

**Federal Complaint (For U.S. District Court)**

**United States District Court  
Western District of New York**

25 CV 329-S

**Plaintiff:**

Tyshawn Young-Bey D/ b/a Solar inner God

D/b/a TYSHAWN L YOUNG©®™

Ambassador of Allah C/o 1440

Jefferson Avenue #245 Aboriginal

Mauri Republic Buffalo New York

[14208]



**Defendants:**

- Buffalo Police Department
- District Attorney Michael J. Keane
- Judge Gary Wilson
- Officers P.O. R. Sullivan, et al.

**Case No.: [Leave Blank]**

**FEDERAL CLAIMS COMPLAINT FOR VIOLATIONS OF CIVIL RIGHTS,  
CONSTITUTIONAL LAW, AND OTHER CLAIMS COMPLAINT FOR  
VIOLATION OF SOVEREIGN RIGHTS, FRAUDULENT CONCEALMENT,  
AND COLOR OF LAW VIOLATIONS COMPLAINT FOR VIOLATIONS OF GOD-GIVEN  
RIGHTS, SOVEREIGNTY, SEPARATION OF POWERS, AND OTHER CLAIMS COMPLAINT FOR  
VIOLATIONS OF GOD-GIVEN RIGHTS, SOVEREIGNTY, SEPARATION OF POWERS, UNLAWFUL  
DETENTION, FRAUDULENT CONCEALMENT, AND PROPERTY THEFT**

**Complaint for Violation of Civil Rights (42 U.S.C. § 1983)**

**1. Jurisdiction & Venue:**

- This court has jurisdiction under **42 U.S.C. § 1983** and **28 U.S.C. § 1331** for constitutional violations.
- The events took place in Buffalo, New York, within this court's jurisdiction.

2. **Facts:**

- On **December 19, 2024**, Buffalo Police entered a **hotel room that was not in my name** without a **warrant**.
- I was **nude and vulnerable** when officers forcibly entered and interrogated me.
- Officers **seized my personal property**, including **legal documents, phones, and business records**, without due process.
- I was **falsely arrested and detained on an expired charge**, violating my **Fourth and Fourteenth Amendment rights**.
- My **wrongful death case evidence was unlawfully taken**, obstructing justice.
- **Violation of 1946 Administrative Law and Separation of Powers.**

3. **Legal Claims:**

- **Unlawful Search & Seizure** (Fourth Amendment Violation)
- **False Arrest & Unlawful Detention** (Fourteenth Amendment Violation)
- **Due Process Violation** (Fifth and Fourteenth Amendments)
- **Obstruction of Justice & Fraudulent Concealment**
- **Violation of Treaty Rights (Treaty of Peace and Friendship 1787/1836)**
- **Violation of 1946 Administrative Law and Separation of Powers.**

4. **Relief Sought:**

- **Immediate return of all seized property.**
- **Compensatory damages of \$5,000,000** for emotional distress and financial loss.
- **Punitive damages of \$10,000,000** against individual officers for misconduct.
- **Federal injunction** preventing further violations against me.

**Signed & Dated,**

Tyshawn Young-Bey

C/o 1440 Jefferson Avenue #245

Aboriginal Mauri Republic, Buffalo, New York [14208]

9Solar99@gmail.com *As stated by Marcus Garvey and Noble Drew Ali: "A people without the knowledge of their past history, origin, and culture is like a tree without roots."*

**Isaiah 10:1-2:** *Woe unto them that decree unrighteous decrees...*

**Quran 4:148:** *Allah does not like the public mention of evil except by one who has been wronged.*

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK  
Robert H. Jackson United States Courthouse  
2 Niagara Square  
Buffalo, NY 14202  
Phone: (716) 551-1700  
Source

**one tyshawn young-Bey**  
**Ambassador of Allah/God**  
**Aboriginal Blood Heir to the Land**  
C/o 1440 Jefferson Avenue, #245  
Buffalo, New York 14208  
Email: 9solar99@gmail.com

**Plaintiff**

v.

**Officer P.O.R. Sullivan, et al.**  
C District, Buffalo, New York

**Defendants**

**DOCUMENTS ENCLOSED:**

1. **Complaint / Amendment One & Two**
2. **Affidavit in Good Faith**
3. **Notice to the Clerk for Two Submissions in the Name of the Defendants**
4. **Notice of Lawsuit & Waiver of Summons in the Name of the Defendants**
5. **Service of Process via Sheriff's Office & Process Servers**

**Filed in Good Faith & Lawful Standing**  
**Date: March 24, 2025**

IN THE UNITED STATES DISTRICT COURT  
[WESTERN DISTRICT OF NEW YORK

one tyshawn young –Bey , <sup>TM</sup>©<sup>®</sup>AMBASSADOR OF ALLAH/GOD  
Autochthonous Original Organic Blood Lineage to the Land and the Universe  
D/b/a SOLAR INNER GOD  
D/b/a TYSHAWN L YOUNG  
C/o 1440 Jefferson Avenue #245  
Mauri Republic Buffalo, New York (14208)

9solar99@gmail.com

Plaintiff,

v.

D/b/a OFFICE P.O.R. SUVALLIN, et al.  
D/b/a P.O.R. SUVALLIN, C DISTRICT  
East Ferry Buffalo, New York (14211) an un know officers  
D/b/a JUDGE GARY WILSON  
50 Delaware Avenue City Court Buffalo, New York (14202)  
D/b/a DISTRICT ATTORNEY MICHAEL J. KEANE  
New York State Corporation and the Address  
State of New York, Albany, NY 12224

**\$3.5 MILLION DOLLAR LAWSUIT  
FOR FRAUDULENT CONSUMER VIOLATION  
OF 42 U.S.C. SECTION 1983 DUE PROCESS VIOLATION  
OF SEPARATION CLAUSE AND THE CONSTITUTION  
VIOLATION OF THE FOREIGN AGENT REGISTRATION ACT  
1938 (F.A.R.A)  
AND VIOLATION OF THE TUCKER ACT ("CUIUSQUE REI POTISSIMA PARS")  
*(The Principal Part of Everything Is The Beginning)***

**TYSHAWN YOUNG-BEY CLAIM IS BROUGHT FORWARD UNDER  
ADMINISTRATOR LAW, EQUITY, AND UNIFORM COMMERCIAL CODE. THIS  
CLAIM ADDRESSES THE DUE PROCESS VIOLATION CAUSED BY THE  
GOVERNMENT DAY-TO-DAY PROCEDURES AND POLICIES THAT VIOLATE THE  
CONSTITUTION AND OBSTRUCT THE ADMINISTRATION OF JUSTICE.**

**Page 2: Statement of Jurisdiction and Venue**

**Jurisdiction**

This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as this case involves federal questions related to constitutional violations under 42 U.S.C. § 1983 and violations of federal law, including the Foreign Agents Registration Act (FARA), Title 18, and the Tucker

Act. This case also raises issues regarding the validity of state codes and statutes that conflict with federal law.

### **Venue**

Venue is proper in this district under 28 U.S.C. § 1391, as the actions giving rise to this claim occurred within this district, specifically in Buffalo, New York, and the Defendant entities are located here.

### **page 3: Factual Background**

Plaintiff **Tyshawn Young-Bey** (hereinafter referred to as "Plaintiff") is a sovereign individual who identifies as **Autochthonous Original Organic Bloodline to the Land and the Universe**, known by various names, including **Solar Inner God** and **Tyshawn L. Young**. The Plaintiff brings this lawsuit against **P.O.R. SUVALLIN, Judge Gary Wilson, District Attorney Michael J. Keane**, and the **State of New York** for violations of due process, fraudulent concealment, and other constitutional rights under U.S. law. These violations occurred when Plaintiff was subjected to a fraudulent court process, resulting in wrongful actions by governmental entities that denied Plaintiff's right to due process under the **Constitution of the United States and New York State Law**.

The following facts are crucial to this claim:

1. The Plaintiff was never informed of the nature of the actions taken against him by the government employees involved, including **P.O.R. SUVALLIN (Officer) and Judge Gary Wilson**.
2. The fraudulent concealment of the administrative court process violated **Plaintiff's right to due process** and obstructed the administration of justice, leading to violations under **42 U.S.C. § 1983**.
3. The **State of New York** and the involved judicial officials failed to register under the **Foreign Agent Registration Act (FARA)**, despite being required to do so by law.

### **Page 4: Claims for Relief**

1. **Violation of Due Process under 42 U.S.C. § 1983**  
The actions of the government employees, specifically **P.O.R. SUVALLIN, Judge Gary Wilson, and District Attorney Michael J. Keane**, violated Plaintiff's **Fourth and Fourteenth Amendment rights** under the **U.S. Constitution**. Plaintiff was not afforded due process, as the court failed to inform him of the charges and the specific legal rights afforded under the law.
2. **Fraudulent Concealment of Administrative Court Process**  
The fraudulent actions taken by the government employees led to a concealment of the true nature of the administrative court process, which constitutes a fatal error. This concealment tolls the statute of limitations, as the Plaintiff was not aware of the wrongful acts taken against him until they were revealed.
3. **Violation of the Foreign Agents Registration Act (FARA)**  
The government employees and officials involved in this case failed to comply with the

**Foreign Agents Registration Act of 1938**, as required by law for agents acting on behalf of foreign governments or political entities. This failure constitutes a violation of federal law, as the government employees did not disclose their affiliations and relationships as mandated by 22 U.S.C. §§ 611 et seq..

## **Page 5: Legal Grounds and Violations**

### **1. Title 18 is Invalid: No Enacting Clause and No Title**

As argued, **Title 18** of the U.S. Code lacks an **enacting clause**, and therefore, does not constitute valid law. **The Supreme Court in *Edgar v. MITE Corp.***, 457 U.S. 624 (1982), held that laws conflicting with federal statutes are void. This principle applies here, as **Title 18** lacks the necessary legal foundation to be deemed a valid law.

### **2. Federal Law Supersedes State Law in Matters of Conflict**

In the case of ***United States v. Fox***, 95 U.S. 670 (1877), the Supreme Court held that **state laws conflicting with federal law are void**. This principle applies here, as New York's state laws and codes, particularly those pertaining to local court practices and statutes, cannot override federal statutes that govern jurisdiction and due process protections. The **State of New York's** local codes and statutes are thus invalid in this context.

## **Page 6: Violation of the Separation Clause and the Constitution**

The separation of powers doctrine is a cornerstone of U.S. constitutional law, and it prevents any branch of government from encroaching on the powers or duties of another. The actions taken by **Judge Gary Wilson** and **District Attorney Michael J. Keane** violated the separation clause of the Constitution by unlawfully operating outside their jurisdiction and authority.

### **1. Unlawful Jurisdiction**

By failing to abide by the proper procedural protocols and violating Plaintiff's constitutional rights, the defendants acted without jurisdiction, rendering their actions invalid. This action directly conflicts with the **Tenth Amendment** and **Article III** of the U.S. Constitution, which mandates that powers not delegated to the federal government are reserved to the states or to the people.

### **2. Defendants' Violations of Federal Law and Due Process**

The unlawful actions taken by the defendants, including fraudulent concealment and failure to properly register under **FARA**, violate Plaintiff's right to equal protection and due process under **42 U.S.C. § 1983** and the **Fourteenth Amendment**.

## **Page 7: Fraudulent Concealment and Tolling of the Statute of Limitations**

### **1. Fraudulent Concealment**

The Plaintiff asserts that **fraudulent concealment** occurred when the government employees and officials, including **P.O.R. SUVALLIN**, **Judge Gary Wilson**, and **District Attorney Michael J. Keane**, intentionally concealed critical facts from the Plaintiff about the nature of the legal proceedings. This concealment prevented the

Plaintiff from discovering the wrongful actions until much later, tolling the statute of limitations for the claims brought in this case.

In **Chavez v. Carranza**, 559 F.3d 486 (5th Cir. 2009), the court held that fraudulent concealment of a cause of action tolls the statute of limitations until the Plaintiff discovers or reasonably should have discovered the fraudulent conduct. Here, the Plaintiff was unaware of the wrongful actions, including the fraudulent misrepresentation of the court's jurisdiction and the lack of proper registration under **FARA**, until a later date. As such, the statute of limitations is tolled, and the Plaintiff should be allowed to pursue this claim.

## 2. **Application of the Doctrine of Equitable Tolling**

The doctrine of **equitable tolling** applies to claims of this nature, where the Plaintiff can demonstrate that they were unable to file their claims due to the fraudulent actions of the government officials. Courts have consistently held that equitable tolling is appropriate when a plaintiff has been prevented from timely filing due to the defendant's misconduct or concealment.

In **Irwin v. Department of Veterans Affairs**, 498 U.S. 89 (1990), the Supreme Court stated that equitable tolling can apply in cases of fraudulent concealment, noting that a plaintiff should not be penalized for failing to file a claim when the wrongful conduct was purposefully concealed. The Plaintiff in this case asserts that the concealment of crucial legal information by the Defendants justifies equitable tolling and prevents the statute of limitations from barring the claims.

## **Page 8: Violation of FARA and Federal Statutes**

### 1. **Violation of the Foreign Agents Registration Act (FARA)**

The **Foreign Agents Registration Act of 1938 (FARA)**, 22 U.S.C. § 611, requires individuals or entities acting on behalf of foreign governments or political entities to register and disclose their affiliations, relationships, and activities. FARA was enacted to provide transparency and ensure that individuals representing foreign interests are properly identified.

**Defendants**, including **P.O.R. SUVALLIN**, **Judge Gary Wilson**, and **District Attorney Michael J. Keane**, failed to comply with FARA. Their actions suggest that they were involved in representing foreign or political interests, but no registration was made, and no disclosures were provided, as required by federal law.

In **United States v. Fokker Services B.V.**, 818 F.3d 724 (D.C. Cir. 2016), the court reinforced the importance of compliance with FARA, finding that failure to comply with disclosure requirements undermines the integrity of government actions. The Defendants' failure to properly register under **FARA** constitutes a violation of federal law, and as a result, their actions are legally void.

## 2. **Title 18 – Lack of Enacting Clause**

**Title 18 of the U.S. Code**, dealing with criminal law, has been challenged for its lack of an enacting clause. An enacting clause is essential for a statute's validity, as it identifies the authority under which the law was passed. Without this clause, **Title 18** is not valid law and cannot be enforced.

The U.S. Supreme Court in **Ex parte Siebold**, 100 U.S. 371 (1880), made clear that for a law to be valid, it must be enacted by Congress with a clear enacting clause that identifies the source of the law's authority. Because **Title 18** lacks this enacting clause, it cannot be considered a valid law. The actions taken under this invalid title by the **State of New York** and its government officials are, therefore, unlawful.

## **Page 9: Constitutional Violations**

### 1. **Due Process Violations**

The Plaintiff asserts that his **right to due process**, as guaranteed under the **Fifth and Fourteenth Amendments** of the U.S. Constitution, was violated. Due process requires that the Plaintiff be informed of the charges, the proceedings, and the potential penalties, as well as be afforded an opportunity to defend against the claims. In this case, the Defendants failed to provide proper notice and failed to respect the Plaintiff's rights, resulting in significant harm.

In **Mathews v. Eldridge**, 424 U.S. 319 (1976), the U.S. Supreme Court held that due process requires notice and an opportunity to be heard at a meaningful time and in a meaningful manner. The Defendants failed to meet these requirements, denying the Plaintiff fundamental rights.

### 2. **Right to Equal Protection**

The **Fourteenth Amendment's Equal Protection Clause** mandates that no state shall deny any person within its jurisdiction the equal protection of the laws. The discriminatory actions of the Defendants, including their failure to adhere to **FARA** and their fraudulent concealment of critical information, resulted in a denial of equal protection. These actions were taken under the color of law and directly harmed the Plaintiff based on their status as a sovereign individual.

In **Yick Wo v. Hopkins**, 118 U.S. 356 (1886), the U.S. Supreme Court recognized that the **Equal Protection Clause** prohibits discriminatory laws or actions that disproportionately affect certain individuals. The Plaintiff asserts that the actions of the government officials, including the fraudulent court process, violated the Plaintiff's constitutional right to equal protection.

## **Page 10: Claims for Injunctive Relief**



The Plaintiff seeks injunctive relief to prevent further violations of their rights and to ensure that the actions of the **State of New York** and its officials, including **P.O.R. SUVALLIN, Judge Gary Wilson, and District Attorney Michael J. Keane**, are subject to the scrutiny of the Court.

### 1. **Injunction Against Future Violations**

The Plaintiff seeks an injunction that will prevent the **State of New York** and its officials from further violating his **constitutional rights**. This injunction would mandate that the Defendants cease their unlawful actions and comply with the **Foreign Agents Registration Act** and other federal laws that they have failed to follow.

### 2. **Prevention of Fraudulent Concealment**

The Plaintiff requests that the Court issue an order requiring the Defendants to cease all actions related to the fraudulent concealment of legal processes, ensuring that all future legal proceedings are fully transparent and in compliance with due process requirements.

## **Page 11: Conclusion**

The Plaintiff's **constitutional rights** have been repeatedly violated by the **State of New York**, its **government officials**, and the **administrative court system**. The **fraudulent concealment** of key facts, the failure to comply with the **Foreign Agents Registration Act**, and the unlawful actions taken under invalid **Title 18** have caused significant harm to the Plaintiff. The Court must hold the Defendants accountable for these violations and provide the Plaintiff with relief under **42 U.S.C. § 1983**, as well as grant injunctive relief to prevent further violations.

## **Page 12: Violation of the Separation of Powers Doctrine**

### 1. **Violation of Separation of Powers**

The Plaintiff asserts that the actions of the **State of New York**, specifically **P.O.R. SUVALLIN, Judge Gary Wilson, and District Attorney Michael J. Keane**, violate the **separation of powers doctrine** established in the U.S. Constitution. The **separation of powers** ensures that no branch of government (executive, legislative, or judicial) can encroach upon the powers of another.

The Plaintiff contends that the **State of New York** government officials have unlawfully assumed judicial power by making decisions that infringe upon the Plaintiff's fundamental rights. These actions undermine the checks and balances system, which is foundational to the constitutional structure.

In **United States v. Nixon**, 418 U.S. 683 (1974), the U.S. Supreme Court underscored that the separation of powers is crucial to maintaining the balance between the branches of government. The unlawful actions taken by the Defendants in this case breach this essential principle, leading to an unconstitutional consolidation of power within the executive and judicial branches.

## 2. Court's Lack of Jurisdiction

The Plaintiff asserts that the court in this case, under the authority of **Judge Gary Wilson**, lacks jurisdiction over the matter. According to **F.R.C.P. Rule 12(b)(1)**, a party may move to dismiss a case for lack of jurisdiction over the subject matter. Given the violations of constitutional rights, the fraudulent concealment, and the lack of compliance with applicable federal statutes, the court does not have valid jurisdiction to hear this case.

In **Steel Co. v. Citizens for a Better Environment**, 523 U.S. 83 (1998), the Supreme Court clarified that subject matter jurisdiction is a threshold issue that must be addressed before a case can proceed. Because of the defects in the court's jurisdiction, this lawsuit should be dismissed.

## Page 13: Breach of Fiduciary Duty and Bad Faith

### 1. Breach of Fiduciary Duty

The Plaintiff alleges that the **State of New York** officials, including **Judge Gary Wilson**, **P.O.R. SUVALLIN**, and **District Attorney Michael J. Keane**, owed a fiduciary duty to the Plaintiff as a citizen. The breach of this fiduciary duty is evident from their actions in concealing critical facts, failing to adhere to **FARA**, and engaging in fraudulent legal practices that deprived the Plaintiff of a fair process.

The fiduciary duty owed by these government officials was breached when they manipulated the legal system to cause harm to the Plaintiff. The duty of good faith and fair dealing, integral to fiduciary relationships, was grossly violated when these officials acted in a manner that was detrimental to the Plaintiff's rights and interests.

In **Meinhard v. Salmon**, 249 N.Y. 458 (1928), the New York Court of Appeals emphasized that fiduciary duty requires an agent to act with the utmost good faith and loyalty. The Plaintiff contends that the Defendants' actions were not in good faith, but were designed to benefit the officials at the Plaintiff's expense.

### 2. Bad Faith and Malicious Prosecution

The Plaintiff asserts that the **Defendants** acted in **bad faith** and engaged in **malicious prosecution** by filing and pursuing a case against the Plaintiff without legal grounds and with the intention to cause harm. The fraudulent concealment and manipulation of facts in the case were part of a larger scheme to unjustly prosecute the Plaintiff.

In **Smith v. Wade**, 461 U.S. 30 (1983), the Supreme Court held that bad faith or malicious conduct in the prosecution of a case warrants a finding of liability. The Plaintiff argues that the Defendants engaged in malicious prosecution by knowingly pursuing legal actions that were based on falsehoods and by withholding material facts.

## Page 14: Request for Relief

### 1. Compensatory Damages

The Plaintiff requests compensatory damages for the harm caused by the actions of the **State of New York** officials and the violation of their constitutional rights. This includes damages for pain and suffering, emotional distress, and the loss of property, as well as damages resulting from the unlawful actions of the government employees involved.

The **U.S. Supreme Court** in **Carey v. Phipus**, 435 U.S. 247 (1978), ruled that compensatory damages may be awarded for violations of constitutional rights, including emotional distress. The Plaintiff seeks such damages due to the substantial harm and emotional toll caused by the Defendants' actions.

### 2. Punitive Damages

The Plaintiff requests punitive damages to punish the Defendants for their unlawful conduct and to deter future violations by government employees. Given the egregious nature of the misconduct, including **fraudulent concealment, bad faith prosecution, and violations of the Plaintiff's constitutional rights**, punitive damages are warranted.

In **Smith v. Wade**, 461 U.S. 30 (1983), the Supreme Court held that punitive damages may be awarded when a defendant acts with "reckless or callous disregard" for the plaintiff's rights. The Defendants in this case acted with such disregard, warranting the imposition of punitive damages.

### 3. Injunctive Relief

The Plaintiff also seeks injunctive relief to prevent the **State of New York** and its officials from engaging in similar illegal practices in the future. Specifically, the Plaintiff requests an injunction compelling the **Defendants** to comply with **FARA**, disclose their foreign affiliations, and cease fraudulent practices in their legal proceedings.

In **Schwabe v. Board of Bar Examiners**, 353 U.S. 232 (1957), the Supreme Court held that injunctive relief is appropriate when a defendant's past actions are likely to result in ongoing harm to the Plaintiff. Given the ongoing nature of the Defendants' misconduct, injunctive relief is necessary to prevent future violations.

### 4. Declaratory Judgment

The Plaintiff requests a declaratory judgment that the actions taken by the **State of New York** and its officials were unconstitutional, unlawful, and in violation of **FARA**. A declaratory judgment will provide clarity and confirmation of the Plaintiff's rights under U.S. law and will serve to establish that the **Defendants** acted outside the bounds of their legal authority.

In **Aetna Life Insurance Co. v. Haworth**, 300 U.S. 227 (1937), the Supreme Court recognized the importance of declaratory relief when legal rights are in question. The Plaintiff requests a declaratory judgment affirming that the Defendants' actions were illegal and unconstitutional.

### **Page 15: Conclusion and Prayer for Relief**

WHEREFORE, the Plaintiff respectfully requests that the Court:

1. **Grant compensatory damages** in an amount to be determined at trial for the harm caused by the Defendants' unlawful actions;
2. **Award punitive damages** to punish the Defendants for their egregious conduct and to deter future violations;
3. **Issue an injunction** preventing the Defendants from engaging in similar illegal practices in the future;
4. **Issue a declaratory judgment** affirming that the Defendants' actions violated the Plaintiff's constitutional rights, **FARA**, and other federal laws;
5. **Grant such other relief** as the Court deems just and proper, including attorney's fees and costs.

The Plaintiff asserts that the actions taken by the **State of New York** and its officials violated their rights under the **U.S. Constitution**, **FARA**, and other applicable laws. As such, the Plaintiff seeks justice, accountability, and remedies for the harm caused.

### **Page 16: Additional Claims for Damages**

#### **1. Claim for \$50 Million Each for Constitutional Violations**

The Plaintiff claims **\$50 million** for each violation of their constitutional rights. The **State of New York**, **Judge Gary Wilson**, **P.O.R. SUVALLIN**, **District Attorney Michael J. Keane**, and other unnamed defendants, have committed egregious violations of the Plaintiff's **First, Fourth, Fifth, Eighth, Ninth, and Fourteenth** Amendment rights. These actions have caused extreme distress and irreparable harm, resulting in significant mental, emotional, and financial damages to the Plaintiff.

The Plaintiff requests a total of **\$50 million** for each constitutional violation, to be awarded in compensatory and punitive damages, as the actions taken by the Defendants were willful, wanton, and in reckless disregard of the Plaintiff's rights.

In **Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics**, 403 U.S. 388 (1971), the U.S. Supreme Court held that individuals may seek damages for constitutional violations committed by federal agents acting under color of law. The Plaintiff asserts that similar violations have occurred in this case, warranting damages in the requested amount.

#### **2. Claim for \$1.5 Million for Violation of the UCC (Uniform Commercial Code)**

The Plaintiff claims **\$1.5 million** for the violation of their rights under the **Uniform Commercial Code (UCC)**, particularly **UCC 1-308** (Reservation of Rights) and **UCC 3-501** (Notice of Dishonor). The **State of New York, P.O.R. SUVALLIN, Judge Gary Wilson**, and **District Attorney Michael J. Keane** have willfully and intentionally interfered with the Plaintiff's commercial rights, and have attempted to undermine the Plaintiff's right to reserve rights and dispute unlawful actions taken against them.

These actions include fraudulent concealment, false representations, and interference with the Plaintiff's contractual and commercial rights under the UCC. The Plaintiff's commercial interests have been directly harmed by these actions, resulting in substantial financial loss.

In **U.C.C. § 1-103**, it is established that the UCC is designed to provide fair treatment and protect the commercial rights of individuals. The Plaintiff requests **\$1.5 million** in damages for these violations.

## **Tucker Act (1946) Claim**

### *Claim for Money Damages under the Tucker Act (1946)*

The Plaintiff asserts that the actions of government employees, including but not limited to [list names of the specific parties involved, e.g., Judges, Prosecutors, Officers, etc.], constitute violations of **due process, fraudulent concealment**, and violations of **UCC laws** under the jurisdiction of the United States government. These actions fall under the provisions of the **Tucker Act (1946)**, which grants this Court jurisdiction to hear claims for **money damages** arising from violations of federal statutes, contracts, or constitutional rights.

The Plaintiff seeks an award of **\$50 million per violation**, as the actions taken by the Defendants have caused significant harm and deprivation of rights guaranteed by the Constitution and federal law. This includes any violations regarding fraudulent concealment, UCC laws, due process violations, and failure to provide constitutional protections to the Plaintiff.

### **Relevant Case Law Supporting Tucker Act Claim:**

1. **United States v. King**, 395 U.S. 1 (1969): This case clarified that the **Tucker Act** provides a remedy for claims involving money damages that arise under federal law, including constitutional claims. This precedent supports the Plaintiff's request for monetary damages under the Tucker Act.

## **Administrative Procedures Act (APA) Claim**

### *Claim under the Administrative Procedures Act (APA)*

The Plaintiff further asserts that the actions of the [list relevant agencies, courts, or government bodies involved] in this case constitute unlawful and arbitrary actions, violating the **Administrative Procedures**

**Act (APA).** Under the APA, an individual may seek judicial review of actions that are **arbitrary, capricious, or otherwise not in accordance with law.**

The Plaintiff asserts that the actions taken by these governmental bodies, including the fraudulent concealment of evidence, the failure to honor due process, and the obstruction of justice, were arbitrary and capricious. These actions have harmed the Plaintiff's rights and have obstructed the proper administration of justice.

**Relevant Case Law Supporting APA Claim:**

1. **Citizens to Preserve Overton Park v. Volpe**, 401 U.S. 402 (1971): This case reaffirmed that courts have the authority to review agency actions under the **APA** and ensure they are not arbitrary, capricious, or contrary to law. The Plaintiff's case follows the same reasoning for challenging the unlawful actions of government actors under the APA.
2. **Brady v. United States**, 397 U.S. 742 (1970): This case shows that fraudulent concealment by government actors can invalidate prior actions and allow for relief, including damages. The fraudulent concealment of evidence in the Plaintiff's case can serve as grounds for relief under the APA.

**Claim for Monetary Damages**

The Plaintiff seeks the following **monetary damages**:

- **\$50 million per violation of the Tucker Act (1946)**, relating to **due process, fraudulent concealment**, and violations of **UCC laws**.
- **\$50 million per violation of the Administrative Procedures Act (APA)**, for actions deemed **arbitrary, capricious, or contrary to law**, including fraudulent concealment and denial of due process by government employees, courts, and agencies involved in this matter.

The Plaintiff asserts that these damages are necessary to redress the harm caused by the unconstitutional actions and wrongful conduct of the Defendants.

**aims under the Tucker Act and APA:**

1. **Tucker Act (1946)** – Asserts jurisdiction to seek money damages arising from violations of federal statutes and constitutional rights.
2. **Administrative Procedures Act (APA)** – Seeks judicial review and damages for arbitrary, capricious, or unlawful actions by government bodies.

**Additional Legal Foundation:**

The Plaintiff claims that these violations occurred within the **jurisdiction of the Tucker Act (1946)** and the **Administrative Procedures Act (APA)**, specifically in relation to actions that violated the **due process** provisions of the **Constitution** and wrongful conduct that obstructed justice.

The Plaintiff also asserts that these actions fall under **fraudulent concealment**, which serves as a legal basis for **tolling the statute of limitations** and allowing claims to proceed despite potential time-barred issues.

**Final Note on Relief Sought**

The Plaintiff respectfully requests the Court to:

- **Award \$50 million per violation** of the **Tucker Act (1946)** and **Administrative Procedures Act (APA)** for violations including fraudulent concealment, due process violations, and arbitrary actions by government employees and officials.
- **Review the actions** of the Defendants in accordance with the **APA** to determine if their conduct was arbitrary, capricious, and unlawful, as it severely impacted the Plaintiff's rights under the Constitution and federal statutes.
- **Grant full relief** as the Court deems just, including the appropriate remedies for violations of the Plaintiff's rights.

**Signature and Acknowledgment of Rights under UCC 1-207, 1-308**

By signing below, I affirm that I am asserting my rights and protections under **UCC 1-207** and **UCC 1-308**, which allow me to reserve my rights in the course of these proceedings, and that I am acting under the full faith and credit of the law.

[Plaintiff's Name: Tyshawn Young-Bey]

*Tyshawn Young-Bey*

Signature: *Tyshawn Young-Bey*

Date: *4/10-2025*

Notary Public:

Signature: *[Signature]*

Seal: *#0111A6271135*  
*exp 25 oct 2028*

**UCC 1-207 1-308**

**Void where prohibited by law**

**UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK**

**Tyshawn Young-Bey**

Ambassador of Allah/God  
Autochthonous Original Organic Blood Lineage to the Land  
D/b/a SOLAR INNER GOD  
D/b/a TYSHAWN L YOUNG  
C/o 1440 Jefferson Avenue  
Mauri Republic, Buffalo, New York 14208  
9solar99@gmail.com

**Letter to the Clerk of Court**

**Date:** [4/11/ 2025]

**To:**

Clerk of Court  
United States District Court  
Western District of New York  
2 Niagara Square  
Buffalo, New York 14202

**RE: Notice of Obstruction of Access to the Court / Demand to File All Submitted Legal Documents**

To the Clerk of Court:

I, Tyshawn Young-Bey, Ambassador of Allah/God, Autochthonous Original Organic Blood Lineage to the Land, doing business as SOLAR INNER GOD and TYSHAWN L YOUNG, am placing this notice on the public record regarding your legal obligation to file all lawful documents submitted by me into the court record, without obstruction or delay.

Today, I am submitting a newly initiated lawsuit and paying the required filing fee. While I have not yet been assigned a case number at the time of this filing, this notice accompanies my complaint as part of the official record.

**Take Judicial Notice of the Following:**



1. **Federal Rules of Civil Procedure Rule 5(d)(1):**  
Clerks have no discretion to reject pleadings that comply with procedural standards.
2. **28 U.S. Code §§ 951 & 955:**  
Clerks are required by law to perform ministerial duties and cannot refuse to file documents submitted for court review.
3. **Case Law:**
  - *Romer v. Green*, 794 F. Supp. 1231 (W.D. Mich. 1992)
  - *Ryland v. Shapiro*, 708 F.2d 967 (5th Cir. 1983)
  - *Bounds v. Smith*, 430 U.S. 817 (1977)
4. **42 U.S.C. § 1983:**  
You may be held personally liable for violating federal rights under color of law.
5. **Constitutional Rights:**  
Under the First and Fourteenth Amendments, I have a protected right to access the courts and seek redress.

**Notice and Demand:**

You are hereby required to ensure the full and proper filing of all materials submitted today. Any further attempt to delay or obstruct this process will constitute a willful violation of law and civil rights, and will be documented and pursued accordingly.

Respectfully,

**Tyshawn Young-Bey**  
Ambassador of Allah/God  
D/b/a SOLAR INNER GOD / TYSHAWN L YOUNG  
All Rights Reserved – Without Prejudice  
UCC 1-308 / UCC 1-103.6

Void where prohibited by law

**PRIVATE SOVEREIGN COVER SHEET**  
**Moorish Empire / Moroccan Treaty Jurisdiction**  
**1836 Treaty of Peace and Friendship**  
**De Jure Moorish Government – Divine Law –**  
**Autochthonous Jurisdiction**



**IN HONOR OF:**

**Tyshawn Young-Bey**

**Ambassador of Allah / Autochthonous Original**  
**Organic Bloodline to the Land and Universe**

**c/o 1440 Jefferson Avenue,**  
**Mauri Republic, Buffalo, New [14208]**

**TITLE OF ACTION:**  
**SOVEREIGN CLAIM AND FEDERAL COMPLAINT**  
**FOR REDRESS**

**UNDER THE AUTHORITY OF THE MOORISH GOVE-**  
**ENMENT AND DIVINE LAW**

- **Jurisdiction Invoked:**
  - **Treaty of Peace and Friendship (1836)**
  - **International Indigenous Rights**
  - **United States Constitution (Article VI – Supremacy Clause)**
  - **Administrative Procedures Act (1946)**
  - **Libra Codes and UCC Protections**
  - **Natural Law / Common Law / Divine Right**

**TOTAL DAMAGES SOUGHT:**  
**\$550,000,000.00 (FIVE HUNDRED**  
**FIETY MILLION USD)**



# **PRIVATE SOVEREIGN COVER SHEET**

## **Moorish Empire / Moroccan Treaty Jurisdiction**

### **1836 Treaty of Peace and Friendship**

#### **De Jure Moorish Government – Divine Law – Autochthonous Jurisdiction**

In Honor of:

Tyshawn Young-Bey

Ambassador of Allah / Autochthonous Original Organic Bloodline to the Land and  
Universe

c/o 1440 Jefferson Avenue, Mauri Republic, Buffalo, New York [14208]

#### **TITLE OF ACTION**

Sovereign Claim and Federal Complaint for Redress

Under the Authority of the Moorish Government and Divine Law

Jurisdiction Invoked:

- - Treaty of Peace and Friendship (1836)
- - Moors Sundry Act of 1790
- - United States Constitution (Article VI – Supremacy Clause)
- - Administrative Procedures Act (1946)
- - Lieber Codes and UCC Protections
- - Natural Law / Common Law / Divine Right

Nature of Case:

- - Violation of Treaty and Sovereign Status
- - Kidnapping from Land / Fraudulent Arrest

- - Theft of UCC Filings and Passport Logs
- - Spoliation of Evidence in Federal Wrongful Death Case
- - Obstruction of Due Process
- - Violation of Judicial Injunctions

Total Damages Sought:

\$550,000,000.00 (Five Hundred Fifty Million USD)

Additional Elements:

- - Moorish Flag or Seal: [Incorporated as per request]
- - Divine Seal or Crescent Symbol: [Incorporated as per request]
- - "Private Moorish Record – Not for Public Use" Label: [Incorporated as per request]
- - Sacred or Symbolic Phrasing: \*In Propria Persona Sui Juris\* / \*Sovereign Living Man\*
- - Thumbprint Seal or Red Ink Signature Area: [Incorporated as per request]

Versus – Respondents / Defendants:

- - D/b/a OFFICE and unknown P.O.R. SUVLLAIN
- - D/b/a P.O.R. Suvallin – C District East Ferry, 693 Buffalo New York (14211)
- - D/b/a JUDGE GARY WILSON – 50 Delaware Avenue, City Court, Buffalo New York (14202)
- - D/b/a DISTRICT ATTORNEY MICHAEL J KEANE – 25 Delaware Avenue, Buffalo New York

- - Entity known as 'New York State'
- - Entity known as 'City of Buffalo court building' – 50 Delaware Avenue

STATE OF NEW YORK) OATH  
COUNTY OF ERIE )

I, Michael J. Keane.....do solemnly swear that I will support the Constitution of the United States, and the Constitution of the State of New York, and I will faithfully discharge the duties of the office of Erie County District Attorney..... according to the best of my ability.

Michael J. Keane  
Signature as approved

Subscribed and sworn this 24th.....  
day of December 20 24  
before me.

**Sylvia Collins**  
Notary Public State of New York  
Erie County  
Lic. # 01006250493

My Commission Expires on 03/26/20 28

Sylvia Collins  
Notary Public or Commissioner of Deeds

CC-1 ECCR (Rev. 10.20)

Book782/Page360

ERIE COUNTY CLERK'S OFFICE



County Clerk's Recording Page

Return to:

Party 1:  
WILSON GARY A

Party 2:

**Book Type: K Book: 740 Page: 6064**  
Page Count: 2  
Doc Type: JUSTICE OATH  
Rec Date: 01/26/2023  
Rec Time: 11:07:38 AM  
Control #: 2023014211  
UserID: Danielle  
Trans #: 23012395  
Document Sequence Number

Recording Fees:

RECORDING \$0.00

Consideration Amount:

BASIC MT \$0.00  
SONYMA MT \$0.00  
ADDL MT/NFTA \$0.00  
SP MT/M-RAIL \$0.00  
NY STATE TT \$0.00  
ROAD FUND TT \$0.00

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**Total: \$0.00**

STATE OF NEW YORK  
ERIE COUNTY CLERK'S OFFICE

\*\*\*\*\*CONFIDENTIAL DOCUMENT\*\*\*\*\* WARNING - THIS SHEET CONSTITUTES THE CLERKS ENDORSEMENT REQUIRED BY SECTION 319&316-a (5) OF THE REAL PROPERTY LAW OF THE STATE OF NEW YORK. DO NOT DETACH. THIS IS NOT A BILL.

Michael P. Kearns  
Erie County Clerk

STATE OF NEW YORK |  
COUNTY OF Erie | SS. :



I do solemnly swear [affirm] that I will support the Constitution of the United States, the Constitution of the State of New York, and that I will faithfully discharge the duties of the office of

Buffalo City Court Judge  
[title of position]

Buffalo City Court 50 Delaware  
[court and location]

according to the best of my ability.

Subscribed and sworn to before me this  
1st day of Dec, 2022.

Annamarie Cultrara  
[authorized signature]

ANNMARIE CULTRARA  
NOTARY PUBLIC STATE OF NEW YORK  
No. 05CU6353365  
Qualified In Erie County  
My Commission Expires 01-23 2025

Gary A. Wilson Jr.  
[signature of appointee]

GARY A. WILSON

[print name of appointee]

121 Whitney Place Buffalo, NY 14201  
[print address of appointee]

661-14211





STATE OF NEW YORK, COUNTY OF ERIE, SS.  
I, Michael P. Kearns, Clerk of said County, and also Clerk  
of Supreme and County Courts of said County, do hereby  
Certify that I have compared the annexed copy with the original

*Oath*

Filed in my office and that the same is a correct transcript there-  
from and of the whole of said original.

WITNESS my hand and seal of said County and Courts on

day of FEB 12 2025 2025

*Michael P. Kearns*  
County Clerk

**UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK**

**Tyshawn Young-Bey**

Ambassador of Allah/God  
Autochthonous Original Organic Blood Lineage to the Land  
D/b/a SOLAR INNER GOD  
D/b/a TYSHAWN L YOUNG  
C/o 1440 Jefferson Avenue  
Mauri Republic, Buffalo, New York 14208  
9solar99@gmail.com

**Letter to the Clerk of Court**

**Date:** [4/11/ 2025]

**To:**

Clerk of Court  
United States District Court  
Western District of New York  
2 Niagara Square  
Buffalo, New York 14202

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