

No. 9:22-cv-81294-AMC

---

**In The United States District Court  
for the Southern District of Florida**

---

DONALD J. TRUMP,

*Plaintiff*

v.

UNITED STATES OF AMERICA,

*Defendants.*

---

PENDING CIVIL ACTION

---

**RAJ K. PATEL'S MOTION FOR INTERVENTION AND MEMORANDUM IN  
SUPPORT OF GRANTING THE MOTION FOR INTERVENTION**

T.E., T.E. Raj K. Patel (*pro se*)  
6850 East 21st Street  
Indianapolis, IN 46219  
Marion County  
[rajp2010@gmail.com](mailto:rajp2010@gmail.com)  
[raj@rajpatel.live](mailto:raj@rajpatel.live)  
[www.rajpatel.live](http://www.rajpatel.live)  
317-450-6651

August 25, 2022

FILED BY SW D.C.

AUG 26 2022

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - W.P.B.

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

DONALD J. TRUMP,

Plaintiff

No. 9:22-cv-81294-AMC

v.

Dated: August 25, 2022

UNITED STATES OF AMERICA,

JURY TRIAL DEMANDED

Defendant

TABLE OF CONTENTS

RAJ K. PATEL'S MOTION FOR INTERVENTION AND MEMORANDUM IN SUPPORT OF GRANTING THE MOTION FOR INTERVENTION ..... 1
RAJ K. PATEL'S MOTION FOR INTERVENTION AND MEMORANDUM IN SUPPORT OF GRANTING THE MOTION FOR INTERVENTION ..... 1
STATEMENT OF FACTS ..... 4
ARGUMENT ..... 5
FED. R. CIV. P. 24(A) – INTERVENTION OF RIGHT ..... 5
FED. R. CIV. P. 24(B) – PERMISSIVE INTERVENTION ..... 8
CLAIMS ..... 10
DEMAND FOR RELIEF ..... 18
CERTIFICATE OF INTEREST ..... 19
CERTIFICATE OF SERVICE ..... 20

RAJ K. PATEL'S MOTION FOR INTERVENTION AND MEMORANDUM IN SUPPORT OF GRANTING THE MOTION FOR INTERVENTION

I, T.E., T.E Raj K. Patel (pro se), the movant, respectfully move this United States District Court for the Southern District of Florida to allow intervention, either my right or permissively. Local Rule 7.1; Fed. R. Civ. P. 24(a)-(b)(1)(B); and 42 U.S.C. §§ 1981(a), 1982, & 2000bb-1(a)-(c). The present civil action contains a lawsuit against the United States to determine whether executive Privilege was violated by a former President of the

United States, the Plaintiff, Donald J. Trump. I am interested in becoming President of the United States and have a property right or interest of holding a privilege, protected by the United States Constitution and Acts of Congress, along with all the honors and rights which come with the “hold[ing]” the office of the Presidency and its thenceforth omnipresent, powerful titles/styles/precedent of The Honorable (The Excellent), including after leaving office. U.S. const. art. IV, § 2; 42 U.S.C. §§ 1981(a) & 1982; Federalist Nos. 78 & 80; and Madison, Monday, June 18, in Committee of the whole, on the propositions of Mr. Patterson & Mr. Randolph, *The Records of the Federal Convention of 1787*, vol. 1, pp. 285-291, New Haven: Yale Univ. Press, 1911, Edited by Max Farrand, <https://oll.libertyfund.org/title/farrand-the-records-of-the-federal-convention-of-1787-vol-1#lf0544-01> head 163; Madison, Monday, June 25, in Convention, *The Records of the Federal Convention of 1787*, vol. 1, pp. 398-405, New Haven: Yale Univ. Press, 1911. Edited by Max Farrand, <https://oll.libertyfund.org/title/farrand-the-records-of-the-federal-convention-of-1787-vol-1#lf0544-01> head 210; Yates, Monday, June 25, in Convention, *The Records of the Federal Convention of 1787*, vol. 1, pp. 410-416, New Haven: Yale Univ. Press, 1911, Edited by Max Farrand, <https://oll.libertyfund.org/title/farrand-the-records-of-the-federal-convention-of-1787-vol-1#lf0544-01> head 211; and Mason, Monday June 4, in Committee of the whole, *The Records of the Federal Convention of 1787*, vol. 1, pp. 285-291, New Haven: Yale Univ. Press, 1911, Edited by Max Farrand, <https://oll.libertyfund.org/title/farrand-the-records-of-the-federal-convention-of-1787-vol-1#lf0544-01> head 080.

*One.* If the matter is decided against the President of United States, I have a statutory protected right that will be violated, and even if I am appointed by the Electoral College President, the holding and consequential precedential value of this Court’s disposition “of the action may as a practical matter [will] impair or impede [my] ability

to protect [my] interest, unless existing [I] adequately represent that interest. Fed. R. Civ. P. 24(a)(2).

*Two.* In addition, I have a “claim or defense that shares with the main action a common question of law or fact” about executive Privilege, as intended by the Framers of the United States Constitution. U.S. const. art. IV, § 2 & art. VI, § 1 referring to Grievance 20, Decl. of Indep. (1776).

*Three.* Next, this Court must allow intervention because the Federal Religious Freedom Restoration Act, 42 U.S.C. §§ 2000bb *et seq.*, gives me an “unconditional right” to intervene and assert a claim or defense of the interest of holding the Presidency, which is a religious right, as it as a political right too. Fed. R. Civ. P. 24(a)(1). *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 736-7 (2014) (Kennedy, J., concurring) (“In our constitutional tradition, freedom means that all persons have the right to believe or strive to believe in a divine creator and a divine law. For those who choose this course, free exercise is essential in preserving their own dignity and in striving for a self-definition shaped by their religious precepts. Free exercise in this sense implicates more than just freedom of belief. *See Cantwell v. Connecticut*, 310 U.S. 296, 303 (1940). It means, too, the right to express those beliefs and to establish one’s religious (or nonreligious) self-definition in the political, civic, and economic life of our larger community.”).

*Four.* Next, this Court may allow intervention because the Federal Religious Freedom Restoration Act, 42 U.S.C. §§ 2000bb *et seq.*, gives me a “conditional right” to intervene when my free exercise of religion is expected to be substantially burden. Fed. R. Civ. P. 24(b)(1)(A). *Burwell*, 573 U.S. at 736-7.

Therefore, I move that this court allow intervention. Local Rule 7.1.

**WELL-PLEADED COMPLAINT STANDARDS**

"[A] *pro se* [intervention], however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers." *Erickson v. Pardus*, 551 U.S. 89, 94 (2007).

### STATEMENT OF FACTS

- I. I, Raj K. Patel, the Plaintiff (*pro se*), am a citizen of Indianapolis, Indiana.
  - A. On September 2, 1992, I was born in New Jersey.
  - B. From 2009-2010, I was the Student Body President of the Brownsburg Community School Corporation ("B.C.S.C.") (corporate sovereign 2009-present) in Brownsburg, Indiana.
  - C. From 2010-2010, I attended Emory University in Atlanta, Georgia, and I graduated with a Bachelor of Arts in Political Science and *cum laude* in Religion. I received an all-A average.
  - D. From 2013-2014, I was the Student Government Association President of Emory University, Inc. (corporate sovereign 2013-present) in Atlanta, Georgia.
  - E. From 2015-2017, I was enrolled at the University of Notre Dame Law School as a juris doctor candidate. I voluntary separation of leave in good standing in November 2017. *See also* Compl., *Patel v. United States*, No. 1:21-cv-2004-LAS (Fed. Cl. 202\_). Most Presidents of the United States, and the Framers of the United States, have been lawyers, read in the law, as currently prepared by law schools. I have completed the minimum law school graduation credit hours as required by the American Bar Association (e.g. 68 credit hours), but not the University of Notre Dame's institutional requirement of 90 credit hours, with 22 remaining credit hours not completed yet.

- F. I have been under the constant lawless use of a stress weapon, which causes stress and physical and mental incapacitations and adversities. *See also Patel v. United States*, No. 1:21-cv-2004-LAS (Fed. Cl. 202\_), Dkt. 10, *aff'd in part & rev'd in part*, No. 22-1131 (Fed. Cir. 2022), ECF 44, *pending cert.*, No. 22-5280 (U.S. 202\_).
- G. In addition to my styles/titles, through my heritage, by my blood/legal-parents, I am Top 1% of Americans, in terms of income and cash-on-hand.
- II. Donald J. Trump, the Plaintiff, is a Republican, and the main action states that he is the likely 2024 Republican National Committee's nominee. Dkt. 1 at 5.
- III. I am a Democrat.
- IV. I was the co-Founder and Vice Chair of the Indiana High School Democrats.
- V. Hinduism, an Old Religion from India, *Kshatriya* religion. *Cf.* Dkt. 1 at 19.
- VI. Despite the differences of political parties, my religion requires me to honor and respect the Head of State, and a fellow-Kshatriya – a fellow statesperson in the Hindu ecclesiastical interpretation of the happenings under the Constitution.
- VII. Following the norms and varna of this social group and caste wins the favor of Vishnu, God.
- VIII. Possibly United States showing distrust in future colored presidency or presidents who might not have white-skin-color in them. 42 U.S.C. §§ 1981-2.
- IX. This complaint follows.

### ARGUMENT

“Intervention may be timely filed even if it occurs after a case has concluded.” *Comm’r, Ala. Dep’t of Corr. v. Advance Local Media, LLC*, 918 F.3d 1161, 1171 (11th Cir. 2019) (internal citations omitted).

**Fed. R. Civ. P. 24(a) – Intervention of Right**

“At the heart of this case is Rule 24(a)(2), which governs intervention as of right. As relevant here, Rule 24(a)(2) provides that a court must permit anyone to intervene who, (1) [o]n timely motion, (2) claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant’s ability to protect its interest, (3) unless existing parties adequately represent that interest.” *Berger v. N. Carolina St. Conference of the NAACP*, No. 21-248 \* 27 (U.S. Jun. 23, 2022) (internal quotations removed).

An Act of Congress is not required to discharge duties of the Privileges and/or Immunities Clauses. *In re Neagle*, 135 U.S. 1, 2 & 98-99 (1890).

1. Movant-Raj K. Patel’s motion is “timely” filed.

The main complaint was initiated less than a week ago, on August 22, 2022. *Comm’r*, 918 F.3d at 1171. Therefore, this motion for intervention is “timely” under the Fed. R. Civ. P. 24(a) & 24(b)(1). *Berger*, No. 21-248 \* 27 (U.S. 2022).

2. Movant-Raj K. Patel has property interest of the Constitutional clout of the Privileges of former Presidents of the United States, and movant-Raj K. Patel has a political and/or religious interest in and from the transactions of the on-going litigation.

The decision on the main complaint will define and create an untenable precedent about Presidential records and the use of vested shared powers between the incumbent President and former Presidents, which effects movant-Raj K. Patel’s religious interest in supporting a former and current Head of State, the President, and His Excellency’s own interest in attaining and self-defining the Presidency. 44 U.S.C. §§ 2203 & 2204(b)-(f); 42 U.S.C. §§ 2000bb *et seq.*; and *Burwell*, 573 U.S. at 736-7. Currently, the President Trump seeks a special master in accessing Defendant’s records, but His Excellency Patel has an interest in making sure the record access accords with Original Intent (as amended). Further, it is important that information-sharing and -restrictions are not fettered with

against an incumbent and former President, as movant's political party, like President's Trump political party, have determinately relied on the United States letting the party and its party's presidential nominee, victory, and successors can make fair use of Presidential records. U.S. const. art. VI, § 1 referring to Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784. Mason, Monday June 4, in Committee of the whole, *The Records of the Federal Convention of 1787*, vol. 1, pp. 285-291, New Haven: Yale University Press, 1911, Edited by Max Farrand.

Therefore, movant-Raj K. Patel has an intervention by right.

3. Existing party, Donald J. Trump (R), do not adequately represent movant-Raj K. Patel's (D) interests, as they have different succession interests or are from opposing political parties.

While existing parties are not political rivals or are not expected to become political rival in 2024, especially as movant-Raj K. Patel is not 35 years of age, the movant and the existing parties are of different religious traditions: President Trump has openly identified as Christian and has descendent from Christians, as has President Biden, who is Catholic, and movant-Mr. Patel is Hindu and a descendent of Hindus. Therefore, existing parties cannot adequately represent the movant-Mr. Patel's Hindu ecclesiastical interpretation of our happenings.

In addition, the existing parties are ideologically different with different considerations and focuses, regardless of party affiliation, and constitutionalism. *But cf. Patel v. United States*, No. 22-5280 (U.S. 202\_). Therefore, existing parties cannot adequately represent movant-Mr. Patel's interest with the incumbent President and former President.

Next, the Defendant-United States of America is interested in preserving the institution of the Presidency just as much as Plaintiff-President Trump and movant-Mr. Patel, but Defendant is represented by the United States Department of Justice which



answers not only to the current President but also to Congress and not the political parties or the general public or voting population and the United States Constitution, unlike Plaintiff-President Trump and movant-Mr. Patel. Dkt. 1 at 3. *But cf. Id.* at 12. Therefore, existing parties cannot adequately represent movant-Mr. Patel's interests in the case-at-hand.

Lastly, the appointment of special master will not sufficiently represent movant-Mr. Patel's interest in the precedential effect of the venerable lineage of the main action. As it currently stands, the special mater will only address the Presidential Records Act as applied to President Trump and his records. Dkt. 1 at 14 & 15. Movant-Mr. Patel's common question of law is embedded and necessary to answer for the main action to be ruled in favor of President Trump. But, unlike movant-Mr. Patel, current parties assume complete constitutionality of the Presidential Records Act, and, thus, existing parties cannot adequately represent movant-Mr. Patel's interests in this transaction. Mason, Monday June 4, in Committee of the whole, *The Records of the Federal Convention of 1787*, vol. 1, pp. 285-291, New Haven: Yale Univ. Press, 1911, Edited by Max Farrand.

For each of these reasons, movant-Mr. Patel has an intervention by right.

**Fed. R. Civ. P. 24(b) – Permissive Intervention**

"Federal Rule of Civil Procedure 24(b) governs permissive intervention. Permissive intervention...is appropriate where a party's claim or defense and the main action have a question of law or fact in common and the intervention will not unduly prejudice or delay the adjudication of the rights of the original parties. *Mt. Hawley Ins. Co. v. Sandy Lakes Props., Inc.*, 425 F.3d 1308, 1312 (11th Cir. 2005) (alteration added; quotation marks and citation omitted). A district court has broad discretion to allow or disallow permissive intervention even if both of those requirements are met[.] *Chiles v. Thornburgh*, 865 F.2d 1197, 1213 (11th Cir. 1989) (alteration added; citation omitted); *see*

also *Tursom v. United States*, No. 20-cv-20811, 2021 WL 3493207 \* 3 (S.D. Fla. Aug. 9, 2021) (noting that a district court can consider almost any factor rationally relevant but enjoys very broad discretion in granting or denying the motion). In exercising that discretion, the district court must consider whether the intervention will unduly delay or prejudice the adjudication of the original parties' rights. Fed. R. Civ. P. 24(b)(3). Any doubt concerning the propriety of allowing intervention should be resolved in favor of the proposed intervenors because it allows the court to resolve all disputes in a single action." *Fed. Sav. & Loan Ins. Corp. v. Falls Chase Special Taxing Dist.*, 983 F.2d 211, 216 (11th Cir. 1993) (citation omitted). *M'izing Tech. Servs. v. Berkshire Hathaway Specialty Ins. Co.*, 22-cv-20596 \* 3 (S.D. Fla. Apr. 14, 2022) (internal citations omitted).

1. Movant-Raj K. Patel's motion is "timely" filed.

The main complaint was initiated less than a week ago, on August 22, 2022. *Comm'r*, 918 F.3d at 1171. Therefore, this motion for intervention is "timely" under the Fed. R. Civ. P. 24(a) & 24(b)(1).

2. Movant-Raj K. Patel's "claim or defense and...[Donald J. Trump's]...main action have a question of law or fact in common" as to the legality of a former President of the United States keeping Presidential records under the Presidential Records Act and the constitutionality of the Presidential Records Act.

President Trump's main action and the movant-Mr. Patel's intervention have a common question of law about the constitutionality of the Presidential Records Act and its applicability. Mr. Patel raises his own constitutional law arguments which will help this Court adjudge the proposals made by President Trump. President Trump raises other important constitutional questions of Fifth Amendment Due Process-Fairness and Fourth Amendment-Unlawful Search and Seizures. Dkt. 1 at 10, 12-4, & 18. Particularly, movant-Mr. Patel to address the Privileges and Immunities Clause as applied to President Trump and other possible former Presidents of the United States. U.S. const.

art. IV, § 2. *See also* U.S. const. amend. XIV, § 1, cl. 2. Further, Amendment I and the Federal RFRA law allows for movant-Mr. Patel to assert this common claim and/or defense in this intervention and to the main action because it impacts his self-definition as he tries to win the favor of God while and after holding the Presidency. 42 U.S.C. §§ 1981-2; 2000bb *et seq.*; and U.S. const. amend. I. U.S. const. art. VI, § 1 referring to Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784.

Therefore, movant-Mr. Patel asks the court to allow permissive intervention. *In re Neagle*, 135 U.S. 1, 2 & 98-99 (1890).

3. Granting the intervention will not unduly prejudice the original parties, as movant-Raj K. Patel's is a necessary question that the Court must answer in order to proceed to the enforcement order under the Presidential Records Act and was timely filed.

Prejudice to the parties will not unduly prejudice the original parties because the motion is timely filed and movant-Mr. Patel has not introduced new or unexpected questions of law or fact; in fact, movant-Mr. Patel only seeks to elaborate on a common question of law embedded in the main action and original preceding. Fed. R. Civ. P. 24(b). Therefore, the existing parties, President Trump versus the United States of America, will not be unduly prejudiced.

### CLAIMS

All paragraphs from above are incorporated into this section. All of the following claims may be read together, in groups, or individually and each permutation.

**CLAIM 1. The application of Presidential Records Act is beyond Congress' vested powers.**

- A. U.S. const. art. I, § 1. *See also* U.S. const. art. VI, § 1 referring to Mason, Monday June 4, in Committee of the whole, *The Records of the Federal*

*Convention of 1787*, vol. 1, pp. 285-291, New Haven: Yale University Press, 1911, Edited by Max Farrand.

- B. *Harlow v. Fitzgerald*, 457 U.S. 800, 811 n. 17 (1982) (“Suits against other officials — including Presidential aides — generally do not invoke separation-of-powers considerations to the same extent as suits against the President himself.”).
- C. *Printz v. United States*, 521 U.S. 898, 920-21 (1997) & *Id.* at 918 quoting *Principality of Monaco v. Mississippi*, 292 U.S. 313, 322 (1934) (constitutional exemptions for local officials).
- D. *In re GTE Service Corp.*, 762 F.2d at 1026-27. Federalist 80. *In re Quarles & Butler*, 158 U.S. 532, 536-37 (1895) & *United States v. Harris*, 106 U.S. 629, 638 & 643-44 (1883).
- E. *Cnty. of Sacramento v. Lewis*, 523 U.S. 833, 847 (1998) (not Fair Play “when Conscience-shocking behavior is ‘so `brutal’ and `offensive’ that it [does] not comport with traditional ideas of fair play and decency.”).
- F. *Rubin v. United States*, 525 U.S. 990, 990-91 (1998) (Breyer, J., dissenting from denial of certiorari) (“The physical security of [an honorable] has a special legal role to play in our constitutional system.”). *Id.* at 995 (but for privileges, there would be a loss of trust in enforcement). U.S. const. art. IV, §§ 1-2. Fed. R. Civ. P. 9(d).
- G. The Privileges and Immunities Clause is why the American people have chosen to have a national constitutional government; faithfulness to this Clause defines the National Character and “the basis of the union.” Federalist No. 80. This Clause, which creates the totem pole of hierarchy of

master, honors, and excellent, is not amendable, per the Treaty of Paris (1783), and administers Sovereignty of the United States Constitution.

- H. "The Citizens of each State shall be entitled to all Privileges and Immunities of Citizens in the several States." U.S. const. art. IV, § 2, cl. 1. *Corfield*, 6 F. Cas. 546, 4 Wash.C.C. 371, No. 3230 (C.C.E.D. Pa. 1823) (Washington, J.).
- I. The Constitutional hierarchy requires "the exercise of executive power [to remain] accountable to the people." *United States v. Arthrex, Inc.*, No. 19-1434 at p. 23, 594 U.S. \_\_\_\_ (2021) (Roberts, C.J., majority).
- J. "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States." U.S. const. amend. XIV, § 1, cl. 2.
- K. An Act of Congress is not required to discharge duties of the Privileges and/or Immunities Clauses. *In re Neagle*, 135 U.S. 1, 2 & 98-99 (1890). Federalist 78. The Federal Government "commands obedience" to its laws through the Privileges and Immunities Clause (and to certain Privileges and Immunities through the Full Faith and Credit Clause). *Logan v. United States*, 144 U.S. 263, 295 (1892) & U.S. const. art. VI, §§ 1 & 2, cl. 1 & amend. XIV, § 1, cl. 2.
- L. Congress has bound each district judge to "administer justice without respect to persons, and do equal right to the poor and to the rich, and...faithfully and impartially discharge and perform all the duties incumbent upon...[each Honorable]...under the Constitution and laws of the United States." 28 U.S.C. § 453.
- M. The Federal Government "commands obedience" to its laws through the Privileges and Immunities Clause (and to certain Privileges and Immunities

through the Full Faith and Credit Clause). *Logan v. United States*, 144 U.S. 263, 295 (1892) & U.S. const. art. VI, §§ 1 & 2, cl. 1 & amend. XIV, § 1, cl. 2.

N. When enforcing the Privileges and Immunities, the United States federal government has supremacy in protecting each citizen and need not involve State executives or other governments. *In re Quarles & Butler*, 158 U.S. at 536-37 & *United States v. Harris*, 106 U.S. 629, 638 & 643-44 (1883).

O. The Privileges and Immunities Clause duties on the Federal Government are foundational and fundamental. *See also* U.S. const. art. VI, § 1 referring to the Decl. of Indep. (1776) & The Treaty of Paris (1783).

i. The President of the United States has the fundamental, foundational, and oath-bound duty to enforce the United States Constitution. 3 U.S.C. §§ 301-03 & U.S. const. art. II, § 1, cls. 1 & 8.

ii. Like in the contemporary, when an inferior officer is not established by Congress, the President of the United States is directly responsible to oversee the enforcement of the Privileges and Immunities Clause. *Arthrex*, No. 19-1434 at p. 23.

iii. Overall, currently, T.H., T.H. (T.E.), T.H. (T.E.) Joe Biden, the President of the United States, is the officer in charge of enforcing the Privileges and Immunities Clause. *See* 3 U.S.C. § 303.

**CLAIM 2. The application of the Presidential Records Act is in violation of the Privileges and Immunities Clause and substantive Due Process.**

A. Equal Protection Cl. in the Due Process Cl. and substantive Due Process. *See United States v. Windsor*, 570 U.S. 744, 770, 774, 793, & 807 (2013) quoting *Bolling v. Sharpe*, 347 U.S. 497 (1954).

B. *See* Claim 1.

**CLAIM 3. A former President of the United States can lawfully retain copies of Presidential records, from either his/her/their own administration or from another President's administrations, under the vested Powers of the President and the Privileges and Immunities Clause of the United States Constitution.**

- A. The Presidential Records Act makes information sharing with the Congress and the public a shared responsibility of the incumbent President and former Presidents.
- B. As originally intended by the Framers, there were no term limits on the number terms a natural-born American can serve as President of the United States. As amended by the United States, it seems that a person can be President for a maximum of 10 years.
  - i. The Lockean Document, consistent with the Powers vested through the Treaty of Paris (1783), made sure that previous Presidents remained a part of the institution by allowing titles and other pensions.
  - ii. The Framers, in addition to maintain the General Welfare, formed the Constitution as contemporary plutocrats and to prevent unethical commercial conduct amongst factions, divided into states.
  - iii. The Framers loathed political parties as a way they challenged the State's role of maintain the Peace. However, from the very beginning of our current written Constitutional experience, political parties have been inseparable and essential to statecraft.
  - iv. The only link between the United States and the political parties which prevent a political party from becoming the hegemon are the current and former Presidents of the United States.

- C. Allowing a former President access to records preserves and creates the checks and balances which are fundamental to our Republic.
- i. While the incumbent President, here, President Biden, can trigger board national security powers to determine who has what information, including amongst former Presidents, without such concerns, there is not Constitutional permissive power to limit a former President from retaining copies of President records, as long as they are securely kept. U.S. const. art. VI, § 1 referring to the Treaty of Paris (1783).
  - ii. The Framers deemed the Text to be evolutionary for at least three reasons (1) it can be amended, (2) it was a polemic calling on states to approve and ratify and change the state of slavery with what will be the Force of the newly-formed Union, and (3) it is intended to be passed down to the generations of the Union's civilization, as stated in the Preamble of the United States Constitution.
  - iii. While there was neither a king nor noble house, the Framers, who were young at the start of ere of the call for Independence, especially Madison and Yates, intended that the Presidency would evolve because former Presidents will raise their own kids to be better leaders than they were. Madison, Madison, and Yates.
- D. President Trump has not converted or aided in the conversion of United States documents of Presidential documents.
- E. Former Presidents need to be able to access records quickly and efficiently and their copies in order to preserve their considerations and executive agreements. Dkt. 1 at 5.



- F. The current action is inconsistent with the Framers' elitist and aristocratic mindset accorded from the Constitutional Convention.
- G. The current happenings in the main action require to me intervene and exercise my political rights to protect the institution of the Presidency, and so I am able to exercise the force of the Presidency in further the United States Constitution, our social compact, as my religion requires me.

**CLAIM 4. Appointment of Special Master will not be sufficient to address the claims and interests which are a part of this intervention.**

- A. The special master will access the disclosures of additional documents and affidavits.
- B. The special master will not address the constitutionality of the happenings of the case and the statute, the Presidential Records Act, which vests subject-matter jurisdiction and its constitutionality, which challenges the Privileges and Immunities Clause of the United States Constitution. U.S. const. art. VI, § 2.

**CLAIM 5. It is unclear who can enforce the Presidential Records Act and its common law vestiges against the former Presidents.**

- A. Can T.H. T.H. (T.E.) T.H. (T.E.) Biden enforce the applied law to T.H. (T.E.) Trump?
- B. Can T.H. T.H. (T.E.) T.H. (T.E.) Biden enforce the applied law to T.H. T.H. T.H. T.H. (T.E.) Obama?
- C. Can T.H. T.H. (T.E.) T.H. (T.E.) Biden enforce the applied law to T.E. T.H. T.H. (T.E.) Regan if Mr. Regan was still alive? T.E. comes from the time when Regan was Student Government President. T.E. T.H. T.H. T.H. (T.E.)

T.H. (T.E.) Nixon? T.E. comes from the time when Nixon was Student Government President.

D. Can T.H. (T.E.) Trump enforce the applied law to T.H. T.H. (T.E.) T.H. (T.E.) Biden?

E. When does the United States Constitution allow for its authoritative veil to be pierced and allow the Commander-in-Chief to assert fiat to arrest more authoritatively powerful former President?

**CLAIM 6. The Religious Freedom Restoration Act has been violated because the main action burdens my ability of self-definition as President of the United States and afterwards.**

A. Hinduism requires me to be the best elected official as possible and to support the Privileges and Immunities Clause of the United States of Constitution. U.S. const. art. VI, § 2.

B. Hinduism requires me to support both President Biden and President Trump as our Head of State, but the law is the King, here, in the United States.

C. A violation of the King, the Law, would hinder my ability to President and former President of the United States. For instance, a change in the status quo of how President Trump allowed for records to be kept risks welcoming racism into how incumbent Presidents might treat former Presidents or the racist effect a precedential holding can inspire in other governments and polities and the business world. 42 U.S.C. §§ 1981-2.

D. Thus, I must assert this claim, and find that President Trump's actions are protected by the United States Constitution's Privileges and Immunities Clause and/or substantive Due Process.

**DEMAND FOR RELIEF**

WHEREFORE, The Excellent, The Excellent Raj K. Patel, with the interest further decency within our Nation and upholding our Constitution, asks this United States District Court for the Southern District of Florida to grant either all or some of the following relief:

1. Allow intervention.
2. Relief described in the claims section above.
3. Find unconstitutionality of the Presidential Records Act.
4. Other remedies which the court might deem fit.

Respectfully submitted,

/s/ Raj K. Patel  
T.E., T.E. Raj K. Patel (*pro se*)  
6850 East 21<sup>st</sup> Street  
Indianapolis, IN 46219  
Marion County  
317-450-6651 (cell)  
[rajp2010@gmail.com](mailto:rajp2010@gmail.com)  
[www.rajpatel.live](http://www.rajpatel.live)

J.D. Candidate, Notre Dame L. Sch. 2015-2017  
President/Student Body President, Student Gov't Ass'n of  
Emory U., Inc. 2013-2014 (corp. sovereign 2013-present)  
Student Body President, Brownsburg Cmty. Sch.  
Corp./President, Brownsburg High Sch. Student Gov't  
2009-2010 (corp. sovereign 2009-present)  
Rep. from the Notre Dame L. Sch. Student B. Ass'n to the  
Ind. St. B. Ass'n 2017  
Deputy Regional Director, Young Democrats of Am.-High  
Sch. Caucus 2008-2009  
Co-Founder & Vice Chair, Ind. High Sch. Democrats 2009-  
2010  
Vice President of Fin. (Indep.), Oxford C. Republicans of  
Emory U., Inc. 2011-2012

**CERTIFICATE OF INTEREST**

I, THE EXCELLENT, THE EXCELLENT Raj K. Patel (pro se), am appearing without counsel. Giving Full Faith to the United States Constitution, I use the Authority of my omnipresent Styles and Office in these proceedings into which I avail myself. U.S. const. art. IV, § 1 & amend. XIV, & art. VI, § 1 referring to the Treaty of Paris (1783) & Paris Peace Treaty – Cong. Proclamation of Jan. 14, 1784.

I have completed five (5) out of the six (6) semesters of my juris dr. candidacy at the U. of Notre Dame L. Sch. in South Bend, IN., where I was enrolled from August 2015 to November 2017, and I have completed sixty-eight (68) out of the ninety (90) credit hours for a juris dr. candidacy at the Notre Dame L. Sch.

Such, I have completed the minimum number of credit hours required by the accrediting Am. B. Ass'n ("A.B.A.") to allow a law school to accredit me a juris dr. degree.

Amongst the grades in my juris dr. academic courses I received at the Notre Dame L. Sch., I received an A-/A in contracts law, an A-/A in civil procedure, and a B/A in constitutional law, while under Weapon S. In the summer of 2016, I worked as summer associate with the City of Atlanta Law Department in Atlanta, GA. In the summer of 2017, I worked as a summer associate at Barnes & Thornburg LLP in Indianapolis, IN.

And, I hold a Bachelor of Arts in Poli. Sci. and *cum laude* in Religion from Emory U., Inc. of Atlanta, Georgia, and I attended both Oxford College and Emory College, and graduated, in 2014, with a 3.718/4.0 grade point average with no pass/fail grades.

Emory U., Inc. is ranked as a top-20 or top-25 *U.S. News* Tier 1 best national university, and the Notre Dame L. Sch. is ranked as a *U.S. News* Top 25 best law school in the United States.

I was Student Body President of the Brownsburg Cmty. Sch. Corp. from 2009-2010 and Student Body President of Emory U., Inc. from 2013-2014. I was also the Notre Dame L. Sch. Student B. Ass'n Rep. to the Ind. State B. Ass'n from September 2017 to November 2017. All jurisdictions are "local" and with an "international" constituency.

Each time I was elected Student Body President, I attained thenceforth omnipresent Styles ("THE EXCELLENT" for each election) which are protected by both the Privileges & Immunities Clause and Privileges or Immunities Clause of the United States Constitution. U.S. const. art. IV, § 2, cl. 1 & amend. XIV, § 1, cl. 2. *See generally* Federalist 80 & *Printz v. United States*, 521 U.S. 898, 918 (1997) quoting *Principality of Monaco v. Mississippi*, 292 U.S. 313, 322 (1934).

I have not received legal advice or counsel from anyone else for this case.

**CERTIFICATE OF SERVICE**

I certify that I served a copy of the foregoing *Pro Se* Motion for Intervention and Memo. In Support on 08/25/2022 to below individuals via e-mail:

**James M. Trusty**

IFRAH, PLLC

1717 Pennsylvania Avenue, NW, Suite 650

Washington, DC 20006

202-852-5669

Email: [jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com)

**Lindsey Halligan**

Cole, Scott and Kissane, P.A.

110 SE 6th Street, Suite 2700

Ft. Lauderdale, FL 33301

720-435-2870

Email: [lindseyhalligan@ymail.com](mailto:lindseyhalligan@ymail.com)

**M. Evan Corcoran**

Silverman, Thompson, Slutkin, & White, LLC

400 East Pratt Street, Suite 900

Baltimore, MD 21230

410-385-2225

Email: [ecorcoran@silvermanthompson.com](mailto:ecorcoran@silvermanthompson.com)

Dated: August 25, 2022

Respectfully submitted,

/s/ Raj Patel

T.E., T.E. Raj K. Patel (*Pro Se*)

6850 East 21st Street

Indianapolis, IN 46219

317-450-6651 (cell)

[rajp2010@gmail.com](mailto:rajp2010@gmail.com)

[www.rajpatel.live](http://www.rajpatel.live)

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA

DONALD J. TRUMP,

*Plaintiff* No. 9:22-cv-81294-AMC

v.

UNITED STATES OF AMERICA,

*Defendant*

**ORDER**

This matter **COMES NOW** before the Court on Mr. Patel’s Motion for Intervention, and the following is **ORDERED**:

Mr. Patel’s Motion for Intervention is **GRANTED**.

The Intervention is one of right under Fed. R. Civ. P. 24(a).

The Intervention is permissive under Fed. R. Civ. P. 24(b).

Mr. Patel’s Motion for Intervention is **DENIED**.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2022

\_\_\_\_\_  
United States District Judge

Distribution to all attorneys and *pro se* litigants of record.

**CERTIFICATE OF SERVICE**

I certify that I served a copy of the foregoing Proposed Order on 08/25/2022 to below individuals via e-mail:

**James M. Trusty**  
IFRAH, PLLC  
1717 Pennsylvania Avenue, NW, Suite 650  
Washington, DC 20006  
202-852-5669  
Email: [jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com)

**Lindsey Halligan**  
511 SE 5th Avenue  
Fort Lauderdale, Florida 33301  
[lindseyhalligan@outlook.com](mailto:lindseyhalligan@outlook.com)  
720-435-2870  
Email: [lindseyhalligan@ymail.com](mailto:lindseyhalligan@ymail.com)

**M. Evan Corcoran**  
Silverman, Thompson, Slutkin, & White, LLC  
400 East Pratt Street, Suite 900  
Baltimore, MD 21230  
410-385-2225  
Email: [ecorcoran@silvermanthompson.com](mailto:ecorcoran@silvermanthompson.com)

Respectfully submitted,

/s/ Raj Patel  
T.E., T.E. Raj K. Patel (*Pro Se*)  
6850 East 21st Street  
Indianapolis, IN 46219  
Marion County  
317-450-6651 (cell)  
[rajp2010@gmail.com](mailto:rajp2010@gmail.com)  
[www.rajpatel.live](http://www.rajpatel.live)

Dated: August 25, 2022

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS

Donald J. Trump

DEFENDANTS

USA

(b) County of Residence of First Listed Plaintiff Palm Beach (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number) see attachment

Attorneys (If Known)

N/A

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State PTF 1 DEF 1
Citizen of Another State PTF 2 DEF 2
Citizen or Subject of a Foreign Country PTF 3 DEF 3
Incorporated or Principal Place of Business In This State PTF 4 DEF 4
Incorporated and Principal Place of Business In Another State PTF 5 DEF 5
Foreign Nation PTF 6 DEF 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Grid of suit categories including CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, LABOR, SOCIAL SECURITY, FEDERAL TAX SUITS, IMMIGRATION, and OTHER STATUTES.

V. ORIGIN

- 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S)

(See instructions): a) Re-filed Case YES NO b) Related Cases YES NO DOCKET NUMBER: 9:22-cv-81294-AMC

VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): Fed. R. Civ. P. 24; 42 USC 1981-2; 42 USC 2000bb et seq; P&I Clause, U.S. const. art. VI § 2; In re Neagle, 135 U.S. 1, 2 & 98-99 (1890)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE SIGNATURE OF ATTORNEY OF RECORD

8/25/2022

Handwritten signature of attorney



**ATTACHMENT TO  
CIVIL COVER SHEET**

**I. (c) Attorneys**

M. Evan Corcoran  
SILVERMAN|THOMPSON|SLUTKIN|WHITE, LLC  
400 East Pratt Street, Suite 900  
Baltimore, MD 21202  
Telephone: (410) 385-2225

James M. Trusty  
Ifrah Law PLLC  
1717 Pennsylvania Ave. N.W. Suite 650  
Washington, DC 20006  
Telephone: (202)524-4176

Lindsey Halligan  
511 SE 5th Avenue  
Fort Lauderdale, FL 33301