

ORIGINAL

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**FILED**

**MAY 15 2012**

Clerk, U.S. District & Bankruptcy  
Court for the District of Columbia

district court of the United States

Case: 1:12-cv-00806  
Assigned To : Sullivan, Emmet G.  
Assign. Date : 5/15/2012  
Description: Pro Se Gen. Civil

**Steven Alan Magritz, Complainant**

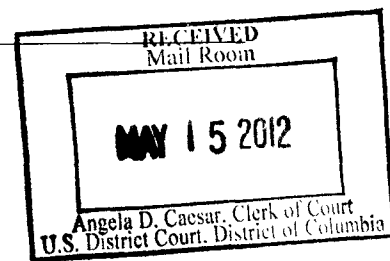
Against

**Ozaukee County**, a public corporation, a political subdivision of State of Wisconsin;  
**Ozaukee County Sheriff's Department**, a quasi-military Agency;  
**62.25 acres of land in the town of Fredonia**, county of Ozaukee, Wisconsin;  
And,  
**the following public officers** in their individual capacities and in their official capacities as officers or officials or employees or associates or agents of one of the named respondents, and the spouses of each respondent, as well as the communal property of each respondent:

Thomas E. Winker, Robert A. Brooks, William S. Niehaus, Lee Schlenvogt, Daniel P. Becker, Joseph A. Dean, Raymond G. Meyer II, Timothy F. Kaul, Jacob Curtis, Daniel R. Buntrock, Kathlyn T. Geracie, Andrew A. Petzold, Patrick Marchese, Karl V. Hertz, Cynthia G. Bock, Robert T. Walerstein, Nancy Sharp Szatkowski, John J. Slater, Jennifer K. Rothstein, Rose Hass Leider, Donald G. Dohrwardt, Richard C. Nelson, Alan P. Kletti, Thomas H. Richart, John C. Grosklaus, Glenn F. Stumpf, Gerald E. Walker, Gustav W. Wirth, Jr., James H. Uselding, Kathlyn M. Callen, Mark A. Cronce, Maurice A. Straub, Karen L. Makoutz, Ronald A. Voigt, Dennis E. Kenealy, Thomas W. Meaux, Andrew T. Struck, Sandy A. Williams, Andrew T. Gonring, Rhonda K. Gorden, Adam Y. Gerol, and Doe # 1 through Doe # 30 -- (*Names and addresses of all known Respondents are set forth in Exhibit C, incorporated herein by reference*),

Respondents.

**VERIFIED COMPLAINT FOR: DECLARATORY JUDGMENT;  
IMPOSITION OF A CONSTRUCTIVE TRUST; AN ACCOUNTING;  
BREACH OF FIDUCIARY DUTY BY PUBLIC OFFICERS /  
BREACH OF THE PUBLIC TRUST; QUO WARRANTO; AND,  
REVOCATION OF CORPORATE CHARTER**



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## INTRODUCTION

This suit arises from the violation of constitutional prohibitions against the impairing of the obligation of contracts and the taking of private property for public use without just compensation. The aforesaid impairment as well as the taking resulted in Complainant's claims against Respondents, who are *public officers and fiduciaries of the Public Trust* created by the Constitution of the United States of America, for breach of fiduciary duty/ dishonesty/ bad faith/ misfeasance/ nonfeasance/ fraud/ misprision of felony/ misrepresentation, non-disclosure, et cetera, against Complainant, *a beneficiary of the Public Trust*; or, Respondents who are *public officers aiding and abetting* breach of fiduciary duty/ dishonesty/ bad faith/ misfeasance/ nonfeasance/ fraud/ misprision of felony/ misrepresentation, non-disclosure, et cetera, perpetrated *by other public officers* against Complainant.

1. *This suit is brought to protect the good name of the state* from impairment of reputation by actions of *public officers* who, pursuant to the facts set forth herein, have acted contrary to the will and the expressed legislative intent of Congress, contrary to the laws and Constitution of the United States, as well as contrary to the laws and Constitution of The State of Wisconsin, *in violation of the peace and dignity of the United States of America, the State, and the County, and in breach of their duties as fiduciaries of the Public Trust.*

2. *To protect the good name of the state*, it is necessary that public officers strictly comply with constitutional limitations set forth in those documents that

created the Public Trust *that secures God given rights*. Enforcing compliance by public officers with the mandates of the Public Trust is the *duty* of the people:

“It is not the function of our Government to keep the citizen from falling into error; it is the function of the citizen to keep the Government from falling into error.” *Entertainment Software Ass'n v. Blagojevich*, 404 F.Supp.2d 1051, 1075 (2005), citing *American Communications Ass'n CIO v. Douds*, 339 U.S. 382, 442-443, (1950).

And, “This duty does not arise solely from the interest of the party concerned, but from the necessity of the government itself,” *In re Quarles*, 158 U.S. 532, 536 (1895).

And, “No people can have any higher public interest, except the preservation of their liberties, than integrity in the administration of their government in all its departments.” *Trist v. Child*, 88 U.S. 441, 450-451, 1874.

Or, as succinctly stated by John F. Kennedy:

“And so, my fellow Americans: ask not what your country can do for you - ask what you can do for your country.” *Inaugural Address*, January 20, 1961.

3. I, Steven Alan Magritz, Complainant, state that I am over the age of twenty-one years; the facts set forth herein are based upon first-hand personal knowledge and I am a competent witness to testify to same; the facts contained herein are true, correct, complete, certain, not misleading; this statement is made under penalty of perjury under the laws of the United States of America. Any statements made upon information, reason, or belief, I believe and charge them to be true and correct.

4. Respondents have dishonestly and deceitfully applied the operating rules or statutes of their corporations named State of Wisconsin and Ozaukee County to Complainant's private property by requiring Complainant to register or record title to Complainant's private property with said corporations, of which Complainant is not an officer, employee, member, resident, or agent, nor has Complainant

consented to be an officer, employee, member, resident, or agent of said corporations, nor is Complainant knowingly, voluntarily or consensually in any way in privity with said corporations.

5. By virtue of the aforesaid registration or recordation Respondents have deceitfully asserted a right to control Complainant's private property and have used Complainant's private property as collateral to borrow or obtain monies or funds or other benefits *for themselves*, thereby *unjustly enriching themselves*, to Complainant's detriment and injury and in violation of the Constitutional prohibitions against the impairing of the Obligation of Contracts as well as the taking of private property for public use without just compensation, Article I Section 10 Clause 1, and, the Fifth Article in Amendment, respectively.

6. Each of the Respondents was acting as an officer, agent, employee, employer, partner, and/or associate of the other Respondents. Respondents have dishonestly and deceitfully applied the operating rules or statutes of their corporations named State of Wisconsin and Ozaukee County to Complainant's private property and have with force and violence disseized Complainant from the peaceful enjoyment, use, and possession of Complainant's private property, which private property Respondents have taken for public use without *any compensation*, let alone *just compensation*, thereby unjustly enriching Respondents and causing Complainant an injury. Each individual Respondent is or was a public officer at the time relevant to their Agreement evidenced in "Exhibit F" or the Affidavit of Criminal Report evidenced in "Exhibit N".

## **JURISDICTION AND VENUE**

7. Jurisdiction is appropriate in *this* district court as a court of record of the United States of America at the seat of Government as a Case invoking the full judicial power of a bona fide Article III court to hear a case in Equity pursuant to Article III section 2 clause 1 of the Constitution regarding violation of the prohibition against public officers impairing the obligation of contracts and the prohibition against public officers taking private property for public use without just compensation, Article I Section 10 Clause 1 and the Fifth Article in Amendment, respectively. The violation of the aforesaid prohibitions constitutes breach of fiduciary duty. Public officers have a fiduciary duty imposed by Article VI Section 3 of the Constitution of the United States of America.

8. Venue is appropriate in *this* district court as the bona fide Article III court located at the seat of Government to hear a case against United States citizens resident in a State (Respondents) brought by one of the people, a sojourning non-resident private American in inherent jurisdiction claiming inherent rights.

## **PARTIES**

9. Complainant is one of the people and a sojourner on the land of Wisconsin, a beneficiary of the Public Trust, a *private* American in *inherent jurisdiction* claiming inherent rights, not franchised, not a United States citizen, not a resident of State of Wisconsin. Complainant's *private* property was taken for public use without just compensation and in violation of the absolute Constitutional prohibition

against impairing the obligation of contracts. Complainant is heir or assignee of the “rights, privileges, immunities, and appurtenances of whatsoever nature, thereunto belonging” to the United States of America, via Land Patents, i.e., executed *contracts*, issued by The United States Of America on land previously governed under the “Northwest Ordinance”. Said rights, privileges, immunities, and appurtenances were granted *prior* to Wisconsin becoming one of the states of the Union, and are inviolable. Complainant’s birthright as an American to the peaceful possession and use of *private* property was Constitutionally secured by the *absolute* prohibition against impairing the obligation of contracts. Public officers ignored said absolute prohibition, thereby breaching their fiduciary duty. Complainant’s *private* land is named as “Respondent” in paragraph number 12 below and is described by metes and bounds in the Confirmation Deed marked “Exhibit A” attached hereto and incorporated herein by reference. Complainant is holder of the first priority secured interest in said private land as evidenced by records in the office of the Department of Financial Institutions of the State of Wisconsin, “Exhibit B” attached hereto and incorporated herein by reference.

10. Respondent Ozaukee County is a public corporation, a political subdivision of the county of Ozaukee or of the corporation named State of Wisconsin, which is in *naked possession* of Complainant’s private land and private property, and for whom most of the individual respondents are public officers.

11. Respondent Ozaukee County Sheriff's Department is a quasi-military Agency, a department or sub-corporation of the corporation named Ozaukee County, and the revenue-raising enforcement arm of said corporation, Ozaukee County.

12. Respondent 62.25 acres of land in the town of Fredonia, county of Ozaukee, Wisconsin, is Complainant's private property, or private land, that was taken for public use without just compensation; taken from Complainant's peaceful possession, enjoyment, and use by violent force of arms on or about October 24, 2001 by Maurice A. Straub, a public officer.

13. Respondent Thomas E. Winker is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

14. Respondent Robert A. Brooks is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

15. Respondent William S. Niehaus is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

16. Respondent Lee Schlenvogt is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

17. Respondent Daniel P. Becker is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

18. Respondent Joseph A. Dean is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

19. Respondent Raymond G. Meyer II is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.



20. Respondent Timothy F. Kaul is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

21. Respondent Jacob Curtis is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

22. Respondent Daniel R. Buntrock is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

23. Respondent Kathlyn T. Geracie is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

24. Respondent Andrew A. Petzold is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

25. Respondent Patrick Marchese is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

26. Respondent Karl V. Hertz is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

27. Respondent Cynthia G. Bock is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

28. Respondent Robert T. Walerstein is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

29. Respondent Nancy Sharp Szatkowski is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

30. Respondent John J. Slater is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

31. Respondent Jennifer K. Rothstein is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

32. Respondent Rose Hass Leider is/was a public officer, a resident of the State of Wisconsin, and is/was member of the Ozaukee County Board of Supervisors.

33. Respondent Donald G. Dohrwardt is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

34. Respondent Richard C. Nelson is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

35. Respondent Alan P. Kletti is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

36. Respondent Thomas H. Richart is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

37. Respondent John C. Grosklaus is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

38. Respondent Glenn F. Stumpf is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

39. Respondent Gerald E. Walker is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

40. Respondent Gustav W. Wirth, Jr. is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

41. Respondent James H. Uselding is a public officer, a resident of the State of Wisconsin, and a member of the Ozaukee County Board of Supervisors.

42. Respondent Kathlyn M. Callen is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

43. Respondent Mark A. Cronce is/was a public officer, a resident of the State of Wisconsin, and is/was a member of the Ozaukee County Board of Supervisors.

44. Respondent Maurice A. Straub is a public officer and a resident of the State of Wisconsin doing business as sheriff of Ozaukee County.

45. Respondent Karen L. Makoutz is a public officer and a resident of the State of Wisconsin doing business as treasurer of Ozaukee County.

46. Respondent Ronald A. Voigt is a public officer and a resident of the State of Wisconsin doing business as register of deeds of Ozaukee County.

47. Respondent Dennis E. Kenealy is a public officer and a resident of the State of Wisconsin doing business as corporation counsel of Ozaukee County.

48. Respondent Thomas W. Meaux is a public officer and a resident of the State of Wisconsin doing business as administrator of Ozaukee County.

49. Respondent Andrew T. Struck is a public officer and a resident of the State of Wisconsin doing business as parks commissioner of Ozaukee County.

50. Respondent Sandy A. Williams is a public officer and a resident of the State of Wisconsin doing business as a judge of Ozaukee County.

51. Respondent Andrew T. Gonring is a public officer, a resident of the State of Wisconsin, and did business as substitute judge of Ozaukee County.

52. Respondent Rhonda K. Gorden is a public officer and a resident of the State of Wisconsin doing business as assistant corporation counsel of Ozaukee County.

53. Respondent Adam Y. Gerol is a public officer and a resident of the State of Wisconsin doing business as district attorney of Ozaukee County.

54. The “Doe” respondents are public officers not presently known by name to Complainant who participated as principals, co-conspirators, or agents and/or aided and abetted and/or who were accessories to acts committed by other respondents.

55. The last known address of each of the named respondents is set forth in “Exhibit C” attached hereto and incorporated herein by reference in its entirety.

### **STATEMENT OF FACTS**

56. The acts complained of in this Complaint constituting *breach of fiduciary duty by public officers*, also known as trustees of the Public Trust or agents of the state or “government personnel”, had, for purposes of this Complaint, their inception on or about January 1, 1997.

57. The individual Respondents named herein are public officers and as such are fiduciaries of the Public Trust.

58. The individual Respondents attempted to take, and subsequently did take, Complainant’s *private* property for public use without just compensation in violation of the Fifth Article in Amendment to the Constitution of the United States of America, and in violation of Article I Section 13 of the Constitution of The State of Wisconsin, both of which are *self-executing*.

59. Complainant’s private land was included in those lands governed under the “Northwest Ordinance” prior to the adoption of the Constitution in 1788.

60. Article II of the “Northwest Ordinance” states, in pertinent part, “And, in the just preservation of rights and property, it is understood and declared, that no law ought ever to be made or have force in the said territory, that shall, in any manner whatever, interfere with or affect private contracts, or engagements, bona fide, and without fraud previously formed.”

61. Upon the adoption of the Constitution for the United States of America in 1788, in order that the ordinance “for the government of the territory north-west of the river Ohio may continue to have full effect,” the “Northwest Ordinance” was adopted by Congress as 1 Stat. 50 on August 7, 1789.

62. The provision “that no law ever be made or have force ... that shall ... interfere with or affect private contracts” was the precursor of Article I Section 10 Clause 1 of the Constitution prohibiting the impairing of the obligation of contracts.

63. The intent of Congress in disposing of the public lands by Land Patents, which are executed *contracts*, is evidenced in the senate debate of March 6, 1820 recorded in *The Debates and Proceedings in the Congress of the United States*, which reports the following (see Exhibit D incorporated herein by reference):

“Mr. [Senator] King, of New York, observed that, if the change of system were favorable to speculators, he should be found in the negative. But, so far from this being the fact, he considered the change as highly favorable to the poor man; and he argued at some length, that it was calculated to plant in the new country a population of **independent, unembarressed freeholders**; that by offering the lands in eighty-acre lots, it would place in the power of almost every man to purchase a **freehold**, the price of which could be cleared in three years; that it would cut up speculation and monopoly; that the money paid for the lands would be carried from the State or country from which the purchaser should remove; that it would prevent the accumulation of an alarming debt, which experience proved never would and never could be paid.” (emphasis added)

64. Congress enacted the provisions set forth in the aforesaid senate debate on April 24, 1820 as 3 Stat. 566, chap. 51, Exhibit E, incorporated herein by reference.

65. Subsequent to the aforesaid Act of April 24, 1820, land was sold and Land Patents were issued by the United States of America wherein the purchasers obtained a freehold with all the privileges and immunities *that were being held in trust for them* by the United States of America, pursuant to the following form:

**“NOW KNOW YE.** That the **United States of America**, in consideration of the Premises, and in conformity with the several acts of Congress, in such case made and provided, **HAVE GIVEN AND GRANTED**, and by these presents **DO GIVE AND GRANT**, unto the said William Jones and to his heirs, the said tract above described: **TO HAVE AND TO HOLD** the same, together with all the rights, privileges, immunities, and appurtenances of whatsoever nature, thereunto belonging, unto the said William Jones and to his heirs and assigns forever.”

66. Complainant’s private lands are a subset of lands granted by Land Patents, i.e., executed contracts, under the aforesaid terms, with Complainant being an heir or assignee of “all the rights, privileges, immunities, and appurtenances of whatsoever nature, thereunto belonging,” which previously belonged to and were inherent in the United States of America *as trustee* for the people.

67. The aforesaid act of taking Complainant’s private property in violation of 1 Stat. 50 (the “Northwest Ordinance”) and Article I Section 10 Clause 1 of the Constitution *absolutely* prohibiting the impairing of the obligation of contracts, e.g., Land Patents issued by the United States of America *prior* to Wisconsin becoming a state, is a dishonest act and an act in breach of Respondents’ fiduciary duties.

68. The individual Respondent public officers named herein, acting in violation of and contrary to the Constitutions they are required by oath to be bound to support, have breached their fiduciary duty, acted dishonestly, and have thereby injured Complainant who is a beneficiary of the Public Trust.

69. Respondent public officers, directly or indirectly, by consent or assent, from January 1, 1997 through October 24, 2001, attempted to obtain Complainant's *private* property for public use without just compensation paid to Complainant.

70. Respondent public officers attempted to impose statutes, codes, rules, or regulations for the governing of *public* property against Complainant and Complainant's *private* property without the consent of Complainant and against the will of Complainant.

71. Respondent public officers attempted to obtain Complainant's *private* property for public use as well as for the benefit of the individual Respondents personally who would benefit therefrom by and through indirectly receiving wages, salaries, fringe benefits, retirement pensions or other perks.

72. Respondent public officers made demands for Complainant's *private* property by and through the use of the United States mail and in person.

73. On or about April 23, 2001 Complainant paid in full, *as extortion*, the \$22,634.97 demanded by Respondents, but Respondents converted Complainant's tender of payment and failed to credit the payment to Complainant.

74. On or about October 24, 2001 Maurice A. Straub, a public officer and a Respondent herein, accompanied by about two dozen armed public officers,

unknown named Respondents “Does”, entered upon Complainant’s *private* land, seized Complainant’s *private* land and *private* chattels for public use, and carried Complainant away and locked Complainant in jail.

75. Respondents took Complainant’s *private* property for public use without paying Complainant *any* compensation whatsoever.

76. Complainant’s *private* property taken for public use without just compensation was valued at the time of taking at over \$700,000.00.

77. Complainant attempted to recover Complainant’s *private* property through the court system but the court refused to provide Complainant remedy.

78. Complainant attempted to recover Complainant’s *private* property in pais but Respondents, or their predecessors, accused Complainant of violating one of their corporation’s statutes and had Complainant imprisoned for 5 years.

79. Upon release from prison Complainant again attempted to obtain remedy in the court but the court again turned a blind eye and refused Complainant remedy.

80. Complainant has exhausted administrative remedies wherein 37 Respondents *have agreed*, nihil dicit, to have taken Complainant’s *private* property for public use without just compensation, acting dishonestly and in breach of fiduciary duty, causing Complainant injury, and refusing Complainant remedy. See “Exhibit F”, incorporated herein by reference in its entirety.

81. Respondents intend to use, have “voted” to use, and are using, the *private* land taken from Complainant as a public park and *continue* to use Complainant’s *private* home as a residence for one of the Respondent public officers.



82. Respondents have acted in breach of their fiduciary duties by subjecting Complainant and Complainant's *private* property to public use without just compensation, without Complainant's consent, against Complainant's will, and in violation of the *absolute* prohibition against impairing the obligation of contracts.

83. Respondents have taken Complainant's *private* property for public use without just compensation as evidenced by "Exhibit G" incorporated herein by reference.

84. Respondents have impaired the obligation of contracts.

85. Respondents have acted dishonestly and in breach of their fiduciary duties.

86. Respondents have caused Complainant an injury.

87. Complainant incorporates herein by reference in *its entirety* Complainant's Affidavit in Support of this Complaint, and each and every Exhibit A through O accompanying this Complaint and said Affidavit evidencing Complainant's right of property, ownership of the private property taken for public use without just compensation, damages owed to Complainant, and particularly sets forth the criminal misconduct of sitting Ozaukee County judge Sandra A. Williams and Ozaukee County district attorney Adam Y. Gerol stated in "Exhibit N". The Memorandum of Law, "Exhibit O", is incorporated herein by reference in its entirety.

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# CAUSES OF ACTION

## FIRST CAUSE OF ACTION

### IMPOSITION OF A CONSTRUCTIVE TRUST

88. Complainant incorporates and re-alleges all of the foregoing paragraphs as if set forth at length herein.

89. Respondents, and in particular Respondent corporation Ozaukee County and the Ozaukee County Sheriff's Department, obtained *naked possession*, control, and color of law "title" over Complainant's *private* property for public use by unlawful and illegal means, without the payment of just compensation to Complainant, *and have been unjustly enriched*, as set forth herein above by way of Complainant's Affidavit in Support of this Complaint, paragraph number 87.

90. Respondents obtained naked possession of, control of, and colorable "title" to Complainant's *private* property by and through their Constitutional violations, and/or their dishonest acts, which were, and are, a breach of fiduciary duty.

91. Complainant's reputation and Complainant's *private* property are in danger of being irretrievably lost or materially impaired by the wrongful acts of Respondents.

92. For purposes of this Complaint "equity" means "justice"; and, "fraud" has a much broader connotation than at law and includes acts inconsistent with fair dealing and good conscience that result in a benefit conferred upon the one holding a dominant position.

93. A constructive trust is the formula through which the conscience of equity finds expression. When property has been acquired in such circumstances that the holder of the legal title may not in good conscience retain the beneficial interest, equity converts him into a trustee. The purpose of the constructive trust is prevention of unjust enrichment.

94. Respondents Ozaukee County and the Ozaukee County Sheriff's Department have been unjustly enriched by the taking of Complainant's *private* land and *private* effects for public use without just compensation.

95. The "legal" title to Complainant's land, which is now in the name of the Respondent, Ozaukee County, is the result of Constitutional violations, dishonest acts, and breach of a fiduciary duty owed by the named Respondents as fiduciaries of the Public Trust to Steven Alan Magritz, beneficiary of the Public Trust.

96. The Court should find that the Respondents, and each of them, gained "legal" title to or possession of Complainant's *private* land and *private* effects, Complainant's other estate assets, and any assets, income, or monies derived from the estate assets, as a result of Constitutional violations, breach of a fiduciary duty, and/or fraud, and should find that the Respondents, and each of them, hold the title(s) as an involuntary trustee for the benefit of Complainant.

97. Complainant has been injured in Complainant's property and Complainant's right to property by the taking of Complainant's *private* property for public use without just compensation.

98. Respondents physically took possession and control of Complainant's *private* property for public use on or about October 24, 2001, have denied complainant the use or possession of said property since that date, and have refused to compensate Complainant for said *private* property taken for public use.

99. Complainant petitions this Court for the imposition of a constructive trust over the use and operation of Complainant's *private* land and *private* effects and the proceeds of the disposition of any of Complainant's *private* property and effects and the income or profits obtained by Respondents from, or by virtue of, possession or use of Complainant's *private* property and effects.

100. Complainant further petitions this Court for the return of possession and control of all Complainant's *private* property taken for public use without just compensation.

## **SECOND CAUSE OF ACTION**

### **AN ACCOUNTING OF ALL PROPERTY TAKEN**

#### **OR HELD IN TRUST**

101. Complainant incorporates and re-alleges all of the foregoing paragraphs as if set forth at length herein.

102. It is impossible for Complainant to determine the extent of injury inflicted upon the *private* property of Complainant seized by Respondents, injuries including but not limited to the destruction and removal of outbuildings or the cutting or harvesting of valuable, slow-growing timber planted decades ago, or monies

received from Complainant's *private* assets by disposition or sale or lease or rental or by any other mechanism, or mense profits, without a detailed review of the books and records of the respondent corporation Ozaukee County and the respondent entity Ozaukee County Sheriff's Department.

103. Accordingly, Complainant seeks an accounting of the use, or disposition, or cutting or harvesting, or removal, of all the *private* effects taken from Complainant, *without exception*, and monies or mense profits or other property or services received by Respondents with regard to Complainant's *private* effects from the individual Respondents and the Respondent entities named Ozaukee County and Ozaukee County Sheriff's Department, and/or the appointment of a receiver over Ozaukee County and the Ozaukee County Sheriff's Department.

### **THIRD CAUSE OF ACTION**

#### **BREACH OF THE PUBLIC TRUST / BREACH OF**

#### **FIDUCIARY DUTY BY PUBLIC OFFICERS**

104. Complainant incorporates and re-alleges all of the foregoing paragraphs as if set forth at length herein.

105. Respondents named above in paragraphs numbered 13 through 54 are *public officers and fiduciaries of the Public Trust* created by the Constitution of the United States of America which Respondents are *bound* to support pursuant to Article VI Section 3.

106. Complainant accepts the offices created by the aforesaid Constitution and the Constitution of The state of Wisconsin and the general laws conforming thereto, as well as the oaths that bind the public officers to said Constitutions and laws.

107. Complainant is a *beneficiary* of the Public Trust.

108. By virtue of the relationship between Complainant and Respondents, at all times relevant to this Complaint Respondents owed Complainant a fiduciary duty.

109. Respondents' major duties as trustees of the public trust are to maintain honesty and loyalty to the trust instrument(s), which are the Constitution of Wisconsin and Constitution of the United States of America.

110. As a public officer and *fiduciary* of the Public Trust, Respondents are obligated to serve with the highest fidelity.

111. Respondents have a fiduciary duty to Complainant, a *beneficiary* of the Public Trust, to display good faith, honesty, and integrity.

112. Respondents failed in their fiduciary duty to display good faith, honesty, and integrity toward Complainant.

113. Respondents' dishonest or *bad faith* acts displayed against Complainant, as set forth more fully in Complainant's Affidavit in Support of Complaint previously incorporated herein by reference, include, but are not limited to, extortion, theft of funds, theft of public records, tampering with public records, concealment of public records, slander of title, infringement of rights secured by Land Patents, trespass on land, aggravated assault, false imprisonment, theft of private property, conspiracy,

misprision of felony, racketeering, retaliation against a witness and victim of crime, and domestic terrorism, *all dishonest acts in breach of fiduciary duty*.

114. Respondents' acts or conduct against Complainant, including but not limited to impairing the obligation of contracts and the taking of Complainant's *private* property for public use without just compensation *resulting in unjust enrichment*, are *dishonest acts in breach of their fiduciary duty*.

115. Respondents, and each of them, acted in conscious disregard of Complainant's rights. The respondents' acts were designed to injure, and did in fact cause injury, and subjected complainant to the injuries as set forth in this Complaint.

116. As a proximate result of respondents' acts or conduct, Complainant has been injured in his rights or his person or his livelihood or his property or his right to property.

117. Respondents' acts or conduct with regard to Complainant's *private* land and *private* effects were conscious acts or conduct, which were done in conscious disregard of Complainant's financial well-being.

118. Respondents' acts or conduct, including but not limited to deceitfully or wrongfully subjecting Complainant's *private* property to operating rules or statutes which apply only to property of the corporations named State of Wisconsin or Ozaukee County, and thereafter using Complainant's *private* property as collateral to obtain profits or benefits for the corporations, constitute taking of *private*

property for public use without just compensation, unjust enrichment, and have caused an injury to Complainant.

119. Respondents' acts or conduct, including but not limited to the physical taking by force of Complainant's *private* land and *private* effects for public use without just compensation, unjustly enriched Respondents and caused Complainant an injury.

120. As a result of Respondents' acts or conduct, Complainant was subjected to Respondents' callous and wanton disregard for the rights of Complainant. As a direct and proximate result, complainant suffered severe emotional distress and personal injuries.

121. Respondents' acts or conduct against Complainant, including but not limited to taking Complainant's *private* property for public use without just compensation, are *ultra vires*.

122. Since April 19, 2001, Respondents have had Notice by way of publication in the official newspaper of Ozaukee County for the publication of legal notices that any tort-feasor against Complainant would be held personally liable and subject to liquidated damages of \$15,000,000 for each and every occurrence of trespass. A copy of the Affidavit of Publication of Complainant's Notice Of Remedy is marked "Exhibit H" and is attached hereto and incorporated herein by reference.

123. Prior to April 19, 2001, Respondents had Notice by way of publication in the official newspaper of Ozaukee County for the publication of legal notices as well as by way of recording in the public record maintained in the office of the Register of



Deeds that Complainant's land was *private* land, was not hypothecated to the public, was not abandoned, was not subject to taxation by corporations such as Ozaukee County or State of Wisconsin, the rights to which were protected to Complainant as heir or assignee by Land Patents no. 672 and 1435 issued by The United States of America. See Affidavit in Support, ¶¶ 9 – 16, and Exhibits J, K, L, M; both the Affidavit and all exhibits are incorporated herein by reference.

124. As a proximate result of the Respondents named in paragraphs 13 through 54, and each of them, for acts and conduct constituting breach of fiduciary duty resulting in the taking of Complainant's *private* property for public use without just compensation, Complainant Steven Alan Magritz has been injured in an amount not less than Seven Hundred Thousand dollars (\$700,000.00) or such sum as may be determined at trial and within the jurisdiction of *this* Court.

125. As a proximate result of the Respondents named in paragraphs 13 through 54, and each of them, for acts and conduct constituting breach of fiduciary duty for acts of violence against Complainant, or deprivation of liberty of Complainant, before, during, and/or after the taking of Complainant's *private* property for public use without just compensation, resulting in loss of livelihood, loss of profits, and suffering severe emotional distress and personal injuries, Complainant Steven Alan Magritz has been damaged in the amount of such sum as may be determined at trial and within the jurisdiction of *this* Court.

126. Respondents' acts were willful, deliberate, outside of and beyond the scope of their authority. In doing the acts or conduct complained of, Respondents acted

with fraud, oppression, or malice, and Complainant is therefore entitled to punitive damages in the amount as determined at trial and within the jurisdiction of *this* Court.

#### **FOURTH CAUSE OF ACTION**

#### **BREACH OF FIDUCIARY DUTY BY OFFICERS OF THE COURT**

#### **RETALIATION AGAINST VICTIM/WITNESS**

127. Complainant incorporates and re-alleges all of the foregoing paragraphs as if set forth at length herein, and in particular paragraph number 87.

128. The good name of the State, be it that associated with the General Government or with the Government of one of the several States, must be especially protected with regard to the reputation of the high-calling to the judicial branch of government vis-à-vis the legislative or executive branches, both of which have earned near single-digit scores in the realm of honesty and integrity, since the support of the state by the people is directly proportional to the *perception of the people* that the public officers of the judicial branch will act equitably and righteously, and *will dispense justice*, and *justice* without respect to persons.

129. As set forth in Complainant's Affidavit in Support incorporated herein by reference in paragraph number 87, Respondents Dennis E. Kenealy, Sandy A. Williams, Rhonda K. Gorden, and Adam Y. Gerol are all attorneys and *officers of the court*, with Williams also being a judge, who have acted dishonestly and in breach of their fiduciary duties by engaging in various criminal acts including but not limited

to misprision of felony, abuse of legal process, malicious prosecution, and retaliation against a victim and witness of crime, Complainant Steven Alan Magritz.

130. The misuse and abuse of the justice system by these four public officer respondents by using the judicial system and the threat of force inherent in the police power of the state against Complainant constitutes particularly egregious acts of dishonesty and breach of fiduciary duty destructive of the good name of the state.

131. The wanton disregard for justice, for the rule of law, for their positions as Trustees of the Public Trust, and for the Constitutions of Wisconsin and The United States of America by Kenealy, Williams, Gorden, and Gerol is destructive of the good name of the state and contemptuous of the good name of the state.

132. As a result of these four Respondents' acts or conduct described in Complainant's Affidavit of Criminal Report which accompanies and is incorporated by reference in Complainant's Affidavit in Support of this Complaint and therefore in this Complaint, Complainant was subjected to Respondents' callous and wanton disregard for the rights of Complainant. As a direct and proximate result, Complainant suffers severe emotional distress and personal injuries and is in threat of physical violence and restraint of liberty resulting from these four Respondents abuse of legal process and/or malicious prosecution.

133. As a proximate result of the Respondents named Kenealy, Williams, Gorden, and Gerol, and each of them, for acts and conduct constituting breach of fiduciary duty and for threatened acts of violence or deprivation of liberty against

Complainant, Complainant Steven Alan Magritz has been damaged in the amount of such sum as may be determined at trial and within the jurisdiction of *this* Court.

**FIFTH CAUSE OF ACTION**

**QUO WARRANTO –**

**“The state of Wisconsin” ex rel. Steven Alan Magritz**

134. Complainant incorporates and re-alleges all of the foregoing paragraphs as if set forth at length herein.

135. This cause of action is titled **“The state of Wisconsin” ex rel. Steven Alan Magritz.**

136. The Attorney General of the State of Wisconsin *has refused* to take any action whatsoever against the Respondents who are in breach of their fiduciary duty as set forth at length herein above and in the affidavits incorporated herein by reference.

137. Quo warranto is the appropriate action, brought in the name of the state to protect the good name of the state, when any person shall usurp, intrude into or unlawfully hold or exercise any public office, civil or military, or any franchise within *this* state, or any office in a corporation created by the authority of *this* state.

138. Respondents named in paragraphs 13 through 54 are all public officers holding public office in “this” state.

139. Respondents, and each of them, as a public officer is obligated to serve with the highest fidelity.

140. Respondents, and each of them, major duty as a trustee of the Public Trust is to maintain honesty and loyalty to the trust instrument(s), which are the Constitutions of Wisconsin and the United States of America.

141. Article VI, Clause Three of the Constitution of the United States reads, in pertinent part, "... *all* executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution;"

142. The Fourteenth Amendment to the Constitution of the United States of America reads, in pertinent part, "No Person shall be a Senator or Representative in Congress, or elector of President and Vice President, or hold any office, civil or military, under the United States, or under any State, who, having previously taken an oath, as a member of Congress, or as an officer of the United States, or as a member of any State legislature, or as an executive or judicial officer of any State, to support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same, or given aid or comfort to the enemies thereof."

143. Respondents, and each of them, by willingly, knowingly, consciously, deliberately, wantonly, acting in violation of the Constitutional prohibition against impairing the obligation of contracts and the self-executing prohibition against the taking of *private* property for public use without just compensation, have not only failed, but have *refused*, to support the Constitution of the United States and therefore have engaged in insurrection or rebellion against said Constitution.

144. The Fourteenth Amendment further states, in pertinent part, “But neither the United States nor any State shall assume or pay any debt or obligation incurred in aid of insurrection or rebellion against the United States, ...; but all such debts, obligations, and claims shall be held illegal and void.”

145. Respondents, and each of them, by their acts in breach of their fiduciary duty and in insurrection or rebellion against the Constitution of the United States, have forfeited their office, emoluments, perks, pensions, et cetera, and are barred from holding any office, civil or military, in or for the government of the United States or the government of the State of Wisconsin.

146. Respondents, and each of them, shall within 45 days serve upon Relator Steven Alan Magritz an original verified Response showing by what constitutional authority Respondent performs any act in or exercises any function of public office, and file a copy of Respondent’s Response with the Clerk of this Court.

**SIXTH CAUSE OF ACTION**  
**QUO WARRANTO –**  
**REVOCATION OF “CHARTER” OF “OZAUKEE COUNTY” FOR**  
  
**CORPORATE ACTS COMMITTED IN EXCESS OF ITS**  
**CORPORATE CHARTER**

**“The state of Wisconsin” ex rel. Steven Alan Magritz**

147. Complainant incorporates and re-alleges all of the foregoing paragraphs as if set forth at length herein.

148. This cause of action is titled “**The state of Wisconsin**” ex rel. **Steven Alan Magritz**.

149. The Attorney General of the State of Wisconsin *has refused* to take any action whatsoever against the Respondents who are in breach of their fiduciary duty as set forth at length herein above.

150. Quo warranto is the appropriate action, brought in the name of the state to protect the good name of the state, when any person shall usurp, intrude into or unlawfully hold or exercise any public office, civil or military, or any franchise within this state, or any office in a corporation created by the authority of this state.

151. Respondent Ozaukee County is *a public corporation*, a political subdivision of the county of Ozaukee or of the corporation named State of Wisconsin, which is in *naked possession* of Complainant’s private land and private property.

152. The county of Ozaukee was erected as a *trust* by the Laws of Wisconsin, 1853(A), Chapter 21, as evidenced by “Exhibit I”, incorporated herein by reference.

153. The powers of the county of Ozaukee are not unlimited but are confined to such as are expressly granted by the Laws of Wisconsin under which it was erected or that are necessary for the purpose of carrying out its express powers or the object of its creation.

154. Regarding the erection of the trust named “Ozaukee”, the Laws of Wisconsin, 1853 Chap. 21 Section 1 reads in pertinent part: “... [metes and bounds

description] is hereby set off and erected into a separate county, under the name and title of Ozaukee.”

155. Section 2 states: “That said county of Ozaukee is hereby erected, established, and organized with all the rights, powers, and privileges by law granted to other counties of this state, and subject to all general laws established for county government.”

156. Complainant is informed and believes, and so charges, that the corporation named “Ozaukee County” is either a subunit of the county of Ozaukee or a subunit of the corporation named “State of Wisconsin” which itself Complainant is informed and believes to be a subunit of the corporation named “United States”.

157. In as much as that created can have no more power or authority than its creator, the corporation named “Ozaukee County” may not have and may not lawfully exercise, any power or authority not originally granted by the people to either of the Public Trust(s) named The United States of America or The state of Wisconsin, as such powers are granted or restricted by the Constitutions of either.

158. “Ozaukee County”, being a legal fiction and a public corporation, is legally and lawfully incapable of asserting a claim against, or claiming a duty from, a natural born man with inherent rights in inherent jurisdiction, or against the *private* property of said man, except by way of a bona fide contract.

159. Complainant has always acted within, or exercised Complainant’s inherent rights in, inherent jurisdiction and has not willingly, knowingly, or consensually acted in statutory jurisdiction.



160. “Ozaukee County”, by and through its public officers, has imposed its public corporate statutes or bylaws or rules or regulations outside its lawful jurisdiction and against the *private* rights and *private* property of Complainant in violation of the limitations and restrictions placed upon its apparent creator the Public Trust by the Constitution of the United States of America and the Constitution of The state of Wisconsin.

161. “Ozaukee County” has imposed its statutes, which allow it to tax public property, against the *private* property of Complainant which is outside the jurisdiction of the corporation named “Ozaukee County”.

162. The imposition by the corporation named “Ozaukee County” of corporate statutes or bylaws or rules or regulations outside of its lawful jurisdiction and against the *private* property of Complainant is an *ultra vires* act.

163. In addition to the corporation named “Ozaukee County” imposing the statutes or bylaws or rules or regulations regarding taxation outside of its lawful jurisdiction, “Ozaukee County”, by and through its public officers, has taken Complainant’s *private* property for public use without just compensation.

164. The taking of Complainant’s private property for public use without just compensation is an *ultra vires* act.

165. Assuming the statutes of the corporation named State of Wisconsin regarding foreclosure of “tax certificates” or “tax liens” apply to the *private* land of Complainant, which Complainant states they do not, “Ozaukee County”, by and

through its public officers, has nevertheless violated those very statutes which “Ozaukee County” *must* obey when proceeding with an *in rem* foreclosure.

166. Regarding the duties and liabilities of the corporation named “Ozaukee County”, Wis. stat. § 59.02(1) states, “The powers of a county as a body corporate can only be exercised by the board, or in pursuance of a resolution adopted or an ordinance enacted by the board.”

167. Wis. stat. § 59.52(12) regarding accounts and claims states, “The board may: a) ... in counties with a population of 50,000 or more, the board may delegate its power in regard to current accounts, claims, demands or causes of action against the county to a standing committee if the amount does not exceed \$10,000 ...”

168. The population of “Ozaukee County” in 2001 was in excess of 50,000, and the alleged claim by Ozaukee County against Complainant’s private land was in excess of \$20,000, therefore any “foreclosure” action against Complainant’s private land had to be exercised by the board rather than a standing committee, which it was not.

169. The decision and approval to institute a “foreclosure” action against Complainant’s *private* property was made by the Taxation and General Claims Committee (since *abolished*) consisting of five (5) members.

170. The decision and approval to institute a “foreclosure” action against Complainant’s *private* property was *not* made by the full board consisting of 32 members, *as required by Wisconsin statutes*.

171. The foreclosure action by the corporation named “Ozaukee County” against Complainant’s *private* property was instituted in violation or contravention of the statutes of the State of Wisconsin and was therefore an *ultra vires* act.

172. The public officers and employees of the corporation named “Ozaukee County” have been NOTICED no less than a dozen times since approximately September 2001 of the *ultra vires* acts perpetrated in the name of “Ozaukee County” but have failed and refused to correct said acts.

173. “Ozaukee County”, by and through its public officers, has not only failed and refused to correct its *ultra vires* acts against Complainant, but has retaliated against Complainant, a victim and witness of crime, for exposing the *ultra vires* acts.

174. Respondent corporation “Ozaukee County”, for *ultra vires* acts against Complainant beginning in 2001 and continuing to this day, should have its corporate charter revoked and its assets sold and/or returned to the county of Ozaukee, the aforesaid trust erected in 1853 pursuant to the General Laws of Wisconsin.

175. Complainant reserves the right to amend this Complaint or add additional counts including but not limited to extortion, racketeering, domestic terrorism, or other torts, which may or may not be considered punishable pursuant to the criminal laws of the United States of America or Wisconsin.

## DEFINITIONS

176. **Private property** - As protected from being taken for public uses, is such property as belongs absolutely to an individual, and of which he has the exclusive right of disposition; property of a specific, fixed and tangible nature, capable of being had in possession and transmitted to another, such as houses, lands, and chattels. *Homochitto River Com'rs v. Withers*, 29 Miss. 21, 64 Am.Dec. 126; *Scranton v. Wheeler*, 21 S.Ct. 48, 179 U.S. 141, 45 L.Ed. 126. (Black's Law Dict. (4<sup>th</sup>. ed. 1968), p. 1382 col. 2).

177. **Equitable Relief** - relief that is just or consistent with the principles of justice.

178. **Fraud in equity** - has a much broader connotation than at law and includes acts inconsistent with fair dealing and good conscience that result in a benefit conferred upon the one holding a dominant position.

179. **Freehold** – See Memorandum of Law incorporated herein by reference.

## PRAYER FOR RELIEF

Complainant seeks equitable relief, as Complainant has no adequate remedy at law. Since Equity will not suffer a wrong without a remedy, and since Respondents may not in Equity enjoy the fruits of their bad faith or be unjustly enriched, Complaint demands the following remedies:

1. Complainant demands a Declaratory Judgment declaring:

A) Respondents had, and have, no right or authority to require Complainant to register or record Complainant's *private* property in the public record and thereby benefit at the expense of and to the injury of Complainant.

B) Respondents had, and have, no right or authority to require Complainant to register or record Complainant's *private* property in the public record without full disclosure of the liabilities or consequences to Complainant, and full disclosure of the benefits to the Respondents.

C) Respondents had, and have, no right or authority to require Complainant to register or record Complainant's *private* property in the public record and thereafter exert or impose any use or control over said property without just compensation for said use or control.

D) Respondents had no authority to impose a tax on Complainant's land protected by Land Patents issued prior to the admission of Wisconsin as a State.

E) Respondents have waived any and all defenses by failing or refusing to respond to Complainant's NOTICE: TO EXHAUST ADMINISTRATIVE REMEDIES and FOR OTHER PURPOSES.

F) Respondents had no right or authority to take Complainant's *private* property for public use without just compensation.

2. Complainant demands the imposition of a constructive trust over the 62.25 acres of land in the town of Fredonia, county of Ozaukee, Wisconsin, named as Respondent herein above in paragraph 12, which is Complainant's *private* property, or *private* land, that was taken for public use without just compensation.

3. Complainant demands the imposition of a constructive trust over the *private* chattels of Complainant taken without just compensation, *or the proceeds* of said chattels, *and the bank accounts* in which the proceeds may have been deposited, of Respondents Ozaukee County and Ozaukee County Sheriff's Department.

4. Complainant demands an accounting of all of Complainant's property taken by Respondents, and either the return of said property or compensation therefor. The accounting must include, but is not limited to, the building materials such as concrete blocks, dimensional lumber, solar panels, greenhouse materials, conduit, hundreds of feet of plastic water pipe, metal for fabricating, maintenance and repair materials, dozens of cars and trucks with big block engines, fuel storage tanks, outbuildings, two-story guest house, any and all trees cut or removed, all monies or any thing of value received for the transfer, possession, or use of Complainant's *private* chattels, *private* land, or *private* buildings. This listing is not all-inclusive.

5. Complainant demands the lands and buildings be restored to Complainant's exclusive, full, complete, unrestrained, unhindered possession and use, without any past, present, or future obligation, duty, or liability by Complainant to any of the Respondents or their principals.

6. Complainant demands Respondents be compelled to execute any and all documents evidencing no title or interest or claim whatsoever in or by any of the Respondents in the 62.25 acres of *private* land of Complainant taken by Respondents, and acknowledging Complainant to own said lands, with both legal and equitable title, and exclusive use; with right of property and absolute right in,

of, and to said land, in *dominium directum et utile*, and to convey immediate possession and use to Complainant.

7. Complainant demands an order quieting title to the 62.25 acres of *private* land of Complainant taken for public use without just compensation and named as Respondent in paragraph number 12.

8. Complainant demands Respondents disgorge any and all income or profits derived from or attributed to the hypothecation of Complainant's *private* land, said hypothecation and investment or pledging of Complainant's *private* land having been concealed from Complainant or not disclosed to Complainant by Respondents, who as fiduciaries of the Public Trust owe a duty of full disclosure to Complainant, a beneficiary of the Public Trust.

9. Complainant demands Respondents disgorge any and all monies, funds, goods, services, and the fair market value of any goods or services, received from, by, or with regard to Complainant's private property taken by Respondents.

10. Complainant demands interest at the rate of ten (10) per cent, compounded monthly, based upon an investment value of \$700,000.00 on October 24, 2001, for the entire period that Respondents have deprived Complainant of the possession and use of Complainant's *private* property.

11. Complainant demands a Permanent Injunction against Respondents forever prohibiting Respondents from trespass, harassment, interference with, infringement upon, hindrance, impairment, molestation, or in any way or manner whatsoever controlling or attempting to control Complainant, or Complainant's

*private* property and right of property, or Complainant's peaceful use and possession of the 62.25 acres of land taken from Complainant for public use without just compensation and named as Respondent in paragraph number 12 above.

12. Respondents have had Notice since April 19, 2001 that any tort-feasor against Complainant would be held personally liable and subject to liquidated damages of \$15,000,000.00 for each and every occurrence of trespass. Complainant demands judgment against the individual Respondents named in paragraphs numbered 13 through 54 in the amount of \$15,000,000.00, jointly and severally, as punitive damages for breach of fiduciary duty, not to compensate Complainant for injuries, but **to give bad actors a legal spanking.**

13. Complainant, in the quo warranto action titled "**The state of Wisconsin**" **ex rel. Steven Alan Magritz** against the individual Respondents, demands that the individual Respondents named in paragraphs numbered 13 through 54 be ordered to show cause why they should not be immediately removed from office for breach of fiduciary duty, and, thereafter forfeit their office, emoluments, perks, pensions, et cetera, and be barred from holding any office, civil or military, in or for the government of the United States or the government of the State of Wisconsin.

14. Complainant, in the quo warranto action titled "**The state of Wisconsin**" **ex rel. Steven Alan Magritz** against the corporation named "Ozaukee County", demands that said corporation be ordered to show cause why it should not be liquidated and its charter, *if it exists at all*, be revoked, and the assets of said corporation be returned to the lawful county of Ozaukee, the trust named "Ozaukee"



