UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Ted Graham Jackson (Plaintiff - pro se) 265 Glen Cove Drive Avondale Estates, GA 30002	)	
Vs	)	
Federal Bureau of Investigation (Defendant) J. Edgar Hoover Building 10th & Pennsylvania Avenue, Northwest Washington, D. C. 20530-00015	)	Case Number: 1:08-CV-2810-ODE
Central Intelligence Agency (Defendant) Washington, D.C. 20505	)	

PLAINTIFF'S RESPONSE TO DEFENDANT'S "MOTION TO DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT"

On September 18, 2008, the defendants submitted to the court a motion for dismissal of the plaintiff's complaint, referring to the federal rules of civil procedure 12(b) and 56, seeking either a dismissal of the plaintiff's complaint or a summary judgement, claiming that there is no dispute regarding material facts.

The citing of 12(b) apparently refers to 12(b)(4) and then not to a lack of adherence to the Federal Rules of Civil Procedure, which the defendants have not supported with arguments, but to one component of the plaintiff's FOIA request to one of the two defendants, which sought documents pertaining to himself, on the pretext that the plaintiff failed to satisfactorily prove his identify according to CIA procedures. The plaintiff does not refute that claim, except to say that the requirement is now effectively fulfilled and moot and that the CIA could by now have expended less time and effort to simply respond to the request rather than taking many pages in seeking to avoid answering the request at all. This is the perfect time and venue for the CIA to provide the requested information, now twenty-eight years or more

overdue, as the plaintiff has clearly shown through his exhibits, despite the defendants' efforts to disguise their scheme in self-protecting ambiguity.

The plaintiff did allow that component of his request to the CIA to be temporarily dropped (knowing that it would be summarily denied or otherwise produce nothing anyway, numerous other similarly targeted persons having already submitted similar requests, observing every particular of the CIA's requirements, and receiving nothing of substance in response). Instead, the plaintiff determined to make a more comprehensive and detailed request for information relating to himself, supported with an abundance of evidence and exhibits within his civil complaint now before the court, which would be more difficult for the defendants to circumvent. The defendants are now seeking to use that aspect of his request as an excuse for seeking a dismissal of the entire civil complaint, wisely choosing not to perjure themselves by refuting the facts of the plaintiff's evidence and allegations and to proceed on purely procedural grounds instead.

According to "US Law Books",

"In Picking v. Pennsylvania Railway, (151 F2d. 240), the Third Circuit Court of Appeals held that, 'Where a plaintiff pleads pro-se in a suit for protection of civil rights, the court should endeavor to construe plaintiffs pleading without regard to technicalities.'"

"In Puckett v. Cox , it was held that a pro-se complaint requires a less stringent reading than one drafted by a lawyer (456 F2d 233 (1972 Sixth Circuit USCA) said Justice Black in Conley v. Gibson. 355 U.S. 41 at 48(1957) 'The Federal Rules rejects the approach that pleading is a game of skill in which one misstep by counsel may be decisive to the outcome and accept the principle that the purpose of pleading is to facilitate a proper decision on the merits.' and 'According to rule 8(f) FRCP all pleadings shall be construed to do substantial justice.'"

In response to the other information requested, the CIA claimed (16-4 16) that "the other requests were so broad, vague, and difficult to understand that CIA professionals familiar with the business of the Agency and the FOIA search process were unable to ascertain what Plaintiff was requesting or how to locate any responsive records, if any existed." and that the requests "were too general and did not provide sufficient specificity to provide professional

employees familiar with the subject to find responsive records through indexing systems."

Those claims, the plaintiff contends, are clearly false and knowingly offered to the plaintiff and to the court in bad faith. On the contrary, so old is the use of those technologies and methods, so many people have complained about their use for so may years, and so many of the defendants' associates have referred obliquely to them in their works as part of the defendants' old formula of suggestion without accountability, as the plaintiff has clearly demonstrated, that any "professional employees familiar with the subject" (which probably includes the entirety of the CIA to a man and woman) would know INSTANTLY what information was being requested.

The plaintiff's request was only broad/general enough to avoid being too specific and presumptuous. Numerous other similarly targeted persons have submitted similar, although more presumptuous and specific requests in terms of the technologies employed (i.e. implants, directed energy *weapons*), and the CIA's response has invariably been nothing of substance at all. For example, the plaintiff specifically avoided using the word "weapons", knowing that the defendants would invariably seek to escape compliance on the unstated pretext that the devices, technologies and/or methods could be technically construed as not falling under the category of "weapons". The plaintiff's request was carefully worded specifically to avoid the defendants' ability to avoid compliance with the request based on such specificity. The defendants are now attempting to use that very reduced specificity to once again avoid compliance with the request and their lawful responsibilities. All that the plaintiff and similarly persecuted persons know and CAN know with absolute certainty are the effects that the defendants' "alleged devices and methods" produce. Perhaps the defendants need a memory refresher – "The UCLA Violence Project" "Project Grill Flame" "Dr. Alfred Webre". The simple fact of the matter is that the defendants have helped to construct a clandestine tyranny and have no intention of ever admitting to or being accountable for it. What those other requesters lacked is proof, which the plaintiff has already brought before the court an abundance of, due in part to the particular nature of the defendants' forms of attack upon the plaintiff, some of which he will confirm in the discovery process.

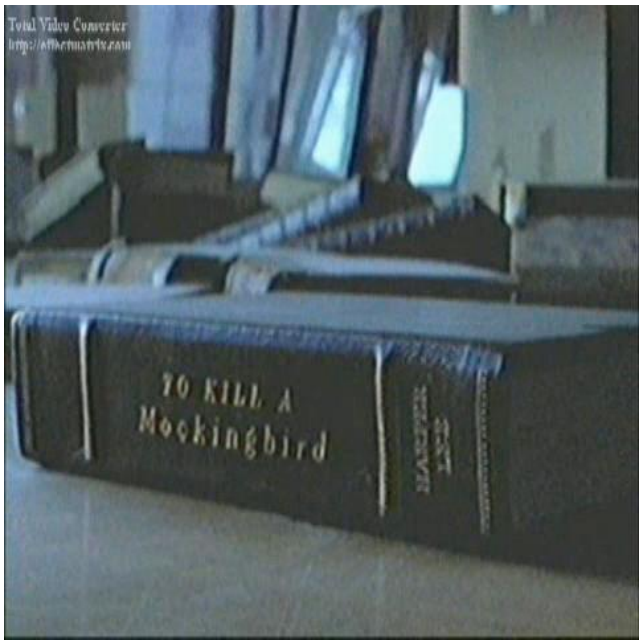
FRCP 56(e)(1) – "The court may permit an affidavit to be supplemented or opposed by depositions, answers to interrogatories, or additional affidavits."

FRCP 56(f) – "If a party opposing the motion [for summary judgement] shows by affidavit that, for specified reasons, it cannot present facts essential to justify its opposition, the court may: (1) deny the motion; (2) order a continuance to enable affidavits to be obtained, depositions to be taken, or other discovery to be undertaken; or (3) issue any other just order.

The plaintiff's request was abundantly clear, concise and easy to understand. If the CIA finds the plaintiff's request "difficult to understand", then they will have a terrible time attempting to decipher the Privacy Act or the Freedom of Information Act, which might explain the defendants' continuing problem in understanding their own limits under the law and their belief that they can enslave citizens to extraordinary surveillance, mental cruelty and torture and social assassination so long as it can never be proven.

Although the plaintiff has already submitted numerous informal affidavits from both the defendants' victims and associates testifying to the falsity of the defendants' pretense of good faith, he has also offered a more formal affidavit from one of the defendants' own former personnel that is testament to the defendants' dishonesty, bad faith and arrogant disregard for the law.

From the film 'The Game'



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Mr. Jackson,

I have read your 'Open Letter to the United States Senate'. Based on my own experience as Agent in Charge of the Los Angeles division of the FBI (the FBI's second largest division) in which I directed the efforts of over 700 persons under my command with an annual budget of over $22 million and my later work as a security consultant and investigator, I find that your description of techniques, methods and motives surrounding the so-called 'mind control' enterprise to be basically on the mark and in agreement with my own experience.

Since I began working toward its exposure, I, like you, have also found myself a target of whisper campaigns, surveillance and other tactics designed to reduce my credibility and effectiveness as a professional. The forms of harassment, intimidation, tracking and surveillance, means of transparent and deniable messaging and behavior manipulation of citizens (particularly those with technical and security related responsibilities), as you describe and as I have personally discovered, are certainly components of that enterprise. Furthermore, I find your efforts to expose that enterprise and force it's proponents and functionaries toward exposure and accountability (both to the public and to targeted individuals themselves) to be a worthy and important effort for the ultimate benefit of the future of a free nation.

Ted Gunderson
FBI Senior Special Agent in Charge (Retired)
(310) 364-2280

Ted L. Gunderson

The defendants argued (16-3 Page 10) – that "The first of the five categories of information consisted of a description of an alleged device or method but did not provide a searchable name for this alleged device or method."

The defendants' refusal to divulge the requested information is analogous to telling the plaintiff that the defendants cannot respond to a request for information pertaining to the reported secretive capture and shipping of persons to foreign lands to be interrogated and tortured, because the request did not mention the secret (and unknown and unknowable) magic word "extraordinary rendition" known only to the defendants.

The refusal is analogous to the fox's gate keeper (also a fox) refusing to release information about the fox's reported treatment of captive chickens, while the fox devours the chickens at the fox's leisure.

The refusal in this context is analogous to a masked assailant holding a gun (which the assailant has ingeniusly hidden under a cloth) telling his victim (bleeding from numerous gunshot wounds) that the victim cannot prove that the assailant possesses a gun or shot the victim with it, since the victim cannot name the make and model number of the gun that shot him and that the assailant cannot divulge the make and model number of the gun nor admit to holding and having fired it at all, because that might allow the victim to determine the make and model number of the gun (which might actually be a mysteriously smoking cookie) and the fact that the assailant shot the victim, the assailant's associates having already gone far and wide throughout the neighborhood for years boasting of having shot the victim and others and making gun shooting signs with their fingers, while nodding their heads vigorously and mumbling "figure o' speech" and "Mr. Langley taught me to sing a song.", with numerous other gunshot victims still lying around the neighborhood in pools of their own blood.

The plaintiff has clearly demonstrated to the court the by now very old and self-consistent patterns of suggestion by the defendants' associates in relation to the use of the "alleged devices and methods". Has demonstrated how persons both known and unknown working with the "alleged devices and methods", which could only have been provided by the defendants and/or their cousins in the intelligence/military community known to the defendants, have subjected the plaintiff to extraordinary surveillance from age thirteen or before apparently for minimal, isolated, momentary and

inconsequential errors. Has demonstrated how the defendants have effectively condemned him to a surveillance and mental cruelty hell presumably for life with no due process at all, those persons frequently making use of their continuous surveillance of the plaintiff and their large network of pseudo-vigilantes to poison any social venue that the plaintiff dares to venture out into at their convenience and leisure. Has demonstrated how those persons have stolen virtually all facts of his life (as well as some of his property), which could only have been captured with those "alleged devices and methods". Has demonstrated how those persons have mixed exaggeration, provocative fiction in the reckless process of mockingbird (for example - metaphorical punches, lacerations, devourings, chokings, etc., which have no basis in fact whatsoever, but which some subset of the public tend to interpret as literal, as part of the reckless destruction of the plaintiff's reputation by those persons. Has demonstrated how those persons have clearly expressed an intention to make his life a hellish one (an intention that they have clearly fulfilled and continue to fulfill). Has shown how his vision has been debilitated with opthamological evidence (and shown how that is part of an old and repeated tactic) and shown how the defendants' associates have then cleverly boasted of that ability through their use of the creative media, which has long served as their propaganda factory.

(from 'Tales from the Darkside: Ursa Minor')

(from the films '12 Monkeys' and 'AI: Artificial Intelligence)

Has shown an ambulance report that is testament to the horrible pain that those "alleged devices and methods" are capable of. And has shown how those persons have not limited their attack to the plaintiff but have extended it to other innocent persons known to the plaintiff, finding it in their interests to do so.

According to US Law Books,

"If a review of the record raises substantial doubt, particularly in view of "well defined requests and positive indications of overlooked materials," Founding Church of Scientology v. National Sec. Agency , 610 F.2d 824, 837 (D.C. Cir. 1979), summary judgment is inappropriate."

"In Walter Process Equipment v. Food Machinery 382 U.S. 172 (1965) the court held that in a 'motion to dismiss, the material allegations of the complaint are taken as admitted.' From this vantage point, courts are reluctant to dismiss complaints unless it appears the plaintiff can prove no set of facts in support of his claim which would entitle him to relief (see Conlev vs. Gibson , 355 U.S. 41(1957)."

In regards to the plaintiff's requests for information other than that pertaining to himself, the plaintiff has indeed fulfilled his obligations under the FOIA and the defendants' self-serving interpretations of "reasonable", "broad" and "vague" are very much in dispute. The CIA's pretense of ignorance is laughable and clearly in bad faith. Their refusal to consider the appeal of the denial is similarly laughable and in bad faith. The plaintiff's request was worthy not only of an adequate response, but should have been sufficient for appeal, particularly considering the profound nature of the tyranny of clandestine human slavery that the defendants have foisted upon some subset of their society for so long.

In regards to the plaintiff's request to the FBI, the plaintiff also requested information pertaining to himself and did so properly according to FBI procedures. As expected, the FBI claimed to have no records, which the plaintiff has clearly shown must exist in some form and location, even if that is through the use of private parties. After twenty-eight years, the FBI cannot claim to be conducting some investigation, such that the requested information is forever immune from disclosure, unless entire lifetimes are

now for the FBI to secretively enslave, torture, pore through and interrogate at their leisure.

It is a symptom of the madness of the defendants' gaming (one of their favorite metaphors) of the justice system that the defendants will probably escape this civil case without ever having been simply asked directly and under penalty of perjury if the plaintiff's allegations are simply true.

The FBI claimed that "The remaining four of the five enumerated categories consisted of requests for the FBI to query its data and perform research to draw conclusions in response to these items of interest to the Plaintiff." The plaintiff requested information that should already be compiled and easily available anyway, particularly those laws (if any) that the defendants presume to justify these continuing clandestine persecutions.

If the CIA and FBI in cooperation with other agencies and their private associates intend to maintain a permanent assembly-line tyranny into which many persons have obviously been thrown, then they certainly SHOULD make available to the public information clearly addressing and describing it rather than only the usual denials on the one hand contradicted by their barrage of self-serving suggestive media propaganda on the other. They certainly SHOULD maintain statistics of the number of persons that it has historically thrust to their deaths. It certainly SHOULD maintain statistics of the sheer number of persons currently and historically trapped within it. It certainly SHOULD publish or otherwise make available information as to what laws (if any) provide for such clandestine persecutions. Their deliberate failure to do so is a violation of both the spirit and the letter of the FOIA and Privacy Acts and numerous laws, some of which the plaintiff has cited within his complaint. In any case, the plaintiff's FOIA request is only part of the plaintiff's civil complaint and the FOIA request alone should not serve as grounds for the dismissal of the case in its entirety. Summary judgement should not be granted to the defendants, at least not until discovery has been completed and the plaintiff has had an opportunity to definitively verify some of his allegations.

The plaintiff contends that Mr. Hardy's retraction, "The sentence referring the plaintiff to the Bureau of Prisons was a clerical error and should not have been included.", refers not to an unintentional "clerical error" at all, but to the usual form of deniable insinuation (newspeak/duckspeak) and an attempted threat. In seeing that the plaintiff is not cowed by the threat and

that the threat is now before the court, Mr. Hardy appears to now consider the earlier remark somewhat ill advised and in need of an equally deniable retraction. This case currently before the court would not be the first time that the defendants have attempted to threaten the plaintiff or shown defiance and contempt for the courts, journalists and other legitimate requesters, and their lawful obligations to their own citizens.

From: jktedj157@email.com Date: Sun, 03 Nov 2002 10:02:09
Subject: tedj1 get rid of him

From: "Frank" johnson65465@hotmail.com Date: Sat, 18 Jan 03 09:21:35
Subject: Beware of your safety
1 MURDER occurs every 24 minutes
1 ASSAULT every 29 seconds

From: "Meagan Carey" eizwwcydhlm@apollo.lv Date: Sat, 04 Sep 2004 15:47:55
Subject: jacksonville terrify

From: "Kent Reilly" wynlawb@hotmail.com Date: Sun, 11 Jul 2004 10:25:34
Subject: there's something about matrix
You are trapped. No matter how hard you work and no matter how many hours you put in, you never seem to get ahead.

Presumably, the FBI has no 'manual records' (and certainly no knowledge) of its threats against "Physicians for Human Rights" or records of the installation and use of the implants found within Brian Wonge's ears by physicians either! See plaintiff's Exhibit G – Other Victims.

Implant Victim Refused Help by 'Humanitarian' Physicians

By Roger Hutcheon - The City Sun Newspaper

"A federal Eastern District Court Judge, Justice REENA RAGGI, has Wronge's lawsuit against the state of New York pending, instructing Wronge to find a surgeon to remove one of the implants. However, in the three years since the May 1991 lab reports, no surgeon would remove the implants, usually citing FBI RETALIATION as the reason."

"On July 21, a staff member stated, 'No one here is allowed to speak with you. I was told to say that,' mentioning that the director gave the silence order prior to a vacation."

"Requests through the Freedom of Information Act to obtain documents on the UTAH experiments, to this date, have not been complied with."

The FBI argued that if it "can establish the reasonableness of its search by affidavits if they are relatively detailed, non-conclusory, and in good faith." (16-3 Page 12-13)

The FBI is simply demonstrating how a dangerous lie can be maintained on a cushion of hate and intolerance for decades and remain just as impervious as ever. History has seen that formula before. The agency's philosophy appears to be that "As long as we knowingly keep the requested information in an unavailable place, then the pretense of an exhaustive, reasonable, non-conclusory, good faith search of another box is sufficient." That philosophy is insufficient and in bad faith. If not, then the Privacy and Freedom of Information Acts and other laws are just so much window dressing.

The defendants argued that "if the agency submits such affidavits showing the scope and method of the search, then in the absence of countervailing evidence, or apparent inconsistency of proof, dismissal or summary judgment is appropriate." (16-3 Page 12-13)

A wealth of countervailing evidence is precisely what the plaintiff has brought before the court. Its authors are in fact the defendants' associates themselves who have been kind enough to provide it. That evidence clearly demonstrates an inconsistency of proof on the part of the defendants, who claim that no records exist. On the contrary, the defendants should be careful of being held in contempt of the court for such brazen falsehoods, if this court is a fair one and not in the pocket of its building-mates downstairs. The defendants are playing a shell game with the truth and summary judgement is clearly inappropriate.

FRCP 56(g) – "If satisfied that an affidavit under this rule is submitted in bad faith or solely for delay, the court must order the submitting party to pay the other party the reasonable expenses, including attorney's fees, it incurred as a result. An offending party or attorney may also be held in contempt."

Additionally, the defendants argued (16-3 Page 14) that "A requester's mere speculation that uncovered documents may exist does not undermine the finding that the agency conducted a reasonable search for them." "Hypothetical assertions are insufficient to raise a material question of fact

regarding the adequacy of the agency's search." "Agency affidavits are given a presumption of good faith that withstands purely speculative claims about the existence of other documents." "It is insufficient for a requester to attempt to rebut agency affidavits with purely speculative claims."

The defendants' associates have done a good job of covering information about the plaintiff (as well as quite a few reckless lies) in ambiguity, cleverly transforming his name 'Ted Jackson' into 'Tek Jansen', displaying only his initials 'TJ', etc. The court will surely see through that facade and that those veilled truths are not "mere speculation", "hypothetical assertions" or "speculative claims". Noting an ambiguous truth is not the equivalent of a speculative claim. The presumption of good faith on the part of the defendants wears very thin.

The defendants have claimed that "there is no evidence here of bad faith on the part of the Defendant or that Defendant has failed to make a reasonable search for responsive records. Any claim by Plaintiff that Defendant might have further responsive records is speculative and fails as a matter of law to rebut Defendant's declarations regarding its search for responsive records. Therefore, the Court should find that the FBI performed an adequate search for records related to Plaintiff's FOIA requested concerning himself." (16-3 Page 16)

The fox claims that the fox's search was reasonable. The evidence proves otherwise. There is considerable evidence of bad faith on the part of the defendants and no evidence whatsoever that an adequate search has been undertaken at all. The plaintiff has shown the court a wealth of circumstantial evidence of the defendants' possession of information about the plaintiff and how that information is insinuated through mockingbird of several forms, self-consistent creative media salesmanship of their activities, medical evidence backing his allegations, complaints of numerous others and an affidavit from one of the FBI's own field office agents in charge. The defendants have offered only assurances of their trustworthiness and falsely attempted to portray the plaintiff's complaint as "pure speculation" or "hypothetical assertion".

"The agency's search should be reasonably calculated to uncover all responsive records." On the contrary, the defendants have structured their search so as to be sure NOT to uncover ANY records. The FBI has hit upon the brilliantly ingenius innovation of putting information not of benefit to

itself in terms of public access in a box other than the accessible one and are playing a simple shell game with the truth.

Also according to US Law Books, "in Campbell , 164 F.3d at 28, the court held a search inadequate when it was evident from the agency's disclosed records that a search of another of its records system might uncover the documents sought.".

The spirit and intention of the Freedom of Information Act and the Privacy Act were intended to provide for a government that is accountable and in particular to those citizens whom it would deprive of their usual rights to pursue their lives unhindered, not a vehicle for the defendants to play a game of appearances. The defendants have clearly violated that public trust.

In the continuing absence of the requested information and accountability on the part of the defendants, self-servingly crafted examples such as these will apparently have to do:

A young German (or American) woman surreptitiously battered to death by human beings, her death blamed on God (through the good works of demons, of course) and the whole matter attributed to the glory of God in one of the silliest crafted and implied arguments by the defendants' many media mockingbird contacts (The Execution of Emily Rose) so far seen. '*Gam*butrol' indeed. '*Tag*garin and headache' indeed. 'Television and wasp' indeed.

People shown confused and mesmerized by some mysterious influence and then proceeding to plunge spikes into their necks, dive under lawnmowers, jump off of buildings and shoot themselves in the head with a "You deserve it" shown prominently on a billboard amidst talk of "hot dogs" and "mustard" and "plant nurseries". (The Happening)

Do the defendants think that the court is stupid? It is no great exaggeration to say that the United States has its own Ruwandan radio broadcasts or Goebbels style filmmaking enterprise, just one that is more subtle, clever and entertaining, and apparently bent on convincing one subset of society to make clandestine warfare upon others. And unfortunately, there are other skeletons in "Mr. Langley's" closet that must surface.

For example, the same film that mentions "Have you been suffering headaches? Burning sensations? Ringing in your ears? Now I use my secret weapon! I've got you on my super video detecto set. Looks like it's [he's] disintegrated. Guess he's had enough." and so forth also includes a moment when the camera sweeps suggestively over Devil's Tower, Wyoming, an actor is directed to conspicuously cover his nose, another actor exclaims 'Yea, a plague epidemic!' and a third actor indicates a need for something so scary that it will clear 200 square miles around Devil's Tower (each of which occur within the space of a single minute of film), reinforced by other suggestions such as 'dark side of the moon', taking a picture of a man's posterior quickly followed up a moment later with "This [camera] isn't yours to play with every time I turn around", characters *psychically* summoned to Devil's Tower, "They're trying to teach us a basic tonal vocabulary", "We see no biological hazards", "Take out the garbage", "They're just crop dusting Los Angeles", "Paralyzed birds dropping to the ground", "Duck herding", "Angels to watch over you", "Halloween for adults", etc.

That film is complemented again and again with similar suggestions within other media like the novel "The Stand", the films "Airplane":

(an actor directed to bend over in front of the camera, while another reads a magazine titled 'Modern Sperm' immediately complemented by a call from the 'Mayo Clinic', soon followed up by discussion of the effects of a virus and talk of 'wasted jelly', mention of a hospital that 'plays tricks on your memory', etc.)

"Heavy Metal", the Stanley Kubrick films "Doctor Strangelove"

(a suggestive title in a film including clear suggestions of homosexuality amidst dialog about 'foreign substances introduced into our precious bodily fluids without our knowledge', ice cream and twenty million killed)

and "2001: A Space Odyssey" - each of which entered the public domain before the first published reports of the HIV disease.

Obviously, there is a clear public interest in a discovery process relating to the still living persons indicating foreknowledge of that disease. The patterns of suggestion that the plaintiff has gone to the time and trouble to illustrate to the court are also central to proving that allegation as well. The issues of

sodomy, promiscuity, homosexuality and so forth have long been one component of the defendants' clandestine persecutions and social assassinations of their and their growing vigilante network's victims. Thus, it is reasonable to include within this civil case that perhaps darkest of skeletons within the defendants' closet. The defendants fear the surfacing of these facts and obviously hope to terminate this case before the initiation of the discovery process. For those and the other reasons mentioned, the defendants surely must not be allowed to dismiss this case or be granted summary judgement prior to discovery.

According to author Alex Constantine:

Psi-Tech. was founded in 1989 by a clique of former intelligence officers.

It [remote viewing] is a very structured technique. Founder, Ed Dames, says "I have been involved in a lot of very very deep, dark black occult projects". He is qualified for covert military operations spiked with classified psychotronics.

He joined the army in 1967. He worked with three "elite units". His familiarity with advanced technology involved highly advanced espionage hardware which he called "boxes in the sky that look down and through buildings .. and he said.. "there are agents underground and sophisticated technology "..

"THE PSYCHIC SPY UNIT" , Dames admits , " has provided services to the CIA, NSA, DIA, DEA, NAVY, AND AIR FORCES.....under watch of an ARMY BOARD.

Ed Dames claims the Taos hum is a 17Hz time beacon, that pumps pulses of gravity into space as an invisible light-house for time-travel and ET's. Psi-techs' telepaths claim discovery of a breed of alien from Mars, connected to a remote civilization called "THE FEDERATION".

The court has the power to help the plaintiff cut through to the facts behind these clever half-truth semi-advertisements and the defendants' arrogance in believing that they can take a boy of thirteen and determine to make the rest of his life a kind of living hell on the one hand and flee responsibility for doing so on the other. The court has the power to drag the defendants by the nose into the light over their new vision for clandestine human slavery. The defendants are laughing at this court, which has the power to end that

laughter once and for all and the moral obligation to do so.

According to "US Law Books",

"It could also be argued that to dismiss a civil rights action or other lawsuit in which a serious factual pattern or allegation of a cause of action has been made would itself be violative of procedural due process as it would deprive a pro-se litigant of equal protection of the law visa vis a party who is represented by counsel. In a fair system, victory should go to a party who has the better case, not the better representation."

The defendants' motions to dismiss and for summary judgement should be denied, at least until after discovery has taken place.

Alternatively, according to the Federal Rules of Civil Procedure 56(d)(1) Establishing Facts – "If summary judgment is not rendered on the whole action, the court should, to the extent practicable, determine what material facts are not genuinely at issue. The court should so determine by examining the pleadings and evidence before it and by interrogating the attorneys. It should then issue an order specifying what facts — including items of damages or other relief — are not genuinely at issue. The facts so specified must be treated as established in the action."

The court has the power to simply ask the defendants if any and/or all of the plaintiff's allegations against them are true (although the court should expect to be boldly lied to), cut through the defendants' legal barbed wire with a few simple questions like a sword through a Gordian knot, and shed some real light on the most insidious tyranny yet foisted upon the nation, which the defendants intend to be permanent, permanently denied and permanently sold to the public purely on their own amorphous terms.

Dated ____/____/____

Respectfully submitted,

Ted Graham Jackson (plaintiff pro se)
265 Glen Cove Drive, Avondale Estates, GA 30002

Certificate of Service

I certify that I have this day served the enclosed PLAINTIFF'S RESPONSE TO "DEFENDANT'S MOTION TO DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT" by hand delivering a copy thereof to the US Attorney's Office for the Fourth District of Georgia at 75 Spring Street, Suite 600, Atlanta, GA 30303 this 1st day of December, 2008.

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