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| **Response to State’s Objection to Motion to Dismiss/Strike** | Ian Freeman  63 Emerald St. #610  Keene, New Hampshire |

**April 26, 2013**

Court Name: Hillsborough District

Case Name: State v. Ian Freeman f/k/a Ian H Bernard

Case Number: 444-2013-CR-00529

Now Comes Ian Freeman, alleged defendant, reserving all rights, by special appearance, not submitting to the court’s jurisdiction, and responds to Beausoleil’s objection and shows it should be rejected because it lacks merit. Mr. Beausoleil actually makes a case against himself. Grounds are set forth below.

1. No evidence I’m present within the plaintiff state. Beausoleil insists I’m present within the plaintiff state in his objection. The only facts Beausoleil appears to rely on is my geographic location. This is not sufficient as even Beausoleil must be aware as shown by his own objection.

Beausoleil wrote: “NOW COMES the State of New Hampshire…The State objects…the state argues…the State respectfully requests…Respectfully submitted, The State of New Hampshire.”

If the “state” were geographic, then it could not object, request and submit anything. Whatever it may be, I’m certain the ground is not giving Beausoleil instructions to object to my motion.

Beausoleil may even stop his equivocating by claiming I was within the “territorial jurisdiction” of the plaintiff state. By not equivocating, he may make a distinction between the geographic and the plaintiff state (political).

Beausoleil has the same problem though: he has no evidence proving jurisdiction. All he can do is cite the plaintiff’s code; he has no evidence proving the code is actually applicable to me.

In addition to not having any evidence, he has no witnesses with personal knowledge the code applies. Beausoleil’s opinion the plaintiff state’s law/code applies to me is speculation at best. His only attempt to support his opinion is to cite more opinions.

2. The complaint is still “unfit for adjudication”. Regardless of the words Beausoleil uses to describe the proceedings, there’s no case or true adversary as there are no allegations of injury and damage.

Because American courts are adversary systems, the complaint is “unfit for adjudication”:

“The [Supreme] Court has found unfit for adjudication any cause that "is not in any real sense adversary," that "does not assume the `honest and actual antagonistic assertion of rights' to be adjudicated…” Poe v. Ullman, 367 U.S. 497, 505 (1961).

There is no doubt this is not an adversary proceeding as there are no allegations I violated any legal rights of the alleged plaintiff.

Conclusion

Because Beausoleil lacks any evidence I’m present within the plaintiff state, no evidence the laws of the plaintiff state apply, he cannot prove jurisdiction and the complaint should be dismissed.

Mailed this \_\_\_\_ day of **April 2012**.

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Ian Freeman

Certificate of service

This is to certify that a true and correct copy of the foregoing has been mailed this

\_\_\_ day of **April 2012** to the alleged plaintiff.

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Ian Freeman

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