



WISCONSIN OFFICE OF JUDICIAL EDUCATION

August 22, 2025

Juvenile Clerk's Conference

DEALING WITH PRO SE LITIGANTS: A Primer

Comm. Barry Boline
Ozaukee County

Comm. Mark Fremgen
Dane County

Why Should You Be Concerned?

Marginalized people can become dangerous



Program Summary:

- What are the Origins of SC
- How to Identify a SC
- Examples of SC behaviour
- How should Courts deal with the SC



WISCONSIN OFFICE OF JUDICIAL EDUCATION

Who are Sovereign Citizens

Generally:

- Anti-government
- Tax revolt
- Believe solely in natural law
- Obstructionists
- Often resort to unlawful means to an end (at times a violent end)

Who are Sovereign Citizens

Pre-1960:

- Do not recognize federal jurisdiction (later, all forms of government; Anti-State movement)
- Religious groups (fringe or Christian Fundamentalists)
- Unstructured groups
 - E.g., Posse Comitatus had begun to emerge, as did many “wild west” survivor groups that lacked a fundamental structure and limited following.

Who are Sovereign Citizens

Post-1960:

- Anti-tax movements (*Posse Comitatus*);
- Non-tax focused organizations:
 - Neo-Nazi groups (The Order; the Weaver Clan)
 - Anti-Semitism
- Moorish Sovereign Movement (1990).
- Militia groups
- Anti-LGBTQ (and other social issues): Qanon

Who are Sovereign Citizens

- The Southern poverty Law Center estimates that there are over 300,000 sovereign citizens members in over 200 distinct organizations.
- The FBI Counterterrorism Division defines these members as a “growing threat to law enforcement.”
- And, as we see, a growing threat to the expedient and efficient machinations of the justice system.

Typical Criminal Case



Why Should Courts be Concerned with SM?

- Fraud
- Paper terrorism
- Obstructionism

Challenges with Sovereign Citizens

- Feign Ignorance
- Refuse to follow direction
- Poor, voluminous, and inconsistent pleading practice
- Strain on a Court's Patience
- Lawsuits against Court Officials

Refuse to Follow Direction

- SC prefer to run the court.
- Never answer the court's direct question.
- Tend to interrupt other party, attorneys, witnesses, and, in particular, the court.

Feign Ignorance

- Claim not to understand the process, the reason being in court, or the judge.
- Deny authority of the court.
- Extreme cases, a litigant may deny ability to understand English and require an interpreter.

Challenges: Video



Keywords you'll experience with Sovereign Citizens

References to UCC
Thumbprints on doc
"Common Law"
"Sui Juris"
"free man"
"All rights reserved"

Use of red ink
"Employee ID" (vs SSN)
© after name
Foreign sounding country
Special Trust Deposit
"lawful de jure"

Refer to person as "fiduciary", "entity", "representative",
or "executor of"

Pleadings

- Signature:
- ✓ “in Proporia Persona”
- ✓ Note that any capitalization of their name is “wrong”
- ✓ Sign off with “All Rights Reserved” and UCC-1 (they believe their authority is derived through the UCC) or using his/her name as a “living trust”
- ✓ Red Thumb Print over his signature (blood)

Case 2021PA000107PJ Document 238 Scanned 01-22-2024 Page 21 of 98

Based on the Supreme Court Case Brown v. Coffin and the Florida Department of Revenue cited above and attached to this case, as well as the argument described above we can conclude that the Respondent's rights of due process, along with their Fourth, and Seventh Amendment were violated. There is no real Child support contract in place with a wet ink signature by the Respondent agreeing to any payments. There are no forms of prior information given to the Respondent this requirement is coded in the above paragraph of 42 U.S.C. 668(5)(c)(i). For these reasons, the Child Support Contract is Considered Null and Void from the beginning and the Respondent hereby requests that the Courts acknowledge this fact and return all gifted funds, and remove all debts, and charges. If the Courts refuse to do so, the courts must produce a valid contract free from Duress including a wet ink Signature from the Respondent.

Kindly,

"Without Prejudice" U.C.C. 1-207, 1-308, 1-103.6, 3-402 (b) (1) Prejudice/Without Recourse

Quintus Pro Per, "Executor" Beneficiary, Authorized Representative, Secured Party Creditor Principal, Attorney-in-Fact, Holder-in-Due-Course, c/o/a Quintus Pro Per, "Executor" ENS LEGIS The Quintus Pro Per, "Executor" REVOCABLE LIVING TRUST All Rights Reserved, waiving none

What if I am Sued?

- Not unusual. SC often sue court officials in federal court.
- Contact your Corporation Counsel
- (Judges should contact Director of State Courts Office).

What if I am Sued?

- Protect yourself (sign up for notifications for any efforts to cloud title on property you own).
- Let your counsel handle the matter.
- If you become aware of a lien on your property, notify your attorney or Corp Counsel (you will need to get approval from the Executive Office (Governor) to remove the lien-which they are very willing to do).

Strain on Court's Patience

Broward County, Florida, Bond court:



Flags of War, Peace and Admiralty

Flag of War (or some SC refer to as a flag of admiralty):



Other Sovereign Claims

Flag of War:

- ***Schnieder v. Schlafer, et al***, 975 F.Supp 1160 (ED Wis. 1997):
- Court does not lack jurisdiction over a matter before it simply because the flag in the courtroom has a yellow fringe.

How to Deal with Extreme Litigants

1. Judges: Do not automatically recuse self.
2. Clerks: Accept the filings; do not give advice from the window; avoid arguments.
3. Do not allow Sovereign Citizens to record hearings.

How to Deal with Extreme Litigants

4. Do not try to persuade the sovereign citizen how their views (on the law, in particular) are not correct.
5. Do not feel as if you need to allow a sovereign to speak on and on.
6. If you feel intimidated, contact your courthouse security or bailiff's office.

How to Deal with Extreme Litigants

You are in
charge



But you are
the adult in
the room

How to Deal with Extreme Litigants

- 7. Be clear, direct and concise in directions.
- 8. Alert bailiff's office for additional security in preparation for hearing.
- 10. In exceptional cases, the Court may enter orders prohibiting future filings (other than habeas Corpus); be cognizant of any rulings.

Risks and Safety Issues

Liens against you and your family
Wis. Stat. 943.60(1)

943.60 Criminal slander of title.

943.60(1)(1) Any person who submits for filing, entering or recording any lien, claim of lien, lis pendens, writ of attachment, financing statement or any other instrument relating to a security interest in or title to real or personal property, and who knows or should have known that the contents or any part of the contents of the instrument are false, a sham or frivolous, is guilty of a Class H felony.

(2) This section applies to any person who causes another person to act in the manner specified in sub. [\(1\)](#).

Risks and Safety Issues

Be vigilant.

Take a class in courthouse or personal security and include your family.

Judicial Security Package (passed in 2024)