

DLC  
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AUG 02 2018

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

ALEXANDER A. FELS

PLAINTIFF

V

UNITED STATES SENATOR

MITCH McCONNELL

PRESIDENT DONALD TRUMP  
DEFENDANTS

CASE NUMBER:

18CV5284

JUDGE KENDALL

MAG. JUDGE FINNEGAN

JUDGE:

MAGISTRATE JUDGE:

MOTION

TEMPORARY RESTRAINING ORDER  
AND GERMANE SUBPOENA(S)

## OPENING STATEMENT

FOR THE COURT'S EDIFICATION, I HAVE BEEN A REPUBLICAN FOR THE LAST FIFTY YEARS OF MY LIFE. THIS POLITICAL RELATIONSHIP HAD IT'S GENESIS IN AUGUST OF 1968. I HAD GONE TO GRANT PARK IN CHICAGO TO LISTEN TO THE ANTI-WAR DISCOURSE PROMULGATED ACROSS THE STREET FROM THE DEMOCRATIC NATIONAL CONFERENCE FOR THE DEMOCRATIC PRESIDENTIAL NOMINATION FOR 1968.

I SAW FIRSTHAND THE ASSAULT ON FREE SPEECH AND PEACEFUL ASSEMBLY ORCHESTRATED BY THEN MAYOR, RICHARD J. DALEY. WHEN I RETURNED HOME THAT NIGHT, I TOLD MY FATHER, WHAT I HAD WITNESSED. I, ALSO, VOWED TO NEVER VOTE DEMOCRATIC.

I HAVE FIFTEEN SPECIAL REASONS FOR SUBMITTING THIS PETITION & MY THIRTEEN FRIENDS, WHO CAME BACK FROM VIETNAM IN A BOX, MY COUSIN, WHO CAME BACK FROM KOREA IN A BOX, AND MY UNCLE BOBBY, WHO THIRTY-FOUR DAYS SHORT OF HIS NINETEENTH BIRTHDAY, NEVER GOT OFF THE BEACH AT NORMANDY.

OPENING STATEMENT

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RECENTLY, FORMER DIRECTOR OF THE C.I.A., JOHN BRENNAN, CALLED PRESIDENT TRUMP'S "PERFORMANCE" IN HELSINKI TREASONOUS.

MR. BRENNAN, ALSO, ASKED, WHERE THE REPUBLICAN PATRIOTS WERE.

I WISH TO ASSURE THIS HONOURABLE COURT, THAT MY PENNING THIS DOCUMENT HAS A DUAL PURPOSE. ONE IS TO RESPOND TO JOHN BRENNAN'S CLARION CALL. THE OTHER IS MY HOMAGE FOR THE ULTIMATE SACRIFICE OF MY FIFTEEN "FALLEN ANGELS".

THIS SAID, YOUR HONOR, LET ME BEGIN THE TASK OF GIVING YOU THE PROBABLE CAUSE TO ISSUE THE EXTRAORDINARY MOTIONS, I AM REQUESTING.

## HISTORY OF THE CASE

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INITIALLY, LIKE MOST REPUBLICANS, THE ELECTION OF DONALD TRUMP, MADE ME HOPEFUL, THAT HEALTH INSURANCE WOULD BE FIXED. I HAD HEARD SIX YEARS OF REPUBLICAN PROMISES "REPEAL AND REPLACE OBAMA CARE". I WAS IN A CAR ACCIDENT OCTOBER 15, 1985, THAT LEFT ME WITH SERIOUS CHRONIC MEDICAL ISSUES. AS WE BOTH NOW KNOW, THE "REPEAL AND REPLACE" RHETORIC OF THE REPUBLICAN PARTY WAS DISINGENUOUS AT BEST. FORTUNATELY, SENATOR JOHN MCCAIN ET AL. PROTECTED THE PEOPLE OF OUR NATION FROM THIS FARCE.

MORE ALARMING IS THE UNRELENTING ASSAULT ON TRUTH BY PRESIDENT TRUMP. IN A RECENT ARTICLE, THE WASHINGTON POST STATED, THAT IN <sup>HIS</sup> FIRST 497 DAYS (FOUR HUNDRED NINETY-SEVEN) PRESIDENT TRUMP HAS TOLD 3,251 (THREE THOUSAND TWO HUNDRED FIFTY-ONE) LIES. THE FIRST REPUBLICAN PRESIDENT, ABRAHAM LINCOLN, BELIEVED THAT "HONESTY IS THE ONLY POLICY". PRESIDENT TRUMP'S INCESSANT DECLARATIONS, THAT THE MEMBERS OF OUR PRESS ARE ENGAGING IN "FAKE NEWS", IF NOT BORDERING ON TREASON, ARE CIVILLY ACTIONABLE.

THE THIRD PART OF THIS UNAMERICAN COURSE OF ACTION BY PRESIDENT TRUMP, IS THAT TOTALLY SHAMEFUL DISPLAY IN HELSINKI.

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PRESIDENT TRUMP'S DEFERENCE TO PUTIN IN DIRECT CONTRADICTION OF OUR ENTIRE INTELLIGENCE COMMUNITY IS ASTOUNDING. WHAT IS NOT KNOWN IS PRESIDENT TRUMP'S MOTIVATION(S).

ONE OF HIS MOTIVATIONS MAY BE HIS REAL ESTATE TRANSACTIONS. ONE NIGHT PRIOR TO HIS PROFESSIONAL DEMISE, CHARLIE ROSE'S SHOW ON P.B.S. WAS FOLLOWED ON 20.1 W.Y.C.C. BY A SHOW TITLED "DEMOCRACY NOW". THE GUEST THAT NIGHT STATED WITH EXTREME CLARITY THE FOLLOWING:

- 1.) DONALD TRUMP SOLD FIVE CONDOS TO A RUSSIAN GANGSTER FOR SIX MILLION DOLLARS IN 1983;
- 2.) RUSSIAN GANGSTERS USE THE PURCHASE AND RESALE OF CONDOS TO "LAUNDER" THEIR CRIMINALLY GENERATED MONEY;
- 3.) THERE IS A SEGMENT OF THE RUSSIAN MAFIA LOCATED IN THE BRIGHTON BEACH NEIGHBORHOOD IN NEW YORK;

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4.) IN THE ENSUING THIRTY PLUS YEARS, PRESIDENT TRUMP, SOLD HUNDREDS OF ADDITIONAL CONDOS TO OTHER MEMBERS OF THE RUSSIAN MAFIA HELPING THEM "LAUNDER" OVER 1.3 BILLION DOLLARS, AND HE KEPT THAT 1.3 BILLION DOLLARS FOR HIMSELF. (I HAVE A QUESTION - IS THAT 1.3 BILLION DOLLARS SUBJECT TO R.I.C.O.)?

THE FOLLOWING MORNING, I CALLED THE T.V. STATION TO DETERMINE THE VALIDITY OF THEIR GUEST'S ASSERTIONS. THE INDIVIDUAL, I TALKED TO, GUARANTEED W.Y.C.C. WOULD NOT HAVE AIRED THAT SHOW, WITHOUT "IRON-CLAD" DOCUMENTATION.

ANOTHER MOTIVATION MAY BE PRESIDENT TRUMP'S INDEBTEDNESS TO RUSSIAN BANKS. PRIOR TO THE 2016 ELECTION, PRESIDENT TRUMP PROMISED ME AND THE REST OF THE AMERICAN ELECTORATE, THAT AFTER HIS I.R.S. AUDIT, HE WOULD RELEASE HIS TAX RETURNS AND HIS FINANCIAL STATEMENTS. I AM STILL AWAITING THE ISSUANCE OF THESE DOCUMENTS.

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ANOTHER FACTOR MAY BE THE SALACIOUS "TALE" OF THE VIDEOTAPE CURRENTLY DUBBED "THE PEE-PEE TAPE". THIS ALLEGED TO FEATURE TWO RUSSIAN PROSTITUTES URINATING ON EACH OTHER IN PRESIDENT TRUMP'S HOTEL SUITE IN MOSCOW, RUSSIA, WHILE PRESIDENT TRUMP WATCHED, HOPEFULLY OUT OF THE "SPASH ZONE".

WHILE I WAS AT FIRST EXTREMELY SKEPTICAL OF THIS REPORTED INCIDENT, C.B.S.'S STEPHEN COLBERT'S EXCURSION TO THE VERY SAME HOTEL SUITE IN MOSCOW DID START TO PUT CRACKS IN MY DOUBT. THE CRACKS BECAME CHASMS, AFTER FORMER F.B.I. DIRECTOR, JAMES COMEY'S, APPEARANCE ON A.B.C.'S SHOW "THE VIEW", WHERE HE TALKED ABOUT PRESIDENT TRUMP'S EXCESSIVE OBSESSION OVER THIS VIDEOTAPE.

ADDING TO MY REVERSAL OF THOUGHT, WAS STEPHEN COLBERT POINTING OUT, THAT THE WINDOWS IN THAT MOSCOW HOTEL SUITE, HAVE A DIRECT VIEW OF THE KREMLIN A SHORT DISTANCE AWAY. (ANOTHER QUESTION FOR YOU, YOUR HONOR, IF SUCH A VIDEOTAPE DOES EXIST, DO YOU THINK PUTIN HAS IT)?

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I HAVE MORE QUESTIONS FOR QUESTIONS FOR YOU, YOUR HONOR. THEY ARE:

- 1.) ARE THE MEMBERS OF CONGRESS TRYING TO BLOCK SPECIAL COUNSEL, ROBERT MUELLER'S, INVESTIGATION SUBJECT TO CRIMINAL CHARGES AS ACCESSORIES AFTER THE FACT TO PRESIDENT TRUMP'S ACTIONS?
- 2.) IS PRESIDENT TRUMP GUILTY OF TREASON, WHEN HE CLAIMS, MR. MUELLER'S INVESTIGATION IS A "RIGGED WITCH HUNT"?
- 3.) IS THE STATUTE OF LIMITATIONS ON TREASON THE SAME AS THAT OF MURDER?
- 4.) IS OBSTRUCTION OF JUSTICE BY PRESIDENT TRUMP AND/OR THE AFOREMENTIONED MEMBERS OF CONGRESS DEFINABLE AS ACTS OF TREASON?

THE LAST PART OF MY EFFORT TO GIVE THE COURT PROBABLE CAUSE IS THE PRESIDENT'S ASSERTION, THAT HE HAS THE POWER TO PARDON HIMSELF.

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IN ARTICLE II SECTION 2 OF OUR CONSTITUTION  
"THE PRESIDENT... SHALL HAVE POWER TO GRANT  
REPRIEVES AND PARDONS FOR OFFENSES AGAINST THE  
UNITED STATES, EXCEPT IN CASES OF IMPEACHMENT".

FURTHERMORE, IN ARTICLE II SECTION 4, GROUNDS  
FOR IMPEACHMENT ARE TREASON, BRIBERY, OR  
OTHER HIGH CRIMES AND MISDEMEANORS.

AS TO SENATOR Mc CONNELL, HIS STATED GOAL OF RAPIDLY  
CONFIRMING PRESIDENT TRUMP'S SUPREME COURT  
NOMINEE RINGS HOLLOW. IN CONTRAST, PRESIDENT  
OBAMA'S NOMINEE WAS NEVER GIVEN THE  
COURTESY OF A SINGLE SENATE HEARING.

THERE IS NO DIRE EMERGENCY PREDICATING SENATOR  
Mc CONNELL'S DESIRE FOR HASTE. ACCORDING TO THE  
RULES OF THE SUPREME COURT, RULE 4 SECTION 2 STATES  
THAT SIX JUSTICES CONSTITUTE A QUORUM.

WHAT IS A DISTINCT POSSIBILITY, IS THAT ROBERT  
MUELLER'S INVESTIGATION MAY LEAD TO CRIMINAL  
CHARGES AGAINST PRESIDENT TRUMP. SHOULD THESE  
CHARGES WIND UP IN THE JURISDICTION OF THE SUPREME  
COURT, A NOMINEE OF PRESIDENT TRUMP COULD WIND  
UP IN THE UNTENABLE POSITION OF TRYING TO  
PROTECT PRESIDENT TRUMP.

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THE COURT MAY, ALSO, WISH TO CONSIDER FORMER SUPREME COURT JUSTICE, JOHN PAUL STEVENS, DISSSENT IN BUSH V. GORE NO. 00-949, IN WHICH JUSTICE STEVENS STATED THAT WHILE THE WINNER OF THE PRESIDENTIAL ELECTION IN FLORIDA MAY NEVER BE KNOWN. "THE IDENTITY OF THE LOSER IS PERFECTLY CLEAR. IT IS THE NATION'S CONFIDENCE IN THE JUDGE AS AN IMPARTIAL GUARDIAN OF THE RULE OF LAW.

AT THE PRESENT TIME, ONLY THIRTY-SIX PERCENT OF THE PEOPLE OF OUR NATION BELIEVE IN PRESIDENT TRUMP. SHOULD THE SCENARIO OCCUR, WHERE PRESIDENT TRUMP'S FATE IS SWUNG BY A PARTISAN VOTE BY THE SUPREME COURT, THE VERY LEGITIMACY OF THE SUPREME COURT ITSELF MAY BE CALLED INTO QUESTION.

RELIEF SOUGHT

PAGE TEN

A SUBPOENA FOR THE AFOREMENTIONED  
FINANCIAL DOCUMENTS OF PRESIDENT TRUMP  
IN AN UNREDACTED CONDITION.

A TEMPORARY RESTRAINING ORDER BLOCKING  
THE SENATE CONFIRMATION PROCESS OF  
PRESIDENT TRUMP'S NOMINEE, UNTIL PRESIDENT  
TRUMP SUBMITS HIS FINANCIAL DOCUMENTS,  
AND THERE IS ADEQUATE TIME TO  
REVIEW THEM.

## CLOSING ARGUMENT

PAGE ELEVEN

AS I UNDERSTAND IT, THERE IS THE MATTER OF WHETHER, I HAVE STANDING TO BRING THIS MATTER TO COURT. I AM A SIXTH GENERATION AMERICAN WITH A LONG STANDING DOCUMENTABLE VOTING RECORD.

AS A CITIZEN OWNER OF THIS NATION, I HAVE THE CONSTITUTIONAL RIGHT TO PETITION THIS COURT FOR REDRESS OF GRIEVANCE(S). PRESIDENT TRUMP PROMISED TO PRODUCE HIS FINANCIAL RECORDS. MY VOTE FOR HIM WAS BASED ON HIS PROMISE TO PRODUCE THESE DOCUMENTS. HIS REFUSAL TO PRODUCE THESE DOCUMENTS IS A FRAUD. AND I CONSIDER THIS FRAUD TO BE THE THEFT OF OF MY VOTE, WHICH, HAVING BEEN PAID FOR IN AMERICAN BLOOD, IS PRICELESS.

AS TO SENATOR MCCONNELL, A TEMPORARY RESTRAINING ORDER IS ACTUALLY IN ORDER. IF PRESIDENT TRUMP IS VINDICATED, A SHORT TIME DELAY OF SENATE CONFIRMATION IS NOT UNREASONABLE.

IF ON THE OTHER HAND, PRESIDENT TRUMP IS DETERMINED TO BE GUILTY OF TREASON, HIS "FINGERPRINTS" (HIS NOMINEE'S APPOINTMENT) WILL CAST A SPECTER OF DISHONOR ON THE COURT.

CLOSING ARGUMENT

PAGE TWELVE

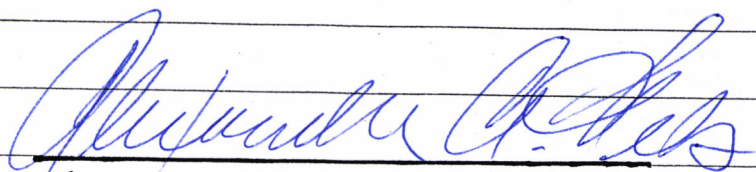
THE LAST PART OF MY CLOSING ARGUMENT IS THE FEDERAL TORT CLAIMS ACT OF 1946, WHICH CONFERS EXCLUSIVE JURISDICTION TO THE UNITED STATES DISTRICT COURTS, WHEN THE UNITED STATES GOVERNMENT OR ONE OF ITS EMPLOYEES IS THE NAMED DEFENDANT IN A FEDERAL TORT SUIT.

WHILE THE SENATE HAS THE DUTY TO ADVISE AND CONSENT SUPREME COURT NOMINEES, THE FOUNDING FATHERS AND FRAMERS OF OUR CONSTITUTION NEVER INTENDED TO ALLOW ANY SUCH POTENTIAL ABERRATION TO OUR COURTS TO OCCUR.

THE SAGE ADVICE OF ANOTHER FORMER SUPREME COURT JUSTICE, LOUIS DEMBETZ BRANDeis, COMES TO MIND "SUNLIGHT IS THE BEST DISINFECTANT."

THANK YOU FOR THE EXPENDITURE OF YOUR VALUED TIME IN READING MY PETITION.

RESPECTFULLY SUBMITTED,

A handwritten signature in blue ink, appearing to read "Alexander A. Fels".

ALEXANDER A. FELS pro se