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5

6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF NEVADA**

8 CLIVEN BUNDY

9 Plaintiff,

CASE NO.:

10 v.

11 GLORIA NAVARRO, in her individual capacity

12 and

13 HARRY REID, in his individual capacity,

14 and

15 RORY REID, in his individual capacity,

16 and

17 BARACK OBAMA, in his individual capacity.

18 Defendants.
19

20
21 **BIVENS COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS**

22 1. Plaintiff, CLIVEN BUNDY, brings this complaint against each and every one of the named
23 Defendants, GLORIA NAVARRO, HARRY REID, RORY REID and BARACK OBAMA
24 in their individual capacities, pursuant to *Bivens v. Six Unknown Named Agents*, 403 U.S.
25 388 (1971), and alleges as follows:
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JURISDICTION

2. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1331 as involving questions and controversies arising under Constitution and the Federal laws and regulations arising thereunder.

VENUE

3. Venue is proper in this district pursuant to 18 U.S.C. § 2334(a) and 28 U.S.C. §§ 1391(b) and 1391(d) as all of the parties except one (Defendant BARACK OBAMA) reside and work in this district, are citizens of the State of Nevada, and the acts complained of, which constitutional the violation of Plaintiff’s constitutional rights occurred in this district.

THE PARTIES

- 4. Plaintiff CLIVEN BUNDY is a rancher who resides at Bunkerville, Nevada and is a citizen of the State of Nevada.
- 5. Defendant Gloria Navarro is a federal judge in the District of Nevada and resides in and is a citizen of the State of Nevada and whose alleged acts herein are not entitled to immunity. She is being sued in her individual capacity.
- 6. Defendant HARRY REID is currently A U.S. Senator who resides in and is a citizen of the State of Nevada and whose alleged acts herein are not entitled to immunity. He is being sued in his individual capacity.
- 7. Defendant RORY REID is the son of Defendant Harry Reid who resides in and is a citizen of the State of Nevada and whose acts alleged herein are not entitled to immunity. He is being sued in his individual capacity.
- 8. Defendant BARACK OBAMA is the President of the United States who currently resides in Washington, D.C. and is a citizen of the State of Illinois and whose acts alleged herein are not entitled to immunity. He is being sued in his individual capacity.

THE FACTS

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9. On or about March 24, 2014 for a period of days leading into April 2016, Defendant HARRY REID’S hand-picked Director of the Bureau of Land Management (BLM), Neil Kornze, a longtime REID aide, at the direction of Defendant HARRY REID ordered and sent the equivalent of federal storm-troopers to Plaintiff BUNDY’S ranch to seize his and his family’s land and capture and/or harm his cattle, at the direction of Defendant HARRY REID.
10. These so called federal agents proceeded to threaten the lives of Defendant BUNDY and his family at gunpoint, abuse and kill their cattle, including burying bulls in secret mass graves, and assaulting and tazing various BUNDY family members to force them off the land.
11. For this purpose, mercenaries were also hired to terrorize and harm Defendant BUNDY and his family.
12. As revealed by numerous news agencies and sources, the reason for this invasion and armed assault by the BLM and other agents, was to remove PLAINTIFF BUNDY and his family from the land so it could be sold for profit and/or kickbacks by and to Defendants HARRY REID and his son RORY REID, a Las Vegas lawyer in a secret under the table deal, being then negotiated by Defendant RORY REID on behalf of himself and his father. See, e.g., “Reports: Company Tied to Reid’s Son Wants Land in Bundy Standoff, Newsmax, Sunday, 13 April 2014. Exhibit 1 incorporated herein by reference. Not coincidentally it has been widely reported and disclosed that Defendant HARRY REID at all material times owned 93 acres adjacent to the Bundy ranch in Bunkerville. Exhibit 2 – “Busted: Harry Reid Owns 93 Acres Next to Bundy Ranch,” Truth and Action Report. He thus coveted his neighbor’s property and chattels.
13. Defendant BUNDY, his sons and family, along with peaceful persons who were rightly armed and defended by peaceful cowboys and militias under the Second Amendment of the

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1 Constitution succeeded, after much personal and physical harm and damage was committed
2 by agents of the BLM and Defendants HARRY REID AND RORY REID, in having the
3 BLM agents leave the premises at the BUNDY RANCH. Defendant BUNDY, his sons and
4 his family also possessed a First Amendment right to peaceable assemble and associate.

5 14. No sooner than this had occurred, Defendant HARRY REID, acting in concert with
6 Defendants RORY REID and OBAMA , each and every one of them, jointly and severally,
7 issued what in effect were public threats to and made false defamatory statements about
8 Defendant BUNDY and his family to further his under the table negotiated deal to seize and
9 sell the BUNDY ranch and its chattels, including any remaining cattle, for profit and/or
10 kickbacks from the purchaser(s), some of whom were reported to be communist Chinese.

11 15. Specifically, Defendant HARRY REID threatened and broadcast publicly, as reported in
12 numerous publications: “They’re nothing more than domestic terrorists..... I repeat. What
13 went on up there was domestic terrorism.” According to the Las Vegas Review-Journal
14 report of April 17, 2014, Defendant HARRY REID also publicly and falsely accused “the
15 Bundy backers of bringing their children to protest the BLM so that federal authorities
16 might harm them, which would prompt negative headlines around the world and hurt the
17 government’s case against the rancher.”

18 16. Also specifically, Defendant HARRY REID falsely broadcast publicly “There were
19 hundreds --- hundreds of people from around the country – that came there. They had
20 sniper rifles on the freeway. They had assault weapons. They had automatic weapons.”

21 17. The Las Vegas Review-Journal also reported other false statements by Defendant HARRY
22 REID: “According to Reid, ‘[S]ome protesters said they had ‘children and women lined up
23 because if anyone got hurt we wanted to make sure they got hurt first, because we want the
24 federal government hurting women and children. What if others tried the same thing.’”
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18. Further the Las Vegas Review-Journal reported other false statements by Defendant HARRY REID: “Cliven Bundy does not recognize the United States. He says that the United States is a foreign government. He doesn’t pay his taxes. He doesn’t pay his fees. And he doesn’t follow the law. He continues to thumb his nose at authority.” Defendant HARRY REID falsely added “If Bundy wins his battle with the BLM, it could set a precedent in which protesters and militias might come to the aid of other farmers and ranchers who have disputes with the federal government.” Laura Meyers, “Reid Calls Bundy Supporters ‘domestic terrorists,’ Las Vegas Review-Journal, April 17, 2014.

19. A day later, on April 18, 2014, the Las Vegas Review-Journal reported more threats and false statements by Defendant HARRY REID, acting in concert with Defendants RORY REID and OBAMA:

“The people, who hold themselves out to be patriots are not. They’re nothing more than domestic terrorists.” The publication also reported that “The Nevada Democrat said he had spoken in detail to Attorney General Eric Holder, FBI Director James Comey, Secretary of the Interior Sally Jewell (the department which oversees the BLM), as well as the Clark County Sheriff. Reid’s comments follow a weeklong back-and-forth between Bundy and the lawmaker. Reid said Monday that the situation at the ranch was ‘not over.’ Bundy struck back, saying Reid should stay out of Nevada and focus on doing his job in Washington. Reid said at an event on Thursday, It’s an issue that we cannot let go, just walk away from. Sen. Rand Paul said Reid shouldn’t be name-calling but added ‘there is a legitimate constitutional question’ as to whether states or the federal government should be in control.”

Lucy McCalmont, “Reid: Bundy’s domestic terrorists,’ Las Vegas Review-Journal, April 18, 2014.

20. Thus, Defendant HARRY REID, acting in concert with Defendants RORY REID and OBAMA, illegally and unethically misused the power of REID’s U.S. Senate position to have Plaintiff BUNDY prosecuted by the Obama administration in order to secure the land that was being negotiated for sale for profit and/or illegal kickback to HARRY REID and his son RORY, with the complicity of Defendant OBAMA. Defendant HARRY REID along with these other Defendants illegally and ethically misused the power of his office for

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1 personal gain, particularly since Plaintiff Bundy and his family did not harm any federal
2 agents and their mercenaries at the stand-off but simply exercised their Second and First
3 Amendment constitutional rights to bear arms and peaceably assemble to stand peacefully in
4 the way of this unethical, illegal, and corrupt attempted takeover of the Bundy's ranch for
5 the personal gain of Defendants HARRY and RORY REID as stated and/or supported by
6 Senator Rand Paul and scores of others.

7
8 21. Following the legal and constitutional stand-off, whereby Plaintiff BUNDY, his sons and
9 other family members and supporters exercised their Second Amendment right of self-
10 defense against the government, and succeeded in having the BLM agents and
11 representatives leave the Bundy ranch unharmed, Plaintiff BUNDY publically equated his
12 and his family's situation to the plight of "Negroes" in the old South, whereby they were
13 enslaved by a tyrannical government as he and his family believed they were given the
14 threats and violent attacks on his family members, his cattle and the Bundy's supporters. He
15 chose the word "Negro" believing that this was a proper term for African-Americans,
16 having looked up the word in Webster's dictionary. He meant no disrespect and insult to
17 African-Americans, particularly since he was equating his and his family's plight with them.
18 Indeed, the Reverend Martin Luther King referred to his people as "Negroes" and he is
19 recognized as the greatest African-American civil rights leader in American history.

20
21 22. Threatening, mocking and disparaging Plaintiff BUNDY at a White House Correspondents'
22 Dinner on May 2, 2016, just days after the Plaintiff BUNDY's successful standoff,
23 Defendant OBAMA made this public statement, which while he couched it as humor, was
24 not in fact humor but a threat to prosecute Defendant BUNDY and his sons and other family
25 members for the successful standoff. This despicable disrespectful mocking threat was made
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1 to further the false and threatening statements of Defendant HARRY REID, as set forth
2 above. Speaking at the dinner and on national and international television Defendant
3 OBAMA publicly stated:

4 “We have some other athletes here tonight, including Olympic
5 snowboarding gold medalist Jamie Anderson is here. We’re proud of her.
6 (Applause). Michelle and I watched the Olympics – we cannot believe
7 what these folks do – death-defying feats – haven’t seen somebody pull a
8 “180” like that fast since Rand Paul disinvited that Nevada rancher from
9 this dinner. (Laughter). As a general rule, things don’t end well if the
10 sentence starts, “Let me tell you something I know about the negro.”
11 (Laughter). You don’t really need to hear the rest of it. (Laughter and
12 Applause). Just a tip for you – don’t start your sentence that way.
13 (Laughter).”

14 23. Indeed, in February 2016, about two years later, Defendant OBAMA, acting in concert with
15 Defendants HARRY and RORY REID made good on his threat against Plaintiff BUNDY
16 and his sons and had the sons Ammon, Ryan, Dave and Mel Bundy, arrested and charged
17 with criminal acts by and through his Justice Department, now under the auspices of
18 Attorney General Loretta Lynch, for a peaceful but armed protest at a game reserve in
19 Oregon again over the BLM’s illegal and unconstitutional acts in attempting to seize land
20 and chattels of fellow ranchers.

21 24. The only one harmed at this protest was a protester who was without cause shot and killed
22 by a federal agent. The sons of Plaintiff BUNDY and no other protestor had harmed any
23 federal agent.

24 25. Shortly after this arrest and indictment in Oregon, Defendant OBAMA -- acting in concert
25 with Defendants HARRY and RORY REID after Plaintiff BUNDY traveled by airplane
26 from Nevada to visit his sons in prison in Portland, Oregon – ordered Attorney General
27 Loretta Lynch have Defendant BUNDY arrested at the Portland airport and charged and
28 then indicted with 17 counts of criminal acts in Nevada, and then had Defendant BUNDY
extradited back to Nevada and incarcerated in prison in solitary confinement, where he
remains to this day. Plaintiff BUNDY’S sons Ammon, Ryan, Dave and Mel Bundy were

1 also then indicted before a federal grand jury in Nevada for their alleged criminal acts
2 during the March/April 2014 standoff, in addition to the indictment in Oregon over their
3 peaceful protest there.

4 26. The indictment and later superseding indictment in the District of Nevada of Plaintiff
5 BUNDY, his sons and other defendants, was assigned for prosecution to Judge Gloria
6 Navarro.

7 27. Navarro was recommended for appointment to the federal bench by Defendant HARRY
8 REID and then nominated by Defendant OBAMA.

9 28. Navarro's history as contained in documents she submitted in support of her confirmation, a
10 United States Senate Committee on the Judiciary Questionnaire for Judicial Nominees,
11 show that she previously attended and graduated law school at Arizona State University in
12 Maricopa County, Arizona, the county where Sheriff Joe Arpaio is the sheriff.

13 29. Arpaio has filed litigation through Larry Klayman of Freedom Watch challenging
14 Defendant Obama's executive orders granting in effect amnesty to over 5 million illegal
15 aliens.
16

17 30. The issue of the legality of these executive orders are now before the U.S. Supreme Court,
18 where Arpaio, through Klayman, has also filed an amicus curiae brief.

19 31. Defendant Navarro, before becoming confirmed as a federal judge, from 2005 to 2007, was
20 the vice-president of the Latino Bar Association and from 2009 to 2010 was its president.
21 She is a Latino activist.
22

23 32. Sheriff Arpaio has been unfairly branded as racist against Latinos, in an unjustified reaction
24 to his stands against illegal immigration and support and endorsement of Presidential
25 Candidate Donald Trump who says that if elected he will force Mexico to pay for a wall to
26 keep out illegal Latino and other immigrants from crossing over into the United States.
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33. It is widely known that Klayman is Arpaio’s lawyer as this has been widely reported in the media both domestically and internationally, and he too by virtue of his representation of Arpaio has been falsely accused of being anti-Latino, even though he represented the Latino Republicans of Arizona in litigation of SB-1070, which was a state immigration bill that resulted in litigation all the way to the U.S. Supreme Court and was intended to allow law enforcement to more easily take action against illegal immigrants in Maricopa County and elsewhere in Arizona.

34. Sheriff Arpaio, Klayman’s client, supported SB-1070.

35. Again, in the United States Senate Committee on the Judiciary Questionnaire for Judicial Nominees, Defendant Navarro stated with regard to “Potential Conflicts of Interest” that “My husband is a Chief Deputy District Attorney for Clark County. Although he does not practice in federal court, individuals who he has prosecuted or may in the future prosecute may be or become party or petitioner in a federal court case. If I am confirmed as a judge, I expect to recuse from any case where my husband has prosecuted a party or petitioner.” Defendant Navarro concluded by stating “If confirmed as a judge, I will handle all matters involving actual or potential conflicts of interest.” As set forth above Defendant HARRY REID, acting in concert with the other Defendants, asked the District Attorney for Clark County to also prosecute Plaintiff BUNDY and his family, and presumably this request is still pending. Contrary the representations she made to the Senate Judiciary Committee during her confirmation process, Defendant NAVARRO has not recused herself.

36. Following the arrest and indictment of Plaintiff BUNDY, in order to telegraph to and instruct Defendant Navarro his desire not to see Bundy released from solitary confinement in prison, convicted and otherwise bankrupted and otherwise harmed such that Defendants HARRY and RORY REID could obtain and sell the Bundy’s land for their own profit or

1 kickbacks, as both are highly corrupt, Defendant HARRY REID had publicly published in
2 the Las Vegas Review Journal and other media as a means to communicate and instruct
3 Defendant NAVARRO on how to proceed against Defendant BUNDY and to poison any
4 jury pool at trial.

5 By JEFF GERMAN
6 LAS VEGAS REVIEW-JOURNAL

7
8 With the “outrageous lawbreaker” Cliven Bundy and four of his sons in custody, U.S.
9 Sen. Harry Reid of Nevada took to the Senate floor Thursday to renew his push to
10 preserve the scenic Gold Butte area northeast of Las [Vegas](#).

11 Reid proposed a congressional bill in 2013 to create a national conservation area at Gold
12 Butte, a region of rugged mountains, sandstone ridges and Native American
13 petroglyphs.

14 But the bill has stalled, and the Democratic leader in his Senate speech accused the
15 defiant Bundy family of blocking daily efforts by [federal officers to protect the land](#).

16 “Because of trouble caused by the Bundys and their pals, the federal employees tasked
17 with safely guarding these antiquities, were prevented from doing their jobs,” he said.
18 “These employees have been under constant physical and mental threat for doing what
19 the American people have tasked them to do

20 The senator still has hopes that President Barack Obama will preserve Gold Butte,
21 something he has the power to do under the law. Obama has made such declarations in
22 the past to protect federal land in Nevada.

23 Reid also called attention in his speech to the armed takeover of a government wildlife
24 refuge in Oregon earlier this year “by a dangerous group of militants” that included
25 Bundy family members.

26 “This particular episode of domestic terrorism has roots in Nevada, I’m sorry to say,”
27 Reid told his colleagues. “They were led by the sons of Cliven Bundy. Cliven who, as
28 we speak, is where he should be — in jail.”

Reid said the Bundy patriarch has been “breaking federal laws for decades,” adding,
“I’m disappointed that some of my colleagues supported this outrageous lawbreaker.”

Bundy is in federal custody facing 16 felony charges stemming from the April 12, 2014,
armed standoff with law enforcement near his Bunkerville ranch, which is part of the
Gold Butte area.

1 In court papers earlier this week, his defense lawyer, Joel Hansen, called Bundy a
2 political prisoner — like the late South African president and civil rights activist Nelson
Mandela — who is being punished for exercising his First Amendment rights.

3 “Harry Reid’s comments just serve to prove that Cliven and his sons and the rest of the
4 cowboys who came there (Bunkerville) to help are political prisoners,” Hansen said
5 Thursday. “Now we have one of the most powerful men in America, Harry Reid, saying
that they ought to be in prison.

6 “Is Harry Reid the judge in this case or is he trying to improperly influence and poison
7 the jury pool so that they will follow his opinion when they get to the jury box?”

8 Bundy, 69, and 18 other people, including four of his [sons](#), were charged in a federal
9 indictment in Las [Vegas](#) last month in connection with the 2014 Bunkerville showdown.

10 All 19 defendants have been ordered held without bail as dangers to the community.

11 The defendants are alleged to have participated in a “massive armed assault” on Bureau
12 of Land Management officers trying to round up Bundy cattle being grazed illegally on
federal land.

13 Jeff German, Reid Attacks Bundys on Senate Floor, calls for Gold Butte Protection, [Las Vegas](#)
14 [Review-Journal](#), April 7, 2016.¹

15 37. Seeing these comments in the media published in the [Las Vegas Review-Journal](#), which also
16 publishes daily legal notices and which all judges and their staff read, Defendant
17 NAVARRO, reacting to the commands of her benefactors Defendants HARRY REID and
18 OBAMA, set out to abridge and harm the constitutional rights of Defendant BUNDY by
19 refusing, without factual or legal bases, to grant *pro hac vice* status to out of state attorney
20 Larry Klayman, knowing that Defendant Bundy was involved in what the Department of
21 Justice called a complicated case and that Defendant Bundy sought a speedy trial as
22 provided by the Sixth Amendment to the Constitution and 18 U.S.C. §§ 3161 through 3174.
23

24 38. By coming up with factually and legally incorrect grounds to not grant Klayman *pro hac*
25 *vice* status, as set forth with greater specificity below, Defendant NAVARRO denied
26 Plaintiff BUNDY his Sixth Amendment right of counsel and caused BUNDY at one point,
27

28 ¹ Accessible at: <http://www.reviewjournal.com/news/las-vegas/harry-reid-attacks-bundys-senate-floor-calls-gold-butte-protection>

1 mistakenly agreed to forfeit his speedy trial rights, (which he has now rescinded) because he
2 lacks resources to pay his legal fees and needs more than one attorney to represent him, as
3 local counsel Joel Hansen needs Klayman's expertise and human resources to augment his
4 own, because he cannot prepare for and go to trial with only one lawyer. This is particularly
5 true given the underlying history and facts inherent to this prosecution, given what the
6 Justice Department has deemed a huge amount of discovery to turn over and that needs to
7 be reviewed and analyzed by defense counsel.
8

9 39. Moreover, Defendant NAVARRO and her Magistrate Judge have not permitted Defendant
10 BUNDY to be released from prison on bail, on the principal bogus grounds that he is a
11 threat to society and dangerous, as broadcast by Defendant HARRY REID, who instructed
12 Defendant NAVARRO that Bundy is a domestic terrorist and must be put away in prison
13 for life.

14 40. To make matters worse, Defendant NAVARRO and her Magistrate Judge have kept
15 Defendant BUNDY in solitary confinement, which constitutes cruel and unusual
16 punishment under the Eighth Amendment to the Constitution, since Bundy has done nothing
17 to merit being held in solitary confinement.
18

19 41. On information and belief, Defendant NAVARRO undertook to violate Defendant
20 BUNDY'S constitutional rights not just because she was told to do so by Defendant
21 HARRY REID and Defendant OBAMA, who proposed and nominated her to the federal
22 bench, but also to curry favor with the likelihood of a Democrat administration under the
23 presidency of Hillary Clinton.
24

25 42. As a Latino Democrat woman, Defendant Navarro understood that she would be high on the
26 list for a higher judicial or other appointment if she contributed as the sitting judge to have
27 Defendant BUNDY denied right of counsel of Klayman, as Klayman has been a strong
28

1 public advocate in exposing and taking legal actions to address and remedy the rank
2 corruption of Bill and Hillary Clinton. See www.freedomwatchusa.org.

3 43. Indeed, as founder of Judicial Watch, Klayman is the only lawyer ever to have a judge rule,
4 the Honorable Royce C. Lamberth, that a president committed a crime.

5 44. That president, Bill Clinton, was the husband of Hillary Clinton, Secretary of State in the
6 Obama administration.

7 45. Klayman as a public advocate has also taken legal actions to seek redress against the
8 corruption of Defendant HARRY REID, who views Klayman as an enemy, as he does
9 others who challenge his unbridled sleaze.
10

11 46. The facts of Defendant NAVARRO'S unethical and unconstitutional conduct are supported
12 by the dishonesty of her orders denying Klayman timely *pro hac vice* entry to defend
13 Defendant BUNDY. See Exhibit 2 incorporated herein by reference. In her first order of
14 March 31, 2016, she misrepresented that the District of Columbia Board of Professional
15 Responsibly had already ruled against Larry Klayman in a 10 year old proceeding that the
16 nation's premier ethics legal expert, Ronald Rotunda, has found to be meritless. To the
17 contrary, she falsely accused Klayman of making false representations when indeed she was
18 the one who had done so. This was done to harm Klayman and his reputation and to try to
19 justify the denial of Klayman's initial *pro hac vice* application and to justify her denial of
20 Defendant Cliven Bundy's constitutionally guaranteed right to the counsel of his choice. To
21 this date, as set forth below, Defendant NAVARRO has not corrected this unethical smear
22 against Klayman, done to further the interests of her benefactors Defendants HARRY REID
23 and OBAMA, as well as satisfy her own prejudices against Klayman and Bundy. Not
24 coincidentally, Klayman has also sued Defendant OBAMA on several occasions and
25 succeeded in perhaps the biggest loss for any administration in American history when
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1 Klayman twice enjoined OBAMA’s National Security Agency from accessing the
2 telephonic metadata of hundred of millions of American citizens without probable cause.
3 *Klayman v. Obama et al.*, 13-cv-00851.

4 47. Then, after Defendant NAVARRO denied Klayman’s *pro hac vice* application without
5 cause, particularly given the extremely low Supreme Court standard in favor of granting
6 such applications in criminal cases where there is a Sixth Amendment right to counsel, and
7 disingenuously asked for more information about the District of Columbia disciplinary
8 proceeding, and Klayman provided it showing that the matter had not ever been decided and
9 was in progress and would not be finally decided for years, given District of Columbia
10 procedures for reaching a final decision and rights of appeal, Defendant NAVARRO
11 dishonestly and cleverly held that she would only consider granting *pro hac vice* after the
12 proceeding ends in a favorable way to Klayman. See Exhibit 3 – Defendant NAVARRO
13 *Pro Hac Vice* Orders incorporated herein by reference.

14 48. This completely dishonest ruling would mean that Klayman would only be granted *pro hac*
15 *vice* entry after Defendant Bundy has been tried and perhaps convicted, and sentenced to
16 life imprisonment as a “domestic terrorist” and “anti-Negro racist” as telegraphed and
17 directed to Defendant NAVARRO by both Defendants HARRY REID and OBAMA.

18 49. Importantly, even the Department of Justice attorneys prosecuting the case against
19 Defendant BUNDY did not oppose *pro hac vice* entry and filed no such pleading – knowing
20 that it is unconstitutional and illegal to deny *pro hac vice* entry in a criminal case. Klayman
21 has been a member in good standing of the District of Columbia Bar for over 34 years and
22 has not been disciplined or suspended for even one day.

23 50. In short, Defendant NAVARRO has shown her true intentions and bias and prejudice, rising
24 to the level of denying Sixth Amendment right of counsel and to a speedy trial to Plaintiff
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**COUNT THREE – CONSPIRACY TO VIOLATE AND VIOLATION OF BUNDY’S
FIRST AMENDMENT RIGHTS**

1
2 56. Plaintiff BUNDY realleges and reincorporates the facts set forth in paragraph 1 through 55,
3 as set forth above.

4
5 57. Defendants, and each and every one of them, have conspired together to violate Cliven
6 Bundy’s constitutionally guaranteed rights of freedom of religion, freedom of speech,
7 freedom of the press, and freedom to peaceably assemble and petition the government for
8 redress of grievances.

9
10 58. Defendants have carried out this conspiracy through the acts mentioned in the complaint
11 above.

**COUNT FOUR – CONSPIRACY TO VIOLATE AND VIOLATION OF BUNDY’S
SECOND AMENDMENT RIGHT TO KEEP AND BEAR ARMS**

12
13 59. Plaintiff BUNDY realleges and reincorporates the facts set forth in paragraph 1 through 58,
14 as set forth above.

15
16 60. Defendants, and each and every one of them, have conspired together to violate Bundy’s
17 Second Amendment guaranteed right to keep and bear arms in conjunction with his First
18 Amendment rights to Peaceably Assemble and to Petition the Government for Redress of
19 Grievances.

20 61. Defendants have carried out this conspiracy as set forth in the Complaint, above.

PRAYER FOR DAMAGES AND OTHER RELIEF

21
22 62. Plaintiff BUNDY hereby sues for compensatory and punitive damages in excess of
23 \$50,000,000 for the illegal, unconstitutional, intentional and malicious acts of the
24 Defendants, and each and every one of them, jointly and severally, and seeks an order by
25 this honorable court quashing his indictment and releasing him on his own recognizance
26 from solitary confinement and from prison.
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1 63. Plaintiff BUNDY hereby sues for an order removing and recusing Judge Navarro as the
2 Judge in his criminal case.

3 64. Plaintiff BUNDY hereby sues for an order allowing counsel of his choice, Larry Klayman,
4 to be allowed *pro hac vice* status in Nevada federal court for the purpose of defending
5 BUNDY in the criminal case.

6 **JURY DEMAND BY PLAINTIFF**

7 Plaintiff Cliven Bundy hereby demands a jury for the trial of this case.

8 DATED this 10th day of May, 2016.

9
10 Respectfully submitted,

11 BY: /s/ Joel F. Hansen
12 JOEL F. HANSEN, ESQ.
13 Nevada Bar # 1876
14 1835 Village Center Circle
15 Las Vegas, NV 89134
16 *Attorney for Cliven Bundy*

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