21 Utah Territory after the civil war in the Arizona Territory.
22

23 193. This group consisted of former Confederate Soldiers that had consolidated themselves
24 in the Arizona Territory post-civil war.

25 194. In 1867 Washington, D.C. decided to give the northwestern portion of Arizona
26 Territory to the State of Nevada’s southern border for two general reasons.
27
28

1 195. These reasons were: (1) that Arizona had sided with the Confederacy in the Civil War
2 that created a distrust with a high concentration of Confederate soldiers living in the then eastern
3 Arizona territory; (2) the Colorado river presented a natural land barrier dividing the Arizona
4 territory and preventing continuity of land access.
5

6 196. Here again, the Washington, D.C. animus played a significant role in what can better
7 be described as territorial lands removed from Arizona territory as opposed to Arizona territorial
8 lands having been given to the State of Nevada.
9

10 197. In 1867 the Nevada Legislature passed by voice ballot a resolution agreeing to accept
11 these two portions of federal territorial lands in the form of a land grant satisfying federal law but
12 failed to take Constitutional possession of the ceded lands. Which means that the State of Nevada
13 did not obtain possessory title and/or jurisdictional authority.
14

15 198. These two new portions of land added to the State of Nevada remained relatively
16 unmolested desert lands from 1867 up until 1894 with THE CAREY ACT.
17

18 199. In 1868 Archibald and Helen Stewart settled at a ranch in the town of Pioche in what
19 was believed to be in Lincoln County, Nevada that as a matter of fact has never been legally in
20 Lincoln County, Nevada and therefore without Nevada jurisdiction.
21

22 200. In 1879 Archibald Stewart loaned Octavius D. Gass \$5,000.00 dollars taking
23 Octavius's Los Vegas ranch as security collateral. (The Mormon Fort also in what was believed
24 to be in Lincoln County, Nevada).
25

26 201. In 1881 Octavius defaulted on the \$5,000.00 loan and Archibald foreclosed on the Los
27 Vegas ranch and in 1882 Archibald and Helen moved into the Los Vegas ranch.
28

202. In 1891 the FORREST RESERVE ACT is created.

1 203. The United States on or around 1900 began investigating the potential of the Black
2 Canyon (Boulder Canyon) for the support of a Dam for flood control, irrigation, and
3 hydroelectricity.
4

5 204. In 1901 the SAN PEDRO, LOS ANGELES & SALT LAKE RAILROAD was built by William
6 Clark on THE ACT land which was not provided for within the Pacific Railroad Act of 1862.
7 (Clark County is named after this Montana shyster who built his railroad under the false premise
8 that his railroad was included in the Pacific Railroad Act of 1862).
9

10 205. In 1901 Las Vegas is established as a railroad steam engine water depot by William
11 Clark.
12

13 206. In 1902 Helen Stewart sold the Los Vegas ranch (Mormon Fort) to the SAN PEDRO,
14 LOS ANGELES & SALT LAKE RAILROAD (Union Pacific purchased the land from Stewart).
15

16 207. In 1902 the Reclamation Act created the Reclamation Service.
17

18 208. Between 1902 and 1907 the United States Reclamation Service began 30 projects in
19 the western states that included projects along the Colorado river.
20

21 209. In 1905 the first Hotel was built in Las Vegas, which said land was purchased in an
22 auction.
23

24 210. In 1906 the Antiquities Act was passed.
25

26 211. In 1909 Clark County is established without the Constitutional authority (physical
27 boundaries) of the Nevada Constitution. Therefore, as a matter of law Clark County's creation
28 was and is for all legal purposes null and void.

 212. In 1909 the Nevada National Forrest(s) are established.

 213. In 1910 Edison Electric of California proposes to build a hydroelectric dam along the
Colorado River in Nevada.

1 214. On May 9, 1912, PRESIDENTIAL EXECUTIVE ORDER 1529 was signed by President
2 William Taft to acquire all federally owned land along the Colorado river necessary for future
3 federal development including water for southern California and preserving water rights to the
4 Mono power company and the Owens River Water & Power Company.
5

6 215. In 1916 the National Park Service is created.

7 216. In 1920 Davis Dam on the Colorado river is established and then delayed due to upper
8 river engineering considerations.
9

10 217. In 1921 Herbert Hoover, acting as the Secretary of Commerce in Washington D.C.
11 began to influence and push for the Black Canyon development project (Hoover Dam) as a means
12 to address and resolve engineering issues regarding the construction of Davis Dam.
13

14 218. In 1922 the Colorado River Compact was signed. Nevada did not have the authority
15 to enter into this agreement because it was not until 1981 that the LCB allegedly extended the
16 Constitutional boundaries of the State to the physical boundaries. So, Nevada's signature on this
17 agreement was and continues to be null and void, which constitutes an administrative color of law
18 action and was signed in an *ultra vires* act.
19

20 219. On January 24, 1922, Warren Hardy declares the Lehman Caves a National Monument
21 using the Antiquities Act of 1906 in violation of the Constitution. The Lehman Caves were lands
22 provided for within THE ACT and lands not owned by the United States in 1922.
23

24 220. This 1922 Lehman Caves land ownership conflict was realized and believed to be
25 resolved in 1945 by Frank W. Johnson (first director of the BLM) and therefore **NRS 328.340**
26 and then amended to **NRS 328.370** was necessary to correct and convey legal land title and land
27 ownership of the Lehman Caves from the State of Nevada discretely to the United States.
28

1 221. In 1923 the United States Reclamation Service name was changed to the United States
2 Bureau of Reclamation [BOR].

3 222. In 1926 the RECREATION AND PURPOSES ACT was created.

4 223. In 1928 President Coolidge authorized the Boulder Canyon (Hoover Dam) project.

5 224. In 1929, Secretary of Interior, Ray Lyman Wilbur while visiting the Boulder Dam area
6 and future reservoir requested the Director of the NPS, Horace Albright, to assess the future of
7 the Lake Mead area for its potential as a National Park. This idea originated with Truman when
8 he was the Secretary of Commerce.
9
10

11 225. Wilbur was a proponent of an administrative conservationist movement in Washington,
12 D.C., that had decided to implement a national land use agenda for the development of National
13 Parks and National Recreational Areas.

14 226. In 1929 Herbert Hoover was elected President of the United States and signed
15 EXECUTIVE ORDER 5209 to further this conservationist movement under his "Fair Deal" agenda.
16

17 227. In 1930 the Hoover Dam site was selected by the BOR.

18 228. On February 20, 1930, Guy D. Edwards, a National Park Service engineer,
19 recommended a National Park for Lake Mead, in a study conducted for and provided to Director
20 Wilbur. However, Congress was without money for the purchase of non-federal land along the
21 Colorado River.
22

23 229. In 1930 Herbert Hoover signed EXECUTIVE ORDERS 5292, 5294 and 5343 that
24 withdrew 4,212 square miles of lands in Arizona and Nevada earmarking these 4.212 square miles
25 as unappropriated public lands for "classification and pending determination" of a National
26 Wildlife Refuge (this circumvented purchasing the land and they instead called it a bird refuge
27 and stole it).
28

1 230. In 1930 the United States Department of Interior through the Bureau of Reclamation
2 informally entered into a contract agreement with the State of Nevada to Purchase 80 acres of
3 land that had been selected on the Nevada side of the Colorado River to facilitate the construction
4 of Hoover Dam.
5

6 231. In 1931 the City of Boulder City was established to house federal workers and their
7 families through the construction of Hoover Dam. (The NRS does not record a land purchase for
8 the Boulder City property therefore the Boulder City land as of 1866 was not owned by the federal
9 government).
10

11 232. In 1931 the United States formally entered into a contract to purchase 80 acres of land
12 owned by the State of Nevada on the Nevada side of the Colorado river as evidenced at **NRS**
13 **328.210** and **NRS 238.220** and being land within THE ACT.
14

15 233. In 1931 the Davis Dam project that had been previously approved was delayed at the
16 direction of General Land Office [GLO] Commissioner Charles C. Moore pending congressional
17 financing.
18

19 234. In 1931 Hoover Dam began Construction.
20

21 235. In 1931 Roger W. Toll, superintendent of the National Park Service [NPS] with Minor
22 R Tillotson and Preston P. Patraw were sent by Wilbur to the Boulder Dam (Lake Mead) reservoir
23 area to initially inspect the withdrawn 4,212 square miles of land area for consideration of a
24 National Park.
25

26 236. In May of 1932 Wilbur had the team return to the area to more closely examine the
27 withdrawn 4,212 square miles, and its potential use as a National Park.
28

 237. Toll stated that to put a National Park at Boulder Dam (Lake Mead) would be
undesirable and may possibly establish a precedent that might endanger existing National Parks.

1 238. Additionally, Toll stated that the Boulder Canyon project included statutory limitations
2 that restricted the United States Bureau of Reclamation to flood control, irrigation, and power
3 generation.
4

5 239. These restrictions limited the United States Department of Interior from free unfettered
6 land use in its desire to develop National Parks and National Recreational Areas along the
7 Colorado river.

8 240. In July of 1932 the Toiyabe National Forrest was added to the federal national forests
9 within Nevada.
10

11 241. In 1932, the United States Bureau of Public Roads [USBPR], W.R.F. Wallace
12 recommended major roads be built throughout the Boulder Dam (Lake Mead) reservoir area.

13 242. In 1932 President Hoover Signs EXECUTIVE ORDER 5843 revoking Executive Order
14 1529 of May 9, 1912, regarding lands within the Mount Diablo Meridian, California. (*the Mount*
15 *Diablo Meridian is a geographic survey landmark that includes all of land within the Nevada*
16 *border*).
17

18 243. In 1933 Frank W. Johnson replaced Charles C. Moore and began serving as the
19 Commissioner of the General Land Office up until 1946 when he became the first director of the
20 BLM.
21

22 244. In 1933, Bureau of Reclamation [BOR] engineer Lloyd Joseph Hudlow was sent to
23 assist in the survey of the Boulder Dam (Lake Mead) reservoir and became the project Manager
24 of the Boulder Canyon Project.

25 245. In February 1933 the National Park Service agreed to allow public roads to be built
26 throughout the Boulder Dam (Lake Mead) reservoir area as the precursor that would become the
27 Work Progress Administration in 1935 and later the Works Project Administration in 1939.
28

1 246. At the reluctance of NPS Director Horace Albright, President Herbert Hoover, on
2 March 3, 1933, acting in consideration to the benefit of the administrative conservationist
3 movement signed EXECUTIVE ORDER 6065.
4

5 247. In 1933, Executive Order 6065 declared that 4,212 square miles of Arizona and Nevada
6 land be reserved “under consideration” as a NPS park to be designated in the future for a Federal
7 National Wildlife Refuge.²⁸

8 248. With EXECUTIVE ORDER 6065 in place, the administrative conservationist movement
9 had established a pretense and foothold to obfuscate Nevada land ownership and build the nation’s
10 first National Recreational Area [NRA] under the auspice of a wildlife refuge along the Colorado
11 River to be located at the Boulder Dam (Lake Mead) reservoir, thus this area was informally
12 designated the Lake Mead Recreational Area. (note the incremental encroachment by the federal
13 government on the state’s jurisdiction, first by the use of words, then by executive orders, and
14 then physically).
15
16

17 249. A significant portion of the land provided for in EXECUTIVE ORDER 6505 is
18 appropriated land within the boundaries of the State of Nevada as provided for within THE ACT
19 and IS NOT land owned by the United States.
20

21 250. EXECUTIVE ORDER 6065 was signed into law on March 3, 1933 (on Friday, the last
22 weekday of his term), and President Herbert Hoover’s second to last day in office, in violation of
23 the Constitution, as the part the Nevada lands contained within the 4,212 square miles are
24 provided for within THE ACT are not owned by the United States nor could they be reserved.
25

26 ²⁸ As the property was not “taken” at that time and was only “reserved” this was a precursor to the land grab. In
27 other words they took the land issue to the line and standing right on it, with the idea that the next guy would push it
28 over the line because the next guy would “assume” that when it was “reserved” that it was owned by the federal
government and that they would act accordingly. So the entire program was designed to take on the “appearance”
of legitimacy. This shows that the entire domino set up was carefully planned and originated with Truman who was
at that time with the Department of Commerce.

1 251. EXECUTIVE ORDER 6065 (1933) in consideration of the appropriated lands provided
2 for within THE ACT can only be applied to unappropriated federal territorial land, military
3 purposed land acquired by due course of a land transfer and land purchased by the United States
4 and recorded in a chain of title.
5

6 252. In 1933 President Roosevelt was elected President and the “New Deal” had arrived
7 including Harold Ickes becoming the new Secretary of Interior. The “New Deal” came after the
8 “Fair Deal” under Hoover.
9

10 253. In 1933 Harold Ickes, immediately issued a memorandum at Roosevelt's instruction
11 that Hoover Dam was to be referred to *only* as Boulder Dam and not as Hoover Dam.

12 254. In 1934 the United States passes the TAYLOR GRAZING ACT establishing fee-based
13 leasing upon federal unappropriated land, which the unappropriated land within THE ACT were
14 not subject to (consisting of the lands upon which the Bundy's cattle graze).
15

16 255. In 1936 the National Park Service formally named the Boulder Dam Recreational
17 Area as the Lake Mead Recreational Area.

18 256. In 1936 the United States establishes the PAHRANAGAT NATIONAL WILDLIFE REFUGE.

19 257. In 1936 a piece of land originally described as the Lake Mead reservoir area was
20 identified and made into the Boulder Dam Recreational Area by the NPS (who didn't own the
21 land). What the NPS did with this land was to create an area for visitors on Nevada's land. When
22 the State did not object the NPS simply assumed ownership and have since pretended (squatted
23 on the land) and claimed to be the owner.
24

25 258. In 1941 the United States General Land Office [GLO] under Director Frank W.
26 Johnson paid the State of Nevada the agreed amount of \$600.00 for the 80 acres of land on the
27
28

1 Nevada side of the Colorado River of which Hoover Dam now rests as recorded at **NRS 328.210**
2 and **NRS 328.220**.

3
4 259. In 1941 the United States Military purchased the land consisting of a privately owned
5 airfield and created the Nellis Air Force Base. Again, a party admission that the federal
6 government understood that the United States did not own THE ACT land as of 1941.

7 260. In 1944 Davis Dam began Construction²⁹ 78 miles south of Hoover Dam on land
8 provided for within THE ACT with land payment by the United States to the State of Nevada as
9 with Hoover Dam to be paid upon completion in 1952.

10
11 261. In 1945 the United States GLO under Director Frank W. Johnson negotiated the
12 conveyance of a piece of land identified in **NRS 328.340** and later **NRS 328.370**, in an attempt
13 to correct an illegal 1922 PRESIDENTIAL PROCLAMATION that cited the ANTIQUITIES ACT OF 1906
14 as the legal authority to place the LEHMAN CAVES NATIONAL MONUMENT on Nevada 1866 land
15 (THE ACT land). This correction was futile (as a matter of law) due to the fact that the White
16 Pine County Commissioners did not have the constitutional authority of the State of Nevada and
17 were therefore, not a lawful political subdivision of the State.

18
19 262. In 1945 Nevada begins the initial process of creating the Nevada Revised Statutes
20 (the soon to be codified version of the Nevada Statutes at Large).

21
22 263. In 1945 Nevada approves the contract with Russell West McDonald who was on the
23 Statutory Revision Commission working on codifying Nevada's Statutes at Large. Out of this
24 came the Legislative Counsel Bureau [LCB] to guide Nevada lawmakers and assist and
25 coordinate the Nevada lawmaking process, *e.g.*, writing bills for Legislators and providing many
26 other services.

27
28

²⁹ Because of engineering problems with holding the water back. Hoover Dam needed to be built first.

1 264. April 12, 1945 Truman becomes President.

2 265. In 1946 at the direction of President Truman the United States Department of Interior
3 merged the General Land Office [GLO] and the Grazing Service creating the United States BLM.
4

5 266. In 1946 Frank W. Johnson moves from the Commissioner of the GLO to becoming
6 the first BLM Director under the Department of Interior [DOI] Director, J.A. Krug.

7 267. In 1947 the NPS renames the Boulder Dam Recreational Area to the Lake Mead
8 Recreational Area [LMRA] and Frank W. Johnson informs his boss Department of Interior Julius
9 A. Krug that the Boulder Dam Recreational Area is property that rests upon land not owned by
10 the United States.
11

12 268. President Truman when informed of this land ownership conflict by Julius A. Krug,
13 has Krug notify Frank W. Johnson that he is going to be replaced by Marion Clawson in 1948 and
14 that Frank W. Johnson **is to do nothing** to interfere with the creation of the LMRA.
15

16 269. In 1951 Davis Dam was completed and the appropriated Nevada lands upon which
17 Davis Dam now rests were not paid for at direction of Truman and Krug claiming this land was
18 now considered to be land part of the 4,212 square miles reserved and subsequently was land now
19 owned by the United States. As of December 5, 2022, this land can now only be legally conveyed
20 to the United States by Michael Little.
21

22 270. In 1952 the BLM acting under the direction of the Truman Administration and
23 Nevada U.S. Senator Alan Bible illegally negotiated a land purchase agreement (fraud) with
24 Howard Hughes for 25,000 acres of land located at the western foothills of the Las Vegas Valley
25 (known as Summerlin) in exchange for several pieces of northern Nevada Land and \$75,000.00.
26 These 25,000 acres of land are subject to THE ACT and was knowingly not owned by the United
27
28

1 States, thus representing the beginning of the BLM's fraudulent sale of the lands owned by the
2 people of Nevada as provided for within THE ACT.

3
4 271. In 1952 the Truman Administration is exposed as being thoroughly corrupt and
5 because of this corruption Truman is not re-elected.

6 272. In 1952 Nevada adopts the Nevada Revised Statutes to replace Nevada Statutes at
7 Large and footnotes A DISCLAIMER at TITLE 26 - PUBLIC LANDS that sets forth the
8 CONFIRMATION OF TITLE IN PURCHASES OF STATE LANDS BETWEEN MARCH 3,
9 1887, AND JULY 3, 1997. (See EXHIBIT 27. TITLE 26 - PUBLIC LAND). The sum and
10 substance of this Disclaimer was that the LCB was effectively announcing to the public that it
11 had no record of land transfers before 1887 and was no longer recording land transfers between
12 the State and the federal government, because Nevada had acquiesced the unclaimed public lands
13 in THE ACT; as an example of this was the sale/transfer of the lands associated with the
14 Nevada/Florida Land Exchange Act of 1988 (nka: the Coyote Springs Master Plan Community);
15 the failure of the Nevada Legislature to list this land transfer in the Statutes is a party admission
16 that the State no longer claims ownership to these lands. So, the State through the LCB makes a
17 footnote disclaimer refusing to recognize any public lands acquired prior to March 3, 1887 as
18 they knew of the 1866 lands and simply attempted to delete history.³⁰ By Failing to make any
19 claim upon these public lands [THE ACT] after 1945 including any land claim with Question No.
20 5. on the 1979/1981 ballot that failed to mention THE ACT, the State of Nevada has legally
21 abandoned any legal land ownership claims and therefore THE ACT lands are without Nevada
22 authority or jurisdiction.
23
24
25
26

27
28 ³⁰ It appears that the LCB recognized THE ACT lands of 1866 and therefore, made a disclaimer and only recognized
legal land transfers after 1887, thus informally setting aside THE ACT. They knew of THE ACT because it is in the
Statutes with the sale of the public unclaimed land sold to the federal government to build Hoover Dam. So the LCB
turned a blind eye to this significant legal occurrence.

1 273. In 1964 the defendants changed the Lake Mead Recreational Area to the Lake Mead
2 National Recreational Area. [LMNRA] The LMNRA was created administratively through
3 PUBLIC LAW 88-639 in violation of federal law [THE ACT] and therefore PUBLIC LAW 88-
4 639 pertaining to the LMNRA is void *ab initio*. (See EXHIBIT 28. *Public Law 88-639*). It should
5 be noted that this entire process of morphing the Boulder Dam Recreation Area into the LMNRA
6 was complete without legal ownership. Instead of purchasing the land from the State of Nevada,
7 Congress (in violation of a Congressional Act) simply passes PL-88-639 and transferred this
8 improperly created area of land (which was not owned by the federal government) and combined
9 it with lands that it alleged was land legally owned by the United States. This Public Law in no
10 way legitimized this land transfer. It appears that this was simply a ruse to create the appearance
11 of federal land ownership and specifically dealt with the “administration” of the area(s) described
12 in the Act. This is what has led to the enigma that the public is now left with. How did Michael
13 Little legally become the owner of THE ACT lands of which these properties now rest upon? The
14 question now is who is legally and financially liable to the damaged parties? Would it be the title
15 companies or Washington D.C. or both? Or can Washington D.C. make this matter go away by
16 LAWFARE or by simply eliminating Michael Little.

17
18
19
20 274. In 1964 the LMRNA was placed under the NPS ultimately fulfilling the Washington,
21 D.C. conservation movement’s objective initiated in 1929 by then Secretary of Interior Ray
22 Lyman Wilbur.

23
24 275. In 1964 the National Park Service established the “Allotment” at Lake Mead upon
25 land provided within THE ACT in violation of federal law.

26
27 276. This *Chronological Timeline, History And Understanding Of Nevada* is a historic
28 summation that is not inclusive and that is included in this complaint as deemed important to

1 establish some historic timeline necessary to clearly identify and frame the course events which
2 defendants have acted to obfuscate legal land ownership upon the lands provided for within THE
3 ACT. The reader is encouraged to cross reference this chronology and to further research the history
4 of Nevada to more fully understand the nature and purpose of this complaint.
5

6 277. Plaintiffs believe that it was the 1952 Howard Hughes land (Summerlin) sale in
7 concert with the Truman Administration's corruption as is historically recorded is what required
8 agents of the United States to adopt the 1848 Treaty of Guadalupe Hidalgo land obfuscation
9 argument. This Howard Hughes land was not land included in the 4,212 square miles and
10 therefore the Treaty of Guadalupe Hidalgo supported the Antiquities Act and therefore became
11 the seminal obfuscation pretense and Defendants blanket land ownership claim that has since
12 been used as a federal land claim upon the entire ownership of the land provided for within THE
13 ACT.
14

15
16 278. Prior to the 1952 Howard Hughes Land Purchase and beginning in 1946 (with the
17 BLM) and with the introduction of the 1848 TREATY OF GUADALUPE HIDALGO legal argument,
18 the United States relied solely upon the ANTIQUITIES ACT OF 1906 as evidenced at **NRS 328.340**
19 to illegally claim certain desired land within THE ACT. The government created the 1848 TREATY
20 OF GUDALUPE-HILDALGO as a pretense to expand certain lands surrounding Lake Mead (4,212 sq
21 miles, estimated to be approximately 10% of THE ACT lands) to include all of the lands within
22 THE ACT (totaling 11,530,000 acres).
23

24 279. In 1979 the LCB on behalf of the State of Nevada proposes, drafts and presents a
25 Nevada State referendum to the people of Nevada as a correction of the Boundaries into
26 conformance with the Constitution that were intended in 1867 with the additional lands provided
27
28

1 for within THE ACT citing “*flexibility*,” yet omitting any land claim or reference of land
2 ownership and/or THE ACT.

3
4 280. In 1981 the people of Nevada pass the referendum to accept the Boundary change as
5 described at the referendum. (*See EXHIBIT 29. Question No. 5 Amendment to the Constitution*).
6 Ironically, as a matter of law The people voting on this referendum that were physically situate
7 within THE ACT lands which were outside the Constitutional authority of the State of Nevada;
8 and, therefore they voted illegally on the referendum. Therefore, the Referendum was never
9 passed lawfully and is NULL & VOID. Therefore, the LCB in their effort to defraud the People
10 by not disclosing the true nature of the Amendment (THE ACT lands) committed malversion and
11 therefore the Amendment itself is null and void. This means that the Constitutional authority of
12 the State was never and is still not extended to THE ACT lands (1867).
13

14
15 281. The 1981 State of Nevada referendum failed to include the 1866 borders of the State
16 of Nevada citing that this parcel of land had been “anticipated” in the 1864 Nevada Enabling Act.
17 This anticipation argument is legally mischaracterized and therefore at present the 1866 parcel of
18 land remains legally without the boundaries of the Nevada State Constitution and yet not
19 territorial land that is or can be considered federal land.

20
21 282. The United States as historically recorded began plotting their Nevada land grab in
22 1929 with the first conscious action being put in place beginning in 1930 with a host of
23 subsequent pre-emptive Presidential Executive Orders to follow.

24
25 283. A montage of Executive Orders cites congressionally delegated authority to the
26 Executive Branch through the ANTIQUITIES ACT OF 1906 as the legal basis for obtaining the non-
27 federally owned appropriated land contained within THE ACT. The Executive Orders that
28 effectuated these violations of Constitutional Law and Rights are: (**see EXHIBIT 30**)

| | | | | |
|----|-----------------|------------------------|---------------------|------------------------------|
| 1 | EXECUTIVE ORDER | 1529 | (May 9, 1912) | President Taft (R) |
| 2 | EXECUTIVE ORDER | 1618 | (January 24, 1922) | President Harding (R) |
| 3 | EXECUTIVE ORDER | 5292 | (March 5, 1930) | President Hoover (R) |
| 4 | EXECUTIVE ORDER | 5294 | (March 5, 1930) | President Hoover(R) |
| 5 | EXECUTIVE ORDER | 5343 | (May 6, 1930) | President Hoover (R) |
| 6 | EXECUTIVE ORDER | 5344 | (May 8, 1930) | President Hoover(R) |
| 7 | EXECUTIVE ORDER | 5496 | (November 22, 1930) | President Hoover (R) |
| 8 | EXECUTIVE ORDER | 5531 | (April 16, 1931) | President Hoover(R) |
| 9 | EXECUTIVE ORDER | 5843 | (April 28, 1932) | President Hoover(R) |
| 10 | EXECUTIVE ORDER | 5902 | (August 18, 1932) | President Hoover (R) |
| 11 | EXECUTIVE ORDER | 6065 | (March 3, 1933) | President Hoover(R) |
| 12 | EXECUTIVE ORDER | PUBLIC LAW NO. 88-639 | | President Johnson (D) (1964) |
| 13 | EXECUTIVE ORDER | PUBLIC LAW NO. 100-275 | | President Regan (R) (1988) |
| 14 | EXECUTIVE ORDER | 9559 | (July 10, 2015) | President Obama (D) |
| 15 | EXECUTIVE ORDER | 9681 | (December 28, 2017) | President Obama (D) |
| 16 | EXECUTIVE ORDER | 10533 | (March 23, 2023) | President Biden (D) |

20
21 284. Between President Obama and President Biden in only eight years from 2015 through
22 2023 citing 320301 Title 54 USC the ANTIQUITIES ACT OF 1906 in violation of the Constitution
23 and with the blessings of the State of Nevada (Nevada elected Representatives) have stolen
24 1,510,814 acres of appropriated Nevada land [THE ACT] which was legally owned by the people
25 of Nevada. Fortunately, Michael Little now legally owns this land [THE ACT] and the people of
26 Nevada are going to get it back with a new usuary mortgage capped at 1%. (The Michael Little
27
28

1 1% Nevada Homestead Act). All that Mortgage interest can now be spent on families for those
2 people that support the Act.

3
4 285. The preceding summary and chronological history, timeline and a cast of nefarious
5 characters established three facts pertinent to this complaint: These facts are: (1) that **NRS**
6 **328.210, NRS 328.220, NRS 328.340, NRS 328.360, NRS 328.370** and **NRS 328.380** factually
7 refute any legal argument(s) presented by the United States of having never relinquished legal
8 land ownership of the land provided for within THE ACT as a result of the 1848 the TREATY OF
9 GUADALUPE HIDALGO; (2) In the absence of land ownership derived from the 1848 TREATY OF
10 GUADALUPE HIDALGO, and never having been relinquished, the United States must rely upon the
11 1933 EXECUTIVE ORDER 6065 as a basis for legal ownership of land provided for within; THE
12 ACT and, (3) Executive Order 6505 derives its constitutionally delegated authority from 320301
13 Title 54 USC THE ANTIQUITIES ACT OF 1906, and whereas the Antiquities Act of 1906 claim is
14 defeated by **NRS 328.210, NRS 328.220, NRS 328.340, NRS 328.360, NRS 328.370** and **NRS**
15 **328.380** and thus defeating all Presidential Executive Orders and Presidential Proclamations that
16 have allegedly derived authority from the Antiquities Act of 1906 relating to land provided for
17 within THE ACT. Therefore all such Executive Orders and Proclamations are in violation of THE
18 ACT and therefore are in violation of federal law and the United States Constitution and are
19 subsequently *null and void* as a matter of law.

20
21
22
23 286. Therefore, all alleged United States land ownership claims upon lands provided for
24 within THE ACT without a recorded legal due course of land transfer in a chain of title are without
25 the congressionally delegated authority of the ANTIQUITIES ACT OF 1906. Therefore, the above
26 seminal Presidential Executive Order(s) are null and void *ab initio* and therefore, all the putative
27 federal activities upon the ACT lands are illegal.
28

1 287. This legal reality and complaint place the constitutionally delegated authority of the
2 ANTIQUITIES ACT OF 1906 in direct conflict with the plenary power of Congress and the
3 Supremacy Clause regarding THE ACT. The 1906 ANTIQUITIES ACT has been fraudulently used
4 to circumvent Congressional law by the Executive Branch that violates the Separation of powers
5 Act and denies the inhabitants of the State of Nevada a Republican form of government, which
6 the Federal government's contract (through the NEVADA ENABLING ACT) guarantees them.
7 Therefore, the United States is in breach of the contract with the people of Nevada through long
8 arm fraud, stealth fraud and intrinsic fraud.
9
10

11 288. Therefore, the land provided for within THE ACT is land legally owned by the
12 PEOPLE of Nevada as expressed in the 10th Amendment, wherein the Rights not mentioned or
13 reserved to the United States, or the State of Nevada are guaranteed as those of the PEOPLE.
14

15 289. Accordingly, the PEOPLE (of the State of Nevada) have a legal right of claim upon
16 the land provided for within THE ACT as guaranteed by the 10th Amendment of the United States.
17

18 290. Therefore, including but not limited to EXECUTIVE ORDER 6505 all EXECUTIVE
19 ORDERS, PRESIDENTIAL PROCLAMATIONS and PUBLIC LAWS pertaining to land
20 provided for within THE ACT represents a trespass of law in violation of THE ACT.
21

22 291. Up until 1900 the primary interest of the federal government within the State of
23 Nevada was focused mostly on northern Nevada as southern Nevada consisted of what was then
24 described as desert wasteland.
25

26 292. With the Black Canyon and the Boulder/Hoover Dam projects in conjunction with
27 the Los Angeles California Area growth in the 1920's and with federal influence the primary
28 interest within the State of Nevada was refocused on southern Nevada and the land along the
Colorado River for agriculture, flood control and hydroelectricity to service California.

1 293. The United States by/and through certain political actors and special interested
2 parties beginning in 1929 began to set in place a “public narrative “ to obfuscate the legal land
3 ownership of certain Nevada land along the Colorado River that are provided for within THE
4 ACT under the pretense of “in the greater good of the public interest”.

5
6 294. This “in the public interest” guise was created to garner public support allowing a
7 group of Washington, D.C. elitist and special interested groups to exploit and expropriate Nevada
8 land through the unlawful use of the ANTIQUITIES ACT OF 1906. Neither the Executive Branch
9 or the Legislative Branch including the administrative agencies of government have the authority
10 to apply and/or benefit from the ANTIQUITIES ACT OF 1906 on non-federal land respectively. And
11 certainly not from appropriated private non federal land as is the current situation with THE ACT
12 lands in Nevada.
13

14 295. The above aforementioned montage of unlawfully applied Executive Order(s) paved
15 the way for the parade of (past and present) unscrupulous State and Federal elected officials to
16 unlawfully separate the people of Nevada from both their land and the exercise of their
17 constitutional rights upon said land, as well as a tacit violation of Nevada’s Enabling Act as
18 evidenced by the illegal PRESIDENTIAL PROCLAMATION 10533 - Establishment of the
19 **MONUMENT.**
20

21
22 296. The aforementioned pertinent Executive Orders all allegedly derive their Presidential
23 Proclamatory congressional delegated authority respectively from the ANTIQUITIES ACT OF 1906.

24 297. Therefore, all of the aforementioned and exhibited Executive Orders reside squarely
25 in the same legal box as PRESIDENTIAL PROCLAMATION 10533 - Establishment of the
26 **MONUMENT.** Being the box titled “*VOID AB INITIO.*”
27
28

1 298. Therefore, as a matter of law these Executive Orders conflict and are inferior to THE
2 ACT.

3 299. Therefore, as a whole, these Executive Orders represent systemic long arm, stealth
4 and extrinsic fraud being operated to date out of Washington, D.C. which has committed a
5 plethora of illegal acts necessary to perpetuate this fraud by protection and enforcement through
6 the federal bench/judiciary, including but not limited to the DOJ, the FBI, the BLM, the US
7 Military, the NPS, the ATF and other unknown alphabet organizations whose duties entail black
8 operations funded with questionable dark money. The defendants in committing this fraud have
9 flagrantly engaged in RICO ACT violations and Treason.
10

11 300. This systemic fraud is recognized as lawfare that relies upon judicial complicity from
12 within the federal court system through bias and prejudice supported by subjective interpretation
13 of historic facts to mitigate and set aside legal contracts such as evidenced by THE ACT and the
14 1864 Nevada State Constitution.
15

16 301. Whereas THE ACT when presented as evidence that the United States relinquished
17 legal land ownership resulted in the criminal case(s) against Nevada ranchers Cliven and Ryan
18 Bundy including the ORDER-AND-REPORT OF FINDINGS AND RECOMENDATIONS
19 prepared by U.S. Magistrate Peggy A. Leen *de novo* to be dismissed by U.S. District Judge Gloria
20 M. Navarro of whom both cite repeatedly that specious precedents establish *stare decisis* to be
21 the law found consistently within the federal courts that conclusively established that the land
22 provided for within THE ACT as *unappropriated* federal territorial land and as such is land owned
23 by the United States. This is simply factually not true.
24

25 302. This clear bias and prejudice supported with erroneous court rulings and illegal
26 judicial rulings established a system of *stare decisis* which has resulted in the judicial
27
28

1 sequestration dealing with any legal argument citing THE ACT of which the United States District
2 Court, District of Nevada has summarily described as a “novel argument,” (See EXHIBIT 8,
3 *United States v. Bundy, U.S. Magistrate Peggy A. Leen Order-And-Report Of Findings And*
4 *Recommendations; P. 17 lines 1.-9.)* and further (See EXHIBIT 9. P. 5. Lines 14-20; *United States*
5 *of America vs. Cliven Bundy; Case No. 2:16-cr-46-GMN-PAL Order, Gloria M. Navarro, Chief*
6 *Judge United States District Court, District of Nevada,* of which both Leen and Navarro appear
7 to view THE ACT with contempt and intentionally concealed THE ACT from being included in
8 the Court’s final decision (it is believed that this is because it would unravel decades of fraud and
9 ultra vires acts by the federal government and open a Pandora’s Box of federal liability exposure).
10
11

12 303. This contempt and judicial sequestration of THE ACT over decades creates an
13 extraordinary condition that favorably positions this complaint pending a dilatory decision from
14 this Honorable court that supports a plain speedy and adequate remedy of a Writ of Mandamus
15 to the United States Supreme Court that would further demonstrate and expose a Nevada Federal
16 District Court bias and prejudice on this subject.
17

18 304. The ANTIQUITIES ACT OF 1906 has been fraudulently presented by the defendants as
19 the legal basis to support legal land ownership claims by the United States upon certain lands
20 within THE ACT beginning in 1922 to present.
21

22 305. With the creation and establishment of the BLM by the Truman administration and
23 the replacement of Frank W. Johnson in 1948 as the Director of the BLM the federal government
24 through the BLM immediately began expanding claims within THE ACT lands.
25

26 306. Frank W. Johnson had negotiated the last land transactions in 1945 between the
27 United States and the State of Nevada in legal observance of the lands provided for with THE
28 ACT as memorialized by Nevada Revised Statutes. Then the BLM exposed its seedy underbelly

1 through its racketeering enterprise in 1952 with the sale of 25,000 acres of land without the 4,212
2 square miles along the western foothills of Las Vegas, Nevada to Howard Hughes (nka:
3 Summerlin).
4

5 307. The BLM beginning in 1947 has refused to recognize the legal ownership of the lands
6 within THE ACT and has through malversion by recruitment and participation of the Department
7 of Interior, the DOJ, the FBI, the BLM, the NPS and the State of Nevada with politically
8 influenced complicity of the Nevada Federal District Courts and *corrupt* Nevada federal
9 representatives believed they had gotten away with stealing 11,530, 000 acres of land from the
10 people of Nevada. "Little says hold on a minute, there partner"! Not so fast!
11

12 308. The United States has maintained unlawful federal control over said lands that
13 includes illegal physical force and illegal federal incarceration for those individuals and/or groups
14 that dare challenge the existing federal neocon deep state political rule based government that
15 initiates and protects fraudulent land dealings in Nevada, e.g.; S.854 – NEVADA - FLORIDA LAND
16 EXCHANGE ACT OF 1988, Coyote Springs and the 114th Congress (2015-2016) and the MOAPA
17 BAND OF PAIUTES LAND CONVEYANCE ACT that paved the way for special interest and the Chinese
18 Moapa Southern Paiute Solar Project, which was illegally negotiated by Harry Reid on land NOT
19 owned by the United States.
20
21

22 309. The BLM's 25,000-acre fraudulent transfer to Howard Hughes through an illegal land
23 sale represented a false flag operation to determine the actual extent of which the Deep State could
24 be relied upon by certain nefarious political and private actors in Washington D.C. to facilitate
25 future theft of high valued Nevada land provided for within THE ACT.
26

27 310. The defendants created the pretense of the 1848 TREATY OF GUADALUPE HIDALGO in
28 1952 as the controlling act, not realizing that future technology and unlimited access of

1 information would eventually expose the defendants as nothing more than a criminal cartel. The
2 1848 TREATY OF GUADALUPE HIDALGO land ownership pretense established a path for both State
3 and Federal elected officials to deceive their constituents in order to illegally and immorally rape,
4 plunder, and pillage unclaimed lands, such as in the case of Joseph Robinette Biden, acting on
5 behalf and in conjunction with Nevada Congresswoman Dina Titus, to illegally establish the
6 **Presidential Proclamation 10533 - MONUMENT.** This Presidential Proclamation under the
7 rule of law is simply straight up fraud and theft.
8

9
10 **SUMMARY OF CHAIN OF TITLE**

11 311. The United States was the *initial owner* and possessory title holder of a parcel of land
12 comprised of 11,530,000 acres as identified and provided for within THE ACT from February 2,
13 1848, up until July 5, 1866.

14 312. The 1848 TREATY OF GUADALUPE HILDALGO is a historic document date and time
15 certain recording a land transfer of possessory title and ownership from the nation of Mexico to
16 the United States by legal due course that is recorded in a chain of title.
17

18 313. The ACT OF CONGRESS (1864) ENABLING THE PEOPLE OF THE STATE OF NEVADA TO
19 FORM A CONSTITUTION AND STATE GOVERNMENT approved March 21, 1864, is a historic
20 documents time certain recording a land transfer of possessory title and ownership of certain lands
21 from within the 1848 TREATY OF THE GUDALUPE HILDALGO described at CHAP. XXXVI Sec, 2.
22 Boundaries of state from the United States to the people of Nevada by legal due course that is a
23 link recorded in a chain of title – which did not and does not include the lands provided for within
24 THE ACT.
25

26 314. The 1864 CONSTITUTION OF THE STATE OF NEVADA signed Oct. 31, 1864, is a historic
27 document date and time certain contract recording terms and conditions including ARTICLE 14,
28

1 BOUNDARIES OF THE STATE that establish the geographic land and land area subject to said
2 contract that became known as the State of Nevada by legal due course that is recorded in a chain
3 of title – which did not and does not include the lands provided for within THE ACT.
4

5 315. THE ACT is an historic documents date and time certain of a land transfer of
6 possessory title and land ownership transferring certain other lands from within the 1848 TREATY
7 OF GUDALUPE HILDALGO by the United States to the people of Nevada by legal due course that is
8 recorded in the chain of title.
9

10 316. The **NRS 328.210, NRS 328.220, NRS 328.340, NRS 328.360, NRS 328.370** and
11 **NRS 328.380** are historic documents of date and time certain that Nevada understood that THE
12 ACT lands, as provided to them, indicated that the United States government had/was
13 relinquished/ing the ownership thereof. Nevada, failed to complete the constitutional
14 requirements to legally obtain possessory ownership of said lands within THE ACT, as such, this
15 establishes that Nevada abandoned these lands which were now within their alleged designated
16 “geographical boundaries.”
17

18 317. Plaintiff Michael Little did legally place a land ownership claim on December 5,
19 2022, upon the statutorily abandoned appropriated land provided for within THE ACT which is a
20 historic document date and time certain of a holders possessory title and land ownership transfer
21 in a chain of title and subject to the Common law, the 9th and 10th Amendments of the United
22 States.
23

24 318. The Nevada Revised Statutes at **NRS 328.210, NRS 328.220, NRS 328.340, NRS**
25 **328.360, NRS 328.370** and **NRS 328.380** establish that at some point in time prior to 1945 the
26 United States did relinquish and did convey, by a legal land transfer, in due course, possessory
27
28

1 title and ownership of 11,530,000 acres of land to the people of Nevada (not the State) as provided
2 for and described within THE ACT.

3
4 **IN SUMMATION**

5 319. THE ACT lands became abandoned western frontier lands beginning in 1867 up until
6 December 5, 2022, (constituting 157 years). Abandoned means without Nevada Constitutional
7 authority and jurisdiction therefore constitutionally and statutorily unclaimed.

8 320. As of the aforementioned date, THE ACT lands legally belong to Plaintiff Michael
9 Little, in recognition of Little's realization of the systemic federal corruption including Nevada's
10 abandonment of legal land ownership. Little filed his claim upon the vacated right of land
11 ownership regarding the disposition of THE ACT lands, a claim which was filed on a date and
12 time certain through documents filed with the Nevada Courts claiming legal possessory
13 ownership of said greater parcel of land, which said land includes the entirety of the lands set
14 forth within THE ACT. Michael Little's claim, stands as the only lawfully recorded and therefore
15 legitimate claim, by virtue of the facts that the State of Nevada has repeatedly abandoned all
16 ownership interest in THE ACT lands Legislatively beginning in 1867, (1) failure to formally
17 amend the Nevada Constitution) and publicly in 1946, (2) allow the BLM to control, manage and
18 sell THE ACT land) and constitutionally in 1979-1981 (3) to formally amend the Nevada
19 Constitution without placing a legal land claim upon THE ACT lands.³¹

20
21
22
23 321. The legal activities and public actions of the State of Nevada over the last 78 years
24 beginning in 1946 constitute a public abandonment of the people of Nevada's land in the failure
25 of the State of Nevada to assertively lay claim upon certain appropriated land and is a breach of
26 the public trust.
27
28

³¹ See NRS 321.598, Nevada Revised Statutes – Disposal of Public Lands; Legislative authorization required.

1 322. Plaintiff Michael Little has assigned the land consisting of approximately 11,530,000
2 acres to hereinafter be recognized as -- Little, Nevada and the regional seat for the AMERICAN
3 NATIONAL PEOPLE'S PARTY [ANPP] to thwart state and federal overreaching and said joint
4 governments' uniparty efforts to diminish the Bill of Rights³² under the administrative *color of*
5 *law*. Whereas the establishment and formation of the ANPP is not repugnant to or in violation of
6 the States or the United States Constitutions respectively. So, the ANPP constitutes a legal civil
7 process for the People to establish a State Bank and TAKE BACK AMERICA.
8

9 323. Whereas the ANPP is not a succession from the United States merely a new entity
10 (political party) created to unify Blue Dog Democrats with Conservative Republicans in a national
11 interest that desirous of restoring and maintain the integrity of the Bill of Rights and our National
12 Culture and Heritage which does not recognize Washington, D.C.'s promotion of abusive banking
13 policies, promotion of usury Zionism and pedophilia (or its subpart "called grooming") under any
14 alternative term or acronym as an individual right provided for within the original Bill of Rights.
15

16 324. The ANPP is a Bill of Rights collective of American Culture where the law is derived
17 from the Law of Nature and Nature's God, as Laws (the same law which is referred to in the
18 Declaration of Independence - 1776) where the Rule of Law is superior to the Color of Law and
19 provides a court for what has now become known as "the peasant class" in this Country. This is
20 necessary because Common Sense has become tainted by ideologies that were foreign to our
21 Founding Fathers concept of God and Country (*e.g.*, predominantly ideas of Marxist origin, which
22 are destructive to the core values and ideologies of freedom, *i.e.*, the idea of a free lunch,
23 institutional directive of evolution, nonexistent climate change designed to create carbon taxes to
24 destroy the food supply, class warfare, gender dysphoria, collectivism, tribalism, *etc.*, all
25
26
27
28

³² See book: The Law: The War On Words And Perception. Available on Amazon.

1 ideologies intended to destroy the family unit and replace it with the nanny state, criminalize
2 Christianity, declare moral values hate crimes and generally destroy the American fabric that was
3 the foundation of America which created this once great Nation).

4
5 **LEGAL REMEDY REGARDING THE NEVADA 1866**
6 **STATE AND FEDERAL LAND FRAUD**

7 325. Who then owns the lands which are those lands addressed in the 1866-67 ACT
8 LANDS? Clearly, the United States government conveyed and ceded their interest in 1866 in
9 THE ACT lands. Nevada then failed to properly acknowledge this transfer by amending Nevada's
10 constitution. Then, the United States purchased 80 acres of land to build Hoover Dam from
11 Nevada, which constituted a party admission that the federal government did not own the
12 unclaimed public lands within THE ACT. The federal government then reaffirmed their position
13 with the Lehman Caves National Monument, wherein the United States government
14 acknowledged, once again, that they did not own the unclaimed public lands within THE ACT.
15 So the federal government again had to have the State convey these unclaimed public lands within
16 THE ACT, which constituted yet another party admission that the federal government did not own
17 the land and therefore, constitutes an irrebuttable presumption that the United States government
18 does not own the land.
19
20

21 Yet, even though the federal government has repeatedly admitted that they don't own the
22 land in THE ACT, the federal government created the Bureau of Land Management [BLM] and
23 worked behind the scenes with Nevada's representative (both state and federal) to commit a fraud
24 that the federal government continued to own the land by simply instructing the BLM to begin
25 exercising control over the land regardless of ownership. This is in complete deference to the
26 decision in *Rhode Island v. Commonwealth of Massachusetts*, 12 Pet. 657, 37 U.S. 657
27 (1838), which states in pertinent part that,
28

1 **“[T]he United States could not take any vacant land within the boundary of a state.**
2 **Hence resulted the principles laid down by this Court in *Harcourt and Gaillard, 12***
3 ***Wheat. 526*, that the boundaries of the United States were the external boundaries of**
4 **the several states; and that the United States did not acquire any territory by the treaty**
5 **of peace, in 1783”**

6 326. As to whom the guilty parties are is irrelevant, but what is relevant is that it
7 happened and it was fomented through a conspiracy between state and federal political entities
8 committing malversion.. Just a note, being found guilty of malfeasance (a lesser offense) is
9 punishable by never being able to EVER hold another public office (not even as a dog catcher).

10 327. The next question then becomes well then if the Federal government doesn't own the
11 land, the State must own the land? The answer to this seems to follow the same dirt road that the
12 federal government has attempted to take everyone down. It must be understood that the BLM
13 has been selling and leasing land situate within what has become known as Clark County. One
14 hundred percent of Clark County lies within THE ACT lands. Over the last 70 years the BLM
15 has been selling off high valued land primarily in what is known as Clark County and each and
16 every time that a sale was performed, the State of Nevada has NEVER objected. This failure of
17 the State to act or to object each time that a property was sold was a reaffirming party admission
18 by the State that they did not own the land.

19 328. So, the federal government ceded the land to the State and then turned around and
20 simply acted like they owned it. The State has acted like they owned it and sold land to the federal
21 government and then turned around and denied that they own it. The actions of the State and
22 federal government are completely incongruous and completely obliterates either position
23 maintained by either of the governments. The only legitimate answer is that neither of them own
24 the lands within THE ACT. Neither of these governmental entities have a legitimate claim to the
25 lands within THE ACT. Neither of these governmental entities have a legitimate claim to the
26 lands within THE ACT. Neither of these governmental entities have a legitimate claim to the
27 lands within THE ACT. Neither of these governmental entities have a legitimate claim to the
28 lands within THE ACT.

1 land. Therefore, MICHAEL LITTLE, claims the lands which neither the State nor the federal
2 governments owns. The only legitimate claim to these unclaimed lands is now LITTLE'S claim.

3
4 329. To hold that LITTLE's claim is invalid or irrelevant would mean that this Honorable
5 Court would have to support the fraud perpetrated by both the State and the Federal government.
6 This is a position that the courts have completely avoided as is evidenced in the Bundy criminal
7 case, and rightly so. Because if this Honorable were to recognize this enigma it would be forced
8 to acknowledge that both the State and the Federal governments committed fraud. To deny this
9 the Court would be committing a fraud itself and become complicit with the conspiracy. So now,
10 we are faced with a conundrum. Therefore, the only ruling that this Court may make without
11 involving itself in the malversion and criminal activities of the State and Federal government is
12 to grant the relief requested in this complaint. This Court is bound by the Constitution to
13 recognize THE ACT as controlling federal law. As the State of Nevada is not a party to this action,
14 the court does not have to make a decision in that regard. The Court therefore has no choice but
15 to grant the relief requested in the complaint.
16
17

18 CONCLUSION

19 330. Plaintiff Michael Little is withholding additional facts as in the Bundy case, as
20 Plaintiff Michael Little is confident that **THE ACT** and the Nevada Revised Statutes: **NRS**
21 **328.210, NRS 328.220, NRS 328.340, NRS 328.360, NRS 328.370, and NRS 328.380.** are more
22 than sufficient evidence to convince any reasonable person, let alone this Honorable Court to
23 grant this **MOTION FOR DECLARATORY AND INJUNCTIVE RELIEF, AND A CEASE-AND-DESIST &**
24 **PROTECTIVE ORDER** that will invalidate **PRESIDENTIAL PROCLAMATION 10533 – Establishment of**
25 **the MONUMENT** and protect the Plaintiffs with the enjoyment of their non-federal lands within
26 the alleged physical boundaries of the State of Nevada.
27
28

PRAYER FOR RELIEF

1
2 331. Wherefore Plaintiff's pray for the following relief.

3
4 332. A declaration, order and judgement holding that Defendants have repeatedly violated
5 the Congressional mandate in: THE ACT.

6 333. A declaration, order and judgement holding that Defendants have repeatedly acted
7 with malversion and in violation of their oaths of office to circumvent THE ACT.

8 334. An Order Compelling Defendants to recognize that the lands provided for within
9 THE ACT are appropriated land that IS NOT owned by the United States.
10

11 335. An Order invalidating PRESIDENTIAL PROCLAMATION 10533 - Establishment of the
12 **MONUMENT.**

13 336. An injunction requiring that before any police powers or enforcement actions be
14 taken that the Defendants be required to provide to Plaintiffs a comprehensive list of each and
15 every land transaction, by whatever means, through which their police powers and/or
16 jurisdictional authority have been conducted. Until that time the exercise of any police powers
17 without which said authority, as juxtaposed against THE ACT, beginning in the year 1866 and
18 going forward shall be considered UNLAWFUL and ULTRA VIRES.
19

20 337. An injunction requiring Defendants to cease and desist or nullify any charges or other
21 executive actions against any said person(s) who has been or is contemplated of being charged
22 federally or incarcerated as a result of alleged criminal violations resulting from illegal acts
23 alleged to have been committed on alleged federal public lands which are located within THE
24 ACT.
25

26 338. A CEASE-AND-DESIST ORDER to prevent the Defendants from continuing to violate
27 the United States Constitution, Nevada's Enabling Act, the Separation of powers Doctrine
28

1 (exercised through the Executive Branch nullifying Congressional Acts and committing *ultra*
2 *vires* acts under the alleged authority of the Antiquities Act) by continuing to exercise ownership,
3 possession, control and false authority over the land provided for within THE ACT.
4

5 339. For Ten Trillion Dollars placed into a private Michael Little Educational trust fund to
6 be created and used similarly to the NEVADA MILLENNIUM SCHOLARSHIP PROGRAM as
7 compensation for the value of the assets and irreconcilable damages upon the People of Nevada
8 by the Defendants beginning in 1946.
9

10 340. Ten Trillion Dollars placed in the People's State Bank and Land Recovery [PSBLR]
11 a private equity trust account to be created to compensate and reimburse Nevadans equally for
12 the value of the land of which they have been defrauded by the government and their elected
13 officials and the banking industry. The purpose of this is to create a private equity trust account
14 by which the usuary abuse on private mortgages may be removed and mortgages be placed in the
15 PSBLR at a one percent mortgage cap. Thus, allowing the common people to actually enjoy the
16 fruits of their hard work, as opposed to enriching politically connected special interests and
17 corrupt politicians with what appears to be a standard 10% Washington D.C. kickback or even
18 better yet inside trading tips.
19

20 341. A finding that "Fraud destroys the validity of everything into which it enters." *Nudd*
21 *v. Burrows*, 91 U.S. 426 (1875); That Fraud vitiates everything." *Boyce v. Grundy*, 3 U.S. (Pet.)
22 210 (1830). And, issuing a PROTECTIVE ORDER directing that all federal agencies cease and desist
23 the harassment and interaction with the Defendants upon the lands clearly described in THE ACT.
24

25 342. An award of all costs and/or attorney's fees pursuant to this complaint.
26

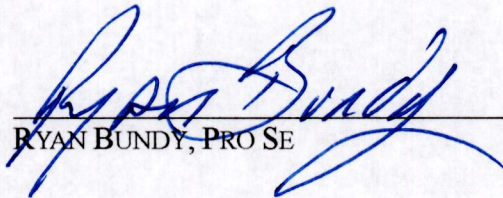
27 343. To declare all outstanding federal leases upon THE ACT lands null and void and to
28 instruct the defendants to assign all of these federal leases currently in effect to Micheal Little.

1 344. And for such other and further relief that the court deems just and proper under the
2 circumstances.

3 Aug 26
4 ~~15~~, 2024

5 Respectfully submitted,

6
7
8 MICHAEL LITTLE, PRO SE


9 RYAN BUNDY, PRO SE

10 **VERIFICATION**

11 Under the penalties of perjury, I declare that I am the Petitioner named in the foregoing
12 **COMPLAINT FOR: DECLARATORY AND INJUNCTIVE RELIEF, A CEASE-AND-**
13 **DESIST ORDER AND A PROTECTIVE ORDER AND RATIFICATION AND**
14 **VINDICATION OF THE UNITED STATES CONGRESSIONAL ACT OF 1866**
15 **JUXTAPOSED AGAINST THE ANTIQUITIES ACT OF 1906** and knows the contents
16 thereof; that the pleading is true of my own knowledge, except as to those matters stated on
17 information and belief, and that as to such matters I believe them to be true.

18
19 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true
20 and correct.

21
22 DATED THIS ____ DAY OF AUGUST, 2024.

23
24 /s/ _____
25 MICHAEL LITTLE
26 Subscribed and affirmed before me
27 On this ____ day of August, 2024.

28 _____
Notary Public, in and for said County

VERIFICATION

Under the penalties of perjury, I declare that I am the Petitioner named in the foregoing
**COMPLAINT FOR: DECLARATORY AND INJUNCTIVE RELIEF, A CEASE-AND-
DESIST ORDER AND A PROTECTIVE ORDER AND RATIFICATION AND
VINDICATION OF THE UNITED STATES CONGRESSIONAL ACT OF 1866
JUXTAPOSED AGAINST THE ANTIQUITIES ACT OF 1906** and knows the contents
thereof; that the pleading is true of my own knowledge, except as to those matters stated on
information and belief, and that as to such matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true
and correct.

DATED THIS 26 DAY OF AUGUST, 2024.

/s/ Ryan Bundy
RYAN BUNDY
Subscribed and affirmed before me
On this 26 day of AUGUST, 2024.

Timothy C Fairse
Notary Public, in and for said County

