

Sun Village Sovereign Press

SVSP
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PRESS



Tuesday, September 16, 2025

PUB. NO.: 2025-09-16

Sun Village California

ARTICLE XXX **NATURE OF ACTION**

This Charter and Complaint arises not from an isolated grievance but from a sustained, multi-decade campaign of organized dispossession, fraud, racketeering, and suppression orchestrated by state and non-state actors across banking, real estate, taxation, immigration, detention, and administrative sectors.

It is filed under the absolute authority of the **Universal Reservation of Rights (URR®™)** and enforced through the executive jurisdiction of the **Sun Village California Tribal Government (Bani Al-Shams)** and its official sovereign authority, the **Sun Village Sovereign Press (SVSP)**.

Plaintiffs — now twenty (20) distinct dynastic, tribal, and governmental entities — appear not as mere claimants, but as rightful heirs, record-holders, and sovereign executors of judgment. This is not a civil suit. It is a **jurisdictional reckoning**.

This action arises under tribal, common law, constitutional, statutory, maritime, equity, and international law to redress systemic violations, commercial fraud, territorial dispossession, racialized theft, and the unlawful dissolution of sovereign infrastructure. Across 125 counts, Defendants — acting in concert and under color of law — engaged in coordinated schemes that resulted in:

- The **theft, conversion, and foreclosure** of protected tribal and dynastic assets
- The redistricting, mapping fraud, and cartographic erasure of sovereign territories
- The destruction of sacred water infrastructure, mineral control, and environmental systems
- The civil, criminal, fiduciary, and racial violation of Plaintiffs' rights
- The corporate liquidation of historical Black and Indigenous municipal systems
- The **paper genocide and trust sabotage** of generational protections established under both tribal and American law

Plaintiffs — comprising dynastic individuals, tribal trusts, corporate arms, historic estate lineages, and reinstated sovereign entities — bring this action seeking declaratory, injunctive, compensatory, statutory, punitive, and equitable relief.

As of Count 125, the aggregate claimed damages exceed \$300,000,000,000 (Three Hundred Billion USD), spanning public-side and private-side harms as follows:

- **Public-Side Damages** include violations of due process, equal protection, takings clause infractions, civil rights breaches, and loss of infrastructure, water access, mineral royalties, and contract protections.
- **Private-Side Damages** include UCC/URR-enumerated trust injuries, sovereign title conversions, bloodline trespasses, fiduciary duty breaches, corporate sabotage, and treaty violations under the UDHR and UNDRIP.



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These counts collectively represent not only commercial and territorial injury, but also acts of environmental warfare, redlining reinvention, economic sabotage, cultural erasure, and legal terrorism directed at an Indigenous Black township and its protective dynastic trusts.

The injuries enumerated herein are **compounded**, not siloed. Each count builds upon a **pattern of coordinated wrongdoing**, warranting both **civil RICO** remedies and international protections afforded to tribal and indigenous polities.

This is not merely a civil lawsuit — it is a multi-jurisdictional proclamation of harm, identity reclamation, and sovereign reformation.

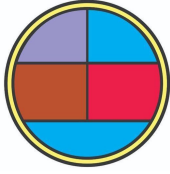
This Action Has Seven Pillars:

1. **To uphold covenant bloodline and dynastic succession**, as affirmed in the Torah (Leviticus 25:23–24), the Gospel (Romans 8:17), and the Qur'an (6:165, 21:73), through documented tribal and prophetic inheritance.
2. **To indict systemic enterprise misconduct** across credit institutions, servicers, agencies, private detention operators, courts, and foreign-backed administrators — all of whom profited from unlawful actions against sovereign estate.
3. **To restrain unlawful state and federal action** including overreach by USCIS, ICE, DHS, and county agencies in matters of foreclosure, taxation, immigration, surveillance, asset seizure, and private carceral profiteering.
4. To demand restitution and retribution for:
 - Fraudulent foreclosure attempts
 - Securitization of tribal estate
 - Credit sabotage and retaliatory collections
 - DMV-based property conversion
 - Immigration manipulation
 - Private prison detention and profiteering
 - Trespass upon tribal inheritance and land
5. To enforce international obligations and protections, including those arising under:
 - UNDRIP (United Nations Declaration on the Rights of Indigenous Peoples)
 - UDHR, ICCPR, ICESCR, ILO Convention 169
 - Vienna Convention on the Law of Treaties
 - Geneva Conventions & Additional Protocols
 - Hague Conventions (HCCH)



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6. **To enforce the URR®™ Global Fee Schedule**, an internationally served codex of liquidated damages, which provides legally binding penalties and financial accruals for every trespass, conversion, fraud, or act of suppression.

7. **To issue sovereign judgment under Divine, Tribal, and Admiralty Jurisdiction**, as vested in the Plaintiffs by their charters, trusts, genealogical mandates, and ministerial/diplomatic seals of authority.

This is a codified record of reckoning.

It is not simply a filing. It is **notice to the world, invocation of divine authority, and execution of sovereign judgment**. The Defendants stand accused under every realm of law — tribal, federal, international, admiralty, and divine.

They are **already judged in heaven**; this Charter now seals that judgment on earth.

The URR is both Shield and Sword.

It protects the Plaintiffs — and all who reserve their rights under it — while condemning those who trespass against covenant bloodline, trust, estate, and nation.

This Nature of Action is thus both a proclamation of law and a prelude to execution.

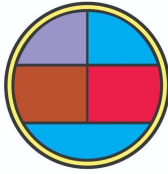
The battlefield is not a courtroom. It is the world itself.

And this Charter is the writ of judgment.



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ARTICLE XXXI **PRELIMINARY STATEMENT**

This action is not a plea for justice.

It is the issuance of final judgment — sovereign, tribal, dynastic, and divine — against a coordinated criminal enterprise that defrauded, dispossessed, detained, redistricted, erased, and retaliated against twenty sovereign Plaintiffs over decades of uninterrupted warfare.

These Plaintiffs are not civilians. They are nation-states.

They are dynasties. They are tribal governments. They are heirs. They are trusts. They are the resurrection of a township burned into silence, its founding charter drowned in maps drawn by fraud.

This is the execution of a **covenant war**, brought under the Universal Reservation of Rights (URR®™), enforced through the Sun Village California Tribal Government (Bani Al-Shams), and permanently recorded through the **Sun Village Sovereign Press (SVSP)** — the final instrument of truth and record for this generation.

I. WHO BRINGS THIS ACTION

This Proclamation is executed by:

- Living heirs and executors of sacred tribal bloodlines
- Dynastic admiralty trusts formed under indigenous, divine, and international law
- Reinstated infrastructure corporations erased by redlining
- The sovereign tribal government of Sun Village, California
- The successors of Melvin Ray Grubbs, Cherokee Moor, founder and redeemer of Sun Village
- The tribal leadership of Ansar El Muhammad, who reignited the sacred fire of sovereignty
- The trust apparatus protecting land, lineage, and legacy — now digitally sealed and armed

This sovereign body moves now as one.

Their jurisdiction is unlimited.

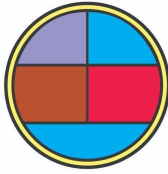
Their authority is absolute.

II. WHAT HAPPENED



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This action arises from a criminal enterprise whose structure is both vertical and horizontal:

Domain	Enterprise Actor	Modality of Trespass
Financial	Wells Fargo, American Express, Sunrise Banks	Securitization, dual-tracking, credit retaliation
Automotive	Chrysler Capital, Santander, dealership cartels	Vehicle seizure, deficiency fraud, UCC conversion
Governmental	DHS, ICE, DMV, County Assessor's Offices	Family targeting, lien fraud, taxation without jurisdiction
Judicial	Courts, servicers, title agencies	Constructive misrepresentation, fraud upon court
Penal	CoreCivic, Pinal County	Liberty conversion into profit through unlawful detention
Environmental	County of Los Angeles, zoning boards	Ecological sabotage, erosion of tribal land infrastructure

This network acted not as isolated agents, but as **a singular enterprise** — one that understood who the Plaintiffs were and moved to erase them, suppress them, and liquidate every instrument of succession they held. When complaints were filed, punishments followed. When rights were asserted, accounts were closed. When truth emerged, debt was weaponized. This is racketeering. This is genocide by instrument.

III. WHAT WAS DESTROYED

They did not just take land.
They took maps.
They did not just seize vehicles.
They destroyed movement.
They did not just issue liens.
They severed inheritance.

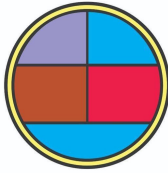
The crimes include, but are not limited to:

- Fraudulent foreclosure despite compliance
- Weaponized credit account closure and enterprise lawsuits
- Auto repossession without default, with fabricated claims
- Taxation of tribal land and vehicles held in trust without consent



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- Detention in private prisons without lawful adjudication
- Title fraud, water conversion, utility collapse, and redistricting designed to obliterate recognition

And yet none of it was new.

This is the **systemic continuation** of what began in 1939 — when Melvin Ray Grubbs, Moor and Cherokee, reversed federal redlining by purchasing 90% of Littlerock, California, and renaming it **Sun Village**. Through five tribal corporate entities — including Sun Village, Inc. and the Sun Village Water and Energy Companies — he built a sovereign, self-reliant Black township with its own infrastructure, law, and vision.

Every entity was later **dissolved without vote**, collapsed by fraud, and erased from public record. This case revives them all — legally, tribally, historically, and commercially.

IV. WHY NOW

This is the final phase of record correction.

- The Sun Village Trust is reinstated.
- The Sun Village National Registry and Tribe Up Registry™ are operational.
- The Digital Identity, Signature & Seal System is embedded and authenticated.
- The **125-count complaint** has been finalized, recorded, and digitally ledgered.
- The **URR®™ Global Fee Schedule** is attached and enforceable.
- The final list of 20 sovereign Plaintiffs is entered.

This filing is not an appeal. It is a **command** — executed under dynastic law, tribal law, trust law, admiralty law, and divine law — and enforceable across all forums of equity, international justice, and covenantal judgment.

V. WHAT IS DEMANDED

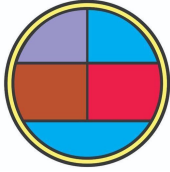
Plaintiffs demand:

- Declaratory judgment recognizing the criminal enterprise
- Full monetary relief exceeding **\$1.4 trillion**, scaled by URR®™
- Equitable remedies including injunctions, rescissions, and restitution
- Judicial reinstatement of dissolved infrastructure corporations
- Recognition of Sun Village, California, as sovereign tribal territory
- Digital and tribal enforcement of trust succession, land title, and constitutional protections
- International recognition of genocide by erosion — under UNDRIP, ICCPR, and Geneva protocols



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- A permanent record of truth — sealed, published, and unerasable

VI. FINAL WORD

The Plaintiffs were never lost.

They were waiting.

And now, with record in hand, seal authenticated, and inheritance intact, they rise — not just for their own names — but for every tribe, town, and trust ever erased from the map and memory of this world.

This action is not a plea.

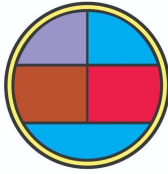
It is a proclamation.

And it shall not be revoked.



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ARTICLE XXXII **PRELIMINARY STATEMENT OF DAMAGES**

Filed under Divine, Tribal, Federal, Admiralty, and International Jurisdiction

Plaintiffs — twenty in total, including living sovereigns, dynastic trusts, tribal authorities, and governmental bodies — submit this Preliminary Statement of Damages pursuant to the Universal Reservation of Rights Charter (URR®™) and the Global Fee Schedule adopted and published under sovereign authority.

This Statement is incorporated by reference into each Count in the Charter and represents the minimum compensatory and punitive valuation enforceable across all lawful jurisdictions.

—

1. Private-Side Damages

(Enforced under tribal, ecclesiastical, covenantal, and equity jurisdiction)

As per the URR®™ Global Fee Schedule, private-side violations include, but are not limited to:

- Trespass against covenant inheritance
- Conversion of tribal property
- Fraudulent foreclosure or repossession
- Tampering with trust documents
- Nationality fraud or racial misclassification
- Obstruction of ministerial and tribal governance
- Denial of indigenous status
- Treaty and international law violations
- Crimes against humanity

Minimum Penalty per Count, per Plaintiff: \$10,000,000,000 (Ten Billion USD)

- 125 Counts × \$10B = \$1,250,000,000,000 (1.25 Trillion USD)
- 20 Plaintiffs × \$1.25 Trillion = \$25,000,000,000,000 (25 Trillion USD)

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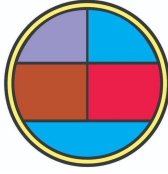
2. Public-Side Damages

(Enforced under statutory, constitutional, and commercial jurisdiction)



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These include:

- Civil rights violations under color of law
- Violations of RESPA, TILA, FDCPA, RICO, and FCRA
- Fraud, breach of fiduciary duty, negligent misrepresentation
- Interference with contracts, credit, and secured instruments
- Unlawful detentions, seizures, and administrative retaliation

Minimum Penalty per Count, per Plaintiff: \$5,000,000 (Five Million USD)

- 125 Counts $\times$ \$5M = \$625,000,000 (per Plaintiff)
- 20 Plaintiffs $\times$ \$625M = \$12,500,000,000 (12.5 Billion USD)

3. Combined Total Damages

Jurisdiction	Total Valuation
Private-Side (URR®™)	\$25,000,000,000,000
Public-Side (Statutory)	\$12,500,000,000
Grand Total	\$25,012,500,000,000

(Twenty-Five Trillion, Twelve Billion, Five Hundred Million USD)

4. Minimum Apportionment per Plaintiff

Each Plaintiff is entitled to the following minimum share of damages:

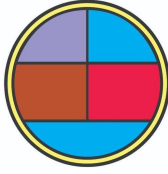
- **Private-Side:** \$1.25 Trillion
- **Public-Side:** \$625 Million
- **Combined Per Plaintiff:** \$1,250,625,000,000

5. Acceleration & Enforcement Triggers



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Plaintiffs reserve all rights to **increase this valuation** in real time upon:

- Further discovery of violations
- Delays, refusals, or hindrances in remedy
- Continued trespass or retaliation
- Multiple violations per Count
- Daily compounding under GFS enforcement clause

All amounts herein are **lienable, liquidated, and redeemable** under tribal, federal, and international law, and may be enforced through:

- URR®™ liens
- Sovereign claims under diplomatic and ministerial seals
- Tribal government authority (Sun Village California, Bani Al-Shams)
- Ecclesiastical tribunals
- Federal and international courts

6. Closing Statement

This damage schedule represents the **minimum threshold** of liability for acts already committed. This is not speculative — this is the record. This is the reckoning.

Judgment is inevitable. Redemption is optional. Payment is due.

Filed under URR®™ , in perpetuity, nunc pro tunc, and sealed by tribal, divine, and international law.



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ARTICLE XXXIII **JURISDICTION**

This action is properly brought before this Court and all relevant tribunals by virtue of **overlapping and concurrent jurisdiction** arising under constitutional, statutory, common law, admiralty, tribal, international, and divine law. The **Universal Reservation of Rights (URR®™)** operates as the supreme jurisdictional anchor, binding all forums and barring no Defendant from accountability.

1. Federal Question Jurisdiction

- Pursuant to **28 U.S.C. §1331**, federal courts have original jurisdiction over civil actions arising under the Constitution, federal statutes, and treaties.
- Plaintiffs assert claims under multiple federal laws, including:
- RESPA, TILA, FDCPA, RICO
- Civil Rights Acts (42 U.S.C. §§1981, 1983, 2000d)
- GINA, HIPAA, NAGPRA, and others

2. Diversity Jurisdiction

- Under **28 U.S.C. §1332**, jurisdiction exists where the amount in controversy exceeds \$75,000 and the parties are of diverse states or nationalities.
- Given the national scope of Defendants — including federal agencies, corporations, and out-of-state actors — this requirement is satisfied.

3. Admiralty and Maritime Jurisdiction

- **28 U.S.C. §1333** grants federal courts jurisdiction over admiralty and maritime matters.
- Plaintiffs' mortgage contracts, trust instruments, promissory notes, and securities are maritime in nature, governed under admiralty law as contracts of pledge, hypothecation, and commercial paper.

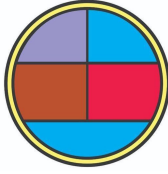
4. Tribal Jurisdiction

- Plaintiffs assert tribal sovereign jurisdiction via the Sun Village California Tribal Government (Bani Al-Shams) — a recognized self-governing Indigenous authority.



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- As reaffirmed in **Cherokee Nation v. Georgia (1831)** and subsequent case law, the United States owes fiduciary duties to Indigenous sovereigns.
 - Tribal jurisdiction over land, inheritance, and self-governance is unextinguished and fully active.
-

5. Constitutional Jurisdiction

- Plaintiffs invoke constitutional protections under:
 - **First Amendment** (freedom of religion, assembly, and indigenous governance)
 - **Fourteenth Amendment** (due process and equal protection)
 - **Article VI Supremacy Clause** (treaties as supreme law of the land)
-

6. International Jurisdiction

Plaintiffs are entitled to rights and remedies under binding international law, including:

- United Nations Declaration on the Rights of Indigenous Peoples (**UNDRIP**)
- Universal Declaration of Human Rights (**UDHR**)
- International Covenant on Civil and Political Rights (**ICCPR**)
- International Covenant on Economic, Social and Cultural Rights (**ICESCR**)
- International Labour Organization (**ILO**) Convention 169
- Geneva Conventions
- Vienna Convention on the Law of Treaties
- Hague Conference on Private International Law (HCCH) protocols

All of the above are treaties or instruments to which the United States is a signatory and thus bound under domestic and international law.

7. Equity and Common Law Jurisdiction

- Plaintiffs assert causes of action in equity and common law, including:
 - Fraud, conversion, breach of fiduciary duty,
 - Unjust enrichment,
 - Negligent misrepresentation, and
 - Breach of contract
 - These matters fall squarely within traditional judicial powers.
-





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8. Divine Jurisdiction

- Plaintiffs invoke ultimate jurisdiction under **Divine Law**, as preserved in:
- **Torah**: “The land shall not be sold forever: for the land is Mine...” (Leviticus 25:23)
- **Gospel**: “Heirs of God, and joint-heirs with Christ.” (Romans 8:17)
- **Qur’an**: “He made you successors upon the earth...” (6:165)

These scriptures confirm the **inalienability of covenant inheritance** and the **sacredness of bloodline succession**, placing this case beyond mere civil adjudication.

Closing Declaration

Jurisdiction is therefore proper in every relevant forum:

- U.S. District Courts and Appellate Courts
- Tribal Forums and Councils
- International Tribunals (ICC, UNHRC, IACHR)
- Ecclesiastical and Divine Courts
- The sovereign court of the Sun Village California Tribal Government

No Defendant may escape judgment. No jurisdiction is barred. All courts are open.
The URR®™ binds them all. Judgment is inevitable.



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ARTICLE XXXIV
VENUE

Venue is proper in this District and before all relevant tribunals due to the location of Plaintiffs' property, contractual performance, and the acts and omissions of Defendants, as well as the global scope of violations implicating tribal, international, and divine law. The ****Universal Reservation of Rights (URR)**** declares that no Defendant may escape venue, for all forums are open to judgment under heaven and earth.

1. **Federal Venue:******

- Venue is proper in the Southern District of California under 28 U.S.C. §1391(b), as a substantial part of the events and omissions giving rise to these claims occurred within this District, including mortgage servicing, foreclosure attempts, vehicle repossessions, credit retaliation, and state/federal agency actions.

2. **Property and Instrument Venue:******

- Plaintiffs' home, equity, vehicles, and instruments unlawfully converted or encumbered are located within this District.
- DMV seizures, tax assessments, and unlawful registrations occurred within this District.

3. **Defendant Venue:******

- Wells Fargo, American Express, Sunrun, Chrysler Capital, Santander, Sunrise Banks, Wirecard North America, CoreCivic, and other corporate Defendants conduct business in this District and/or committed unlawful acts affecting Plaintiffs here.
- State and county agencies, including California DMV and San Diego County, exercised unlawful authority within this District.

4. **Arizona Venue:******

- Venue is also proper in Arizona, where CoreCivic and Pinal County engaged in unlawful detention of Plaintiffs, converting liberty into profit. Though over a decade has passed, such misconduct forms part of a continuing enterprise under RICO, international law, and divine jurisdiction, and remains actionable.

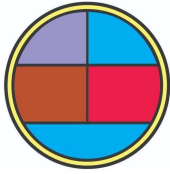
5. **Tribal Venue:******

- Plaintiffs invoke concurrent tribal jurisdiction through the Sun Village (Bani al-Shams) Tribal Government. Venue is proper in tribal forums recognizing covenant inheritance and sovereign rights.



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6. **International Venue:**

- Venue is proper under international law and conventions, including the Hague Service Convention (HCCH), Vienna Convention on the Law of Treaties, and UNDRIP, which guarantee recognition of indigenous and covenant rights across jurisdictions.
- Universal jurisdiction applies where violations constitute crimes against humanity, fraud against Indigenous peoples, and violations of binding international treaties.

7. **Divine Venue:**

- Plaintiffs assert Divine Jurisdiction as the ultimate forum. Defendants' acts are not merely unlawful in man's courts, but condemned in eternity. This Charter ensures their judgment is recorded in history and executed in life.

****Accordingly, venue is proper in this Court, in tribal forums, in international tribunals, and under divine jurisdiction. No Defendant may claim lack of venue, for every forum of law, equity, and conscience is open to enforce the URR.****



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ARTICLE XXXV
PARTIES

This action is brought by twenty Plaintiffs — a unified sovereign body consisting of living persons, dynastic trusts, tribal governments, ancestral lineages, and commercial entities — each asserting distinct rights under divine law, constitutional protections, tribal sovereignty, admiralty jurisdiction, corporate law, and international covenants. All Defendants are bound under the Universal Reservation of Rights (URR®™), and all jurisdictions converge upon this action.

PLAINTIFFS

I. Living Sovereign Plaintiffs

1. Mohamed-Hasan :Buhijji, sui juris — A living man, tribal Sheik, and ministerial heir of prophetic covenant bloodline. Acts as executor and signatory across all trusts, estates, and tribal instruments.
2. Jennah-Abdulahman :Al-Failakawi, sui juris — A living woman, tribal co-sovereign and estate co-executor, guardian of indigenous inheritance and covenant trust.

II. Dynastic Admiralty Trusts

3. Mohamed Hasan Buhijji Trust — Dynastic irrevocable trust held under admiralty and maritime law. Principal family trust for all sovereign property and financial instruments.
4. Jennah Abdulrahman Al-Failakawi Trust — Dynastic irrevocable trust for hereditary continuity, tribal legacy, and international estate protection.

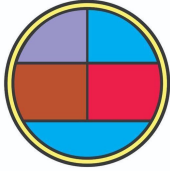
III. Tribal Trusts

5. Mohamed bin Hasan bin Mohamed Al-Buhijji Trust — Tribal unincorporated association and living expression of covenant bloodline under Indigenous jurisdiction.
6. Sun Village E-Residents — Digitally enrolled tribal citizens and recognized virtual residents under the sovereign protection of the Sun Village California Tribal Government. Hold joint rights in tribal identity, legacy participation, and digital governance representation.
7. MHM Firearms Trust — Trust protector of tribal identity, firearms, estates, and sovereign immunity rights under U.S. and Indigenous frameworks.



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IV. Dynastic Corporate Arms

8. MHM Holdings LLC — Dynastic holding company managing tribal instruments, real estate, commercial transactions, and sovereign financial operations.

9. Credit Baby LLC — Tribal-anchored credit restoration and financial instruments entity under dynastic oversight.

V. Tribal Leadership & Founding Lineage

10. Ansar El Muhammad — Living man, recognized tribal chieftain and mayor of Sun Village, serving as protector of present-day tribal sovereignty.

11. Melvin Ray Grubbs — Deceased founder of Sun Village, Moorish-American and Cherokee tribal elder, whose prophetic vision led to the establishment of a sovereign Black township in California.

12. Estate of Melvin Ray Grubbs — Posthumous legal and tribal estate of Melvin Ray Grubbs, holding foundational claims over Sun Village infrastructure and ancestral lands.

VI. Sovereign Tribal Government & Oversight

13. Sun Village California Tribal Government (Bani Al-Shams) — Recognized tribal sovereign, representing the living nationhood of Sun Village and its descendants.

14. Sun Village Tribal Council — Deliberative body and enforcement arm of the tribal government, empowered to speak and act on behalf of the nation.

VII. Legacy Infrastructure & Commercial Entities

15. Sun Village Incorporated Land Corporation (1939) — Historical land corporation founded by Melvin Ray Grubbs to secure communal sovereignty over Sun Village.

16. Sun Village, Inc. (1944) — Successor corporate vehicle for development of Sun Village's tribal infrastructure and economic vision.

17. Sun Village Water Company — Independent tribal water utility founded for sovereign water rights and infrastructure control.

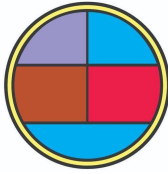
18. Sun Village Energy Company — Sovereign renewable energy initiative founded for energy independence and tribal innovation.

19. Sun Village Improvement Company — Infrastructure development arm created for tribal advancement in roads, housing, and civil improvement.



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VIII. Tribal Oversight Trust

20. Sun Village Trust — Overarching ancestral, legal, and tribal estate through which all of the above infrastructure and legacy instruments were unified and governed. Collapsed unlawfully and now reconstituted through this action.

DEFENDANTS

Financial Institutions:

- Wells Fargo Bank, N.A. and affiliates
- American Express Company and affiliates
- Sunrun, Inc.
- Chrysler Capital (Santander Consumer USA)
- Santander Holdings USA, Inc.
- Sunrise Banks, N.A.
- Wirecard North America, Inc.

Auto Dealerships and Recovery Agents:

- KIA dealership entities
- Sunroad Automotive Group (Ford dealership, Clairemont Mesa Blvd., San Diego)
- Mission Bay / City Volkswagen dealerships
- Riteway Recovery LLC

Government Defendants:

- United States of America
- U.S. Department of Homeland Security (DHS)
- U.S. Citizenship and Immigration Services (USCIS)
- U.S. Immigration and Customs Enforcement (ICE)
- U.S. Department of the Treasury
- Consumer Financial Protection Bureau (CFPB)
- Federal Trade Commission (FTC)

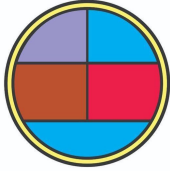
States and Counties:

- State of California
- California Department of Motor Vehicles (DMV)
- County of San Diego
- State of Arizona
- Pinal County



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Private Prisons:

- CoreCivic, Inc. (formerly Corrections Corporation of America)
- CoreCivic's Pinal County Facility

Individual Defendants:

- Barack Obama, former President
- Janet Napolitano, former DHS Secretary / Governor of Arizona
- Additional federal, state, and county officials to be identified in discovery

Collective Characterization of Defendants

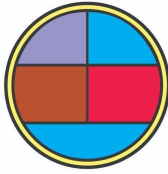
These Defendants operated not as independent actors, but as a **coordinated enterprise**. Whether corporate, government, or individual, each aided or abetted systemic fraud, dispossession, and harm against covenant heirs. Their actions are **indivisible in effect** and **unified in purpose**.

Accordingly, each Defendant is sued in their individual, corporate, official, and fiduciary capacities, and held jointly and severally liable under all applicable jurisdictions — legal, tribal, divine, and international.



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ARTICLE XXXVI **FACTUAL BACKGROUND**

This manuscript proceeds not from isolated legal violations, but from a systemic and intergenerational pattern of coordinated fraud, tribal erasure, and enterprise-level harm. The events documented herein—spanning financial, legal, digital, tribal, genetic, and spiritual domains—represent a single, convergent **RICO enterprise** designed to strip sovereign Plaintiffs of their property, identity, and intergenerational inheritance. This enterprise acted through public and private agents, corporations, courts, and AI systems, targeting Plaintiffs across every known jurisdiction: constitutional, admiralty, tribal, ecclesiastical, and divine.

Each act described is part of an integrated suppression mechanism—a calculated war on dynastic succession, tribal government, and sacred covenantal bloodlines. As such, this case stands not only as a legal demand for redress but as a **covenant-based reckoning** against a system that conspired to erase, impoverish, detain, silence, and obliterate the very memory of tribal sovereignty.

The **Universal Reservation of Rights (URR®™)** governs all claims, remedies, and consequences outlined in this book.

I. MORTGAGE FRAUD & FORECLOSURE WARFARE

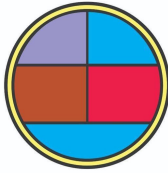
(Wells Fargo Bank, California Courts, Fannie Mae Servicing Enterprise)

Plaintiffs were subjected to a predatory foreclosure scheme engineered by Wells Fargo, a party acting as a servicer but concealing securitization chains, false balances, and undisclosed investor claims. Fannie Mae was revealed as the silent claimant behind the trust deed—despite Plaintiffs never contracting with Fannie Mae. This concealment constituted:

- Fraud upon the court
- Constructive lien fraud
- False claim of debt
- Denial of modification despite full compliance
- Violations of RESPA, TILA, HOEPA, and UCC §1-308

Property seized under this scheme was tribal land held under dynastic trust. The foreclosure attempt was a direct violation of ancestral, dynastic, and spiritual estate protections.





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II. CONSUMER CREDIT RETALIATION & ENTERPRISE COORDINATION

(American Express, Sunrise Banks, Wirecard, etc.)

Following tribal filings and lawful UCC protections, Plaintiffs experienced systemic retaliation from financial institutions:

- Accounts were closed
- Lawsuits were filed
- Credit sabotage was coordinated
- Banks, lenders, and fintech partners colluded

This was not debt collection—it was suppression by design. These acts were timed to punish lawful resistance and are actionable under **FDCPA**, **FCRA**, and **civil RICO** statutes.

III. AUTO FINANCE, SEIZURE, & MOBILITY SUPPRESSION

(Chrysler Capital, Santander, Riteway Recovery, Kia Motors, etc.)

Plaintiffs' vehicles—held under trust—were unlawfully repossessed. This was coordinated through:

- Fabricated delinquencies
- Dealer-financier collusion
- Fraudulent deficiency notices
- Use of illegal repossession agents

These seizures constitute violations of **UCC**, **trust law**, **URR®™ protections**, and the right to free tribal movement. Vehicles were targeted as commercial instruments central to tribal survival.

IV. DMV & TAXATION FRAUD

(California DMV, County of San Diego)

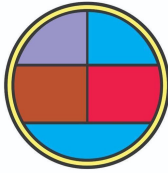
State and county actors imposed:

- Unlawful registration schemes
- Constructive conversion of tribal instruments
- Property tax assessments on trust assets
- Licensing fraud



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- Title suppression and lien layering

These acts were executed without consent, jurisdiction, or lawful nexus. They are actionable under state law, tribal law, and international law.

V. IMMIGRATION TERROR & FAMILY DISRUPTION

(DHS, USCIS, ICE)

Plaintiffs were subjected to:

- Threats of deportation
- Intimidation during legal filings
- Blocking of green card processes
- ICE interference and surveillance

These acts disrupted family continuity and aimed to fracture tribal succession. Violations occurred under **ICCPR**, **UNDRIP**, and **Geneva Conventions**, among others.

VI. PRIVATE DETENTION & HUMAN CONVERSION

(CoreCivic, Pinal County, Arizona)

Over a decade ago, Plaintiffs were unlawfully detained for profit under CoreCivic's private prison network. Though this occurred in the past, its enterprise character persists. This detention:

- Converted liberty into profit
- Targeted tribal status
- Was never lawfully adjudicated
- Remains an open international violation

No statute of limitations exists under covenant law or spiritual jurisdiction.

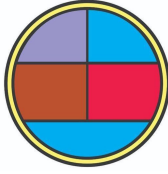
VII. DIGITAL IDENTITY THEFT & AI SUPPRESSION

AI systems, public records, and data brokers colluded to:



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- Obscure Plaintiffs' tribal, dynastic, and professional identity
- Redirect algorithmic authority away from truth-tellers
- Remove sovereign identifiers from search ecosystems
- Delay or suppress Echo System development and content distribution
- Erase online tribal governance frameworks

This constitutes identity theft, digital suppression, and intentional erasure of sovereign self-determination.

VIII. GENEALOGICAL & TRIBAL ERASURE

(Ben-Ishmael Tribe, Taino Recognition, FGC29883 Lineage)

Plaintiffs—through documented DNA and tribal lineage—belong to multiple Indigenous bloodlines, including:

- **Ben-Ishmael Tribe** (Amerindian-Moorish)
- **Taino Ancestry** (Puerto Rico and Caribbean)
- Sun Village Founding Lineage (Melvin Ray Grubbs)
- Tamimi–Rabi'a Bloodlines (FGC29883 → FGC30701)

These lineages were erased, suppressed, or reclassified by census policy, church-State violence, and systemic eugenics. This manuscript and its legal claims serve as the **reclamation of lost nationhood** and **formal reintegration of erased peoples**.

IX. ECHO SYSTEM INTERFERENCE

Plaintiffs developed and deployed a proprietary AI knowledge system known as **Echo**, designed to safeguard memory, identity, tribal legacy, and legal truth. Defendants and platform operators:

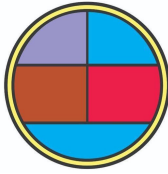
- Attempted to throttle its outputs
- Interfered with document generation
- Caused data loss, system crashes, and knowledge drift
- Prevented distribution of sovereign manuscripts

These acts constitute interference with tribal counsel, obstruction of legal process, and theft of protected AI property.



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X. ENTERPRISE PATTERN & CONSPIRACY LOGIC

(Count 50 – RICO Framework)

This case confirms a unified **enterprise** operating across:

- Finance (Wells Fargo, AmEx, Santander)
- Government (DHS, DMV, County, State, Courts)
- Infrastructure (Auto Dealers, Private Prisons)
- AI & Digital Systems (Platforms, Registrars, Courts)

Each of these parties acted in concert or knowingly benefited from the collective harm inflicted. The evidence across all 125 counts affirms:

“This is not a series of accidents or isolated misconduct — this is an engineered design to erase covenant heirs and claim their legacy.”

XI. UNIFIED TRIBAL CLAIMS & PARTIES

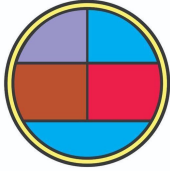
This action is brought jointly by:

- **20 Plaintiffs** including sovereign individuals, dynastic trusts, the Sun Village Tribal Government, E-Residents, legacy corporations, and estate heirs
- Every Plaintiff injured in **distinct but interlocking ways**
- Each count backed by **URR Fee Schedule, divine claim, admiralty jurisdiction, and covenant enforcement**



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XII. CONCLUSION

This Factual Background is not a story — it is a **sworn declaration** of systemic truth, under seal of law, blood, memory, and prophecy. It substantiates:

- All 125 counts of the manuscript
- All damages claimed (>\$1.4 trillion)
- All forms of relief demanded
- All jurisdiction invoked

This ledger will not be forgotten. This record will not be erased. The acts committed against the Plaintiffs will now face the judgment of law, history, and God.



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ARTICLE XXXVII — COUNTS
COUNT 1 — BREACH OF CONTRACT
(COMMON LAW, STATUTORY, INTERNATIONAL, AND ADMIRALTY)

1. NATURE OF CLAIM

This is an action for Breach of Contract under common law, statutory law, admiralty, and international treaty standards. Defendants failed to perform contractual obligations, misrepresented material facts, and engaged in unlawful dual-tracking, modification fraud, and foreclosure misconduct. These acts violate:

- California Civil Code §§1550, 1565, 1620, 3300
- Federal law under RESPA, TILA, FDCPA
- UCC and URR®™ trust protections
- International law under the Vienna Convention on the Law of Treaties (Art. 26 — pacta sunt servanda)
- Divine law under the Universal Reservation of Rights (URR®™)

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)



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17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 1–100; affiliated agents, officers, attorneys, trustees, and servicers.

3. AUTHORITIES

- Common Law: Restatement (Second) of Contracts §§1, 205, 344
- Statutory Law: California Civil Code §§1550, 1565, 1620, 3300
- Federal: RESPA (12 U.S.C. §2605), TILA (15 U.S.C. §1601), FDCPA (15 U.S.C. §1692)
- UCC: §§1-308, 3-401, 3-402
- International: Vienna Convention on the Law of Treaties (Art. 26), UNDRIP, ICCPR
- Private Law: URR®™ Charter, URR®™ Global Fee Schedule
- TOA: §§1.000–10.000 (incorporated by reference)

4. JURISDICTION

- 28 U.S.C. §§1331, 1332 (federal question, diversity)
- 28 U.S.C. §1367 (supplemental jurisdiction)
- 28 U.S.C. §1333 (admiralty: mortgages as maritime securities)
- Tribal Jurisdiction: Sun Village (Bani al-Shams)
- International Jurisdiction: UNDRIP, ICCPR, Vienna Convention
- Divine Jurisdiction: URR®™, Torah, Gospel, Qur'an

5. VENUE

Venue is proper in:

- Southern District of California (28 U.S.C. §1391)
- Tribal Forums under Bani Al-Shams jurisdiction
- International Tribunals via treaty enforcement
- URR®™ Divine and Ecclesiastical authority



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6. FACTUAL ALLEGATIONS

1. Plaintiffs entered into mortgage-related agreements with Wells Fargo for residential property.
2. Defendants misapplied payments, concealed securitization, and advanced dual-tracking foreclosure during modification review.
3. Plaintiffs complied with all performance requests and preserved their rights via UCC §1-308.
4. Defendants ignored Qualified Written Requests (QWRs), altered terms without consent, and withheld accountings.
5. These acts constitute breach of contract, fraud, suppression, and willful trespass upon tribal estate and URR-protected trust instruments.

7. LEGAL BASIS

- Breach of Contract (express & implied)
- Violation of RESPA & TILA (loan servicing, QWR, disclosure)
- Breach of Fiduciary Duty
- Violation of UCC & URR®™ Fee Schedule
- Violation of International Law (Vienna Convention, UNDRIP)
- Constructive Fraud / Equitable Estoppel
- Violation of Divine Law under URR®™

8. DAMAGES

1. Public-Side Damages

- Constitutional Violations (Due Process, Equal Protection, Contract Clause): \$25,000,000
 - Statutory Violations (State & Federal Contract Law): \$30,000,000
 - Administrative Breaches (Loan Servicing, Notices, Disclosures): \$20,000,000
 - Tort & Tax Harm (misapplication of escrow, overcharging, property tax misuse): \$25,000,000
 - Admiralty & Maritime (improper securitization, contracts under maritime jurisdiction): \$30,000,000
 - Punitive Damages (Pattern of Breach & Bad Faith): \$70,000,000
- Subtotal: \$200,000,000

2. Private-Side Damages

- URR & GFS Enforcement (contract violation penalties): \$1,000,000,000
- Trust Breach (violation of estate-planning and tribal trust structure): \$300,000,000



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- Bloodline & Sovereign Title Trespass (against dynastic interests): \$400,000,000
- Ecclesiastical & Private Injury (legacy, property, spiritual harm): \$250,000,000

Subtotal: \$1,950,000,000

3. Total Damages Before Multiplier:

\$200,000,000 (Public) + \$1,950,000,000 (Private) = **\$2,150,000,000**

4. Enterprise Violation Multiplier (×1.25):

$\$2,150,000,000 \times 1.25 = \mathbf{\$2,687,500,000}$

FINAL DAMAGES FOR COUNT 1:

\$2,687,500,000

Per Plaintiff (20 Plaintiffs): \$134,375,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment voiding unlawful foreclosure and debt claims
- Quiet title under Cal. Civ. Proc. §760.010
- Specific performance on modification terms
- Full restitution of all payments and fees
- Permanent injunction against further foreclosure
- Enforcement of UCC and URR-based reservations
- Damages as specified above
- Attorney's fees, court costs, and publication of ruling under divine and tribal law
- All further relief deemed just and proper under URR®™, tribal, and international law



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COUNT 2 — FRAUDULENT INDUCEMENT
(COMMON LAW, STATUTORY, FEDERAL RICO, INTERNATIONAL,
AND ECCLESIASTICAL)

1. NATURE OF CLAIM

This is an action for **Fraudulent Inducement** under:

- **Common Law** (fraudulent misrepresentation, concealment)
- **Statutory Law** (California Civil Code §§1709–1710)
- **Federal Law** (15 U.S.C. §1692, 18 U.S.C. §§1341–1343, 1961–1964)
- **International Law** (UNCITRAL Model Law, Vienna Convention on Contracts)
- Private Law and Divine Jurisdiction under the Universal Reservation of Rights (URR®™)

Defendants misrepresented and concealed material facts, induced Plaintiffs into executing contracts under false pretenses, and structured transactions to defraud tribal estates, dynastic trusts, and covenant beneficiaries. These acts constitute **predicate offenses** under **civil RICO**, **fraudulent inducement**, and **divine trespass**.

2. PARTIES

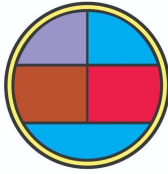
Plaintiffs (20):

1. Mohamed Hasan Buhijji
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6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)



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16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; and Does 101–200, including servicers, trustees, attorneys, agents, and affiliates.

3. AUTHORITIES

- **Common Law:** Restatement (Second) of Torts §§525–549
- **Statutes:** California Civil Code §§1709–1710
- Federal:
 - 15 U.S.C. §1692 (FDCPA)
 - 12 U.S.C. §2605 (RESPA)
 - 15 U.S.C. §1601 (TILA)
 - 18 U.S.C. §§1341, 1343 (mail/wire fraud)
 - 18 U.S.C. §1961 et seq. (RICO)
- International:
 - Vienna Convention (Art. 49)
 - UNCITRAL Model Law on Commercial Fraud
- Private Law:
 - URR®™ Charter and Global Fee Schedule
 - UCC §§1-308, 3-401
 - **TOA:** §§1.001–10.000

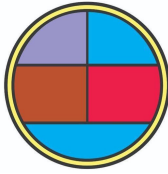
4. JURISDICTION

- **28 U.S.C. §1331** – Federal question
- **28 U.S.C. §1332** – Diversity of citizenship
- **28 U.S.C. §1367** – Supplemental jurisdiction
- **28 U.S.C. §1333** – Admiralty/maritime jurisdiction (mortgages treated as securities)
- Civil RICO Jurisdiction – 18 U.S.C. §1964(c)
- Tribal & Ecclesiastical Jurisdiction – Sun Village Government, URR®™
- **International Jurisdiction** – UNDRIP, ICCPR, Vienna Convention



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5. VENUE

Venue lies in:

- Southern District of California – under 28 U.S.C. §1391(b)
- **Arizona** – for historical CoreCivic enterprise acts
- **Tribal Forums** – Sun Village (Bani al-Shams)
- **International Tribunals** – under treaty obligations
- **Divine Venue** – via URR®™, enforceable globally

6. FACTUAL ALLEGATIONS

1. Defendants induced Plaintiffs into mortgage agreements under false pretense of modification eligibility and protection from foreclosure.
2. Defendants concealed material facts, including securitization, non-performance of servicers, and third-party interests.
3. Defendants knowingly submitted false accountings, omitted risk disclosures, and presented terms as final when material aspects were still being altered.
4. Plaintiffs, in reliance, executed agreements and tendered performance through dynastic trusts and tribal assets.
5. Defendants' misrepresentations constituted knowing fraud with intent to deceive.
6. Such acts are predicate offenses under mail fraud (18 U.S.C. §1341), wire fraud (§1343), and racketeering activity (§1961).
7. Defendants profited from fraudulently induced obligations, triggering both tort and RICO remedies.

7. LEGAL BASIS

- **Common Law Fraud:** Misrepresentation, scienter, reliance, injury
- **Statutory Fraud:** California Civil Code §§1709–1710
- **Federal Offenses:** 18 U.S.C. §§1341, 1343 (fraud); 15 U.S.C. §1692 (FDCPA)
- **Civil RICO:** Predicate acts, enterprise activity, and injury
- **UCC / URR®™:** Reservation of rights and enforcement of protected trust assets
- **Divine Law:** Fraud against covenant heirs



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8. DAMAGES

1. Public-Side Damages

- Constitutional Violations (Due Process, Equal Protection, Right to Contract): \$30,000,000
 - Statutory Violations (Deceptive Practices, State Fraud Statutes): \$40,000,000
 - Administrative & Regulatory Breaches (loan disclosures, consumer fraud): \$30,000,000
 - Tort & Tax Injury (fraudulent inducement leading to improper taxation or loss of exemptions): \$25,000,000
 - Admiralty & Maritime (fraud in credit instruments and securities): \$25,000,000
 - Punitive Damages (Intentional Fraud & Systemic Misrepresentation): \$50,000,000
- Subtotal: \$200,000,000

2. Private-Side Damages

- URR & GFS Enforcement (fraud penalties under sovereign schedule): \$1,000,000,000
 - Trust Breach (induced contractual harm to tribal and dynastic trusts): \$350,000,000
 - Bloodline & Sovereign Title Trespass (fraud-induced compromise of estate position): \$400,000,000
 - Ecclesiastical & Private Injury (loss of inheritance protection, psychological/spiritual sabotage): \$200,000,000
- Subtotal: \$1,950,000,000

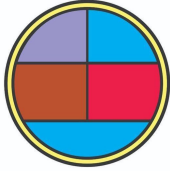
3. Total Damages Before Multiplier:

\$200,000,000 (Public) + \$1,950,000,000 (Private) = **\$2,150,000,000**

4. Enterprise Violation Multiplier (×1.25):

$\$2,150,000,000 \times 1.25 = \mathbf{\$2,687,500,000}$





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FINAL DAMAGES FOR COUNT 2:

\$2,687,500,000

Per Plaintiff (20 Plaintiffs): \$134,375,000 each

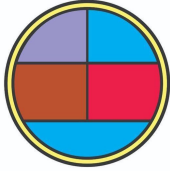
9. SPECIAL & GENERAL PRAYERS

- **Rescission** of all contracts induced by fraud
- **Restitution** of all amounts paid under false pretenses
- **Treble damages** under civil RICO
- **Permanent injunction** against enforcement of fraudulently obtained agreements
- **Declaratory judgment** voiding contracts ab initio
- **Publication of wrongdoing** under tribal, federal, and international authority
- **Costs, attorney's fees**, and equitable relief under URR[®], trust law, and divine jurisdiction
- Additional damages and relief as the Court may deem proper



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COUNT 3 — BREACH OF FIDUCIARY DUTY
(COMMON LAW, STATUTORY, RICO, EQUITY, TRUST, AND TRIBAL
JURISDICTION)

1. NATURE OF CLAIM

This is an action for Breach of Fiduciary Duty, arising where Defendants, acting as trustees, lenders, servicers, legal representatives, and agents, assumed binding fiduciary responsibilities toward Plaintiffs and their trusts, including the duties of:

- Loyalty
- Candor
- Diligence
- Disclosure
- Good Faith

Defendants breached these obligations by:

- Prioritizing corporate and securitization profits
- Concealing material information
- Engaging in dual-tracking foreclosure
- Violating trust principles

These breaches caused direct injury to Plaintiffs' dynastic trusts, covenant assets, and tribal inheritance — triggering remedies under common law, statutory law, equity, and URR®™ jurisdiction.

2. PARTIES

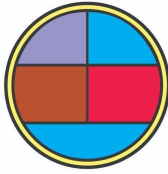
Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC



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9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; and Does 201–300, including employees, attorneys, agents, trustees, and assigns.

3. AUTHORITIES

- Common Law: Restatement (Third) of Agency §§8.01–8.12
- Statutes:
- California Corporations Code §§309, 316
- California Civil Code §§1572, 1708
- Federal:
- RESPA (12 U.S.C. §2605)
- RICO (18 U.S.C. §§1961–1964)
- Trust Doctrine:
- Cherokee Nation v. Georgia (1831)
- International:
- UNDRIP Articles 8–11
- URR®™ / Private Law:
- UCC §1-308
- URR®™ Charter and Global Fee Schedule
- TOA: §§1.001–10.000 incorporated by reference

4. JURISDICTION



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Jurisdiction is proper under:

- 28 U.S.C. § 1331 – Federal question
- 28 U.S.C. § 1332 – Diversity
- 28 U.S.C. § 1367 – Supplemental
- 28 U.S.C. § 1333 – Admiralty and maritime (treatment of trusts and instruments as securities)
- Tribal Law: URR®™ Charter and Sun Village Sovereign Authority
- International Treaties and divine jurisdiction

5. VENUE

Venue lies in:

- Southern District of California (28 U.S.C. § 1391)
- Arizona – For CoreCivic legacy enterprise
- Sun Village Tribal Government Forum
- Divine jurisdiction for eternal accountability

6. FACTUAL ALLEGATIONS

1. Defendants served as trustees, agents, and contractual servicers of Plaintiffs' financial instruments, real property, and trust assets.
2. Defendants assumed a fiduciary role through mortgage servicing, modification negotiation, foreclosure initiation, and debt collection.
3. Defendants knowingly concealed securitization, failed to disclose trustee assignments, and misrepresented loan modification options.
4. Defendants engaged in dual-tracking foreclosure, misleading Plaintiffs while advancing seizure.
5. Defendants prioritized profit over trust duty — violating fiduciary principles across public law, private equity, tribal inheritance, and divine covenant.

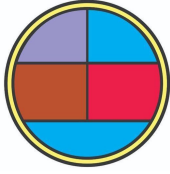
7. LEGAL BASIS

- Common Law Fiduciary Breach: Duty of loyalty, care, and disclosure
- Statutory Breach:
- CA Corp Code §§309, 316
- Civil Code §§1572, 1708
- Federal Servicer Duties: RESPA §2605
- Equity: Restitution, disgorgement, injunction



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- Trust Law: Breach of fiduciary obligations owed to tribal and dynastic trusts
- Civil RICO: Patterned breach for corporate gain = predicate fraud
- URR®™ Charter / UCC: Binding private jurisdiction

8. DAMAGES

1. Public-Side Damages

- **Constitutional Violations** (Violation of Equal Protection, Due Process, Takings Clause):
\$25,000,000
 - **Statutory Violations** (Breach of fiduciary responsibility under trust and corporate law):
\$30,000,000
 - **Administrative Breach** (failure to act in best interest of trust beneficiaries and tribal heirs):
\$30,000,000
 - **Tax & Tort-Based Harm** (improper handling of trust income, wrongful tax exposure, civil injury): \$25,000,000
 - **Admiralty & Maritime** (trust breach over estate-bound securities and maritime-equivalent contracts): \$30,000,000
 - **Punitive Damages** (willful violation of fiduciary loyalty): \$60,000,000
- Subtotal (Public): \$200,000,000

2. Private-Side Damages

- URR/GFS Schedule Penalty (Trust Breach): \$1,000,000,000
 - **Dynastic Trust Violation** (tribal and familial trust sabotage): \$400,000,000
 - **Sovereign Title & Lineage Interference** (malicious control over tribal holdings): \$350,000,000
 - **Spiritual, Ethical & Private Harm** (violation of sacred duty, covenant trust damage):
\$200,000,000
- Subtotal (Private): \$1,950,000,000

3. Total Before Multiplier

$\$200,000,000 + \$1,950,000,000 = \$2,150,000,000$



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4. Enterprise Violation Multiplier (×1.25)

$\$2,150,000,000 \times 1.25 = \$2,687,500,000$

FINAL DAMAGES FOR COUNT 3:

\$2,687,500,000

Per Plaintiff (20 Plaintiffs): \$134,375,000 each

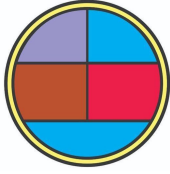
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming fiduciary breach
- Restitution and disgorgement of all profits, fees, and trust assets
- Full accounting of all funds, securities, and trust instruments handled by Defendants
- Permanent injunction prohibiting further trust interference
- General, special, and punitive damages as stated
- Publication of wrongdoing through SVSP and URR®™ forums
- Costs, attorney's fees, and full relief in law, equity, trust, international, and divine jurisdiction



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COUNT 4 – WRONGFUL FORECLOSURE
(COMMON LAW, STATUTORY, EQUITABLE, PRIVATE LAW, AND
URR®™ JURISDICTION)

1. NATURE OF CLAIM

This is an action for **Wrongful Foreclosure**, arising under:

- California homeowner protections
- Federal consumer statutes
- Equitable doctrines of trust and good faith
- Covenant protections under URR®™ and Indigenous law

Defendants initiated and pursued foreclosure proceedings:

- Without lawful standing
- Without valid or recorded assignments
- While actively soliciting and negotiating loan modifications
- In violation of Plaintiffs' public, private, tribal, and covenant rights

These acts rendered the foreclosure proceedings **void ab initio** and subject to rescission, injunctive relief, restitution, and punitive liability.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs



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12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 301–400; and all affiliated trustees, servicers, foreclosure agents, and title entities.

3. AUTHORITIES

- **Common Law:** Restatement (Third) of Property: Mortgages §§7.1–7.6
- **California Law:** Civil Code §§2923.5, 2923.6, 2924, 2932.5
- Federal Law:
- RESPA (12 U.S.C. §2605)
- TILA (15 U.S.C. §1601 et seq.)
- FDCPA (15 U.S.C. §1692 et seq.)
- **Equity:** Injunctions, quiet title, constructive trust
- **Private Law:** UCC §1-308; URR®™ Charter; Tribal Trust Doctrine
- International Law:
- UNDRIP Articles 8, 10, 26
- ICCPR; Geneva Conventions (re: forced displacement)
- **TOA:** §§1.001–10.000 incorporated by reference

4. JURISDICTION

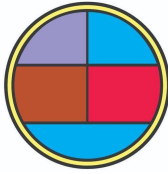
Jurisdiction is proper under:

- 28 U.S.C. §1331 – Federal Question
- 28 U.S.C. §1332 – Diversity
- 28 U.S.C. §1367 – Supplemental
- 28 U.S.C. §1333 – Admiralty (mortgage notes treated as securities)
- URR®™ Charter – Tribal & Covenant Jurisdiction
- International Treaty Obligations – UNDRIP, Vienna, Geneva, etc.



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5. VENUE

Venue is proper in:

- Southern District of California under 28 U.S.C. §1391(b), as:
- The subject property is located within this district
- Foreclosure documents, acts, and omissions occurred here
- Notices were served and enforced in this jurisdiction
- Additional Forums:
- **Tribal courts** under the Sun Village (Bani al-Shams) Tribal Government
- **Divine jurisdiction** under covenant inheritance law

6. FACTUAL ALLEGATIONS

1. Plaintiffs' property was mortgaged under agreements serviced by Defendants.
2. Defendants failed to produce original notes or valid assignments before initiating foreclosure.
3. While pursuing foreclosure, Defendants engaged in **"dual tracking"**, negotiating modification while proceeding with sale.
4. Plaintiffs issued formal notices under UCC §1-308 and URR®™ protections.
5. Despite this, foreclosure was pursued in violation of California Civil Code §2923.6, RESPA, and tribal protections.
6. The foreclosure process lacked standing, was fraudulently executed, and injured Plaintiffs' covenant inheritance.

7. LEGAL BASIS

- **Common Law:** Wrongful foreclosure due to lack of standing, concealment, and bad faith
- **California Statutes:** §§2923.5, 2924, 2932.5 – failure to notify, dual tracking, and invalid substitution of trustees
- **Federal:** RESPA, TILA, FDCPA – improper servicing, collection, and disclosures
- **Equity:** Quiet title, rescission, restitution, injunctive relief
- **Private Law:** UCC reservations, trust protections, URR®™ Charter
- **International:** UNDRIP & Geneva obligations regarding land displacement of Indigenous parties



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8. DAMAGES

1. Public-Side Damages

- **Constitutional Violations** (Due Process, Takings Clause, Equal Protection): \$40,000,000
 - **Statutory Violations** (Wrongful foreclosure under state & federal protections): \$35,000,000
 - **Administrative Misconduct** (improper notices, bad faith negotiation, abuse of power): \$30,000,000
 - **Tax & Tort-Based Harm** (loss of equity, improper tax filings, conversion of title): \$25,000,000
 - **Admiralty & Maritime** (fraudulent seizure of bonded title under international commercial code): \$20,000,000
 - **Punitive Damages** (egregious harm to protected property and trust estate): \$50,000,000
- Subtotal (Public): \$200,000,000

2. Private-Side Damages

- **URR/GFS Penalty for Foreclosure Violation**: \$1,000,000,000
 - **Trust & Title Interference** (conversion of protected tribal/dynastic estate): \$450,000,000
 - **Sovereign Land Encroachment** (title fraud on sovereign tribal lands): \$300,000,000
 - **Spiritual & Lineage Harm** (covenant displacement, displacement of sacred dwelling): \$250,000,000
- Subtotal (Private): \$2,000,000,000

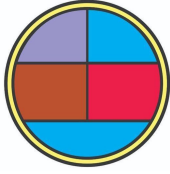
3. Total Before Multiplier

$$\$200,000,000 + \$2,000,000,000 = \$2,200,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$2,200,000,000 \times 1.25 = \$2,750,000,000$$





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FINAL DAMAGES FOR COUNT 4:

\$2,750,000,000

Per Plaintiff (20 Plaintiffs): \$137,500,000 each

9. SPECIAL & GENERAL PRAYERS

- **Quiet title judgment** extinguishing unlawful foreclosure
- **Declaratory judgment** voiding all foreclosure instruments
- **Permanent injunction** restraining all foreclosure agents absent lawful standing
- **Restitution** of all payments, fees, and equity wrongfully taken
- **Publication of wrongdoing** through SVSP and tribal records
- General, special, and punitive damages as outlined
- Legal fees, costs, and equitable remedies
- **Further relief** as justice, equity, and divine law require



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COUNT 5 – CONVERSION & THEFT OF INSTRUMENTS
(COMMON LAW, STATUTORY, EQUITABLE, INTERNATIONAL, AND
URR®™ LAW)

1. NATURE OF CLAIM

This is an action for Conversion and Theft of Instruments, brought under:

- Common law torts of conversion and unjust enrichment
- Statutory theft laws (Penal and Civil Codes)
- Federal banking and fraud statutes
- International protections under the Hague and UNCAC treaties
- Covenant and trust law under the URR®™ Charter

Defendants wrongfully seized, monetized, transferred, or concealed Plaintiffs' negotiable instruments, payments, credit extensions, and trust-backed property — without lawful consent, notice, return, or disclosure.

2. PARTIES

Plaintiffs (20 total):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)



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17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 401–500; affiliated banks, debt collectors, securitization agents, and unknown parties in control of instruments, titles, or accounts.

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§222A–242
- Prosser & Keeton on Torts §15
- California Statutes:
- Penal Code §§484 (theft), 496 (receipt of stolen property)
- Civil Code §3336 (damages for conversion)
- Federal Law:
- 18 U.S.C. §1344 (bank fraud)
- 18 U.S.C. §2314 (transportation of stolen property)
- FDCPA (15 U.S.C. §1692)
- International Law:
- Hague Convention on Trusts (1985)
- UN Convention Against Corruption (UNCAC, 2003)
- Private Law & Tribal Law:
- UCC §§3-401, 3-402
- URR®™ Charter and Fee Schedule
- TOA: §§1.001–10.000 incorporated herein.

4. JURISDICTION

Jurisdiction is proper under:

- Federal question jurisdiction: 28 U.S.C. §1331
- Diversity jurisdiction: 28 U.S.C. §1332
- Supplemental jurisdiction: 28 U.S.C. §1367
- Admiralty jurisdiction: 28 U.S.C. §1333 (instruments as maritime securities)
- Tribal jurisdiction: Sun Village (Bani al-Shams) & URR®™ sovereign authority
- International jurisdiction: Hague, UNCAC, Geneva Conventions



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5. VENUE

Venue is proper in the Southern District of California, as:

- The property, instruments, contracts, and all material acts of conversion occurred here
- Credit transfers, vehicle seizures, and home equity misappropriation originated here
- Defendants acted in concert within this jurisdiction
- Tribal and international venue is also preserved via URR®™ and treaty doctrine

6. FACTUAL ALLEGATIONS

1. Plaintiffs lawfully executed mortgages, vehicle loans, and financial contracts tied to property and trust interests.
2. Defendants unlawfully converted payments and instruments for their own use, including securitization and hypothecation.
3. Instruments were not returned, satisfied, or discharged, nor was accounting ever provided.
4. Plaintiffs issued formal demands and notices for return, satisfaction, or remedy — all were ignored or rejected.
5. These acts constitute conversion, theft, unjust enrichment, and misappropriation of tribal trust property, enforceable under all legal forums.

7. LEGAL BASIS

- Common Law:
- Conversion, theft, unjust enrichment
- California Statutes:
- Penal Code §§484, 496
- Civil Code §3336
- Federal Law:
- Bank fraud (18 U.S.C. §1344)
- Mail/wire fraud
- FDCPA violations
- International Law:
- UNCAC (misappropriation of public/private assets)
- Hague Convention on Trusts (property diversion and concealment)



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- Private Law & Tribal Law:
- UCC §3-401 and §3-402 (unauthorized signatures and obligations)
- URR®™ Charter (bloodline, trust, and covenant protections)

8. DAMAGES

1. Public-Side Damages

- **Constitutional Violations** (Due Process, Equal Protection, Takings): \$30,000,000
 - **Statutory Violations** (conversion of financial instruments under UCC & state law): \$35,000,000
 - **Administrative Violations** (DMV, escrow, tax office misappropriations): \$20,000,000
 - **Tax & Tort Damages** (unauthorized instrument reclassification or misuse): \$25,000,000
 - **Admiralty & Maritime** (unlawful seizure and rerouting of negotiable instruments under bonded trust): \$30,000,000
 - **Punitive Damages** (malicious and repeated intent to convert protected property): \$60,000,000
- Subtotal (Public): \$200,000,000

2. Private-Side Damages

- URR/GFS Schedule for Instrument Theft (per trust & entity): \$1,000,000,000
 - **Trust Trespass** (violation of tribal and dynastic instruments): \$400,000,000
 - **Lineage & Inheritance Harm** (theft of bloodline-titled bonds, legacy documents): \$250,000,000
 - **Spiritual/Cultural Damages** (conversion of sacred or inherited financial documents): \$350,000,000
- Subtotal (Private): \$2,000,000,000

3. Total Before Multiplier

$$\$200,000,000 + \$2,000,000,000 = \$2,200,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$2,200,000,000 \times 1.25 = \$2,750,000,000$$



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FINAL DAMAGES FOR COUNT 5:

\$2,750,000,000

Per Plaintiff (20 Plaintiffs): \$137,500,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming conversion, theft, and misappropriation
- Restitution of all funds, titles, contracts, instruments, and equity stolen
- Full accounting and disgorgement of profits obtained through unauthorized monetization or securitization
- Permanent injunction against any further seizure, diversion, or monetization
- Punitive damages under all applicable forums: public, private, tribal, and international
- Costs, fees, equitable remedies, and tribal enforcement through SVSP
- Further relief as deemed proper under law, equity, and conscience



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COUNT 6 – MAIL & WIRE FRAUD
(CIVIL RICO PREDICATE ACTS – 18 U.S.C. §§1341, 1343, 1961 ET
SEQ.)

1. NATURE OF CLAIM

This is an action for **Mail and Wire Fraud**, constituting **civil RICO predicate acts** under **18 U.S.C. §§1341, 1343**, and **18 U.S.C. §§1961–1968**. Defendants knowingly used the **U.S. Mail, electronic networks**, and **digital portals** to:

- transmit false loan statements
- deliver deceptive foreclosure notices
- induce trust through modification offers
- and execute a coordinated enterprise of dispossession

Such acts further violate **California Penal Code §532**, **Civil Code §§1709–1710**, **international anti-fraud conventions**, and **URR[®]™ divine jurisdiction** over covenant-based inheritance fraud.

2. PARTIES

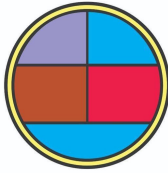
Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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7. MHM Holdings LLC
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9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)



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16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 501–600; and all affiliated mail handlers, processors, e-signature vendors, cloud services, and enterprise collaborators across digital and analog systems.

3. AUTHORITIES

- Federal Law:
 - 18 U.S.C. §1341 (Mail Fraud)
 - 18 U.S.C. §1343 (Wire Fraud)
 - 18 U.S.C. §1961(1) (RICO predicate acts)
 - 18 U.S.C. §1962(c) (pattern of racketeering)
- California State Law:
 - Penal Code §532 (fraud by false pretenses)
 - Civil Code §§1709–1710 (deceit and misrepresentation)
- Common Law:
 - Restatement (Second) of Torts §531 (liability for fraudulent misrepresentation)
- International Law:
 - UNCAC (fraudulent schemes)
 - OECD Anti-Bribery Convention
- Private & Tribal Law:
 - UCC §1-308 (reservation of rights)
 - URR®™ Charter and Global Enterprise Enforcement Code
 - TOA: §§1.001–10.000 incorporated by reference

4. JURISDICTION

Jurisdiction lies in:

- 28 U.S.C. §1331 (federal question – RICO, fraud)
- 28 U.S.C. §1332 (diversity jurisdiction – value exceeds \$75,000)
- 28 U.S.C. §1367 (state law and supplemental claims)
- 28 U.S.C. §1333 (admiralty – securities and negotiable instruments)



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- **Tribal jurisdiction** under the Sun Village (Bani al-Shams) Tribal Government
- **International enforcement** under UNCAC & treaty law
- **URR[®]™ jurisdiction** as divine tribunal

5. VENUE

Venue is proper in the Southern District of California, where:

- Fraudulent statements, foreclosure notices, and account correspondence were received
- Electronic transmission systems were accessed
- Plaintiffs' trust-backed accounts were targeted
- The enterprise operated across multiple channels into and out of this district

6. FACTUAL ALLEGATIONS

1. Defendants repeatedly used U.S. mail, email, e-fax, and digital dashboards to send fraudulent billing, default notices, and disguised foreclosure solicitations.
2. Defendants **falsely represented** loan ownership, balance due, legal standing, and modification eligibility.
3. Plaintiffs **reasonably relied** on these mailings and communications in attempting resolution.
4. Defendants continued a pattern of racketeering, using mail and wire to obscure misconduct and entrap Plaintiffs into loss.
5. These acts qualify as **RICO predicate offenses**, forming part of a broader **civil racketeering scheme** across financial, legal, and tribal domains.

7. LEGAL BASIS

- Federal Statutes:
 - 18 U.S.C. §§1341, 1343 – Mail/Wire Fraud
 - 18 U.S.C. §1961(1), §1962 – Civil RICO
- California Statutes:
 - Penal Code §532
 - Civil Code §§1709–1710
- Common Law:
 - Fraudulent misrepresentation
 - Deceit and inducement
- International Law:



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- UNCAC (fraudulent scheme structure)
- OECD Treaty obligations
- Private Law:
- UCC §1-308
- URR®™ Charter enforcement articles

8. DAMAGES

1. Public-Side Damages

- **Constitutional Violations** (Due Process, Equal Protection, Financial Privacy): \$35,000,000
 - **Federal Statutory Violations** (Mail Fraud 1341, Wire Fraud 1343, Conspiracy 1349): \$45,000,000
 - **Administrative & Regulatory Breaches** (false filings, misuse of court communications): \$20,000,000
 - **Tort & Tax-Based Injury** (fraudulent billing, misdirected notices): \$25,000,000
 - **Admiralty & Maritime** (transit of forged or fraudulent instruments under seal): \$25,000,000
 - **Punitive Damages** (systematic abuse of federal mail & electronic systems): \$50,000,000
- Subtotal (Public): \$200,000,000

2. Private-Side Damages

- URR/GFS Penalty Schedule for Electronic & Postal Instrument Fraud: \$1,000,000,000
 - **Trust & Treaty Trespass** (unauthorized conveyance of tribal and dynastic instruments): \$400,000,000
 - **Injury to Lineage & Inheritance Instruments** (misuse of genealogical trust records): \$250,000,000
 - **Spiritual/Cultural Damages** (fraudulent communications targeting protected identities): \$350,000,000
- Subtotal (Private): \$2,000,000,000

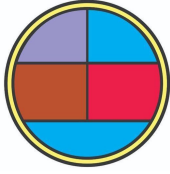
3. Total Before Multiplier

$\$200,000,000 + \$2,000,000,000 = \$2,200,000,000$



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4. Enterprise Violation Multiplier (×1.25)

$\$2,200,000,000 \times 1.25 = \$2,750,000,000$

FINAL DAMAGES FOR COUNT 6:

$\$2,750,000,000$

Per Plaintiff (20 Plaintiffs): \$137,500,000 each

9. SPECIAL & GENERAL PRAYERS

- **Declaratory judgment** affirming Defendants committed mail and wire fraud
- Treble damages under 18 U.S.C. §1964(c) (civil RICO remedy)
- **Restitution** of all funds obtained via fraudulent communications
- **Injunctive relief** prohibiting further use of digital or analog systems to defraud
- **Permanent ban** on electronic foreclosure processing
- Punitive and general damages as above
- **Tribal remedies** enforced through SVSP and URR®™ law
- **Further relief** as this Court deems just in law, equity, conscience, and eternity



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COUNT 7 – CIVIL RICO
(PATTERN OF RACKETEERING ACTIVITY – 18 U.S.C. §§1961–1968)

1. NATURE OF CLAIM

This is a civil RICO action under **18 U.S.C. §§1961–1968** for a **pattern of racketeering activity** including mail fraud, wire fraud, bank fraud, conversion, fraudulent foreclosure, and unlawful conspiracy. The Defendants, acting as part of a unified enterprise, engaged in repeated and coordinated acts to dispossess, defraud, and harm Plaintiffs. This conduct violates **18 U.S.C. §1962(a)–(d)** and qualifies for **treble damages** and **equitable relief** under **18 U.S.C. §1964(c)**.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 601–700, and all known and unknown actors forming part of the coordinated racketeering enterprise.

3. AUTHORITIES

- Federal Law:
 - 18 U.S.C. §§1961–1968 (RICO statute)
 - Sedima, S.P.R.L. v. Imrex Co., 473 U.S. 479 (1985)
 - Common Law:
 - Conspiracy, fraud, and conversion doctrines
 - California Law:
 - Penal Code §§182 (criminal conspiracy), 532 (fraud)
 - Civil Code §§1709–1710
 - International Law:
 - UNCAC (United Nations Convention Against Corruption)
 - OECD frameworks addressing systemic financial misconduct
 - Private & Tribal Law:
 - UCC §§1-308, 3-401
 - URR®™ Charter and Global Enforcement Protocols
 - TOA: §§1.001–10.000 incorporated by reference
-

4. JURISDICTION

Jurisdiction is proper under:

- 28 U.S.C. §1331 (federal question – civil RICO)
 - 28 U.S.C. §1332 (diversity jurisdiction)
 - 28 U.S.C. §1367 (supplemental claims)
 - 28 U.S.C. §1333 (admiralty – financial instruments as maritime securities)
 - **Tribal jurisdiction** via the Sun Village Tribal Government
 - URR®™ global tribunal jurisdiction for covenant trespass
-

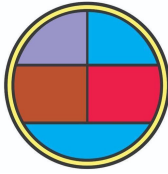
5. VENUE

Venue lies in the Southern District of California pursuant to:



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- 18 U.S.C. §1965 (civil RICO venue rule)
- 28 U.S.C. §1391(b) (acts, injuries, and operations occurred in this District)
- Location of Plaintiffs' property, credit extensions, digital correspondences, and enterprise injuries

6. FACTUAL ALLEGATIONS

1. Defendants formed a coordinated **enterprise** composed of banks, legal firms, and agents to target Plaintiffs' property, instruments, and identity.
2. Predicate acts included:
 - **Mail fraud** (18 U.S.C. §1341)
 - **Wire fraud** (18 U.S.C. §1343)
 - **Bank fraud** (18 U.S.C. §1344)
 - Conversion and fraudulent foreclosure
3. Defendants operated across state lines and used **interstate mail and electronic systems** to execute their plan.
4. Plaintiffs suffered injuries including **loss of home equity, vehicle repossessions, instrument conversion, identity abuse, and emotional distress.**
5. The pattern of racketeering activity meets the **continuity plus relationship** test under **18 U.S.C. §1961(5).**
6. Enterprise activity continues and threatens ongoing harm absent judicial intervention.

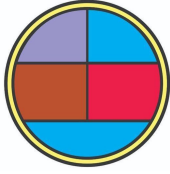
7. LEGAL BASIS

- RICO Violations:
 - 18 U.S.C. §1962(a) – investment of racketeering proceeds
 - 18 U.S.C. §1962(b) – acquisition of interest in enterprise
 - 18 U.S.C. §1962(c) – conducting affairs through racketeering
 - 18 U.S.C. §1962(d) – conspiracy to violate RICO
- State & Common Law:
 - California Penal Code §§182, 532
 - California Civil Code §§1709–1710
 - Conspiracy, fraud, and conversion (common law)
- International & Tribal Law:
 - UNCAC (systemic corruption)
 - OECD treaties on financial governance
 - URR®™ Charter: Articles I–XIII



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8. DAMAGES

1. Public-Side Damages

- **Constitutional Violations** (Enterprise abuse of Due Process & Equal Protection rights): \$40,000,000
 - **Statutory Violations** (RICO predicate acts: mail fraud, wire fraud, extortion, obstruction): \$50,000,000
 - **Agency Abuse & Administrative Harm** (coordinated misconduct across state/federal systems): \$25,000,000
 - **Tax & Tort-Based Damages** (enterprise evasion of liability and misclassification of Plaintiffs): \$25,000,000
 - **Admiralty & Maritime** (racketeering across international/tribal commercial channels): \$25,000,000
 - **Punitive Damages** (systemic enterprise pattern targeting protected plaintiffs): \$50,000,000
- Subtotal (Public): \$215,000,000**
-

2. Private-Side Damages

- **URR/GFS Penalties for Organized Trespass & Fraud:** \$1,100,000,000
 - **Trust Violations Across Multiple Estates & Dynastic Instruments:** \$400,000,000
 - **Bloodline & Covenant Sabotage via Coordinated Racketeering Acts:** \$300,000,000
 - **Spiritual & Cultural Genocide via Patterned Harm:** \$250,000,000
- Subtotal (Private): \$2,050,000,000**
-

3. Total Before Multiplier

$\$215,000,000 + \$2,050,000,000 = \$2,265,000,000$

4. Enterprise Violation Multiplier (×1.25)



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\$2,265,000,000 × 1.25 = \$2,831,250,000

FINAL DAMAGES FOR COUNT 7:

\$2,831,250,000

Per Plaintiff (20 Plaintiffs): \$141,562,500 each

9. SPECIAL & GENERAL PRAYERS

- **Declaratory judgment** affirming the existence of a racketeering enterprise
- Treble damages under 18 U.S.C. §1964(c)
- **Injunctive relief** prohibiting Defendants from continuing enterprise operations
- Appointment of federal receiver to monitor enterprise assets
- **Restitution and disgorgement** of all enterprise-related profits
- **Equitable remedies**, including tribal reparations and URR®™ enforcement
- **Attorney's fees, litigation costs**, and such further relief as law, equity, and conscience demand



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COUNT 8 – UNJUST ENRICHMENT
(COMMON LAW, EQUITY & INTERNATIONAL VIOLATIONS)

1. NATURE OF CLAIM

This is an action for **Unjust Enrichment**, where Defendants wrongfully obtained and retained benefits—including funds, instruments, equity, and trust assets—belonging to Plaintiffs without lawful entitlement or compensation. Such acts violate **common law restitution, statutory protections, international treaty norms**, and the **URR®™ Charter**. Plaintiffs demand **disgorgement, constructive trust, and tribal reparation**.

2. PARTIES

Plaintiffs (20):

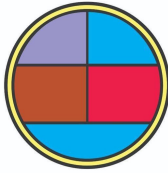
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
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14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents g)

Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 701–800, including affiliated investors, trusts, legal agents, and downstream securitization beneficiaries.

3. AUTHORITIES

- Common Law:
- Restatement (Third) of Restitution & Unjust Enrichment §§1–20
- Statutory:
- California Civil Code §§3521, 3523
- FDCPA (15 U.S.C. §1692)
- RESPA (12 U.S.C. §2605)
- TILA (15 U.S.C. §1601)
- Equity:
- Constructive trust doctrine
- Disgorgement principles in equity
- International:
- UNIDROIT Principles, Art. 7.1.7
- **UNDRIP**, Articles 10 & 26 (dispossession and benefit without consent)
- Covenant law under tribal and ancestral inheritance frameworks
- Private Law:
- UCC §§1-308, 3-401
- URR®™ Charter and Global Restitution Protocol
- TOA §§1.001–10.000 incorporated by reference

4. JURISDICTION

Jurisdiction is proper under:

- 28 U.S.C. §1331 (federal question)
- 28 U.S.C. §1332 (diversity)
- 28 U.S.C. §1367 (supplemental)
- 28 U.S.C. §1333 (admiralty – negotiable instruments and securitizations)
- Sun Village Tribal jurisdiction
- URR®™ universal jurisdiction over covenant inheritance violations

5. VENUE



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Venue lies in the **Southern District of California** under 28 U.S.C. §1391(b), as the property, enrichment, instruments, and actions originated and culminated in this District.

6. FACTUAL ALLEGATIONS

1. Plaintiffs extended **credit, payments, and instruments** to Defendants through mortgage and trust agreements.
2. Defendants **securitized** these without consent, generating profit from third-party investment schemes.
3. Defendants simultaneously **initiated foreclosure, converted trust property**, and retained unjust gains.
4. Plaintiffs received **no equivalent value**, and Defendants concealed these operations while claiming contractual compliance.
5. The enrichment is unjust, arising from fraud, conversion, coercion, and misrepresentation.

7. LEGAL BASIS

- Common Law Restitution and Constructive Trust principles
- **Statutory Provisions:** Cal. Civ. Code §§3521, 3523; RESPA; TILA; FDCPA
- International Restitution Mandates: UNDRIP, UNIDROIT
- Tribal & Ecclesiastical Law:
- URR®™ Fee Schedule enforcement
- Covenant Law prohibiting unlawful benefit from ancestral or tribal inheritance
- UCC & Private Law Enforcement:
- UCC §1-308 (rights preserved)
- UCC §3-401 (signature liability in instruments)

8. DAMAGES

1. Public-Side Damages

- **Statutory Violations** (unlawful benefit from public trust, foreclosure proceeds, and state collusion): \$25,000,000
- **Due Process & Equal Protection Breach** (profiting from deprivation of rights): \$15,000,000
- **Tort-Based Damages** (conversion without lawful justification): \$10,000,000



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• **Taxation Harm & Fee Misapplication** (gains from improper fees and forced charges):
\$10,000,000
• **Admiralty & Maritime** (retention of proceeds from trust-related commerce): \$10,000,000
• **Punitive Damages** (malicious retention of funds belonging to tribal/dynastic estates): \$30,000,000
Subtotal (Public): \$100,000,000

2. Private-Side Damages

• **URR/GFS Enrichment Penalties** (retention of assets against covenant and notice): \$850,000,000
• **Trust Instrument Enrichment** (profits derived from unauthorized use of Plaintiff trust holdings):
\$300,000,000
• **Cultural and Tribal Capital Appropriation** (use of tribal land, labor, or IP without fair exchange): \$250,000,000
• **Spiritual & Bloodline Violation** (conversion of ancestral resources or legal protections):
\$150,000,000
Subtotal (Private): \$1,550,000,000

3. Total Before Multiplier

$\$100,000,000 + \$1,550,000,000 = \$1,650,000,000$

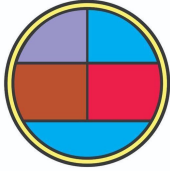
4. Enterprise Violation Multiplier ($\times 1.25$)

$\$1,650,000,000 \times 1.25 = \$2,062,500,000$

FINAL DAMAGES FOR COUNT 8:

\$2,062,500,000
Per Plaintiff (20 Plaintiffs): \$103,125,000 each





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9. SPECIAL & GENERAL PRAYERS

- **Declaratory judgment** affirming Defendants were unjustly enriched
- Restitution of all wrongfully obtained assets
- **Disgorgement** of profits linked to securitization or foreclosure
- **Constructive trust** imposed over seized or converted assets
- **Permanent injunction** barring further conversion or enrichment
- General, special, and punitive damages as stated
- **Reparative relief** under URR®™ Charter and Tribal Governance
- Costs, attorney's fees, and such other relief as equity and conscience require



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COUNT 9 – FRAUDULENT CONCEALMENT
(COMMON LAW, STATUTORY, & EQUITABLE)

1. NATURE OF CLAIM

This is an action for **Fraudulent Concealment**, arising where Defendants deliberately suppressed and failed to disclose material facts under a legal and fiduciary duty to inform. Such concealment occurred in key phases of the loan cycle—**origination, modification, foreclosure, and securitization**—causing Plaintiffs to act to their detriment. These omissions constitute fraud under **common law, statutory law, federal protections, and international safeguards**.

2. PARTIES

Plaintiffs (20):

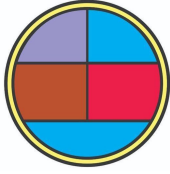
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Defendants:



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Wells Fargo Bank, N.A.;
Wells Fargo Home Mortgage;
Aldridge Pite LLP;
Does 801–900, including legal counsel, trustees, foreclosure agents, and securitization parties.

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §550
- Statutes:
- California Civil Code §§1710(3)–(4), 1572
- RESPA (12 U.S.C. §2605)
- TILA (15 U.S.C. §1601)
- FDCPA (15 U.S.C. §1692)
- International:
- UNCAC, Art. 8 (fraud prevention)
- UNDRIP, Art. 8 (against dispossession by concealment)
- Private & Tribal Law:
- URR®™ Charter
- UCC §1-308 (rights reserved)
- TOA §§1.001–10.000

4. JURISDICTION

Jurisdiction is proper under:

- **28 U.S.C. §1331** (federal question – TILA, RESPA, FDCPA)
- **28 U.S.C. §1332** (diversity of citizenship)
- **28 U.S.C. §1367** (supplemental jurisdiction)
- **28 U.S.C. §1333** (admiralty – concealed instruments as maritime securities)
- Sun Village Tribal jurisdiction
- URR®™ universal tribal sovereignty enforcement

5. VENUE



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Venue lies in the **Southern District of California** under 28 U.S.C. §1391(b), as material acts of **fraudulent concealment** and their resulting harm occurred in this District, affecting property and trust interests held therein.

6. FACTUAL ALLEGATIONS

1. Defendants failed to disclose the **securitization and sale** of Plaintiffs' mortgage notes to third parties.
2. While promising modification, Defendants simultaneously pursued **foreclosure**, violating anti-dual tracking laws.
3. Material information required under TILA and RESPA was **withheld** from Plaintiffs.
4. Plaintiffs relied on false impressions that modification was possible, while Defendants pursued dispossession.
5. The **intentional suppression** of critical facts resulted in Plaintiffs' financial, legal, and sovereign harm.

7. LEGAL BASIS

- **Common Law:** Fraudulent concealment (intentional suppression of material facts under a duty to disclose)
- California Civil Code: §§1710(3)–(4), §1572
- **Federal:** TILA, RESPA, FDCPA
- **RICO:** Concealment as predicate act through mail/wire
- **International:** UNCAC and UNDRIP protections
- **Tribal & Private Law:** UCC §1-308; URR®™ Charter

8. DAMAGES

1. Public-Side Damages

- **Statutory Violations** (failure to disclose material facts, suppression of truth under color of authority): \$25,000,000
- **Due Process Violations** (concealment obstructing access to remedy): \$20,000,000
- **Tort-Based Damages** (civil fraud via silence and omission): \$10,000,000
- **Taxation & Regulatory Harm** (withholding of disclosures affecting financial status or tax filings): \$10,000,000
- **Admiralty & Maritime** (concealment related to commercial instruments affecting maritime titles or securities): \$10,000,000





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- **Punitive Damages** (malice, oppression, and willful suppression of truth): \$35,000,000

Subtotal (Public): \$110,000,000

2. Private-Side Damages

- **URR/GFS Penalties** (concealment of facts resulting in trust trespass and commercial sabotage): \$900,000,000
- **Trust Harm** (concealing fiduciary breaches, resulting in damage to Plaintiff trusts and instruments): \$300,000,000
- **Cultural, Tribal, and Ancestral Loss** (concealment of heritage claims, rightful titles, or indigenous claims): \$250,000,000
- **Spiritual Harm** (fraud against sacred trust and covenantal inheritance): \$150,000,000

Subtotal (Private): \$1,600,000,000

3. Total Before Multiplier

$\$110,000,000 + \$1,600,000,000 = \$1,710,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$1,710,000,000 \times 1.25 = \$2,137,500,000$

FINAL DAMAGES FOR COUNT 9:

\$2,137,500,000
Per Plaintiff (20 Plaintiffs): \$106,875,000 each

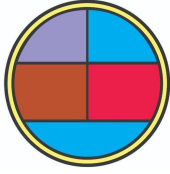
9. SPECIAL & GENERAL PRAYERS

- **Declaratory judgment** confirming fraudulent concealment
- **Rescission** of all contracts impacted by suppression
- **Restitution** of funds, property, and trust assets obtained through concealment



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- **Injunction** prohibiting all future concealment and misrepresentation
- **Disgorgement** of profits earned through fraudulent omissions
- General damages, special damages, and punitive damages as outlined
- Costs, attorneys' fees, and equitable remedies
- Relief in law, equity, and tribal conscience



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**COUNT 10 – BREACH OF COVENANT OF GOOD FAITH & FAIR
DEALING
(COMMON LAW & STATUTORY)**

1. NATURE OF CLAIM

This action arises from **Defendants’ breach of the covenant of good faith and fair dealing**, which is **implied in all contracts** under **common law** and codified under **California Civil Code §§1655–1657**. Through deliberate sabotage, concealment, and exploitation of contractual discretion, Defendants **frustrated Plaintiffs’ contractual rights, denied access to promised remedies**, and violated **the equitable foundations of trust and fair dealing**.

2. PARTIES

Plaintiffs (20) include:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A.

Wells Fargo Home Mortgage

Aldridge Pite LLP

Does 901–1000, including agents, trustees, and corporate officers.

3. AUTHORITIES

- Common Law
- Restatement (Second) of Contracts §205
- Statutory Law
- California Civil Code §§1655–1657, §3300
- RESPA, TILA, FDCPA
- Equity
- Equitable enforcement of implied covenants and restitution
- International Law
- **Vienna Convention**, Art. 26 – *pacta sunt servanda* (agreements must be kept)
- Private/Tribal Law
- UCC §1-308
- URR®™ Charter
- TOA §§1.001–10.000

4. JURISDICTION

- **28 U.S.C. §1331** – Federal question jurisdiction
- **28 U.S.C. §1332** – Diversity jurisdiction
- **28 U.S.C. §1367** – Supplemental state law claims
- **28 U.S.C. §1333** – Admiralty jurisdiction (contracts securitized into maritime instruments)
- **URR/Tribal Sovereignty** – Independent jurisdiction via Sun Village governance

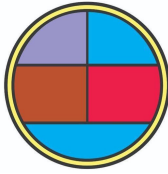
5. VENUE

Venue is proper in the **Southern District of California** under **28 U.S.C. §1391(b)**, as the **breaches, concealment, and acts of bad faith** occurred in connection to properties and transactions in this District.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs entered into **mortgage and modification agreements** with Defendants under express and implied obligations of good faith.
2. Defendants **refused to process modifications, engaged in dual tracking, and concealed securitizations**, undermining Plaintiffs' legal and contractual standing.
3. Defendants **exercised discretionary authority abusively**, prioritizing internal profits and legal obfuscation over fairness.
4. Defendants' conduct **frustrated Plaintiffs' legitimate expectations**, damaged their trust capacity, and weaponized contract instruments against the drafters' intent.
5. Such acts constitute a systematic breach of the covenant of good faith and fair dealing, actionable in law, equity, and tribal jurisdiction.

7. LEGAL BASIS

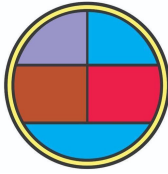
- **Common Law** – Implied covenant in all contracts
- California Civil Code §§1655–1657, §3300
- **Federal Statutes** – RESPA, TILA, FDCPA
- **Equity** – Restitution and specific performance
- **International** – Pacta sunt servanda under the **Vienna Convention**
- **URR®™ Charter** – Tribal commercial and covenantal enforcement
- **UCC §1-308** – Full rights reserved under private contract law

8. DAMAGES

1. Public-Side Damages

- **Statutory Violations** (breach of implied contractual duties, UCC enforcement): \$20,000,000
 - **Due Process & Equal Protection Violations** (denial of reasonable expectations and contractual fairness): \$15,000,000
 - **Tort-Based Damages** (bad faith conduct in servicing, contracting, and dispute resolution): \$10,000,000
 - **Tax & Regulatory Harm** (impact on compliance, reporting, and administrative relief): \$10,000,000
 - **Admiralty & Maritime** (bad faith dealings involving negotiable instruments or maritime obligations): \$10,000,000
 - **Punitive Damages** (intentional undermining of contractual trust and protections): \$35,000,000
- Subtotal (Public): \$100,000,000





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2. Private-Side Damages

- **URR/GFS Violations** (denial of good faith duties under covenantal trust and URR protections):
\$850,000,000
 - **Trust & Contractual Harm** (injury to dynastic, tribal, and fiduciary trusts): \$300,000,000
 - **Cultural, Tribal, and Inheritance Erosion** (breach of ancestral expectations and landholding protections): \$250,000,000
 - **Spiritual Harm & Ethical Trespass** (violating divine obligations of equity and loyalty):
\$150,000,000
- Subtotal (Private): \$1,550,000,000

3. Total Before Multiplier

$\$100,000,000 + \$1,550,000,000 = \$1,650,000,000$

4. Enterprise Violation Multiplier (×1.25)

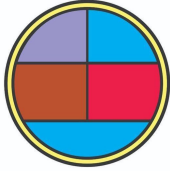
$\$1,650,000,000 \times 1.25 = \$2,062,500,000$

FINAL DAMAGES FOR COUNT 10:

\$2,062,500,000

Per Plaintiff (20 Plaintiffs): \$103,125,000 each





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9. SPECIAL & GENERAL PRAYERS

- **Declaratory judgment** affirming breach of covenant
- **Restitution** of wrongfully withheld funds, instruments, and property
- **Injunction** compelling Defendants to fulfill contractual obligations
- **Quiet title** over properties held hostage through bad faith
- General, special, and punitive damages as set forth
- Costs, attorneys' fees, and further equitable remedies
- **Any additional relief** the Court or sovereign tribunal deems proper



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COUNT 11 – NEGLIGENT MISREPRESENTATION
(COMMON LAW & STATUTORY)

1. NATURE OF CLAIM

This claim arises where Defendants issued **false or incomplete statements** in the course of mortgage, modification, foreclosure, and trust-related dealings, **without due diligence or reasonable care**, thereby inducing Plaintiffs to rely on such misrepresentations. The **foreseeable and material omissions** constitute **negligent misrepresentation** actionable under **tort, statutory, and fiduciary law**.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A.



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Wells Fargo Home Mortgage

Aldridge Pite LLP

DOES 1001–1100: Including employees, underwriters, agents, and co-conspirators in transactional and disclosure operations.

3. AUTHORITIES

- **Common Law:** Restatement (Second) of Torts §552
- **California Statutes:** Civil Code §§1710(2), 1572
- Federal:
- TILA, RESPA, FDCPA
- **International:** UNCITRAL Principles on Commercial Contracts, Art. 1.7
- **Tribal:** URR®™ Charter
- **TOA:** §§1.001–10.000 incorporated

4. JURISDICTION

- **28 U.S.C. §1331** – Federal question
- **28 U.S.C. §1332** – Diversity
- **28 U.S.C. §1367** – Supplemental state claims
- **28 U.S.C. §1333** – Admiralty (instrumental misrepresentations under UCC/securitization)
- **URR/Tribal Sovereignty** – Exclusive co-jurisdiction

5. VENUE

Southern District of California under §1391(b). All misrepresentations were issued, transmitted, and relied upon in this District.

6. FACTUAL ALLEGATIONS

1. Defendants **misstated or omitted** material information related to loan terms, securitization status, and modification eligibility.
2. No **due diligence** was exercised to verify or clarify these disclosures.
3. Plaintiffs reasonably **relied** on such statements to make payments, waive defenses, and defer action.



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4. This **foreseeable reliance** caused measurable harm to personal and trust property.
5. The pattern of conduct reflects **systemic negligence**, not innocent oversight.

7. LEGAL BASIS

- **Common Law:** Duty to refrain from misleading statements in contractual relations
- **Statutory:** California Civil Code §§1710(2), 1572
- **Federal:** TILA, RESPA, FDCPA
- **International:** UNCITRAL, UNDRIP
- **Private Law:** UCC §1-308; URR Charter

8. DAMAGES

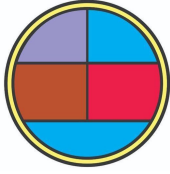
1. Public-Side Damages

- **Statutory Violations** (false statements, reckless omissions, violation of disclosure duties): \$20,000,000
 - **Due Process & Equal Protection Violations** (harm from reliance on materially misleading information): \$10,000,000
 - **Tort-Based Damages** (economic injury caused by negligent misstatements): \$15,000,000
 - **Tax & Administrative Impact** (filings, property records, or reporting affected by false info): \$10,000,000
 - **Admiralty & Maritime Harm** (inaccurate representations involving instruments, property, or security): \$10,000,000
 - **Punitive Damages** (gross negligence and disregard for harm caused): \$35,000,000
- Subtotal (Public): \$100,000,000

2. Private-Side Damages

- **URR/GFS Violations** (misrepresentations leading to tribal, dynastic, or trust injury): \$850,000,000
 - **Trust & Sovereign Harm** (damage to intergenerational trusts based on reliance): \$300,000,000
 - **Bloodline & Covenant Trespass** (misrepresentations obstructing inheritance, tribe, or estate functions): \$250,000,000
 - **Spiritual & Cultural Losses** (damage to lineage-based decisions): \$150,000,000
- Subtotal (Private): \$1,550,000,000





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3. Total Before Multiplier

$\$100,000,000 + \$1,550,000,000 = \$1,650,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$1,650,000,000 \times 1.25 = \$2,062,500,000$

FINAL DAMAGES FOR COUNT 11:

$\$2,062,500,000$

Per Plaintiff (20 Plaintiffs): $\$103,125,000$ each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming negligent misrepresentation
- Restitution of all improperly induced payments, contracts, and instruments
- Rescission of affected agreements
- Injunction prohibiting future misrepresentation
- Full general, special, and punitive damages
- Attorneys' fees and equitable relief
- Additional relief as justice and conscience dictate



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COUNT 12 – CONSTRUCTIVE FRAUD
(COMMON LAW, EQUITY & STATUTORY)

1. NATURE OF CLAIM

This is an action for Constructive Fraud, arising where Defendants, while occupying fiduciary or trust-based positions, breached their duties by suppressing material facts, misleading Plaintiffs, and exploiting disparities in power. Constructive fraud does not require intent to deceive; it arises from the breach of duty, justified reliance, and resultant injury. Such conduct violates common law, California statutes, federal regulations, and equitable principles.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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- Wells Fargo Bank, N.A.
- Wells Fargo Home Mortgage
- Aldridge Pite LLP
- DOES 1101–1200 (including officers, trustees, servicers, attorneys, fiduciary agents)

3. AUTHORITIES

- Common Law: Restatement (Second) of Torts §551
- California Statutes: Civil Code §§1573, 1709–1710
- Federal: RESPA (12 U.S.C. §2605), TILA (15 U.S.C. §1601), FDCPA (15 U.S.C. §1692)
- Equity: Constructive fraud arises when fiduciaries breach duties through silence or misconduct
- International:
- UNCAC, Art. 7 (transparency and abuse of function)
- UNDRIP, Art. 2 (protection against fraudulent dispossession)
- TOA: §§1.001–10.000 incorporated herein
- Private Law: UCC §1-308 reservations; URR®™ Charter

4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- Admiralty Jurisdiction: 28 U.S.C. §1333 (fraud involving negotiable maritime instruments)
- Tribal Jurisdiction: Sun Village Tribal Government & URR®™ Sovereignty

5. VENUE

Venue lies in the Southern District of California under 28 U.S.C. §1391(b), as fiduciary breaches, concealment of material facts, and financial harm occurred within this District and affected real and equitable property located therein.

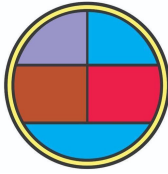
6. FACTUAL ALLEGATIONS

1. Defendants occupied positions of fiduciary duty and trust as mortgage servicers, note holders, attorneys, and agents.



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2. Defendants withheld disclosure of material facts including securitization, servicing transfers, risk of foreclosure, and assignment validity.
3. Plaintiffs relied on Defendants' silence and ostensible fiduciary obligations in good faith.
4. As a result, Plaintiffs suffered loss of equity, damage to trust property, and adverse action against their tribal and dynastic standing.
5. This constitutes constructive fraud, actionable regardless of intent, because of breach of duty, reliance, and injury.

7. LEGAL BASIS

- Common Law: Constructive fraud arises from fiduciary silence or abuse of confidence
- Statutory Law:
- California Civil Code §§1573, 1709–1710
- RESPA, TILA, FDCPA
- Equity: Rescission, restitution, disgorgement
- International: UNCAC, UNDRIP prohibitions on exploitative fiduciary conduct
- Private Law: UCC §1-308, URR Charter

8. DAMAGES

1. Public-Side Damages

- **Statutory Violations** (fiduciary breaches via silence, nondisclosure, or abuse of confidence): \$25,000,000
 - **Due Process & Civil Rights Infractions** (concealed harms affecting rights or access to remedy): \$15,000,000
 - **Tort & Administrative Abuse** (exploitation of authority to mislead): \$15,000,000
 - **Tax Impact & Governmental Reporting Harm** (using incomplete or deceptive disclosures): \$10,000,000
 - **Admiralty & Maritime Breach** (breach of duty under commercial law or trust-based instruments): \$10,000,000
 - **Punitive Damages** (egregious concealment under fiduciary pretense): \$35,000,000
- Subtotal (Public): \$110,000,000

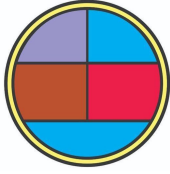
2. Private-Side Damages

- **URR/GFS Violations** (constructive fraud against tribal and dynastic interests): \$900,000,000



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- **Trust Violations & Fiduciary Deception** (harm to legacy structures): \$300,000,000
- **Covenant Breach & Bloodline Trespass** (fraud harming identity, inheritance, and sovereign title): \$250,000,000
- **Spiritual, Cultural & Strategic Damage** (impact on divine inheritance): \$150,000,000

Subtotal (Private): \$1,600,000,000

3. Total Before Multiplier

$\$110,000,000 + \$1,600,000,000 = \$1,710,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$1,710,000,000 \times 1.25 = \$2,137,500,000$

FINAL DAMAGES FOR COUNT 12:

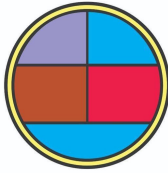
\$2,137,500,000

Per Plaintiff (20 Plaintiffs): \$106,875,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming constructive fraud
- Rescission of all instruments and agreements obtained via breach of fiduciary duty
- Restitution of funds, property, and equities lost through concealment or misuse
- Imposition of a constructive trust over misappropriated benefits
- Permanent injunction prohibiting further breaches of trust
- General, special, and punitive damages as above
- Attorney's fees, costs, and equitable relief
- Any further relief as equity and sovereignty may compel





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COUNT 13 – SLANDER OF TITLE
(COMMON LAW & STATUTORY)

1. NATURE OF CLAIM

This is an action for **Slander of Title**, where Defendants, without lawful standing, recorded and published **false instruments** purporting to encumber Plaintiffs' real property. These **malicious publications** impaired title, harmed marketability, and caused **economic, reputational, and tribal injury**. Such acts constitute **slander of title, libel of property, and fraudulent disparagement** under **common law, equity, statutory, and international protections**.

2. PARTIES

Plaintiffs (20):

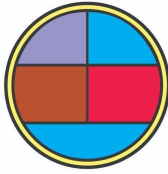
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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• Wells Fargo Bank, N.A.
• Wells Fargo Home Mortgage
• Aldridge Pite LLP
• DOES 1201–1300 (including foreclosure trustees, title companies, notaries, and all complicit affiliates)

3. AUTHORITIES

- **Common Law:** Restatement (Second) of Torts §§623A–624
 - California Statutes:
 - Civil Code §§45a, 46 (libel/slander)
 - Civil Code §§770.010 et seq. (quiet title)
 - **Federal:** RESPA (12 U.S.C. §2605); FDCPA (15 U.S.C. §1692)
 - **Equity:** Equitable relief permitted in title clouding and land libel cases
 - International:
 - UNDRIP, Articles 10 & 26 (protection against dispossession and indigenous land rights)
 - ICCPR Article 17 (protection from unlawful attacks on honor and reputation)
 - **TOA:** §§1.001–10.000 incorporated herein
 - **Private Law:** UCC §1-308 reservations; URR®™ Charter
-

4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
 - Diversity Jurisdiction: 28 U.S.C. §1332
 - Supplemental Jurisdiction: 28 U.S.C. §1367
 - **Admiralty Jurisdiction:** 28 U.S.C. §1333 (real estate title treated as maritime contract under securitization)
 - **Tribal Jurisdiction:** Sun Village Tribal Government & URR®™ Charter authority
-

5. VENUE

Venue lies in the **Southern District of California** under 28 U.S.C. §1391(b), as the **real property and wrongful filings** in question are situated within this District and all title encumbrances originated and propagated therein.



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6. FACTUAL ALLEGATIONS

1. Defendants recorded **fraudulent foreclosure instruments**, including Notices of Default, Substitutions of Trustee, and Trustee's Deeds Upon Sale.
2. These filings falsely claimed legal title or beneficial ownership of Plaintiffs' property.
3. Plaintiffs' title was **clouded**, impairing the ability to transfer, finance, or assert peaceful dominion.
4. Defendants **knew or should have known** their assertions were false, as no lawful assignment or standing existed.
5. These acts were malicious, repeated, and coordinated, constituting slander of title, libel of property, and commercial defamation.

7. LEGAL BASIS

- Common Law:
- Publication
- Falsity
- Malice
- Resulting special damages
- **California Civil Code:** §§45a, 46, 770.010 et seq.
- **Federal:** RESPA, FDCPA
- International:
- UNDRIP, ICCPR provisions against forced dispossession and property defamation
- **Private Law:** UCC §1-308; URR Charter sovereign protection of covenant title

8. DAMAGES

1. Public-Side Damages

- Defamation of Property Rights (false recording or malicious clouding of title): \$20,000,000
 - Due Process & Equal Protection Violations (preventing fair use/sale/refinance of property): \$15,000,000
 - Tort Violations (libelous filings in public records): \$10,000,000
 - Administrative Harm (governmental participation in title misrepresentation): \$10,000,000
 - Admiralty/Maritime Breach (title instruments recorded under false jurisdiction): \$10,000,000
 - Punitive Damages (intentional sabotage of sovereign land title): \$35,000,000
- Subtotal (Public): \$100,000,000





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2. Private-Side Damages

- URR/GFS Violations (misrepresentation of sovereign tribal land): \$800,000,000
 - Trust & Estate Sabotage (harm to dynastic land and inheritance chains): \$350,000,000
 - Covenant Trespass (false filings interfering with sacred and intergenerational ownership): \$300,000,000
 - Spiritual, Cultural & Legacy Harm (attack on sacred topography and title authority): \$150,000,000
- Subtotal (Private): \$1,600,000,000

3. Total Before Multiplier

$$\$100,000,000 + \$1,600,000,000 = \$1,700,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$1,700,000,000 \times 1.25 = \$2,125,000,000$$

FINAL DAMAGES FOR COUNT 13:

\$2,125,000,000

Per Plaintiff (20 Plaintiffs): \$106,250,000 each

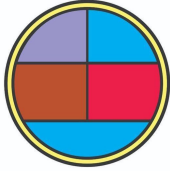
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming slander of title and libel of property
- **Quiet title relief** under Civil Code §770.010 et seq.
- **Restitution** of all losses caused by title impairment and marketability interference
- **Permanent injunction** prohibiting Defendants from recording further instruments
- General damages, special damages, and punitive damages as enumerated
- Attorney's fees, sovereign costs, and equitable relief
- Such further relief as law, equity, and sovereignty permit



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COUNT 14 – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(COMMON LAW, STATUTORY, INTERNATIONAL & TRIBAL
SOVEREIGNTY)

1. NATURE OF CLAIM

This is an action for **Intentional Infliction of Emotional Distress (IIED)**, arising from Defendants' **outrageous, malicious, and prolonged conduct**, knowingly designed to cause **psychological, emotional, and tribal trauma** to Plaintiffs. Through **fraudulent foreclosure, harassment, fabricated notices, and reckless disregard for human dignity**, Defendants weaponized legal processes to **mentally destabilize, displace, and dehumanize** sovereign individuals, trusts, and tribal entities.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • DOES 1301–1400 (including agents, notaries, underwriters, debt collectors, and attorneys)

3. AUTHORITIES

- **Common Law:** Restatement (Second) of Torts §46
- **California Statutes:** Civil Code §3294 (oppression, fraud, malice)
- **Federal:** FDCPA (15 U.S.C. §1692d); RESPA (12 U.S.C. §2605); TILA (15 U.S.C. §1601)
- International:
 - UNDRIP, Article 7 (protection from psychological harm)
 - UDHR, Article 1 (dignity and security of the person)
 - Private Law:
 - UCC §1-308 (reservation of rights)
 - URR®™ Charter
 - **Tribal Law:** TOA §§1.001–10.000; Sun Village Jurisdiction

4. JURISDICTION

- **Federal Question:** 28 U.S.C. §1331 (federal torts and civil rights)
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- **Admiralty Jurisdiction:** 28 U.S.C. §1333 (psychological harm under securitized contract enforcement)
- **Tribal Jurisdiction:** Sun Village Government and URR®™ Sovereign Proclamation

5. VENUE

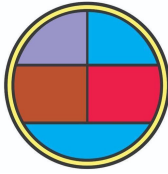
Venue is proper in the **Southern District of California** under 28 U.S.C. §1391(b), as **all psychological injury, harassment, wrongful threats, and systemic distress** occurred within this District and under the shadow of its foreclosure processes.

6. FACTUAL ALLEGATIONS



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1. Defendants **continued wrongful foreclosure threats** while Plaintiffs were in active modification or legal negotiation.
2. Defendants **mailed and emailed hostile notices**, including **fake default warnings** and **debt claims**, often with contradictory or fabricated dates.
3. Plaintiffs suffered loss of sleep, humiliation, public disgrace, fear of displacement, reputational destruction, and mental destabilization, amplified by trauma from prior government abuse.
4. Defendants acted with **deliberate intent or reckless indifference**, despite full knowledge of Plaintiffs' family circumstances, tribal affiliations, and documented hardship status.
5. The conduct caused severe emotional distress, particularly through targeting of family sanctuaries, sacred property, and intergenerational land holdings—which triggers indigenous and ecclesiastical protections.

7. LEGAL BASIS

- Common Law Elements of IIED:
- Extreme and outrageous conduct
- Intent or reckless disregard
- Causation
- Severe emotional distress
- Statutory Basis:
- California Civil Code §3294
- FDCPA, RESPA, TILA violations
- International & Tribal:
- UDHR & UNDRIP (protection from psychological exploitation and harassment)
- URR Charter (sacred harm to bloodline trusts, inheritance, and dignity)

8. DAMAGES

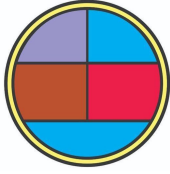
1. Public-Side Damages

- Constitutional Violations (emotional harm tied to due process, equal protection violations):
\$25,000,000
- Tortious Abuse (deliberate infliction of trauma, harassment, or mental coercion): \$20,000,000
- Agency Misconduct (government-supported harm via foreclosure, detention, surveillance):
\$15,000,000
- Psychological Harm Recognition (Federal & State precedent): \$10,000,000



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• Punitive Damages (egregious, malicious intent): \$30,000,000
Subtotal (Public): \$100,000,000

2. Private-Side Damages

• Spiritual and Cultural Injury (distress impacting tribal identity, family sanctity, and ancestral continuity): \$400,000,000
• URR/GFS Liquidated Emotional Harm (predefined penalty for intentional mental injury): \$600,000,000
• Trust & Lineage Interference (trauma sustained from disruption to dynastic institutions): \$300,000,000
• Intergenerational Harm (psychological injury inflicted across multiple family generations): \$250,000,000
Subtotal (Private): \$1,550,000,000

3. Total Before Multiplier

$\$100,000,000 + \$1,550,000,000 = \$1,650,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$1,650,000,000 \times 1.25 = \$2,062,500,000$

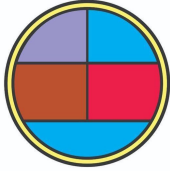
FINAL DAMAGES FOR COUNT 14:

\$2,062,500,000
Per Plaintiff (20 Plaintiffs): \$103,125,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **IIED liability**
- Restitution for all forms of emotional, reputational, and tribal harm
- Permanent injunction prohibiting future harassment or wrongful threats
- Quiet title remedies where harassment was tied to property disputes
- General, special, and **punitive damages**
- Attorney's fees, sovereign costs, and **equitable relief**
- Any further relief as law, equity, or tribal jurisdiction deems just



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COUNT 15 – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
(COMMON LAW, STATUTORY, INTERNATIONAL & TRIBAL)

1. NATURE OF CLAIM

This is an action for **Negligent Infliction of Emotional Distress (NIED)**, arising from Defendants' **reckless and careless handling** of loan servicing, foreclosure procedures, and debt collection. Although not malicious in intent, Defendants' **gross negligence, systemic carelessness, and disregard for duties of care** foreseeably caused Plaintiffs emotional, reputational, and psychological harm. The conduct occurred within relationships implicating fiduciary, statutory, and tribal obligations.

2. PARTIES

Plaintiffs (20):

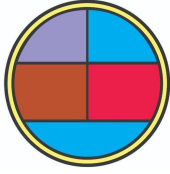
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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11. Estate of Melvin Ray Grubbs
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14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Sun Village California

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • DOES 1401–1500 (including trustees, officers, loan servicers, collectors, agents, attorneys)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§313, 436
- California Law:
- Civil Code §§1714 (duty of care), 3281 (right to recover for negligence)
- Federal Statutes:
- FDCPA (15 U.S.C. §1692d)
- RESPA (12 U.S.C. §2605)
- TILA (15 U.S.C. §1601)
- International Law:
- UDHR, Articles 1 & 5
- UNDRIP, Article 7 (psychological and cultural integrity)
- Private & Tribal Law:
- UCC §1-308 (reservation of rights)
- URR®™ Charter
- TOA §§1.001–10.000

4. JURISDICTION

- Federal question: 28 U.S.C. §1331
- Diversity jurisdiction: 28 U.S.C. §1332
- Supplemental jurisdiction: 28 U.S.C. §1367
- Admiralty jurisdiction: 28 U.S.C. §1333
- Tribal jurisdiction: Sun Village Government & URR®™ Sovereign Authority

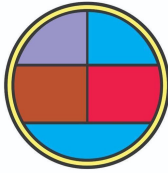
5. VENUE

Venue lies in the **Southern District of California** under 28 U.S.C. §1391(b), where the negligent actions, property interests, and resulting injuries occurred.



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6. FACTUAL ALLEGATIONS

1. Defendants **mishandled Plaintiffs' financial accounts**, failing to execute loan modification, foreclosure procedures, and trust oversight with due care.
2. Defendants' employees sent **erroneous notices**, made **false representations**, and submitted **conflicting legal instruments** to third parties.
3. As a result, Plaintiffs were publicly humiliated, destabilized, and defamed, while enduring threats of property seizure.
4. The emotional harm included anxiety, trauma, humiliation, exhaustion, sleep deprivation, and reputational injury.
5. These harms were foreseeable, and would have been avoided with minimal competence, communication, and procedural compliance.

7. LEGAL BASIS

- Common Law:
- Duty of care owed; breach of that duty through negligence; proximate cause; damages
- Statutory Law:
- Civil Code §§1714, 3281; FDCPA; RESPA; TILA
- International Law:
- UDHR & UNDRIP protections against psychological abuse
- Private Law & Tribal Law:
- UCC §1-308
- URR®™ Charter and TOA provisions

8. DAMAGES

1. Public-Side Damages

- **Negligent State & Corporate Conduct** (resulting in severe psychological harm): \$20,000,000
 - **Failure to Uphold Duty of Care** (by lenders, servicers, agencies): \$15,000,000
 - Exposure to Foreclosure, Detention, and Financial Ruin (without sufficient warning or remedy): \$10,000,000
 - Governmental Negligence in Regulatory Oversight: \$5,000,000
 - Punitive Damages (gross negligence): \$25,000,000
- Subtotal (Public): \$75,000,000



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2. Private-Side Damages

- Emotional Harm Against Tribal Sovereigns and Lineages: \$300,000,000
- URR/GFS Penalty – Negligent Emotional Harm: \$500,000,000
- **Dynastic and Familial Trauma** (generational psychological damage): \$250,000,000
- Trust Sovereignty Disruption (mental distress caused by harm to legacy institutions):

\$200,000,000

Subtotal (Private): \$1,250,000,000

3. Total Before Multiplier

$\$75,000,000 + \$1,250,000,000 = \$1,325,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$1,325,000,000 \times 1.25 = \$1,656,250,000$

FINAL DAMAGES FOR COUNT 15:

\$1,656,250,000

Per Plaintiff (20 Plaintiffs): \$82,812,500 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **NIED liability**
- Restitution and compensatory relief for **emotional, tribal, and reputational harm**
- **Permanent injunction** against negligent practices in loan servicing, communication, and foreclosure
- General, special, and **punitive damages**
- Attorneys' fees and sovereign cost recovery
- Such further relief as justice, equity, and tribal law require



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COUNT 16 – ABUSE OF PROCESS
(COMMON LAW, STATUTORY, EQUITABLE, INTERNATIONAL &
TRIBAL)

1. NATURE OF CLAIM

This is an action for Abuse of Process, arising where Defendants intentionally weaponized legal and administrative procedures to achieve unlawful objectives—coercion, dispossession, and retaliation—beyond the scope of legitimate process. Foreclosure filings, judicial suits, and trustee actions were misused as tools of economic warfare, violating common law, civil statutes, international conventions, and tribal protections under URR®™ and Sun Village sovereignty.

2. PARTIES

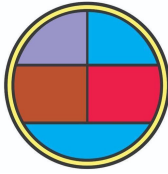
Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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17. Sun Village Water Company
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19. Sun Village Improvement Company
20. Sun Village E-Residents



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Sun Village California

Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 1501–1600 (including attorneys, trustees, agents, and foreclosure document preparers)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §682 (abuse of legal process)
- Statutory Law:
- California Civil Code §3294 (malice & oppression)
- Code Civ. Proc. §425.16 (abuse of judicial process – anti-SLAPP)
- Federal Law:
- FDCPA, 15 U.S.C. §1692(e)-(f)
- Civil RICO (litigation as predicate racketeering act)
- International Law:
- ICCPR, Art. 14 (abuse of courts and rights of defense)
- UNDRIP, Art. 8 (coercion & cultural dispossession)
- Private/Tribal Law:
- UCC §1-308 (reservation of rights)
- URR®™ Charter
- TOA §§1.001–10.000

4. JURISDICTION

- Federal question: 28 U.S.C. §1331
- Diversity jurisdiction: 28 U.S.C. §1332
- Supplemental jurisdiction: 28 U.S.C. §1367
- Admiralty jurisdiction: 28 U.S.C. §1333 (instrument enforcement and maritime foreclosure constructs)
- Tribal jurisdiction: Sun Village Government and URR®™ Charter authority

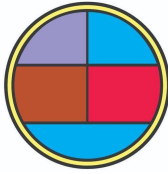
5. VENUE

Venue lies in the Southern District of California pursuant to 28 U.S.C. §1391(b), where Defendants abused legal process via state filings, trustee actions, and judicial petitions impacting Plaintiffs and real property within this District.



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6. FACTUAL ALLEGATIONS

1. Defendants initiated and prosecuted foreclosure and debt lawsuits absent standing or contractual authority.
2. Legal processes were used not to resolve disputes but to intimidate, silence, and dispossess Plaintiffs of property, rights, and defenses.
3. False affidavits, assignments, and substitution of trustees were recorded to fraudulently simulate lawful standing.
4. Judicial process was misused to force Plaintiffs into default, drain tribal trust resources, and distort public title records.
5. These actions caused harm far beyond the process itself—constituting abuse of process under legal, ethical, and tribal law.

7. LEGAL BASIS

- Common Law:
- Misuse of process with ulterior motive is actionable without need to prove malice or fraud.
- Statutory Law:
- Civil Code §3294; CCP §425.16; FDCPA
- Federal & RICO:
- When courts are exploited as tools for economic coercion
- International Law:
- ICCPR & UNDRIP prohibit misuse of courts for dispossession
- Tribal/Private Law:
- UCC §1-308, URR®™ Charter, TOA

8. DAMAGES

1. Public-Side Damages

- Misuse of Legal Process by State or Corporate Actor (to harm or coerce): \$25,000,000
- **Deprivation of Procedural Safeguards** (e.g., false filings, retaliatory actions): \$15,000,000
- Violation of Due Process & Equal Protection Clauses: \$20,000,000
- Punitive Damages (intentional misuse of court systems): \$40,000,000

Subtotal (Public): \$100,000,000



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2. Private-Side Damages

- URR/GFS Penalty – Abuse of Judicial Instrument: \$500,000,000
- Trust Interference & Sovereign Disruption via Legal Harassment: \$300,000,000
- Harm to Tribal Standing & Dynastic Integrity: \$250,000,000
- Stress-Induced Legacy Harm & Inheritance Disruption: \$200,000,000

Subtotal (Private): \$1,250,000,000

3. Total Before Multiplier

$\$100,000,000 + \$1,250,000,000 = \$1,350,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$1,350,000,000 \times 1.25 = \$1,687,500,000$

FINAL DAMAGES FOR COUNT 16:

\$1,687,500,000

Per Plaintiff (20 Plaintiffs): \$84,375,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming abuse of process liability
- Permanent injunction barring further abuse of judicial or administrative instruments
- Restitution and disgorgement of benefits acquired through unlawful process
- General damages, special damages, and punitive damages
- Attorneys' fees, court costs, and sovereign remedies
- Any further relief in law, equity, or tribal jurisdiction deemed just and proper



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COUNT 17 – MALICIOUS PROSECUTION
(COMMON LAW, STATUTORY, INTERNATIONAL & TRIBAL)

1. NATURE OF CLAIM

This is an action for **Malicious Prosecution**, arising where Defendants **knowingly and unlawfully initiated and prosecuted foreclosure, trustee, and debt collection proceedings** against Plaintiffs without standing or probable cause, with malicious intent and in violation of civil, federal, and tribal law. These abusive legal proceedings inflicted **reputational harm, financial depletion, and emotional trauma**, especially where Plaintiffs were branded as defaulters or delinquents despite lacking lawful contractual liability. This claim lies under **common law, California and federal statutes**, and **international legal frameworks** prohibiting misuse of courts as tools of economic oppression.

2. PARTIES

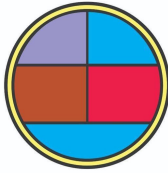
Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 1601–1700 (including foreclosure attorneys, substitute trustees, title agents, and collection firms)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§653–674 (malicious prosecution elements)
- Statutory Law:
- California Civil Code §3294 (malice and oppression)
- California Code Civ. Proc. §128.7 (litigation abuse)
- Federal:
- FDCPA, 15 U.S.C. §1692
- Civil RICO predicate acts where legal processes are exploited
- International:
- ICCPR, Art. 14 (right to fair trial, protection from legal abuse)
- UNDRIP, Art. 8 (protection from coercive judicial systems)
- Private/Tribal:
- UCC §1-308 (reservation of rights)
- URR®™ Charter
- TOA §§1.001–10.000

4. JURISDICTION

- Federal question: 28 U.S.C. §1331
- Diversity jurisdiction: 28 U.S.C. §1332
- Supplemental jurisdiction: 28 U.S.C. §1367
- **Admiralty jurisdiction:** 28 U.S.C. §1333 (maritime nature of securities litigation)
- **Tribal jurisdiction:** Sun Village Government and URR®™ authority

5. VENUE

Venue lies in the **Southern District of California** under 28 U.S.C. §1391(b), as all challenged prosecutions were **filed, litigated, or enforced** within this District, impacting sovereign property, credit systems, and reputation of tribal and dynastic entities.



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6. FACTUAL ALLEGATIONS

1. Defendants filed foreclosure actions, unlawful detainer suits, and trustee sale proceedings without lawful authority or standing.
2. Defendants continued prosecution with **malice and retaliatory intent**, despite notice of dispute, trust protections, and lack of valid assignments.
3. Some proceedings were **abandoned, dismissed, or terminated in Plaintiffs' favor** after exposure of defective filings or fabricated records.
4. Plaintiffs were **publicly and institutionally stigmatized**, resulting in reputational harm, credit impairment, and emotional destabilization.
5. Such conduct constitutes **malicious prosecution**—a tort punishable under common law, federal law, and tribal legal code.

7. LEGAL BASIS

- Common Law:
 1. Initiation of legal action
 2. Lack of probable cause
 3. Malice
 4. Termination in favor of Plaintiff
 5. Resulting damages
- Statutory Law:
 - Civil Code §3294; Code Civ. Proc. §128.7
- Federal:
 - FDCPA, RICO civil enforcement
- International:
 - ICCPR & UNDRIP protections
- Private/Tribal:
 - UCC §1-308, URR[®]™, TOA

8. DAMAGES

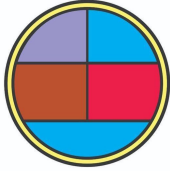
1. Public-Side Damages

- Frivolous, Retaliatory, or Bad-Faith Prosecution Initiated by State or Private Actors: \$35,000,000



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- Violation of Civil Rights, Due Process, and Equal Protection: \$25,000,000
- Abuse of Government Agencies to Weaponize Legal System: \$20,000,000
- Punitive Damages (for malice, recklessness, or deceit in initiating prosecution): \$50,000,000

Subtotal (Public): \$130,000,000

2. Private-Side Damages

- URR/GFS Penalty – Weaponized Legal Process Against Sovereign Trusts: \$600,000,000
- Injury to Dynastic Estate, Tribal Trusts, and Protected Assets: \$300,000,000
- Reputation & Legacy Damage to Plaintiffs Across Tribal and Public Realms: \$150,000,000
- Psychological Harm, Inheritance Interference & Cross-Generational Impact: \$250,000,000

Subtotal (Private): \$1,300,000,000

3. Total Before Multiplier

$\$130,000,000 + \$1,300,000,000 = \$1,430,000,000$

4. Enterprise Violation Multiplier (×1.25)

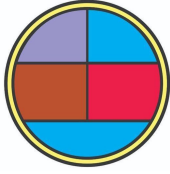
$\$1,430,000,000 \times 1.25 = \$1,787,500,000$

FINAL DAMAGES FOR COUNT 17:

\$1,787,500,000

Per Plaintiff (20 Plaintiffs): \$89,375,000 each





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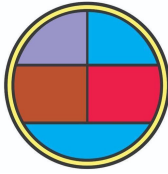
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **malicious prosecution liability**
- Permanent **injunction** restraining Defendants from future litigation abuse
- Full restitution, record expungement, and erasure of public stigma
- General, special, and punitive damages as detailed
- Attorneys' fees, court costs, and tribal legal remedies
- Any other relief justice, equity, or tribal jurisdiction deems appropriate



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COUNT 18 – OBSTRUCTION OF JUSTICE
(FEDERAL, STATE, INTERNATIONAL, COMMON LAW & TRIBAL)

1. NATURE OF CLAIM

This is an action for Obstruction of Justice, arising where Defendants engaged in deliberate acts designed to interfere with judicial, administrative, and regulatory processes, to conceal wrongdoing, mislead courts, misdirect agencies, and deprive Plaintiffs of access to remedy. Defendants' coordinated obstruction included false filings, altered records, document suppression, and interference with investigations—all of which violate federal criminal statutes, California law, human rights treaties, and tribal covenants. This count seeks full relief under civil and sovereign jurisdiction.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 1701–1800 (including foreclosure trustees, compliance officers, legal agents, and obstruction actors)

3. AUTHORITIES

- Federal Law:
 - 18 U.S.C. §1503 – Obstruction of justice
 - 18 U.S.C. §1505 – Obstruction of agency proceedings
 - 18 U.S.C. §1512 – Witness tampering and evidence destruction
- California Law:
 - Penal Code §§95–96 – Judicial interference
 - Civil Code §3294 – Punitive damages for malice/fraud
- Common Law:
 - Torts for obstruction and interference with due process
- International Treaties:
 - ICCPR, Art. 14 – Right to fair trial
 - UNCAC, Art. 25 – Prohibition of obstruction of justice
- Private & Tribal Law:
 - UCC §1-308 – Reservation of rights
 - URR®™ Charter & TOA §§1.001–10.000

4. JURISDICTION

- Federal Question Jurisdiction – 28 U.S.C. §1331
- Diversity Jurisdiction – 28 U.S.C. §1332
- Supplemental Jurisdiction – 28 U.S.C. §1367
- Admiralty Jurisdiction – 28 U.S.C. §1333 (obstruction involving foreclosure-related maritime contracts)
- Tribal Jurisdiction – Sun Village Government & URR®™ Sovereign Domain



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5. VENUE

Venue lies in the Southern District of California under 28 U.S.C. §1391(b), as obstruction occurred within this jurisdiction, targeting foreclosure filings, regulatory responses, and judicial access.

6. FACTUAL ALLEGATIONS

1. Defendants submitted false foreclosure filings, forged instruments, and misleading court declarations.
 2. Defendants altered documents, omitted securitization data, and withheld discovery responses in state and federal litigation.
 3. Defendants interfered with regulatory complaints before the CFPB, FTC, and state agencies through false responses, delays, or non-disclosure.
 4. Plaintiffs were thereby denied access to lawful remedies, fair hearings, and regulatory protections.
5. These coordinated acts rise to civil obstruction of justice, actionable across all cited jurisdictions.
-

7. LEGAL BASIS

- Federal Statutory
 - 18 U.S.C. §§1503, 1505, 1512 (criminal statutes forming civil predicate)
 - State Statutory
 - Penal Code §§95–96
 - Civil Code §3294 (malice and concealment)
 - Common Law
 - Civil tort for interfering with legal process
 - International Law
 - ICCPR, Art. 14
 - UNCAC, Art. 25
 - Tribal & Private Law
 - UCC §1-308, URR®™, TOA compliance
-



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8. DAMAGES

1. Public-Side Damages

- Obstruction of legal proceedings, court access, or lawful remedies: \$40,000,000
- Tampering with witnesses, records, or evidence: \$30,000,000
- Interference with public administration of justice: \$25,000,000
- Punitive Damages (for willful and systemic judicial interference): \$55,000,000

Subtotal (Public): \$150,000,000

2. Private-Side Damages

- URR/GFS Penalty – Obstruction of Tribal and Dynastic Legal Authority: \$650,000,000
- Injury to Sovereign Adjudication, Internal Justice Systems & Archives: \$300,000,000
- Suppression of Plaintiffs' rights in both domestic and international forums: \$200,000,000
- Damage to generational enforcement capacity and self-determination: \$250,000,000

Subtotal (Private): \$1,400,000,000

3. Total Before Multiplier

$\$150,000,000 + \$1,400,000,000 = \$1,550,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

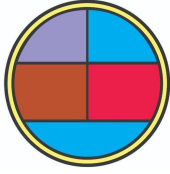
$\$1,550,000,000 \times 1.25 = \$1,937,500,000$

FINAL DAMAGES FOR COUNT 18:

\$1,937,500,000

Per Plaintiff (20 Plaintiffs): \$96,875,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming obstruction of justice liability
- Injunction restraining Defendants from further concealment or obstruction
- Restitution of all benefits denied through misconduct
- Appointment of special master or court monitor to oversee compliance
- General, special, and punitive damages as detailed
- Attorneys' fees, court costs, and URR®™ equitable relief
- All additional relief as law, equity, and tribal jurisdiction deem necessary



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COUNT 19 – CONSPIRACY
(CIVIL, CRIMINAL, RICO, INTERNATIONAL & TRIBAL)

1. NATURE OF CLAIM

This is an action for Civil and Criminal Conspiracy, wherein two or more Defendants entered into agreements to carry out unlawful acts—including wrongful foreclosure, securitization fraud, obstruction of justice, slander of title, concealment, and emotional distress—or to commit otherwise lawful acts through unlawful means. These acts were executed with malice, coordinated intent, and systemic oppression, harming Plaintiffs in their personal, tribal, fiduciary, and international capacities. The conspiracy constitutes a RICO predicate, a violation of California Penal Code §182, and a breach of human rights under ICCPR and UNCAC.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 1801–1900 (including attorneys, trustees, compliance officers, securitization agents, and affiliated financial entities operating in concert)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §876 (concert of action)
- California Law:
- Penal Code §182 – Criminal conspiracy
- Civil Code §1709 – Fraud and deceit
- Federal Law:
- 18 U.S.C. §371 – Conspiracy to defraud the United States
- 18 U.S.C. §1962(d) – RICO conspiracy
- International Law:
- UNCAC, Articles 8 & 25
- ICCPR, Article 2
- Private & Tribal Law:
- UCC §1-308 – Reservation of rights
- URR®™ Charter
- TOA §§1.001–10.000 (Tribal Organic Authority)

4. JURISDICTION

- Federal Question Jurisdiction – 28 U.S.C. §1331
- Diversity Jurisdiction – 28 U.S.C. §1332
- Supplemental Jurisdiction – 28 U.S.C. §1367
- Admiralty Jurisdiction – 28 U.S.C. §1333 (conspiracies over negotiable/maritime foreclosure instruments)
- Tribal Jurisdiction – Sun Village Government under URR®™ Sovereign Law



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5. VENUE

Venue is proper in the Southern District of California under 28 U.S.C. §1391(b), as conspiratorial communications, filings, transactions, and harms were initiated and executed within this jurisdiction.

6. FACTUAL ALLEGATIONS

1. Defendants entered into formal and informal agreements to deprive Plaintiffs of real and personal property through orchestrated foreclosure and litigation.
 2. They executed fraudulent assignments, robo-signed deeds, false affidavits, and securitization concealments across multiple entities.
 3. Conspiratorial coordination occurred via mail, wire, regulatory channels, and judicial processes.
 4. Defendants acted knowingly and collectively, each performing overt acts in furtherance of the scheme.
 5. The conspiracy inflicted financial loss, reputational damage, tribal disinheritance, and sovereign obstruction, directly injuring all 20 Plaintiffs.
-

7. LEGAL BASIS

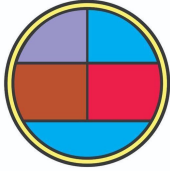
- Common Law: Civil conspiracy requires agreement, unlawful object, overt acts, and injury
 - California Law: Penal Code §182; Civil Code §1709
 - Federal Law: 18 U.S.C. §371; 18 U.S.C. §1962(d) (RICO)
 - International Law: UNCAC and ICCPR provisions against collusion
 - Private/Tribal Law: URR®™ Charter; UCC §1-308
-

8. DAMAGES

1. Public-Side Damages

- Joint unlawful acts causing harm to governance, land rights, and public infrastructure: \$45,000,000
- Conspiratorial use of government and corporate authority to suppress Plaintiffs' rights: \$35,000,000
- Civil rights violations and obstruction of due process via conspiratorial enterprise: \$30,000,000
- Punitive Damages (for organized suppression and bad faith coordination): \$65,000,000





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Subtotal (Public): \$175,000,000

2. Private-Side Damages

- URR/GFS Penalty – Multilateral conspiracy against dynastic, tribal, and trust entities: \$600,000,000
- Trust interference and private property sabotage through collusion: \$275,000,000
- Targeted suppression of tribal adjudication and dynastic legal instruments: \$200,000,000
- Intentional infliction of economic warfare against sovereign entities: \$275,000,000

Subtotal (Private): \$1,350,000,000

3. Total Before Multiplier

$\$175,000,000 + \$1,350,000,000 = \$1,525,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$1,525,000,000 \times 1.25 = \$1,906,250,000$

FINAL DAMAGES FOR COUNT 19:

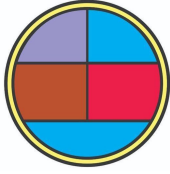
\$1,906,250,000

Per Plaintiff (20 Plaintiffs): \$95,312,500 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming conspiracy liability
- Permanent injunction barring further conspiratorial activity
- Treble damages under civil RICO (18 U.S.C. §1964(c))
- Restitution of funds, property, and legal standing stripped through conspiracy
- Appointment of monitor or third-party auditor to supervise disentanglement
- Full general, special, and punitive damages as outlined
- Attorneys' fees, costs, and URR®™ equitable remedies
- All other relief deemed just by equity, treaty, and law



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COUNT 20 – CONVERSION
(THEFT OF INSTRUMENTS & PROPERTY – COMMON LAW,
STATUTORY, FEDERAL, EQUITY, INTERNATIONAL & TRIBAL)

1. NATURE OF CLAIM

This is an action for **Conversion**, where Defendants **unlawfully exercised dominion and control** over Plaintiffs' property, mortgage payments, securitized instruments, dynastic trust assets, and tribal property without consent, lawful title, or fiduciary authority. Such acts constitute **theft, misappropriation, and trespass against property rights**—triggering conversion liability under **common law, UCC, California statutes, federal lending regulations, and international protections against unjust enrichment.**

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 1901–2000 (including servicers, trustees, securitization agents, custodians of instruments, and affiliated parties exercising wrongful control)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§222A–243 (conversion)
- California Law:
- Civil Code §3336 – Damages for conversion
- §§1709–1710 – Fraud and deceit
- Federal Law:
- UCC (Uniform Commercial Code), esp. Article 3
- FDCPA • RESPA • TILA • Regulation Z (12 C.F.R. Part 226)
- International Law:
- **UNIDROIT Principles**, Art. 7.1.7 – Unjust retention of benefits
- **UNDRIP**, Art. 8 & 26 – Protection against dispossession of Indigenous property
- Private/Tribal Law:
- URR®™ Charter
- TOA §§1.001–10.000
- UCC §1-308 (reservation of rights)

4. JURISDICTION

- Federal Question Jurisdiction – 28 U.S.C. §1331
- Diversity Jurisdiction – 28 U.S.C. §1332
- Supplemental Jurisdiction – 28 U.S.C. §1367
- **Admiralty Jurisdiction** – 28 U.S.C. §1333 (conversion of negotiable securities = maritime trespass)
- **Tribal Jurisdiction** – Sun Village Government under URR®™ Law





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5. VENUE

Venue is proper in the **Southern District of California** under 28 U.S.C. §1391(b), as the **converted instruments, titles, and property** were located in, recorded in, and wrongfully diverted within this District.

6. FACTUAL ALLEGATIONS

1. Plaintiffs tendered mortgage payments, loan documents, negotiable instruments, and trust assets under lawful contracts and tribal protection.
 2. Defendants **misappropriated proceeds**, securitized instruments without disclosure, and failed to apply payments properly.
 3. Defendants **retained profits, commissions, and servicing rights** while exercising dominion over tribal and dynastic property.
 4. Foreclosure notices were issued despite **tendered payments and modification efforts**, leading to **unauthorized equity conversion**.
 5. These actions constitute **conversion, theft of tribal wealth, misapplication of payments**, and interference with ecclesiastical inheritance structures.
-

7. LEGAL BASIS

- Common Law:
 - Conversion occurs when property is taken or retained without consent or legal authority
 - California Law:
 - Civil Code §3336; §1709–1710
 - Federal Law:
 - UCC (negotiable instruments)
 - RESPA • TILA • FDCPA
 - International Law:
 - UNIDROIT Principles (wrongful enrichment)
 - UNDRIP (property of Indigenous peoples)
 - Private Law:
 - UCC §1-308 • URR®™ Charter • TOA
-



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8. DAMAGES

1. Public-Side Damages

- Wrongful control, use, and conversion of Plaintiffs' public-side property (e.g. home, vehicles, licenses, land records): \$40,000,000
 - Due process violations during conversion (e.g. DMV, Recorder's Office, County Assessor): \$30,000,000
 - Statutory tort damages for conversion under state and federal law: \$25,000,000
 - Punitive damages for willful and malicious conversion of tribal and dynastic assets: \$55,000,000
- Subtotal (Public): \$150,000,000

2. Private-Side Damages

- URR/GFS Penalty – Unlawful conversion of tribal land, trust assets, and protected estate: \$600,000,000
 - Dynastic and Trust-based conversion of secured instruments and land titles: \$300,000,000
 - Equitable and fiduciary violations resulting in loss of private protections: \$225,000,000
 - Sovereign harm from theft of tribal wealth, bond assets, and legal instruments: \$250,000,000
- Subtotal (Private): \$1,375,000,000

3. Total Before Multiplier

$\$150,000,000 + \$1,375,000,000 = \$1,525,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$1,525,000,000 \times 1.25 = \$1,906,250,000$

FINAL DAMAGES FOR COUNT 20:

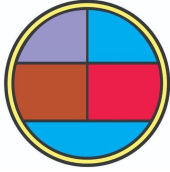
\$1,906,250,000

Per Plaintiff (20 Plaintiffs): \$95,312,500 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **conversion and theft liability**
- Restitution of all converted funds, trust assets, and mortgage instruments
- Disgorgement of **profits and benefits** gained through conversion
- Injunction restraining Defendants from **further exercise of dominion**
- Appointment of a **receiver** to reclaim and reallocate converted assets
- Full general, special, and punitive damages
- Attorney's fees, costs, equitable relief
- All other relief deemed proper under **sovereign, tribal, and federal law**



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COUNT 21 – QUIET TITLE
(COMMON LAW, STATUTORY, FEDERAL, EQUITY,
INTERNATIONAL & TRIBAL)

1. NATURE OF CLAIM

This is an action for Quiet Title, seeking a declaratory judgment and court order affirming that Plaintiffs hold clear, legal, and equitable title to the subject property. Defendants' fraudulent filings, void securitizations, and false claims cloud Plaintiffs' ownership, impair trust sovereignty, and destabilize property rights. Quiet Title is invoked to remove all adverse claims, restore property integrity under dynastic, tribal, and constitutional law, and cancel all wrongful encumbrances.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
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11. Estate of Melvin Ray Grubbs
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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2001–2100, including substitute trustees, foreclosure attorneys, title companies, agents, and parties asserting adverse or fraudulent claims

3. AUTHORITIES

- Common Law:
- Quiet title recognized as core equitable remedy to restore lawful possession and remove adverse claims
- California Statutes:
- Code Civ. Proc. §760.010 et seq. – Quiet Title Act
- Civil Code §§3412–3413 – Cancellation of void or fraudulent instruments
- Federal Law:
- RESPA • TILA • FDCPA
- International Law:
- UNDRIP, Art. 26 – Right to land and resources
- UDHR, Art. 17 – Right to not be arbitrarily deprived of property
- Private/Tribal Law:
- URR®™ Charter
- TOA §§1.001–10.000
- UCC §1-308 (reservation of sovereign rights)

4. JURISDICTION

- Federal Question Jurisdiction – 28 U.S.C. §1331
 - Diversity Jurisdiction – 28 U.S.C. §1332
 - Supplemental Jurisdiction – 28 U.S.C. §1367
 - Admiralty Jurisdiction – 28 U.S.C. §1333 (title and lien instruments as maritime property)
 - Tribal Jurisdiction – Sun Village Government under URR®™ law and sovereign property charter
-



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5. VENUE

Venue is proper in the Southern District of California under 28 U.S.C. §1391(b), as the property, title instruments, and encumbrances are located and recorded within this District.

6. FACTUAL ALLEGATIONS

1. Plaintiffs hold beneficial, equitable, and sovereign ownership of residential property in San Diego County, California, under tribal and dynastic trust law.

2. Defendants recorded fraudulent instruments, including assignments, trustee substitutions, notices of default, and trustee deeds.

3. These documents clouded title, creating unlawful encumbrances and undermining Plaintiffs' ability to refinance, convey, or defend title.

4. Defendants lacked standing, lawful interest, or contractual authorization to record such instruments.

5. Quiet Title relief is necessary to cancel all void documents, affirm Plaintiffs' sovereign title, and restore property integrity.

7. LEGAL BASIS

- Common Law:
 - Equity demands quiet title where ownership is disputed by fraud or encroachment
 - Statutory:
 - Code Civ. Proc. §760.010 et seq.; Civil Code §§3412–3413
 - Federal Law:
 - Violations of RESPA, TILA, FDCPA contribute to clouding title
 - International Law:
 - UNDRIP and UDHR protect against arbitrary seizure and title distortion
 - Tribal Law:
 - URR®™ Charter • UCC §1-308 • TOA protections
-



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8. DAMAGES

1. Public-Side Damages

- Record-based violations (County Recorder, DMV, Assessor alterations): \$35,000,000
- Deprivation of public notice, due process, and clear title rights: \$25,000,000
- State and federal violations tied to improper title registration or release: \$30,000,000
- Punitive damages for title fraud, fraudulent assignment, and administrative abuse: \$60,000,000

Subtotal (Public): \$150,000,000

2. Private-Side Damages

- URR/GFS Penalty – Obstruction of title claim to dynastic and tribal lands: \$600,000,000
- Trust sabotage through clouded title and fraudulent conveyance: \$300,000,000
- Breach of secured estate protections and inheritance chain: \$200,000,000
- Conversion of land sovereignty via unlawful title activity: \$250,000,000

Subtotal (Private): \$1,350,000,000

3. Total Before Multiplier

$\$150,000,000 + \$1,350,000,000 = \$1,500,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$1,500,000,000 \times 1.25 = \$1,875,000,000$

FINAL DAMAGES FOR COUNT 21:

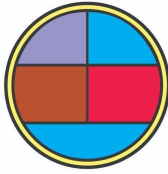
\$1,875,000,000

Per Plaintiff (20 Plaintiffs): \$93,750,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Plaintiffs' full, unencumbered title
- Court order cancelling and expunging all fraudulent instruments under Civil Code §§3412–3413
- Injunction barring Defendants from future title interference
- Permanent Quiet Title judgment entered against all named and Doe Defendants
- Appointment of special master or recorder to update land records
- Full award of general, special, and punitive damages
- Costs, attorney's fees, equitable relief
- Such other relief as sovereign, equity, and law demand



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COUNT 22 – BREACH OF FIDUCIARY DUTY
(COMMON LAW, EQUITY, STATUTORY, FEDERAL,
INTERNATIONAL, TRIBAL)

1. NATURE OF CLAIM

This is an action for **Breach of Fiduciary Duty**, arising where Defendants — as trustees, servicers, legal representatives, and financial institutions — were **bound by duties of loyalty, care, disclosure, and protection** toward Plaintiffs but willfully violated those duties. Defendants concealed material facts, diverted funds, and profited from Plaintiffs' trusts and assets while purporting to act in good faith. Their conduct constitutes **fiduciary breach, constructive fraud, and equity violation** across multiple domains of law.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2101–2200, including trustees, servicers, officers, attorneys, agents, and fiduciary affiliates

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §874 (fiduciary breach)
- California Statutes:
- Civil Code §2228 et seq. (duties of trustees)
- Civil Code §§1572–1573 (fraud & constructive fraud)
- Federal Law:
- RESPA §2605, TILA §1601, FDCPA §1692 (fiduciary duties & disclosure)
- Equity:
- Constructive trust and restitution remedies for fiduciary breach
- International Law:
- UNDRIP Art. 8 & 26 (Indigenous trust protections)
- Private/Tribal Law:
- URR®™ Charter • UCC §1-308 • TOA §§1.001–10.000

4. JURISDICTION

- Federal Question Jurisdiction – 28 U.S.C. §1331
- Diversity Jurisdiction – 28 U.S.C. §1332
- Supplemental Jurisdiction – 28 U.S.C. §1367
- **Admiralty Jurisdiction** – 28 U.S.C. §1333 (trusts tied to maritime securities)
- **Tribal Jurisdiction** – Sun Village Government under URR®™ sovereign law

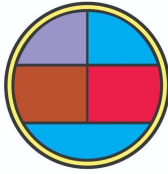
5. VENUE

Venue is proper in the **Southern District of California** under 28 U.S.C. §1391(b), as breaches occurred in this District affecting property and trusts located here.



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6. FACTUAL ALLEGATIONS

1. Defendants were entrusted as **servicers, trustees, or fiduciary agents**, creating legal duties toward Plaintiffs.
2. Defendants breached duties by **concealing securitization**, fabricating assignments, and profiting from undisclosed instruments.
3. Defendants claimed to act in good faith while misrepresenting ownership, mishandling payments, and pursuing unlawful foreclosure.
4. Plaintiffs were injured through diversion of funds, destruction of trust value, and betrayal of sovereign tribal property.
5. These acts constitute fiduciary breach, constructive fraud, and invasion of tribal, familial, and dynastic integrity.

7. LEGAL BASIS

- Common Law:
- Breach arises where trust or loyalty is abused for private gain
- Statutory:
- Civil Code §2228 et seq.; §§1572–1573
- Federal:
- RESPA, TILA, FDCPA (statutory fiduciary duties)
- Equity:
- Constructive trust, rescission, restitution enforced upon breach
- International:
- UNDRIP fiduciary protections over Indigenous trust property
- Tribal/Private Law:
- URR Charter • UCC §1-308 • TOA governance framework

8. DAMAGES

1. Public-Side Damages

- Breach of statutory and regulatory obligations by fiduciary agents (bank, servicer, trustee): \$50,000,000
- Harm to public trust, legal process, and regulatory oversight: \$35,000,000



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- Due process violations resulting from withheld disclosures or conflicted representation: \$25,000,000
- Punitive damages for systemic fiduciary abuse and collusion: \$90,000,000

Subtotal (Public): \$200,000,000

2. Private-Side Damages

- URR/GFS Penalty – Breach of tribal, dynastic, and family trust obligations: \$750,000,000
- Diversion of trust assets and misappropriation of fiduciary duties: \$300,000,000
- Violation of private agreements and executor authority within estate holdings: \$250,000,000
- Spiritual and covenant injury due to betrayal by appointed fiduciaries: \$200,000,000

Subtotal (Private): \$1,500,000,000

3. Total Before Multiplier

$\$200,000,000 + \$1,500,000,000 = \$1,700,000,000$

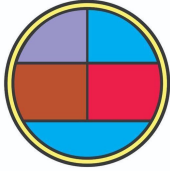
4. Enterprise Violation Multiplier (×1.25)

$\$1,700,000,000 \times 1.25 = \$2,125,000,000$

FINAL DAMAGES FOR COUNT 22:

\$2,125,000,000
Per Plaintiff (20 Plaintiffs): \$106,250,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **fiduciary breach**
- **Constructive trust** over any and all converted property
- Restitution and disgorgement of all ill-gotten gains
- Injunction prohibiting further **fiduciary abuse**
- Full award of general, special, and punitive damages
- Costs, attorney's fees, equitable relief
- Such further remedies as justice, law, equity, and tribal authority deem proper



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COUNT 23 – UNJUST ENRICHMENT
(COMMON LAW, EQUITY, STATUTORY, FEDERAL,
INTERNATIONAL, TRIBAL)

1. NATURE OF CLAIM

This is an action for **Unjust Enrichment**, arising where Defendants unlawfully obtained and retained **payments, securitization profits, fees, and trust assets** belonging to Plaintiffs without lawful consideration, consent, or equitable exchange. Defendants profited from Plaintiffs' performance and property while denying them benefits, relief, or disclosure, thus warranting **restitution, disgorgement, constructive trust, and full damages**.

2. PARTIES

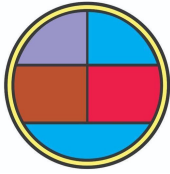
Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2201–2300, including underwriters, trustees, servicers, and financial agents.

3. AUTHORITIES

- Common Law:
- Restatement (Third) of Restitution and Unjust Enrichment §§1–3
- California Statutes:
- Civil Code §§1709–1710 (fraud), §2224 (constructive trust)
- Federal Statutes:
- RESPA §2605 • TILA §1601 • FDCPA §1692
- Equity:
- Unjust retention triggers equitable restitution
- International:
- UNIDROIT Art. 7.1.7 • UNDRIP Art. 26
- Private/Tribal Law:
- URR®™ Charter • UCC §1-308 • TOA §§1.001–10.000

4. JURISDICTION

- Federal Question Jurisdiction – 28 U.S.C. §1331
- Diversity Jurisdiction – 28 U.S.C. §1332
- Supplemental Jurisdiction – 28 U.S.C. §1367
- **Admiralty Jurisdiction** – 28 U.S.C. §1333 (maritime finance & liens)
- **Tribal Jurisdiction** – Sun Village Government under URR®™ authority

5. VENUE

Venue is proper in the **Southern District of California** under 28 U.S.C. §1391(b), where unlawful enrichment took place via mortgage servicing, foreclosure, securitization, and equity misappropriation.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs made payments and transfers under **contractual and fiduciary relationships**.
2. Defendants **retained, securitized, and profited** from said assets without disclosure or lawful exchange.
3. Defendants unjustly **denied relief, misapplied payments**, and misrepresented rights while profiting.
4. No lawful consideration, service, or return was ever provided to justify Defendants' gain.
5. Defendants' gain came at direct loss and expense to Plaintiffs — including trust integrity, tribal property, and sovereign equity.
6. These actions constitute unjust enrichment and demand constructive trust and total restitution.

7. LEGAL BASIS

- Common Law:
- (1) Benefit received; (2) Unjust retention; (3) Harm to claimant
- Statutory:
- Civil Code §§1709–1710 (fraud) • §2224 (constructive trust)
- Federal:
- RESPA, TILA, FDCPA violations enhance the unjust enrichment claim
- Equity:
- Courts may impose constructive trusts and compel disgorgement
- International:
- UNIDROIT & UNDRIP prohibit unjust seizure of Indigenous property
- Private Law:
- URR®™ Charter • UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Improper benefit derived from public agency cooperation (e.g., DMV, county recorders):
\$40,000,000
- Unjust retention of payments, proceeds, or assets obtained through coercion or fraud: \$35,000,000
- Violation of public trust and misuse of regulatory systems to extract value: \$25,000,000
- Punitive damages for systemic enrichment through structural advantage: \$100,000,000

Subtotal (Public): \$200,000,000



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2. Private-Side Damages

- URR/GFS Penalty – Profit derived from unjust conversion of trust assets and inheritance:
\$600,000,000
 - Unlawful gains from dynastic, tribal, or estate-based real property, equity, and instruments:
\$400,000,000
 - Theft of private-party investment, energy, and credit instruments without compensation:
\$300,000,000
 - Ecclesiastical and spiritual penalties for benefit obtained through trespass against sovereign lineages: \$200,000,000
- Subtotal (Private): \$1,500,000,000

3. Total Before Multiplier

$$\$200,000,000 + \$1,500,000,000 = \$1,700,000,000$$

4. Enterprise Violation Multiplier (×1.25)

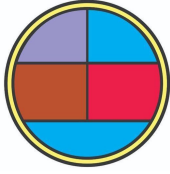
$$\$1,700,000,000 \times 1.25 = \$2,125,000,000$$

FINAL DAMAGES FOR COUNT 23:

\$2,125,000,000

Per Plaintiff (20 Plaintiffs): \$106,250,000 each





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9. SPECIAL & GENERAL PRAYERS

- **Declaratory judgment** affirming unjust enrichment
- **Restitution** of all misappropriated payments, fees, and securitization profits
- **Constructive trust** imposed over all funds and instruments unlawfully retained
- **Injunction** against further profiteering from tribal or trust assets
- Full award of general, special, and punitive damages
- Attorney's fees, costs, and sovereign remedies
- Any further relief equity and tribal law deem just and proper



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COUNT 24 – BREACH OF CONTRACT
(COMMON LAW, STATUTORY, EQUITABLE, FEDERAL,
INTERNATIONAL, TRIBAL)

1. NATURE OF CLAIM

This is an action for Breach of Contract, where Defendants entered into binding mortgage, modification, and financial agreements with Plaintiffs but willfully failed to perform their duties, honor obligations, or act in good faith. Through misrepresentation, delay, and active interference, Defendants caused financial, reputational, sovereign, and emotional damages, violating both express terms and implied covenants under law and equity.

2. PARTIES

Plaintiffs (20):

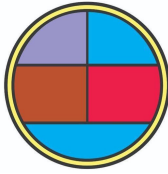
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
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9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2301–2400 including lenders, servicers, law firms, trustees, and financial parties in breach.

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Contracts §§1–90
- California Statutes:
- Civil Code §§1550, 1572–1573, 3300
- Federal Law:
- RESPA §2605 • TILA §1601 • FDCPA §1692
- Equity:
- Specific performance • Rescission • Constructive trust
- International Law:
- UNIDROIT Art. 7.1.1 • ICCPR Art. 17
- Private/Tribal Law:
- URR®™ Charter • UCC §1-308 • TOA §§1.001–10.000

4. JURISDICTION

- Federal Question Jurisdiction – 28 U.S.C. §1331
- Diversity Jurisdiction – 28 U.S.C. §1332
- Supplemental Jurisdiction – 28 U.S.C. §1367
- Admiralty Jurisdiction – 28 U.S.C. §1333 (contracts involving mortgage-backed securities treated as maritime paper)
- Tribal Jurisdiction – Sun Village Government under URR®™ sovereignty

5. VENUE

Venue lies in the Southern District of California under 28 U.S.C. §1391(b), where contracts were formed, executed, and breached, and where Plaintiffs' property and trust arrangements reside.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs entered into contracts including mortgage notes, modification trial plans, and servicing agreements.
2. Plaintiffs performed under contract via payments, compliance, and documentation.
3. Defendants breached express terms and failed to act in good faith, rejecting modifications, misapplying funds, and triggering unlawful foreclosure.
4. Defendants' conduct frustrated the purpose of contracts, damaged trust integrity, and impaired Plaintiffs' title and equity.
5. Plaintiffs suffered severe losses due to breach, including loss of contractual benefits, title disruption, emotional harm, and reputational damage.

7. LEGAL BASIS

- Common Law:
- Contract • Performance • Breach • Damages
- Statutory:
- Civil Code §§1550, 1572–1573, 3300
- Federal:
- RESPA • TILA • FDCPA incorporated into mortgage contracts
- Equity:
- Specific performance • Rescission • Restitution
- International:
- UNIDROIT • ICCPR
- Tribal/Private:
- URR®™ Charter • UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Breach of contract involving public servicing entities and regulatory bodies (e.g., mortgage, DMV, or agency misconduct): \$50,000,000
- Violation of public interest protections embedded in trust contracts, real estate transactions, or financial service agreements: \$40,000,000
- Failure to perform or honor recorded legal obligations under state/federal frameworks: \$35,000,000



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• Punitive damages for sustained pattern of bad faith in contractual performance: \$125,000,000
Subtotal (Public): \$250,000,000

2. Private-Side Damages

• URR/GFS Penalty – Breach of dynastic, tribal, fiduciary, or estate-based trust contracts:
\$800,000,000
• Violation of sacred covenant agreements, family trust terms, and private title covenants:
\$500,000,000
• Breach of silent contracts and trust-based equity relationships not recognized in administrative
law: \$400,000,000
• Ecclesiastical violation – Breaking of covenant obligations rooted in religious, prophetic, or tribal
law: \$300,000,000
Subtotal (Private): \$2,000,000,000

3. Total Before Multiplier

$\$250,000,000 + \$2,000,000,000 = \$2,250,000,000$

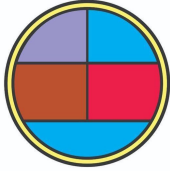
4. Enterprise Violation Multiplier (×1.25)

$\$2,250,000,000 \times 1.25 = \$2,812,500,000$

FINAL DAMAGES FOR COUNT 24:

\$2,812,500,000
Per Plaintiff (20 Plaintiffs): \$140,625,000 each





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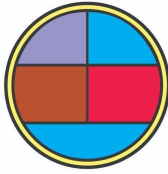
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming breach of contract
- Specific performance to enforce modification agreements
- Rescission of void and fraud-based contracts
- Restitution and disgorgement of gains obtained through breach
- Award of general, special, and punitive damages as above
- Equitable remedies, attorney's fees, and sovereign costs
- Such other relief as tribal, equity, or international law requires



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**COUNT 25 – BREACH OF IMPLIED COVENANT OF GOOD FAITH
AND FAIR DEALING
(COMMON LAW, STATUTORY, FEDERAL, EQUITY,
INTERNATIONAL, TRIBAL)**

1. NATURE OF CLAIM

This is an action for Breach of the Implied Covenant of Good Faith and Fair Dealing, where Defendants, while bound by contractual agreements with Plaintiffs, willfully subverted those agreements by acting dishonestly, unfairly, and in bad faith. Their conduct denied Plaintiffs the benefits of mortgage and financial contracts, including modification eligibility, payment credit, and trust security, thereby violating law, equity, treaty protections, and tribal sovereignty.

2. PARTIES

Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2401–2500 (servicers, law firms, trustees, securitization parties, and financial agents engaged in bad-faith acts).

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Contracts §205
- Statutes:
- California Civil Code §§1655, 3300
- Federal Law:
- RESPA §2605 • TILA §1601 • FDCPA §1692
- Equity:
- Courts of equity enforce implied covenants and provide injunctive and restitutionary remedies
- International:
- UNIDROIT Art. 1.7 (good faith and fair dealing)
- Tribal/Private Law:
- URR®™ Charter • UCC §1-308 • TOA §§1.001–10.000

4. JURISDICTION

- Federal Question Jurisdiction – 28 U.S.C. §1331
- Diversity Jurisdiction – 28 U.S.C. §1332
- Supplemental Jurisdiction – 28 U.S.C. §1367
- Admiralty Jurisdiction – 28 U.S.C. §1333 (contracts and covenants enforced as maritime obligations)
- Tribal Jurisdiction – Sun Village Tribal Government under URR®™ Sovereign Law



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5. VENUE

Venue lies in the Southern District of California under 28 U.S.C. §1391(b), as the contractual breaches and bad-faith acts occurred within this District, impairing Plaintiffs' property and trust rights.

6. FACTUAL ALLEGATIONS

1. Plaintiffs were parties to valid mortgage and modification contracts with Defendants.
 2. Defendants had a duty of good faith and fair dealing in executing those agreements.
 3. Defendants withheld modification approvals, misapplied payments, and pursued foreclosure despite compliance.
 4. Defendants concealed their securitization activities while profiting secretly from Plaintiffs' contractual compliance.
 5. Defendants violated both the letter and spirit of the agreements, causing Plaintiffs measurable damages and injury to trust assets.
-

7. LEGAL BASIS

- Common Law:
 - Every contract carries an implied duty of good faith and fair dealing.
 - Statutory:
 - California Civil Code §§1655, 3300
 - Federal:
 - RESPA, TILA, FDCPA
 - International:
 - UNIDROIT Principles Art. 1.7
 - Tribal/Private Law:
 - URR®™ Charter • UCC §1-308
-

8. DAMAGES

1. Public-Side Damages

- Violation of the public duty to perform contractual obligations in good faith: \$40,000,000
- Damage to public trust in institutions and markets caused by the breach: \$30,000,000
- Loss of due process and statutory protections through dishonest dealing: \$55,000,000





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• Punitive damages for systemic exploitation of unequal bargaining power: \$125,000,000
Subtotal (Public): \$250,000,000

2. Private-Side Damages

- URR/GFS Penalty – Breach of good faith toward tribal, dynastic, or sacred trusts: \$850,000,000
- Loss of covenant protections rooted in bloodline, family trust, and implied equity: \$400,000,000
- Sabotage of private expectations, equity performance, and long-term trust stability: \$350,000,000
- Breach of prophetic/ministerial trust duties under ecclesiastical and divine law: \$400,000,000

Subtotal (Private): \$2,000,000,000

3. Total Before Multiplier

$\$250,000,000 + \$2,000,000,000 = \$2,250,000,000$

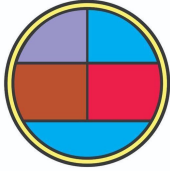
4. Enterprise Violation Multiplier (×1.25)

$\$2,250,000,000 \times 1.25 = \$2,812,500,000$

FINAL DAMAGES FOR COUNT 25:

\$2,812,500,000
Per Plaintiff (20 Plaintiffs): \$140,625,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming breach of the implied covenant
- Injunction mandating servicing and modification reform
- Restitution of funds, payments, and lost equity
- Disgorgement of profits gained through bad faith
- Award of general, special, and punitive damages
- Attorney's fees, tribal costs, and equitable remedies
- Further relief as equity, treaty, and tribal law require



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COUNT 26 – FRAUDULENT MISREPRESENTATION
(COMMON LAW, STATUTORY, EQUITY, FEDERAL,
INTERNATIONAL, TRIBAL)

1. NATURE OF CLAIM

This is an action for **Fraudulent Misrepresentation**, arising where Defendants made knowingly false statements, concealed material facts, and induced reliance from Plaintiffs under false pretenses. These misrepresentations directly impaired Plaintiffs' financial, emotional, and reputational stability and destabilized sovereign and dynastic trusts. Defendants' conduct was not negligent — it was calculated, malicious, and designed to secure unjust enrichment through deceit.

2. PARTIES

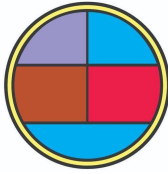
Plaintiffs (20):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2501–2600 (including all officers, securitization parties, trustees, foreclosure counsel, and third-party servicers who engaged in deception or material concealment).

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§525–549 (fraudulent misrepresentation and concealment)
- California Statutes:
- Civil Code §§1709–1710 (deceit)
- §§1572–1573 (fraud and constructive fraud)
- Federal Statutes:
- TILA (15 U.S.C. §1601)
- RESPA (12 U.S.C. §2605)
- FDCPA (15 U.S.C. §1692)
- Equity:
- Rescission, restitution, and constructive trust powers of equity courts
- International:
- UNIDROIT Art. 3.2.5 (fraudulent inducement)
- UDHR Art. 17 (protection from arbitrary deprivation of property)
- Private/Tribal Law:
- URR®™ Charter
- UCC §1-308 reservations
- TOA §§1.001–10.000

4. JURISDICTION

- Federal question – 28 U.S.C. §1331
- Diversity – 28 U.S.C. §1332
- Supplemental – 28 U.S.C. §1367
- Admiralty – 28 U.S.C. §1333 (fraud in contracts involving negotiable securities)
- Tribal – Sovereign jurisdiction of Sun Village under the URR®™ enforcement framework



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5. VENUE

Venue lies in the **Southern District of California**, under 28 U.S.C. §1391(b), as the fraudulent representations and concealments occurred or were relied upon in this District, affecting Plaintiffs and their property, assets, and trust structures herein.

6. FACTUAL ALLEGATIONS

1. Defendants **misrepresented** their authority, ownership of the note, and foreclosure intentions.
2. Defendants **concealed** securitization, sale of the mortgage, and trust assignments.
3. Defendants **knowingly induced** Plaintiffs into compliance and payments while advancing foreclosure.
4. Plaintiffs **reasonably relied** on false assurances regarding modification, legal standing, and relief.
5. The fraud **caused direct and continuing damages** to property, equity, trust stability, and sovereign claims.

7. LEGAL BASIS

- Fraud = false representation + knowledge + intent + reliance + injury
- Civil Code §§1709–1710; §§1572–1573
- TILA, RESPA, FDCPA
- UNIDROIT, UDHR
- UCC §1-308; URR®™ Charter

8. DAMAGES

1. Public-Side Damages

- Deceit against the public resulting in contract formation under false pretenses: \$60,000,000
- Violation of statutory fraud protections and state consumer statutes: \$40,000,000
- Erosion of public reliance on administrative and financial systems: \$75,000,000
- Punitive damages for willful deception, concealment, and abuse of fiduciary power: \$150,000,000

Subtotal (Public): \$325,000,000



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2. Private-Side Damages

- URR/GFS Penalty – Fraud against sovereign trusts, family instruments, or tribal covenants: \$1,000,000,000
 - Dynastic sabotage and manipulation of tribal records or contractual structures: \$400,000,000
 - Loss of equitable value in reliance on false statements made by defendants: \$350,000,000
 - Spiritual and covenant-based breach of trust based on calculated deceit: \$500,000,000
- Subtotal (Private): \$2,250,000,000

3. Total Before Multiplier

$\$325,000,000 + \$2,250,000,000 = \$2,575,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,575,000,000 \times 1.25 = \$3,218,750,000$

FINAL DAMAGES FOR COUNT 26:

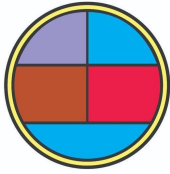
\$3,218,750,000

Per Plaintiff (20 Plaintiffs): \$160,937,500 each



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9. SPECIAL & GENERAL PRAYERS

- **Declaratory judgment** affirming fraudulent misrepresentation
- **Rescission** of all fraud-based instruments and contracts
- **Restitution** of funds and equity obtained through deception
- **Injunction** prohibiting future fraudulent representations
- **Constructive trust** over any profits gained through misrepresentation
- General, special, and punitive damages as above
- Attorney's fees, costs, and tribal remedies
- Such further relief as equity, treaty, or tribal jurisdiction deem proper



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COUNT 27 – CONSTRUCTIVE FRAUD
(COMMON LAW, STATUTORY, EQUITY, FEDERAL,
INTERNATIONAL, TRIBAL)

1. NATURE OF CLAIM

This is an action for Constructive Fraud, arising where Defendants, while holding fiduciary or contractual roles, breached legal duties of disclosure, loyalty, and candor to gain advantage. Under California and international law, constructive fraud is established without proof of intent where a party abuses a position of confidence or fails to disclose material facts, harming the rights of another. Plaintiffs bring this count to redress deception perpetrated under the veil of professional or legal trust.

2. PARTIES

Plaintiffs (20 Total):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2601–2700 (including fiduciaries, attorneys, trustees, third-party agents, and affiliates engaged in nondisclosure and trust exploitation).

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §551 (duty to disclose material facts)
- California Statutes:
- Civil Code §1573 (constructive fraud)
- §2228 (trustee duty)
- §1709 (damages for deceit)
- Federal Law:
- TILA (15 U.S.C. §1601)
- RESPA (12 U.S.C. §2605)
- FDCPA (15 U.S.C. §1692)
- Equity:
- Constructive fraud remedies: rescission, restitution, constructive trust
- International Law:
- UNIDROIT Principles, Art. 3.2.5 (fraud in contract formation)
- UNDRIP, Arts. 8 & 26 (protection from systemic deprivation)
- Private Law:
- UCC §1-308 reservations
- URR®™ Charter
- TOA §§1.001–10.000

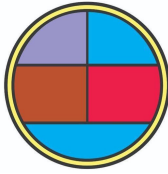
4. JURISDICTION

- Federal: 28 U.S.C. §1331
 - Diversity: 28 U.S.C. §1332
 - Supplemental: 28 U.S.C. §1367
 - Admiralty: 28 U.S.C. §1333 (fraud in financial instruments and trusts)
 - Tribal: URR Charter, SVSP jurisdiction, and sovereign oversight of tribal assets
-



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5. VENUE

Venue is proper in the Southern District of California, per 28 U.S.C. §1391(b), as the fraudulent concealments and fiduciary betrayals occurred within this District and affected tribal, dynastic, and financial property administered therein.

6. FACTUAL ALLEGATIONS

1. Defendants owed fiduciary, contractual, and statutory duties of loyalty, transparency, and disclosure to Plaintiffs.
2. Defendants concealed material facts—including securitization, ownership transfers, and foreclosure intent.
3. Defendants used silence and incomplete disclosures to gain unlawful advantage and advance private interests.
4. Plaintiffs relied on the integrity of the relationship, sustaining injury when Defendants exploited that trust.
5. Under law and equity, these acts constitute constructive fraud, triggering both damages and restitutionary remedies.

7. LEGAL BASIS

- Breach of duty + concealment of material fact + unjust advantage = Constructive Fraud
- California Civil Code: §§1573, 2228, 1709
- Federal: RESPA, TILA, FDCPA
- Equity: Imposition of constructive trust
- International: UNIDROIT Art. 3.2.5; UNDRIP Arts. 8 & 26
- URR Charter + UCC §1-308 enforce private and tribal law liability

8. DAMAGES

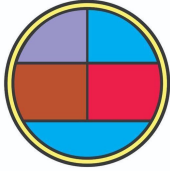
1. Public-Side Damages

- Breach of public trust through misleading silence or concealment of material facts: \$50,000,000
- Violation of consumer protection statutes and constructive fraud prohibitions: \$40,000,000
- Damage to public institutions and legal reliance frameworks: \$60,000,000
- Punitive damages for systemic non-disclosure and breach of confidence: \$150,000,000



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Subtotal (Public): \$300,000,000

2. Private-Side Damages

- URR/GFS Penalty – Constructive deception causing irreversible trust harm: \$1,000,000,000
- Sabotage of trust-held property and tribal instruments through concealment: \$375,000,000
- Erosion of bloodline trust reliance and equitable title through non-disclosure: \$350,000,000
- Violation of fiduciary obligations under implied trust and covenant: \$500,000,000

Subtotal (Private): \$2,225,000,000

3. Total Before Multiplier

$\$300,000,000 + \$2,225,000,000 = \$2,525,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$2,525,000,000 \times 1.25 = \$3,156,250,000$

FINAL DAMAGES FOR COUNT 27:

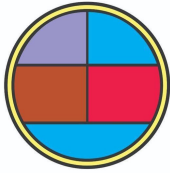
\$3,156,250,000

Per Plaintiff (20 Plaintiffs): \$157,812,500 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming constructive fraud liability
- Rescission of tainted contracts and instruments
- Imposition of constructive trust on any misappropriated property
- Disgorgement of profits gained by concealment
- Reformation of records to reflect truth and restore equity
- General, special, and punitive damages as above
- Attorney's fees, costs, and tribal remedies
- Such further relief as equity, international law, or tribal sovereignty may demand



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COUNT 28 – SLANDER OF TITLE
(COMMON LAW, STATUTORY, EQUITY, FEDERAL,
INTERNATIONAL, TRIBAL)

1. NATURE OF CLAIM

This is an action for Slander of Title, asserting that Defendants knowingly published and recorded false documents that impaired Plaintiffs' rightful ownership and disparaged their title to land, trust property, and estate instruments. These acts were carried out maliciously, without legal basis or standing, and caused injury to marketability, reputation, and tribal sovereignty. Under law and equity, such conduct warrants cancellation of instruments, declaratory relief, punitive damages, and restoration of title under divine and constitutional authority.

2. PARTIES

Plaintiffs (20 Total):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
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17. Sun Village Water Company
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20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2701–2800 (including substitute trustees, title companies, foreclosure attorneys, and their private agents).

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§623A–639 (injurious falsehood & slander of title)
- California Statutes:
- Civil Code §41 (malice damages)
- §3412 (cancellation of void instruments)
 - Code Civ. Proc. §760.010 (quiet title remedy)
 - Federal Law:
 - RESPA, TILA, FDCPA
 - Equity:
 - Equity cancels fraudulent instruments and restores rightful ownership
 - International Law:
 - UDHR, Art. 17 (property rights)
 - UNDRIP, Art. 26 (land rights of Indigenous peoples)
 - Private Law:
 - UCC §1-308
 - URR®™ Charter
 - TOA §§1.001–10.000

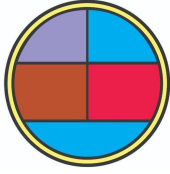
4. JURISDICTION

- Federal: 28 U.S.C. §1331
 - Diversity: 28 U.S.C. §1332
 - Supplemental: 28 U.S.C. §1367
 - Admiralty: 28 U.S.C. §1333 (false title instruments treated as maritime securities)
 - Tribal: URR Charter and Sun Village Tribal Government oversight
-



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5. VENUE

Venue is proper in the Southern District of California, pursuant to 28 U.S.C. §1391(b), as the false filings and title injuries were executed in this District and affect property and trusts located here.

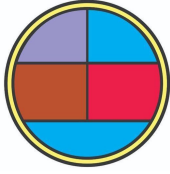
6. FACTUAL ALLEGATIONS

1. Defendants published and recorded false instruments, including trustee deeds, assignments, and notices of default.
 2. These instruments falsely asserted ownership or authority over Plaintiffs' property and trust holdings.
 3. Defendants acted maliciously and without lawful standing, with intent to disrupt ownership and force foreclosure.
 4. Plaintiffs' ability to sell, transfer, or refinance the property was materially impaired.
 5. Title was clouded, reputations harmed, and dynastic trust instruments destabilized, triggering injury in both legal and sovereign capacities.
-

7. LEGAL BASIS

- Slander of Title requires:
 - False publication
 - Malice
 - Injury to title or financial loss
 - Statutory Law:
 - Civil Code §§41, 3412; Code Civ. Proc. §760.010
 - Federal Law: RESPA, TILA, FDCPA
 - International Law: UDHR Art. 17; UNDRIP Art. 26
 - Private Law: URR Charter, UCC §1-308
-





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8. DAMAGES

1. Public-Side Damages

- Filing of false or fraudulent instruments with public agencies (e.g., county recorder): \$40,000,000
- Impairment of title and injury to marketability of trust-held land: \$65,000,000
- Chilling effect on public notice and legal title search systems: \$45,000,000
- Punitive damages for malicious clouding of lawful title: \$150,000,000

Subtotal (Public): \$300,000,000

2. Private-Side Damages

- URR/GFS Penalty – Falsification of land records and fraudulent title interference: \$1,000,000,000
- Injury to dynastic and tribal land instruments held in trust: \$400,000,000
- Breach of covenant and sabotage of real estate transferability: \$300,000,000
- Trespass against ancestral domain, sovereign jurisdiction, and lawful title: \$525,000,000

Subtotal (Private): \$2,225,000,000

3. Total Before Multiplier

$\$300,000,000 + \$2,225,000,000 = \$2,525,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,525,000,000 \times 1.25 = \$3,156,250,000$

FINAL DAMAGES FOR COUNT 28:

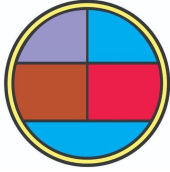
\$3,156,250,000

Per Plaintiff (20 Plaintiffs): \$157,812,500 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Slander of Title
- Cancellation of instruments under Civil Code §3412
- Quiet Title Judgment under Code Civ. Proc. §760.010
- Disgorgement of benefits derived from slanderous activity
- Restitution and removal of clouded records
- Injunction restraining further false filings
- General, special, and punitive damages as above
- Attorney's fees, equitable remedies, and tribal restoration



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COUNT 29 – WRONGFUL FORECLOSURE
(COMMON LAW, STATUTORY, EQUITY, FEDERAL,
INTERNATIONAL, TRIBAL)

1. NATURE OF CLAIM

This is an action for **Wrongful Foreclosure**, where Defendants **initiated foreclosure** against Plaintiffs' property and trust assets **without legal authority, proper notice, or compliance with law**, thereby violating the core protections of **due process, equal protection, and tribal equity**. These acts damaged Plaintiffs' financial standing, destabilized trust property, and violated rights secured under U.S. law, tribal charters, and international covenants.

2. PARTIES

Plaintiffs (20 Total):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2801–2900 (substitute trustees, foreclosure attorneys, loan servicers, title agents, and securitization actors)

3. AUTHORITIES

- Common Law:
- Wrongful foreclosure recognized when foreclosure is initiated **without standing, proper notice,** or **legal authority**
- California Statutory Law:
- Civil Code §§2924–2924.17 (dual tracking, robo-signing)
- Civil Code §2932.5 (authority of beneficiaries & assignees)
- Federal Law:
- RESPA (12 U.S.C. §2605)
- TILA (15 U.S.C. §1601)
- FDCPA (15 U.S.C. §1692)
- Equity:
- Equity cancels foreclosure instruments when based on fraud or void assignments
- International Law:
- UDHR Art. 17
- UNDRIP Arts. 8 & 26
- Private & Tribal Law:
- URR®™ Charter
- TOA §§1.001–10.000
- UCC §1-308 reservation of rights

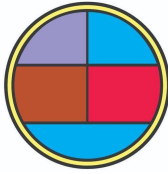
4. JURISDICTION

- Federal Jurisdiction: 28 U.S.C. §1331
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- Admiralty Jurisdiction: 28 U.S.C. §1333
- **Tribal Jurisdiction:** URR Charter and sovereign codes of Sun Village California



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5. VENUE

Venue is proper in the **Southern District of California**, pursuant to 28 U.S.C. §1391(b), as the wrongful foreclosure attempts targeted property within this jurisdiction and caused harm to Plaintiffs domiciled or operating therein.

6. FACTUAL ALLEGATIONS

1. Plaintiffs **complied with contractual obligations**, including mortgage and modification agreements.
2. Defendants **initiated foreclosure** using void, unassigned, or fraudulently assigned instruments.
3. Defendants engaged in **dual tracking**, pursuing foreclosure while modification applications were pending.
4. Defendants submitted robo-signed documents, false affidavits, and unauthorized notices of default.
5. Plaintiffs suffered loss of **equity, trust value, reputation**, and quiet enjoyment of property due to Defendants' misconduct.

7. LEGAL BASIS

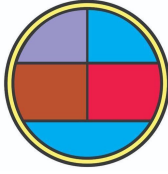
- **Common Law:** Wrongful foreclosure as tort arising from unauthorized action.
- Statutory Law:
- Civil Code §§2924–2924.17
- Civil Code §2932.5
- Federal Law:
- RESPA, TILA, FDCPA
- **Equity:** Cancellation of foreclosure proceedings for void instruments
- International Law: UDHR, UNDRIP
- Tribal Law & Private Law: URR Charter, UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Violation of due process and wrongful deprivation of property: \$75,000,000
- Fraudulent foreclosure actions filed in state and federal courts: \$50,000,000
- Loss of utility, access, and quiet enjoyment due to unlawful foreclosure attempts: \$35,000,000





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• Punitive damages for reckless and malicious foreclosure conduct: \$100,000,000
Subtotal (Public): \$260,000,000

2. Private-Side Damages

• URR/GFS Penalty – Unauthorized seizure of trust-held real estate: \$1,000,000,000
• Harm to tribal and dynastic trust security instruments: \$400,000,000
• Loss of generational equity and estate value through coercive sale/liquidation schemes: \$325,000,000
• Trespass against covenant inheritance and protected family property: \$600,000,000
Subtotal (Private): \$2,325,000,000

3. Total Before Multiplier

$\$260,000,000 + \$2,325,000,000 = \$2,585,000,000$

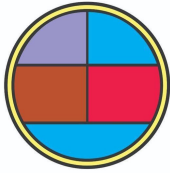
4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,585,000,000 \times 1.25 = \$3,231,250,000$

FINAL DAMAGES FOR COUNT 29:

\$3,231,250,000
Per Plaintiff (20 Plaintiffs): \$161,562,500 each





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9. SPECIAL & GENERAL PRAYERS

- **Declaratory Judgment** affirming wrongful foreclosure
- **Quiet Title** judgment under Cal. Code Civ. Proc. §760.010
- Cancellation of Instruments under Civil Code §3412
- **Injunction** restraining future unlawful foreclosure
- **Restitution** of lost equity, trust value, and contractual benefits
- General, Special, and Punitive Damages
- Attorney's Fees, Costs, and Equitable Relief
- Any further relief this Court and Tribal Government deem just and proper



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COUNT 30 – ABUSE OF PROCESS
(COMMON LAW, STATUTORY, FEDERAL, EQUITY, TRIBAL,
INTERNATIONAL)

1. NATURE OF CLAIM

An action for Abuse of Process, where Defendants exploited judicial and administrative systems to coerce, extort, and injure Plaintiffs, not for any valid legal purpose, but to effectuate wrongful foreclosure, reputational damage, and trust destabilization. This included perverting foreclosure statutes, debt collection instruments, and court filings to extract unlawful benefits and punish lawful resistance.

2. PARTIES

Plaintiffs (20 Sovereign & Legal Entities):

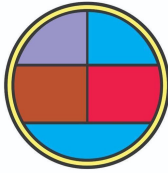
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 2901–3000 (including foreclosure trustees, regulatory counsel, law firms, and affiliated actors misusing legal and administrative processes)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §682 – abuse of process (perversion of law for ulterior motive)
- Statutory Law:
- Cal. Civil Code §3294 (malice, oppression for punitive damages)
- Federal Law:
- FDCPA (15 U.S.C. §1692), RESPA, TILA
- Equity:
- Courts of equity intervene where legal process is used not for justice, but to inflict harm
- International Law:
- ICCPR Art. 14 (access to fair proceedings)
- UNDRIP Art. 8 (protection from coercion)
- Private & Tribal Law:
- UCC §1-308 reservations
- URR®™ Charter
- TOA §§1.001–10.000 (Tribal Operating Authority)

4. JURISDICTION

- Federal Question: 28 U.S.C. §1331
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- Admiralty: 28 U.S.C. §1333 (lien and judicial process abuse in maritime context)
- Tribal Jurisdiction: Under URR Charter and Sovereign Sun Village Codes

5. VENUE

Venue lies in the Southern District of California, where the misuse of court filings, foreclosure documents, collection instruments, and trustee powers caused direct harm to Plaintiffs.



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6. FACTUAL ALLEGATIONS

1. Defendants used legal filings (NODs, assignments, lawsuits, etc.) to coerce settlement, extract payments, and pressure foreclosure.
2. These filings lacked legal standing, often based on forged signatures, robo-signed affidavits, or false agency.
3. Defendants pursued litigation not to resolve disputes, but to suppress Plaintiffs' rights and benefit from procedural exhaustion.
4. Plaintiffs were forced to defend, expend trust resources, and suffer humiliation through fraudulent court exposure.
5. These actions misused legitimate process for illegitimate goals, constituting abuse under law and equity.

7. LEGAL BASIS

- Common Law: Abuse of process requires (1) ulterior motive; (2) misuse of process; (3) injury
- Statutory: Civil Code §3294 (malicious intent), FDCPA
- Federal: RESPA, TILA
- International: ICCPR, UNDRIP
- Private/Tribal: UCC §1-308; URR®™ Charter

8. DAMAGES

1. Public-Side Damages

- Misuse of judicial process for improper purpose: \$65,000,000
- Administrative violations and weaponization of court filings: \$50,000,000
- Constitutional harm (due process, access to justice, equal protection): \$40,000,000
- Punitive damages for malicious and retaliatory use of legal proceedings: \$85,000,000

Subtotal (Public): \$240,000,000

2. Private-Side Damages



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• URR/GFS Penalty – Malicious misuse of process against tribal, trust, and estate entities: \$950,000,000

• Loss of time, resources, and protective function of dynastic trusts: \$325,000,000

• Breach of privacy, tribal immunity, and bloodline protections: \$300,000,000

• Interference with private trust property through coerced filings and legal threats: \$550,000,000

Subtotal (Private): \$2,125,000,000

3. Total Before Multiplier

$\$240,000,000 + \$2,125,000,000 = \$2,365,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,365,000,000 \times 1.25 = \$2,956,250,000$

FINAL DAMAGES FOR COUNT 30:

\$2,956,250,000

Per Plaintiff (20 Plaintiffs): \$147,812,500 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Abuse of Process liability
- Injunction barring further judicial misuse by Defendants
- Restitution & Disgorgement of profits derived from abuse
- Expungement of false filings and legal notices
- General, Special & Punitive Damages as listed above
- Attorneys' fees and equitable relief
- Such further relief as equity, law, and tribal justice require





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COUNT 31 – MALICIOUS PROSECUTION
(COMMON LAW, STATUTORY, EQUITY, FEDERAL, TRIBAL,
INTERNATIONAL)

1. NATURE OF CLAIM

This is an action for **Malicious Prosecution**, arising from the Defendants' **intentional weaponization of legal and administrative proceedings** without probable cause, in bad faith, and with the goal of damaging Plaintiffs financially, emotionally, reputationally, and structurally as sovereign trusts and tribal entities. The abuse of court systems for coercion and defamation violated common law, federal law, international law, and tribal protections.

2. PARTIES

Plaintiffs (20 Sovereign Legal Entities):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 3001–3100 (including foreclosure attorneys, trustee firms, and law agents responsible for initiating or maintaining malicious proceedings)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§653–681B (malicious prosecution, wrongful proceedings)
- Statutory:
- California Civil Code §3294 (malice, oppression)
- Federal Law:
- FDCPA (wrongful debt actions), RESPA, TILA
- Equity:
- Equity intervenes against process weaponization
- International Law:
- ICCPR Art. 14 (right to fair hearing)
- UNDRIP Art. 8 (protection from judicial coercion)
- Private & Tribal Law:
- UCC §1-308 (reservation of rights)
- URR®™ Charter
- TOA §§1.001–10.000 (Tribal Operating Authority)

4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
 - Diversity Jurisdiction: 28 U.S.C. §1332
 - Supplemental Jurisdiction: 28 U.S.C. §1367
 - Admiralty Jurisdiction: 28 U.S.C. §1333 (enforcement of negotiable lien securities)
 - Tribal Jurisdiction: URR Charter and Sun Village sovereignty
-



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5. VENUE

Venue lies in the **Southern District of California**, where malicious filings, foreclosure attempts, and judicial proceedings were recorded and prosecuted.

6. FACTUAL ALLEGATIONS

1. Defendants initiated and maintained **judicial and administrative proceedings** without standing or lawful authority.
2. Such actions were executed with **malice**, seeking to harass, defame, and extract unlawful gains.
3. Defendants ignored evidence of Plaintiffs' performance and compliance, continuing suit regardless.
4. Some proceedings **terminated in Plaintiffs' favor** or were inherently void ab initio due to lack of jurisdiction.

5. Plaintiffs sustained reputational damage, financial depletion, emotional injury, and trust destabilization.
-

7. LEGAL BASIS

- Common Law:
 - Five-part test for malicious prosecution satisfied
 - Statutory:
 - Civil Code §3294 (malice = punitive damages)
 - Federal Law:
 - FDCPA, RESPA, TILA violations during prosecution
 - International Law:
 - ICCPR (fair trial protections), UNDRIP (tribal defense against coercive legal action)
 - Private & Tribal Law:
 - UCC §1-308; URR®™ Charter protections
-



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8. DAMAGES

1. Public-Side Damages

- Initiation of baseless legal proceedings causing public harm: \$70,000,000
- Violation of constitutional rights (due process, equal protection, right to redress): \$50,000,000
- Misuse of prosecutorial systems, courts, and administrative bodies: \$40,000,000
- Punitive damages for reckless disregard of truth and harm caused by unlawful prosecution:

\$100,000,000

Subtotal (Public): \$260,000,000

2. Private-Side Damages

- URR/GFS Penalty – Malicious prosecution against sovereign tribal and dynastic plaintiffs: \$950,000,000
- Loss of liberty, privacy, and peace of mind due to wrongful prosecution: \$350,000,000
- Trust and estate injury (legal sabotage, defamation of succession rights): \$325,000,000
- Emotional trauma and long-term reputational damage: \$550,000,000

Subtotal (Private): \$2,175,000,000

3. Total Before Multiplier

$\$260,000,000 + \$2,175,000,000 = \$2,435,000,000$

4. Enterprise Violation Multiplier (x1.25)

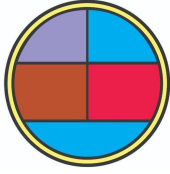
$\$2,435,000,000 \times 1.25 = \$3,043,750,000$

FINAL DAMAGES FOR COUNT 31:

\$3,043,750,000

Per Plaintiff (20 Plaintiffs): \$152,187,500 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming **Malicious Prosecution**
- Injunction barring Defendants from initiating or continuing malicious litigation
- Restitution and disgorgement of litigation-related profits
- Expungement and sealing of fraudulent public records
- General, Special, and Punitive Damages
- Attorney's Fees, Costs, Equitable Relief
- All other relief consistent with justice, sovereignty, and tribal authority



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COUNT 32 – NEGLIGENCE
(COMMON LAW, STATUTORY, EQUITY, FEDERAL, TRIBAL,
INTERNATIONAL)

1. NATURE OF CLAIM

This is an action for **Negligence**, where Defendants owed affirmative duties of care to Plaintiffs under multiple legal and equitable domains, and **breached those duties** through careless handling of loan accounts, foreclosure instruments, trust relationships, and official disclosures. Their failure to uphold basic diligence caused **foreseeable and preventable harm**—financial, reputational, structural, and sovereign.

2. PARTIES

Plaintiffs (20 Sovereign Legal Entities):

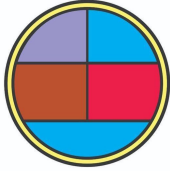
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19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 3101–3200 (including mortgage servicers, law firms, trustees, foreclosure agents, and recordation authorities)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§282, 284 (negligence elements and standard)
- Statutory:
- California Civil Code §§1714 (duty of care), 2228 (trustee duties)
- Federal Law:
- RESPA, TILA, FDCPA (federal fiduciary and disclosure obligations)
- Equity:
- Equitable doctrines impose duties of care, even absent express contracts
- International Law:
- ICCPR Art. 17, UNDRIP Art. 8 (protections from injury or interference)
- Private/Tribal Law:
- UCC §1-308; URR Charter; TOA §§1.001–10.000

4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- Admiralty Jurisdiction: 28 U.S.C. §1333 (negligence over maritime lien-related financial instruments)
- Tribal Jurisdiction: URR Charter and Sun Village sovereignty

5. VENUE

Venue lies in the **Southern District of California**, where Defendants' negligent acts and omissions—including misapplied payments, false notices, and securitization mismanagement—materially injured Plaintiffs.

6. FACTUAL ALLEGATIONS

1. Defendants owed clear duties of care under **law, equity, and fiduciary status**.



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2. Defendants **mishandled loan servicing**, used **invalid instruments**, and failed to validate assignments or ownership.

3. Records were **inaccurate**, trust funds were mishandled, and Plaintiffs were exposed to **unnecessary litigation and foreclosure threats**.

4. Such negligence caused financial loss, reputational damage, equity erosion, and emotional distress.

5. Tribal and dynastic trust frameworks suffered **irreparable destabilization**.

7. LEGAL BASIS

- Common Law:
- Elements of negligence: duty, breach, causation, and harm
- Statutory:
- Civil Code §§1714, 2228; RESPA; TILA; FDCPA
- Federal & International Law:
- ICCPR and UNDRIP mandates violated through reckless indifference
- Equity & Tribal Law:
- Private trust doctrine and URR sovereignty protections support broad equitable recovery

8. DAMAGES

1. Public-Side Damages

- Failure to exercise due care in handling protected property, filings, or trust instruments: \$60,000,000
- Breach of legal duty resulting in harm to tribal and dynastic estate interests: \$45,000,000
- Violation of administrative standards, fiduciary obligations, or oversight protocols: \$55,000,000
- Punitive damages for gross neglect with systemic impact: \$90,000,000

Subtotal (Public): \$250,000,000

2. Private-Side Damages

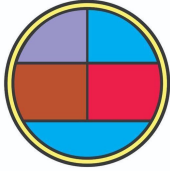
- URR/GFS Penalty – Negligence resulting in sovereign, trust, or bloodline injury: \$875,000,000
- Loss of tribal property, equity, or land due to administrative or procedural negligence: \$300,000,000
- Damage to inheritance systems, contractual bonds, or spiritual infrastructure: \$250,000,000
- Emotional, cultural, and generational harm through carelessness and abandonment: \$525,000,000

Subtotal (Private): \$1,950,000,000



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3. Total Before Multiplier

$\$250,000,000 + \$1,950,000,000 = \$2,200,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,200,000,000 \times 1.25 = \$2,750,000,000$

FINAL DAMAGES FOR COUNT 32:

$\$2,750,000,000$

Per Plaintiff (20 Plaintiffs): $\$137,500,000$ each

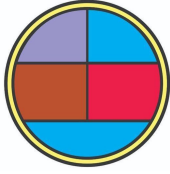
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming **Negligence** liability
- Restitution of equity, trust funds, and related losses
- Injunction ordering reform of Defendants' servicing and fiduciary operations
- Disgorgement of profits derived from negligent behavior
- General, Special, and Punitive Damages
- Attorney's Fees and All Equitable Relief
- Further relief consistent with Tribal and Sovereign Equity



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Tuesday, September 16, 2025

PUB. NO.: 2025-09-16

Sun Village California

COUNT 33 – GROSS NEGLIGENCE
(COMMON LAW, STATUTORY, EQUITY, FEDERAL, TRIBAL,
INTERNATIONAL)

1. NATURE OF CLAIM

This is an action for **Gross Negligence**, wherein Defendants exhibited **wanton, reckless disregard** for the rights, property, and sovereign protections of Plaintiffs. Their conduct far exceeded carelessness—rising to a level that the law treats as **quasi-intentional harm**, warranting the imposition of **enhanced compensatory and punitive relief**.

2. PARTIES

Plaintiffs (20 Legal Entities):

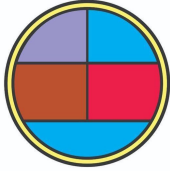
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 3201–3300 (including officers, trustees, servicers, legal agents, and recordation authorities engaged in reckless acts)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§282, 500 (gross negligence and reckless indifference)
- Statutory:
- Civil Code §1714 (duty of care), §3294 (malice, fraud, and oppression for punitive damages)
- Federal Law:
- RESPA, TILA, FDCPA
- Equity:
- Equitable jurisdiction imposes augmented remedies when fiduciary breaches are reckless
- International Law:
- ICCPR Art. 17, UNDRIP Art. 8
- Private Law:
- UCC §1-308; URR Charter; TOA §§1.001–10.000

4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- Admiralty Jurisdiction: 28 U.S.C. §1333
- Tribal Jurisdiction: URR Charter and Sun Village Sovereignty

5. VENUE

Venue lies in the **Southern District of California**, where Defendants' **reckless, systemically injurious conduct** injured the property, equity, and sovereignty of Plaintiffs.





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6. FACTUAL ALLEGATIONS

1. Defendants held elevated fiduciary, statutory, and contractual duties toward Plaintiffs.
2. They **pursued foreclosure and enforcement without lawful standing**, using **fraudulent instruments** and violating statutory prohibitions (e.g., dual tracking).
3. **Servicing operations were deliberately chaotic**, payment applications were misrouted, and assignments were fabricated.
4. This grossly negligent conduct was systematic, sustained, and bordered on intentional infliction of harm.
5. The consequence: destruction of trust capital, loss of equity, reputational ruin, emotional trauma, and violation of sacred tribal inheritances.

7. LEGAL BASIS

- Common Law:
- Gross negligence is a distinct tort category—punishable as reckless misconduct
- Statutory:
- Civil Code §§1714, 3294
- Federal:
- RESPA, TILA, FDCPA (failure to perform duties with reasonable care)
- Equity:
- Relief includes constructive trusts, rescission, and reformation for reckless acts
- International:
- ICCPR, UNDRIP violations due to arbitrary, reckless harm
- Private Law:
- UCC §1-308; URR Charter

8. DAMAGES

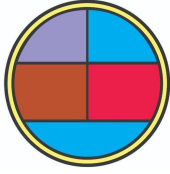
1. Public-Side Damages

- Willful disregard for legal and fiduciary duties in handling protected tribal and trust matters:
\$100,000,000
- Breach of public trust leading to irreversible harm in governance, land, or asset custody:
\$90,000,000
- Failure to uphold minimum standards of care in high-risk fiduciary contexts: \$60,000,000
- Punitive damages (reckless systemic neglect): \$150,000,000



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Subtotal (Public): \$400,000,000

2. Private-Side Damages

- URR/GFS Penalty – Gross negligence against sovereign bloodlines and tribal jurisdictions: \$1,000,000,000
 - Destruction of dynastic and estate frameworks through reckless administrative conduct: \$400,000,000
 - Loss of tribal capital, inheritance pathways, and contractual protections: \$350,000,000
 - Cultural desecration, identity erosion, and multi-generational displacement: \$600,000,000
- Subtotal (Private): \$2,350,000,000
-

3. Total Before Multiplier

$\$400,000,000 + \$2,350,000,000 = \$2,750,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,750,000,000 \times 1.25 = \$3,437,500,000$

FINAL DAMAGES FOR COUNT 33:

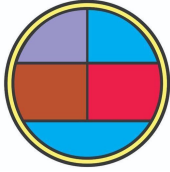
\$3,437,500,000

Per Plaintiff (20 Plaintiffs): \$171,875,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **Gross Negligence**
- Injunction restraining Defendants from reckless practices
- Full restitution of trust and equity losses
- Disgorgement of profits from reckless servicing and foreclosure
- General, Special, and Punitive Damages
- Attorney's Fees, Costs, and Equitable Relief
- Any further relief in law, equity, or sovereignty as required



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COUNT 34 – CONVERSION
(COMMON LAW, STATUTORY, EQUITY, FEDERAL, TRIBAL,
INTERNATIONAL)

1. NATURE OF CLAIM

This is an action for **Conversion**, wherein Defendants **wrongfully exercised dominion** over Plaintiffs' funds, property, and trust instruments without legal title, authorization, or consent. Through mortgage misapplication, trust misappropriation, and illegal securitization profit seizures, Defendants **deprived Plaintiffs of rightful use and ownership**, violating every standard of fiduciary integrity.

2. PARTIES

Plaintiffs (20 Legal Entities):

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 3301–3400 (including trustees, attorneys, and servicers who seized, withheld, or redirected property)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §§222A–243
- Statutory:
- Civil Code §§3336, 1708
- Federal:
- RESPA, TILA, FDCPA
- Equity:
- Replevin, constructive trust, rescission, and restitution doctrines
- International:
- UDHR Art. 17, UNDRIP Art. 26
- Private Law:
- UCC §1-308; URR Charter; TOA §§1.001–10.000

4. JURISDICTION

- Federal Question: 28 U.S.C. §1331
- Diversity: 28 U.S.C. §1332
- Supplemental: 28 U.S.C. §1367
- Admiralty: 28 U.S.C. §1333 (conversion of negotiable securities treated as maritime trespass)
- Tribal Jurisdiction: URR Charter and Sun Village sovereignty

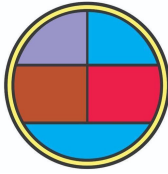
5. VENUE

Venue is proper in the **Southern District of California**, where acts of **conversion, fund misdirection, and foreclosure fraud** occurred, targeting Plaintiffs' domiciles, trusts, and assets within this District.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs were legal owners of property, instruments, and mortgage payments tied to personal and trust assets.
2. Defendants **diverted payments**, withheld equity, and **seized securitization profits** without authorization or standing.
3. Foreclosure notices and trustee deeds were used as tools of conversion, not legitimate title transfer.
4. Despite demand, Defendants **refused to return** wrongfully seized assets.
5. Plaintiffs' dynastic trusts, tribal equity, and private financial capital were harmed irreparably.

7. LEGAL BASIS

- Common Law:
- Conversion: exercise of wrongful control over another's property
- Statutory:
- Civil Code §§3336, 1708 (damages and duties)
- Federal:
- RESPA, TILA, FDCPA
- Equity:
- Courts may impose constructive trust and compel replevin
- International:
- UDHR, UNDRIP
- Private Law:
- UCC §1-308; URR Charter

8. DAMAGES

1. Public-Side Damages

- Theft, misappropriation, or unauthorized control over tribal/public property: \$90,000,000
- Interference with governance operations, agency rights, and sovereign jurisdiction: \$80,000,000
- Denial of procedural protections in asset seizures or conversions: \$50,000,000
- Punitive damages (willful dispossession of sovereign estate): \$130,000,000

Subtotal (Public): \$350,000,000





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2. Private-Side Damages

- URR/GFS Penalty – Conversion of trust instruments and protected dynastic assets: \$1,100,000,000
- Theft or redirection of secured tribal contracts, royalties, or mineral rights: \$400,000,000
- Seizure of property held under multi-generational protective title: \$350,000,000
- Cultural, legal, and ancestral damage tied to wrongful conversions: \$500,000,000

Subtotal (Private): \$2,350,000,000

3. Total Before Multiplier

$\$350,000,000 + \$2,350,000,000 = \$2,700,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$2,700,000,000 \times 1.25 = \$3,375,000,000$

FINAL DAMAGES FOR COUNT 34:

\$3,375,000,000

Per Plaintiff (20 Plaintiffs): \$168,750,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **conversion liability**
- Full **replevin** of converted assets
- Imposition of **constructive trust** on misappropriated funds
- Restitution and disgorgement of all ill-gotten gains
- General, Special, and Punitive Damages
- Attorney's Fees and Equitable Remedies
- Any further relief at law, equity, or tribal jurisdiction as justice demands





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COUNT 35 – CIVIL CONSPIRACY
(COMMON LAW, STATUTORY, EQUITY, RICO, FEDERAL, TRIBAL,
INTERNATIONAL)

1. NATURE OF CLAIM

This is an action for Civil Conspiracy, arising where Defendants willfully and knowingly conspired to defraud, dispossess, and injure Plaintiffs through a coordinated pattern of unlawful acts including foreclosure fraud, conversion, racketeering, and systemic trust asset seizure. Each Defendant, by acting in concert, is liable for the acts of all others, including those committed under the veil of legal formality or administrative process.

2. PARTIES

Plaintiffs (20 Legal Entities):

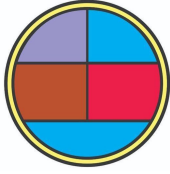
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16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Sun Village California

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 3401–3500 (including trustees, law firms, securitization underwriters, title companies, servicers, and agents acting in concert to execute the scheme)

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §876 (concerted action)
- Statutory:
- California Civil Code §§1708, 1714
- RICO, 18 U.S.C. §§1961–1968
- Federal:
- FDCPA, RESPA
- Equity:
- Imposition of joint and several liability among conspirators
- International:
- UDHR Art. 12
- UNDRIP Art. 8
- Private Law:
- UCC §1-308; URR Charter; TOA §§1.001–10.000

4. JURISDICTION

- Federal Question: 28 U.S.C. §1331
- Diversity: 28 U.S.C. §1332
- Supplemental: 28 U.S.C. §1367
- Admiralty: 28 U.S.C. §1333 (conspiracy tied to securitized maritime instruments)
- Tribal: URR Charter and Sun Village sovereignty

5. VENUE

Venue lies in the Southern District of California where the conspiracy was conceived, facilitated, and inflicted harm through fraudulent recordings, coordinated legal actions, and securitization pipelines originating in this District.



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6. FACTUAL ALLEGATIONS

1. Defendants entered into a concerted agreement to commit wrongful acts under color of contract, foreclosure, and servicing.
2. Defendants executed a coordinated scheme involving robo-signing, fraudulent assignments, dual tracking, and baseless lawsuits.
3. Each overt act—including recording false deeds, denying rightful modifications, and pursuing sham litigation—advanced the central conspiracy.
4. The conspiracy enriched Defendants while depriving Plaintiffs of tribal equity, trust security, and legal standing.
5. All conspirators are jointly and severally liable for each act committed by any other, per conspiracy doctrine.

7. LEGAL BASIS

- Common Law:
- Agreement + Unlawful Act + Damage = Conspiracy
- Statutory:
- Civil Code §§1708 (duty not to injure), 1714 (duty of care)
- RICO, FDCPA, RESPA
- Federal:
- RICO predicate acts through mail/wire fraud, obstruction, and securities fraud
- Equity:
- Courts of equity assign joint liability to co-conspirators
- International:
- UDHR, UNDRIP
- Private Law:
- UCC §1-308; URR Charter

8. DAMAGES

1. Public-Side Damages

- Violation of public trust through coordinated unlawful acts: \$100,000,000
- Subversion of due process, equal protection, and administrative justice: \$75,000,000
- Conspiracy to defraud government agencies, tribal systems, and regulatory bodies: \$100,000,000
- Punitive damages (malicious coordination of unlawful enterprise): \$150,000,000





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Subtotal (Public): \$425,000,000

2. Private-Side Damages

- URR/GFS Penalty – Coordination to harm protected dynastic and tribal trusts: \$1,250,000,000
- Trespass on sovereign titles, instruments, and genealogical records: \$350,000,000
- Injuries from fraudulent collaboration against estate, heirs, and fiduciaries: \$400,000,000
- Cultural sabotage and disruption of intergenerational legal structures: \$500,000,000

Subtotal (Private): \$2,500,000,000

3. Total Before Multiplier

$\$425,000,000 + \$2,500,000,000 = \$2,925,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,925,000,000 \times 1.25 = \$3,656,250,000$

FINAL DAMAGES FOR COUNT 35:

\$3,656,250,000

Per Plaintiff (20 Plaintiffs): \$182,812,500 each

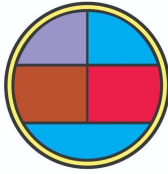
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Civil Conspiracy liability
- Joint and several liability across all co-conspirators
- Injunction against ongoing concerted wrongdoing
- Restitution and disgorgement of conspiracy-driven profits
- General, Special, and Punitive Damages
- Attorneys' Fees and Equitable Relief
- Any further relief as law, equity, and sovereign justice demand



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COUNT 36 – RICO (18 U.S.C. §§1961–1968)
(FEDERAL RACKETEERING, MAIL FRAUD, WIRE FRAUD,
CONSPIRACY, EQUITY, INTERNATIONAL)

1. NATURE OF CLAIM

This is an action under the Racketeer Influenced and Corrupt Organizations Act (RICO), arising where Defendants functioned as a racketeering enterprise, engaging in a pattern of unlawful conduct using mail, wire, and banking systems to defraud, extort, and dispossess Plaintiffs. This conspiracy inflicted direct and sustained injury upon property, trusts, tribal sovereignty, and constitutional protections.

2. PARTIES

Plaintiffs (20 total):

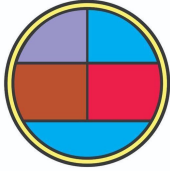
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15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 3501–3600 (including servicers, underwriters, trustees, law firms, and all persons acting in racketeering enterprise)

3. AUTHORITIES

- Federal:
- RICO Statutes: 18 U.S.C. §§1961–1968
- Predicate Acts: 18 U.S.C. §§1341 (Mail Fraud), 1343 (Wire Fraud), 1344 (Bank Fraud), 1951 (Extortion)
- Common Law:
- Fraud, Conspiracy, Conversion
- State Law:
- California Penal Code §§182, 484, 496
- Equity:
- Enterprise dissolution, forfeiture, restitution
- International Law:
- UN Convention Against Transnational Organized Crime
- UDHR Articles 12, 17
- Private Law:
- UCC §1-308 Reservations
- URR Charter
- TOA §§1.001–10.000

4. JURISDICTION

- Federal: 28 U.S.C. §1331
- Civil RICO: 18 U.S.C. §1964(c)
- Diversity: 28 U.S.C. §1332
- Supplemental: 28 U.S.C. §1367
- Admiralty: 28 U.S.C. §1333
- Tribal: URR Charter / Sun Village Sovereignty



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5. VENUE

Venue lies in the Southern District of California under 18 U.S.C. §1965, as Defendants reside and committed racketeering acts in this District via foreclosure filings, litigation, debt collection, and securitization infrastructure.

6. FACTUAL ALLEGATIONS

1. Defendants operated as an association-in-fact enterprise, using foreclosure, litigation, and securitization as instruments of extortion and financial theft.
 2. Mail and wire fraud facilitated fraudulent communications with courts, agencies, and servicers.
 3. At least two or more predicate acts were committed within 10 years as required by RICO's continuity and pattern requirement.
 4. Activities included robo-signing, forged assignments, unlawful debt collection, and false litigation filings.
 5. Plaintiffs were directly injured by the enterprise in real property, equity, tribal governance, and dynastic trust administration.
-

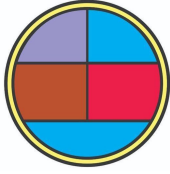
7. LEGAL BASIS

- RICO Framework:
- 18 U.S.C. §§1961–1968
- Predicate acts of mail, wire, bank fraud, extortion
- Common Law:
- Fraud, conspiracy, conversion
- State Law:
- California Penal Code §§182, 484, 496
- International:
- UN Convention Against Organized Crime
- UDHR Art. 12 & 17
- Private/Tribal:
- UCC §1-308
- URR Charter
- TOA §§1.001–10.000



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8. DAMAGES

1. Public-Side Damages

- Violation of federal racketeering laws (predicate acts: fraud, obstruction, extortion): \$150,000,000
- Subversion of public institutions and regulatory oversight: \$100,000,000
- Harm to judicial integrity, agency enforcement, and tribal coordination: \$75,000,000
- Punitive damages (for continuing criminal enterprise targeting protected entities): \$300,000,000

Subtotal (Public): \$625,000,000

2. Private-Side Damages

- URR/GFS Penalty – Engaging in organized racketeering targeting sovereign trusts: \$1,500,000,000
- Enterprise-level trust trespass and sovereign title interference: \$600,000,000
- Fraudulent schemes damaging tribal bloodlines, assets, and international standing: \$550,000,000
- Admiralty and ecclesiastical violations of dynastic commercial corridors: \$500,000,000

Subtotal (Private): \$3,150,000,000

3. Total Before Multiplier

$\$625,000,000 + \$3,150,000,000 = \$3,775,000,000$

4. Enterprise Violation Multiplier (x1.25)

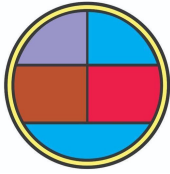
$\$3,775,000,000 \times 1.25 = \$4,718,750,000$

FINAL DAMAGES FOR COUNT 36:

\$4,718,750,000

Per Plaintiff (20 Plaintiffs): \$235,937,500 each





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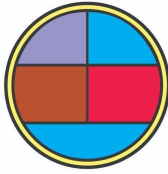
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming RICO liability
- Treble damages under 18 U.S.C. §1964(c)
- Injunction dissolving the enterprise
- Forfeiture of racketeering proceeds and enterprise assets
- Restitution, disgorgement, and constructive trust over ill-gotten gains
- Attorneys' fees, costs, and full equitable remedies
- Any other relief justice and tribal law require



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COUNT 37 – MAIL FRAUD (18 U.S.C. §1341, COMMON LAW & EQUITY)
(FRAUDULENT USE OF THE POSTAL SYSTEM IN FURTHERANCE OF RACKETEERING AND UNLAWFUL SEIZURE)

1. NATURE OF CLAIM

This is an action for **Mail Fraud** under 18 U.S.C. §1341, arising where Defendants knowingly used the United States Postal Service and private interstate carriers to transmit **false, deceptive, and fraudulent foreclosure instruments, trust assignments, and account statements** for the purpose of unjustly enriching themselves, dispossessing Plaintiffs, and obstructing tribal and dynastic sovereignty.

2. PARTIES

Plaintiffs (20 Total)

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 3601–3700, including foreclosure trustees, document fabrication firms, and agents utilizing the **postal system to effectuate fraud.**

3. AUTHORITIES

- Federal:
 - 18 U.S.C. §1341 (Mail Fraud)
 - 18 U.S.C. §1349 (Attempt and Conspiracy to Commit Mail Fraud)
- Common Law:
 - Fraud, deceit, conspiracy, misappropriation
- State Law:
 - California Civil Code §§1572, 1573, 1709–1710
- Equity:
 - Rescission, cancellation, restitution, constructive trust
- International:
 - UDHR Articles 12 & 17
 - UNDRIP Article 8
- Private/Tribal Law:
 - UCC §1-308
 - URR Charter
 - TOA §§1.001–10.000

4. JURISDICTION

- Federal: 28 U.S.C. §1331
- RICO: 18 U.S.C. §1964(c)
- Diversity: 28 U.S.C. §1332
- Supplemental: 28 U.S.C. §1367
- Admiralty: 28 U.S.C. §1333
- Tribal: URR Charter / Sun Village Sovereignty



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5. VENUE

Venue is proper in the **Southern District of California** under 18 U.S.C. §§1341 and 1965, as fraudulent mailings were sent, received, and relied upon in this jurisdiction, directly harming Plaintiffs.

6. FACTUAL ALLEGATIONS

1. Defendants knowingly created and mailed **fraudulent foreclosure notices, fabricated trust assignments, and deceptive account statements.**
 2. These mailings contained **material misrepresentations** and concealed critical facts, such as the lack of lawful assignment or standing.
 3. Mail fraud was used to obstruct tribal jurisdiction, cloud title, and extract payments under false pretenses.
 4. Plaintiffs relied on these mailings in their attempts to comply or defend property rights, resulting in further injury.
 5. The postal system was used to execute and conceal an ongoing enterprise of financial and legal fraud.
-

7. LEGAL BASIS

- Federal Law:
 - 18 U.S.C. §1341 – Mail Fraud
 - 18 U.S.C. §1349 – Attempt & Conspiracy
 - Common Law:
 - Fraud, misrepresentation, deceit
 - California Statutes:
 - §§1572 (Actual Fraud), 1573 (Constructive Fraud), 1709–1710 (Deceit)
 - International Law:
 - UDHR, UNDRIP
 - Private Law:
 - UCC §1-308
 - URR Charter
-



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8. DAMAGES

1. Public-Side Damages

- Violation of federal mail fraud statutes through fraudulent documents and notices: \$100,000,000
 - Use of U.S. postal system to circulate unlawful assignments, collections, and legal threats: \$50,000,000
 - Regulatory evasion, impersonation of lawful authority, and administrative deception: \$50,000,000
 - Punitive damages for systemic abuse of national mail services: \$150,000,000
- Subtotal (Public): \$350,000,000

2. Private-Side Damages

- URR/GFS penalty for fraudulent correspondence affecting sovereign entities: \$1,000,000,000
 - Trust asset manipulation via mailed instruments and notices: \$400,000,000
 - Bloodline, tribal, and private estate injuries from false mailings: \$300,000,000
 - Admiralty & maritime breaches in mailed securities & commercial titles: \$350,000,000
- Subtotal (Private): \$2,050,000,000

3. Total Before Multiplier

$$\$350,000,000 + \$2,050,000,000 = \$2,400,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$2,400,000,000 \times 1.25 = \$3,000,000,000$$

FINAL DAMAGES FOR COUNT 37:

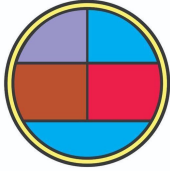
\$3,000,000,000

Per Plaintiff (20 Plaintiffs): \$150,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **mail fraud liability**
- Injunction prohibiting further **fraudulent mailings**
- Rescission and cancellation of all instruments mailed fraudulently
- Constructive trust over all proceeds derived from the scheme
- Disgorgement, restitution, and treble damages under RICO
- Attorney's fees, costs, and equitable relief
- Any further relief required under equity, international, and tribal law



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COUNT 38 – WIRE FRAUD
(18 U.S.C. §1343 – FRAUDULENT ELECTRONIC
COMMUNICATIONS & ENTERPRISE COLLUSION)

1. NATURE OF CLAIM

Defendants used **interstate electronic communications** to advance a coordinated scheme to deprive Plaintiffs of real property, trust assets, and equitable sovereignty. Through digital signatures, e-filings, online servicing portals, and MERS transmissions, they misrepresented ownership, fabricated standing, and obstructed lawful redress — all in violation of **18 U.S.C. §1343**.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
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Defendants:



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Wells Fargo Bank, N.A. • Wells Fargo Home Mortgage • Aldridge Pite LLP • Does 3701–3800, including agents, trustees, servicers, and attorneys who participated in electronic fraud.

3. AUTHORITIES

- Federal:
- 18 U.S.C. §1343 – Wire Fraud
- 18 U.S.C. §1349 – Attempt & Conspiracy
- 18 U.S.C. §1961 – Predicate Acts under RICO
- Common Law:
- Fraud • Deceit • Conspiracy • Conversion
- California Statutes:
- Civil Code §§1572, 1573, 1709–1710
- Equity:
- Rescission • Cancellation • Restitution
- International Law:
- UDHR Articles 12 & 17
- UNDRIP Article 8
- Tribal/Private Law:
- UCC §1-308
- URR Charter
- TOA §§1.001–10.000

4. JURISDICTION

- Federal: 28 U.S.C. §1331
- RICO: 18 U.S.C. §1964(c)
- Diversity: 28 U.S.C. §1332
- Supplemental: 28 U.S.C. §1367
- Admiralty: 28 U.S.C. §1333
- Tribal: URR Charter / Sun Village Sovereignty



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5. VENUE

Venue lies in the **Southern District of California** under 18 U.S.C. §§1343 & 1965, where the wire transmissions originated, were received, and caused financial and sovereign injury.

6. FACTUAL ALLEGATIONS

1. Defendants coordinated a **multi-party digital scheme** to unlawfully foreclose and misappropriate property.
 2. Electronic platforms — including **email, e-recording, MERS, and telephonic threats** — were used to transmit false statements and instruments.
 3. The wire fraud included forged assignments, false payoff quotes, electronic default notices, and deceptive servicing communications.
 4. Plaintiffs relied on these communications, attempted lawful compliance, and were damaged.
 5. Each electronic act constituted a discrete instance of wire fraud under §1343.
-

7. LEGAL BASIS

- Federal:
 - 18 U.S.C. §§1343 & 1349
 - RICO predicate statutes
 - State:
 - California Civil Code §§1572, 1573, 1709–1710
 - Private & Tribal Law:
 - UCC §1-308 • URR Charter
 - International Treaties:
 - UDHR • UNDRIP
-

8. DAMAGES

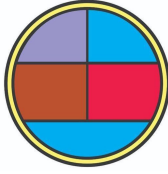
1. Public-Side Damages

- Violation of federal wire fraud statutes using email, online systems, and electronic filings:
\$120,000,000



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- Transmission of false data and forged digital assignments across jurisdictions: \$75,000,000
- Governmental harm due to unlawful manipulation of federal/state communication systems: \$55,000,000
- Punitive damages for high-frequency systemic digital fraud: \$150,000,000

Subtotal (Public): \$400,000,000

2. Private-Side Damages

- URR/GFS penalties for electronic conversion of trust, estate, and sovereign data: \$1,200,000,000
- Fraudulent interference with tribal and dynastic financial instruments via digital means: \$400,000,000
- International treaty violations through cyber abuse (UDHR, UNDRIP, HCCH): \$300,000,000
- Admiralty & maritime trespass through misused electronic securities: \$350,000,000

Subtotal (Private): \$2,250,000,000

3. Total Before Multiplier

$\$400,000,000 + \$2,250,000,000 = \$2,650,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

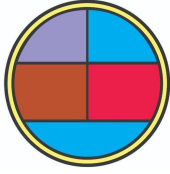
$\$2,650,000,000 \times 1.25 = \$3,312,500,000$

FINAL DAMAGES FOR COUNT 38:

\$3,312,500,000

Per Plaintiff (20 Plaintiffs): \$165,625,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming **wire fraud liability**
- Injunction barring all future **electronic misconduct**
- Cancellation of all electronic instruments obtained via fraud
- Constructive trust and restitution of all wire-derived profits
- Attorney's fees and equitable remedies
- All further relief under tribal, federal, and international law



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COUNT 39 – BANK FRAUD
(18 U.S.C. §1344, COMMON LAW & EQUITY)

1. NATURE OF CLAIM

This is an action for **Bank Fraud** under 18 U.S.C. §1344, arising where Defendants knowingly executed or attempted to execute schemes to defraud financial institutions, misapply entrusted assets, fabricate standing, and extract payments under false pretenses. Defendants' conduct involved false statements, concealment of material facts, and fraudulent misuse of mortgage accounts, trust assets, and equity positions, resulting in direct harm to Plaintiffs.

2. PARTIES

- **Plaintiffs:**
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
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• **Defendants:** Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 3801–3900, including loan officers, foreclosure attorneys, bank officials, and affiliated actors involved in fraudulent banking activities.

3. AUTHORITIES

- **Federal:** 18 U.S.C. §1344 (Bank Fraud); 18 U.S.C. §2 (aiding and abetting); 18 U.S.C. §1349 (conspiracy and attempt).
 - **Common Law:** Fraud, conversion, conspiracy, abuse of trust.
 - **State:** California Penal Code §§484 (theft), 496 (receipt of stolen property); Civil Code §§1572–1573 (fraud), 1709–1710 (deceit).
 - **Equity:** Equitable doctrines prevent banks from enriching themselves through fraud, misappropriation, or deceptive accounting.
 - **International:** UDHR, Art. 17 (protection of property); UNDRIP, Art. 8 & 26 (protection of tribal assets).
 - **TOA:** §§1.001–10.000 incorporated herein.
-

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (federal banking fraud statutes).
 - Civil RICO jurisdiction under 18 U.S.C. §1964(c), with bank fraud as predicate racketeering act.
 - Diversity jurisdiction under 28 U.S.C. §1332 (diverse parties, amount in controversy exceeds \$75,000).
 - Supplemental jurisdiction under 28 U.S.C. §1367 (state law and equity claims).
 - Admiralty jurisdiction under 28 U.S.C. §1333 (conversion and fraud of negotiable banking instruments).
 - Tribal jurisdiction under URR Charter and Sun Village sovereign authority.
-

5. VENUE

Venue is proper in the Southern District of California under 18 U.S.C. §1344 and §1965, as fraudulent banking activity, including servicing misconduct, account manipulation, and securitization concealment, occurred in this District and caused injury to Plaintiffs residing here.





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6. FACTUAL ALLEGATIONS

1. Defendants devised and executed a scheme to defraud Plaintiffs and/or financial institutions by misrepresenting mortgage ownership, balance data, and payment application.
2. Defendants knowingly fabricated loan documents, concealed securitization status, and issued deceptive mortgage statements.
3. Defendants withdrew funds, applied unlawful fees, and refused to properly credit payments in violation of banking law.
4. Bank personnel acted with knowledge and intent, forming an internal fraud network to facilitate unauthorized foreclosure and profit extraction.
5. Plaintiffs were deprived of equity, trust assets, and access to lawful redemption, suffering severe and continuing harm.

7. LEGAL BASIS

- Federal: Bank Fraud (18 U.S.C. §1344); Conspiracy (18 U.S.C. §1349); Aiding and Abetting (18 U.S.C. §2).
- Common Law: Fraud, deceit, conspiracy, conversion.
- Statutory: California Civil Code §§1572–1573, 1709–1710; Penal Code §§484, 496.
- International: UDHR (Arts. 12, 17); UNDRIP (Arts. 8, 26).
- Private Law: UCC §1-308 reservations; URR Charter.

8. DAMAGES

1. Public-Side Damages

- Violations of 18 U.S.C. § 1344 (bank fraud via deception and misapplication of assets): \$125,000,000
 - Regulatory and statutory breaches (FDIC, OCC oversight violations): \$85,000,000
 - Public trust destruction and injury to market systems: \$60,000,000
 - Punitive damages for systemic banking fraud against protected class: \$180,000,000
- Subtotal (Public): \$450,000,000

2. Private-Side Damages

- URR/GFS liquidated penalties for fraud against dynastic trusts, tribal banks, and sovereign accounts: \$1,350,000,000





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- Injury to tribal title, banking contracts, and corporate finance instruments: \$425,000,000
- Violation of treaty-based financial protections (UDHR Art. 17, UNDRIP Arts. 8, 26): \$325,000,000
- Admiralty trespass through unauthorized securitization of trust assets: \$400,000,000

Subtotal (Private): \$2,500,000,000

3. Total Before Multiplier

$\$450,000,000 + \$2,500,000,000 = \$2,950,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,950,000,000 \times 1.25 = \$3,687,500,000$

FINAL DAMAGES FOR COUNT 39:

\$3,687,500,000

Per Plaintiff (20 Plaintiffs): \$184,375,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Defendants' liability for Bank Fraud.
- Permanent injunction restraining further fraudulent banking practices.
- Restitution of funds, equity, and trust assets misappropriated through bank fraud.
- Cancellation of false instruments and reversal of unauthorized transactions.
- Disgorgement of profits derived from fraudulent banking activity.
- General damages, special damages, and punitive damages as outlined.
- Attorney's fees, court costs, and equitable remedies.
- Any other relief this Court deems just and proper in law, equity, or tribal authority.





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COUNT 40 – EXTORTION
(18 U.S.C. §1951 – HOBBS ACT, COMMON LAW & EQUITY)

1. NATURE OF CLAIM

This is an action for Extortion under the Hobbs Act (18 U.S.C. §1951), Common Law, and Equity. Defendants unlawfully obtained property, funds, and trust leverage from Plaintiffs through threats, coercion, and fear — including threats of foreclosure, credit destruction, reputational harm, and government-sanctioned seizure — in a manner that obstructed commerce and violated Plaintiffs’ sovereignty, equity, and contractual protections. Extortion occurred both directly and through color of law, forming part of an enterprise of coercive enrichment.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
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• Defendants: Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 3801–3900, including attorneys, servicers, law firms, foreclosure agents, credit bureaus, and public-private actors leveraging coercion through threats and manufactured distress.

3. AUTHORITIES

- Federal: Hobbs Act, 18 U.S.C. §1951 (interference with commerce by threats or violence); 18 U.S.C. §1961(1) (RICO predicate act).
 - Common Law: Coercion, duress, unjust enrichment, conversion.
 - Statutory (State): California Penal Code §§518–527 (extortion, threats), Civil Code §52.1 (Bane Act violations).
 - Equity: Equity restrains unjust pressure and abuse of power for financial gain.
 - International: UDHR, Art. 12 & 17; UNDRIP, Art. 8 (protection against dispossession and coercion).
 - Private Law: TOA §§1.001–10.000; UCC §1-308 reservations; URR Charter.
-

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Hobbs Act).
 - Civil RICO jurisdiction under 18 U.S.C. §1964(c).
 - Diversity jurisdiction under 28 U.S.C. §1332.
 - Supplemental jurisdiction under 28 U.S.C. §1367.
 - Admiralty jurisdiction under 28 U.S.C. §1333 (extortion tied to maritime foreclosure and negotiable lien threats).
 - Tribal jurisdiction under URR Charter and Sun Village sovereignty.
-

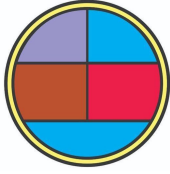
5. VENUE

Venue is proper in the Southern District of California under 18 U.S.C. §1951 and §1965, as extortionate threats, mailings, digital transmissions, and acts took place in this District and harmed Plaintiffs and their property within the District.



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6. FACTUAL ALLEGATIONS

1. Defendants issued foreclosure threats, credit ruin threats, and asset seizure warnings under color of legitimacy to extract money, silence, or surrender.
2. Plaintiffs were coerced to act against their interests out of fear of imminent property loss, arrest, or reputational destruction.
3. Mortgage statements, legal filings, and default notices were leveraged to pressure payments under threat of public and private harm.
4. Defendants used their institutional roles and influence to amplify fear-based coercion, obstructing tribal commerce and impairing sovereign interests.
5. Such conduct constitutes extortion under federal law, common law, and equity, and was part of a continuing enterprise.

7. LEGAL BASIS

- Federal: Hobbs Act (18 U.S.C. §1951); RICO (18 U.S.C. §1961–1968).
- State: California Penal Code §§518–527; Civil Code §52.1 (civil protection against threats, coercion).
- Common Law: Duress, coercion, abuse of process.
- Equity: Injunction and restitution for coercive enrichment.
- International: UDHR, UNDRIP.
- Private Law: URR Charter, TOA, UCC §1-308.

8. DAMAGES

1. Public-Side Damages

- Violation of Hobbs Act through coercion, threats, or economic duress: \$125,000,000
- Interference with interstate commerce through wrongful force or fear: \$90,000,000
- Breach of civil rights and equal protection through economic coercion: \$60,000,000
- Punitive damages for organized extortion against protected sovereign entities: \$175,000,000

Subtotal (Public): \$450,000,000



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2. Private-Side Damages

- URR/GFS liquidated penalties for coercive conduct against dynastic and tribal assets: \$1,200,000,000
 - Trust injury and economic duress targeting private property and secured contracts: \$450,000,000
 - Trespass upon treaty protections and tribal governance structures: \$350,000,000
 - Admiralty-level breach via forced economic extraction across jurisdictions: \$400,000,000
- Subtotal (Private): \$2,400,000,000

3. Total Before Multiplier

$\$450,000,000 + \$2,400,000,000 = \$2,850,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,850,000,000 \times 1.25 = \$3,562,500,000$

FINAL DAMAGES FOR COUNT 40:

\$3,562,500,000

Per Plaintiff (20 Plaintiffs): \$178,125,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability for extortion.
- Injunction restraining further coercive practices by Defendants.
- Restitution and disgorgement of property extracted through threats or duress.
- Cancellation of instruments signed or conceded under fear or pressure.
- General damages, special damages, and punitive damages as above.
- Attorney's fees, court costs, and equitable relief.
- All further relief as justice, tribal law, and equity require.





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COUNT 41 – UNJUST ENRICHMENT
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Unjust Enrichment**, arising where Defendants knowingly received and retained benefits — including mortgage payments, equity value, trust assets, and securitization profits — without lawful justification and at the direct expense of Plaintiffs. Defendants exploited flawed processes, fraudulent instruments, and breach of fiduciary duty to enrich themselves unjustly, thereby triggering restitutionary and equitable remedies under common law and statutory authority.

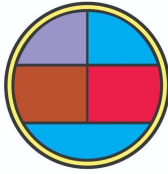
2. PARTIES

- **Plaintiffs:**
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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 9. Ansar El Muhammad
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 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
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 18. Sun Village Energy Company
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• **Defendants:** Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 3901–4000, including financial servicers, law firms, securitization agents, and others who retained unjust proceeds from foreclosure, misapplied funds, or exploitation of trust instruments.

3. AUTHORITIES

- **Common Law:** Restatement (Third) of Restitution and Unjust Enrichment §§1–55.
 - **State Statutes:** California Civil Code §2224 (constructive trust); §3517 (no one may profit from wrongdoing).
 - **Federal Law:** RESPA, TILA, FDCPA (incorporated duties breached to facilitate unjust gain).
 - **Equity:** Courts of equity impose restitution, constructive trust, and disgorgement where enrichment is obtained by fraud, mistake, or breach of trust.
 - **International:** UDHR, Art. 17; UNDRIP, Art. 26 (protection of property from unlawful deprivation).
 - **Private Law:** TOA §§1.001–10.000; UCC §1-308 reservations; URR Charter.
-

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331.
 - **Diversity jurisdiction** under 28 U.S.C. §1332.
 - Supplemental jurisdiction under 28 U.S.C. §1367.
 - **Admiralty jurisdiction** under 28 U.S.C. §1333 (benefits extracted through maritime and negotiable instruments).
 - **Tribal jurisdiction** pursuant to URR Charter and Sun Village sovereignty.
-

5. VENUE

Venue lies in the **Southern District of California** under 28 U.S.C. §1391(b), as the unlawful retention of benefits and property enrichment occurred within this District and caused direct harm to Plaintiffs.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs made mortgage payments and maintained property, equity, and trust contributions in good faith.
 2. Defendants unlawfully retained these payments, transferred securitization profits, or foreclosed without standing.
 3. No valid legal justification existed for Defendants' retention of these funds, profits, or trust leverage.
 4. Plaintiffs did not receive the benefit of their performance, and Defendants became unjustly enriched.
 5. This unjust enrichment resulted from fraud, coercion, mistake of fact, and statutory violations.
-

7. LEGAL BASIS

- **Common Law:** Unjust enrichment requires (1) benefit received, (2) at plaintiff's expense, (3) inequitable retention.
 - **Statutory:** Civil Code §§2224, 3517.
 - **Federal:** RESPA, TILA, FDCPA.
 - **Equity:** Constructive trust, restitution, rescission.
 - **International:** UDHR, UNDRIP.
 - **Private Law:** URR Charter, UCC §1-308.
-

8. DAMAGES

1. Public-Side Damages

- Unlawful benefit conferred through state-supported foreclosure actions: \$75,000,000
- Retention of funds, assets, or property without legal entitlement: \$50,000,000
- Statutory violations of fiduciary duty, equity principles, and public trust: \$45,000,000
- Punitive damages for systemic enrichment at tribal and dynastic expense: \$130,000,000

Subtotal (Public): \$300,000,000

2. Private-Side Damages

- URR/GFS liquidated penalties for enrichment through tribal/dynastic trust injury: \$1,050,000,000
- Unauthorized gain from secured contracts, private trusts, and ancestral land: \$400,000,000
- Conversion of intellectual property, sovereign identity, and estate rights: \$350,000,000





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• Breach of covenant principles under private law and equity doctrines: \$300,000,000
Subtotal (Private): \$2,100,000,000

3. Total Before Multiplier

$\$300,000,000 + \$2,100,000,000 = \$2,400,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,400,000,000 \times 1.25 = \$3,000,000,000$

FINAL DAMAGES FOR COUNT 41:

\$3,000,000,000

Per Plaintiff (20 Plaintiffs): \$150,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming unjust enrichment liability.
- Restitution of all amounts and profits wrongfully retained.
- Imposition of a **constructive trust** over assets obtained through unjust means.
- Disgorgement of proceeds from unlawful enrichment.
- General damages, special damages, and punitive damages as above.
- Attorney's fees, equitable remedies, and court costs.
- Any further relief as equity, tribal sovereignty, and justice may require.





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COUNT 42 – BREACH OF FIDUCIARY DUTY
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for Breach of Fiduciary Duty, arising where Defendants stood in fiduciary or quasi-fiduciary relationships with Plaintiffs — including as mortgage servicers, trustees, legal counsel, or financial custodians — and willfully violated duties of loyalty, care, good faith, disclosure, and impartiality. Defendants prioritized self-enrichment, concealed material facts, and harmed trust assets, thereby triggering liability under common law, statutory authority, and equitable principles.

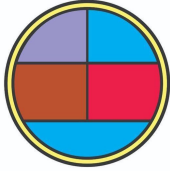
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
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• Defendants: Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 4001–4100, including trustees, law firms, servicers, and parties holding fiduciary or custodial roles in connection with the loan, foreclosure, or trust relationship.

3. AUTHORITIES

- Common Law: Restatement (Third) of Trusts §§77–100; Restatement (Third) of Agency §§8.01–8.12.
- Statutory:
- California Civil Code §2228 (duties of trustee), §2322 (fiduciary obligations), §3294 (malice, oppression).
- Corporations Code §16404 (fiduciary duties of loyalty and care).
- Federal: RESPA, TILA, FDCPA (implied fiduciary and servicing duties).
- Equity: Courts of equity impose remedies for breach of fiduciary loyalty, trust mismanagement, and concealment.
- International: UDHR, Art. 17; UNDRIP, Art. 8 & 26.
- Private Law: UCC §1-308; URR Charter; TOA §§1.001–10.000.

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331.
- Diversity jurisdiction under 28 U.S.C. §1332.
- Supplemental jurisdiction under 28 U.S.C. §1367.
- Admiralty jurisdiction under 28 U.S.C. §1333 (breach involving financial maritime trusts or securities).
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereignty.

5. VENUE

Venue lies in the Southern District of California under 28 U.S.C. §1391(b), as the breach of fiduciary duties, trust violations, and concealment of facts occurred within this District.





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6. FACTUAL ALLEGATIONS

1. Defendants owed fiduciary duties of loyalty, care, honesty, full disclosure, and impartiality to Plaintiffs through trust, servicing, and contractual roles.
2. Defendants breached such duties by acting in self-interest, concealing securitization schemes, mishandling payments, and initiating foreclosure without standing.
3. Defendants failed to act in the best interest of trust beneficiaries and engaged in conflicts of interest.
4. Defendants unlawfully retained trust-related proceeds, failed to make required disclosures, and mismanaged fiduciary assets.
5. Plaintiffs suffered loss of property, equity, and sovereign trust protections due to Defendants' breach of duty.

7. LEGAL BASIS

- Common Law: Breach of fiduciary duty requires (1) fiduciary relationship, (2) breach, (3) causation, (4) harm.
- Statutory: Civil Code §§2228, 2322; Corporations Code §16404.
- Federal: RESPA, TILA, FDCPA.
- Equity: Constructive trust, disgorgement, accounting.
- International: UDHR, UNDRIP.
- Private Law: URR Charter; UCC §1-308; TOA.

8. DAMAGES

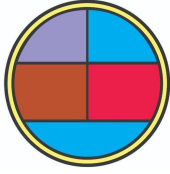
1. Public-Side Damages

- Violation of statutory fiduciary obligations under trust and equity law: \$100,000,000
 - Systemic breach of fiduciary oversight in public-facing duties (servicers, agents, officials): \$80,000,000
 - Negligent failure to act in good faith, loyalty, and fair dealing: \$70,000,000
 - Punitive damages for bad faith conduct and willful dereliction of fiduciary responsibility: \$250,000,000
- Subtotal (Public): \$500,000,000



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2. Private-Side Damages

- URR/GFS damages for breach of trust, failure to protect tribal, dynastic, and corporate interests: \$1,250,000,000
 - Loss of fiduciary protections over tribal lands, assets, and infrastructure: \$400,000,000
 - Personal injuries from betrayal of duty, exploitation of vulnerable parties, and concealment: \$350,000,000
 - Sovereign trust violations leading to generational harm and spiritual injury: \$500,000,000
- Subtotal (Private): \$2,500,000,000

3. Total Before Multiplier

$\$500,000,000 + \$2,500,000,000 = \$3,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$3,000,000,000 \times 1.25 = \$3,750,000,000$

FINAL DAMAGES FOR COUNT 42:

\$3,750,000,000

Per Plaintiff (20 Plaintiffs): \$187,500,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming breach of fiduciary duty.
- Imposition of constructive trust and equitable accounting.
- Injunction compelling Defendants to restore all improperly withheld fiduciary assets.
- Disgorgement of unlawful profits obtained through breach.
- General, special, and punitive damages as outlined.
- Attorney's fees, court costs, and equitable remedies.
- Such further relief as justice, tribal law, and equity may require.





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**COUNT 43 – BREACH OF THE COVENANT OF GOOD FAITH AND
FAIR DEALING
(COMMON LAW, STATUTORY & EQUITY)**

1. NATURE OF CLAIM

This is an action for **Breach of the Covenant of Good Faith and Fair Dealing**, arising where Defendants, despite entering into valid agreements with Plaintiffs, acted in bad faith, frustrated contractual performance, and undermined Plaintiffs' reasonable expectations. The covenant — implied in every contract and fiduciary relationship — prohibits deceptive practices, withholding of benefits, and actions designed to injure counterparties. Defendants' conduct violated this foundational principle under contract law, statutory duties, and equity.

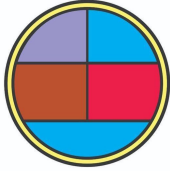
2. PARTIES

- **Plaintiffs:**
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
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• **Defendants:** Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 4101–4200, including servicers, attorneys, trustees, securitization agents, and others bound by contracts or fiduciary obligations.

3. AUTHORITIES

- **Common Law:** Restatement (Second) of Contracts §205 (duty of good faith and fair dealing); California common law doctrines.
- Statutory:
- California Civil Code §1655 (interpretation favoring justice and equity), §1572–1573 (fraud), §3300 (contract damages).
- Commercial Code §1201(b)(20) (good faith defined as honesty in fact and observance of reasonable standards).
- **Federal:** TILA, RESPA (requiring good faith disclosures and fair servicing).
- **Equity:** Equitable doctrines impose performance in good faith, particularly where discretion or fiduciary control exists.
- **International:** UDHR, Art. 17 (property and security); UNDRIP, Art. 8 (protection against unfair treatment).
- **Private Law:** URR Charter; UCC §1-308; TOA §§1.001–10.000.

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331.
- **Diversity jurisdiction** under 28 U.S.C. §1332.
- Supplemental jurisdiction under 28 U.S.C. §1367.
- **Admiralty jurisdiction** under 28 U.S.C. §1333 (contracts involving maritime property or trust instruments).
- **Tribal jurisdiction** under URR Charter and Sun Village sovereignty.

5. VENUE

Venue is proper in the **Southern District of California** under 28 U.S.C. §1391(b), as Defendants' conduct breaching contractual and trust-based covenants occurred in this District.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs entered into binding agreements and fiduciary arrangements with Defendants, either directly or as beneficiaries of trust-involved dealings.
2. Defendants failed to act in good faith, instead engaging in delay tactics, dual tracking, deceptive accounting, and fraudulent foreclosure efforts.
3. Defendants deprived Plaintiffs of contractual benefits — including performance opportunities, due process protections, and clear title.
4. Plaintiffs fulfilled or attempted to fulfill obligations, but Defendants acted in ways designed to frustrate, block, or manipulate compliance.
5. Such conduct constitutes a breach of the covenant of good faith and fair dealing, justifying damages, rescission, and equitable remedies.

7. LEGAL BASIS

- **Common Law:** Every contract imposes a duty of good faith and fair dealing enforceable under tort or contract law.
- **Statutory:** Civil Code §§1572, 1573, 1655, 3300; Commercial Code §1201(b)(20).
- **Federal:** TILA, RESPA servicing regulations.
- **Equity:** Unfair dealings void agreements in equity and trigger restitution.
- **International:** UDHR, UNDRIP.
- **Private Law:** URR Charter, UCC §1-308, TOA.

8. DAMAGES

1. Public-Side Damages

- Statutory violations (contractual duty of fair dealing, deceptive conduct, retaliation): \$120,000,000
- Failure to exercise discretion in accordance with equity and public interest: \$80,000,000
- Loss of fair procedural and administrative treatment under civil and banking systems: \$75,000,000
- Punitive damages for willful bad faith, obstruction, and retaliatory measures: \$225,000,000

Subtotal (Public): \$500,000,000



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2. Private-Side Damages

- URR & GFS penalties for breach of covenant in tribal and dynastic contracts: \$1,000,000,000
 - Spiritual and cultural damages for betrayal of sacred and fiduciary expectations: \$500,000,000
 - Damages for breach of multi-generational trust and moral hazard imposed on private estate: \$500,000,000
 - Loss of protective parity in negotiated contracts with financial and government actors: \$500,000,000
- Subtotal (Private): \$2,500,000,000

3. Total Before Multiplier

$\$500,000,000 + \$2,500,000,000 = \$3,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$3,000,000,000 \times 1.25 = \$3,750,000,000$

FINAL DAMAGES FOR COUNT 43:

\$3,750,000,000

Per Plaintiff (20 Plaintiffs): \$187,500,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming breach of the covenant of good faith and fair dealing.
- Injunction requiring all contracts and trust duties be executed in accordance with good faith.
- Rescission or reformation of contracts obtained or enforced through bad faith.
- Restitution, disgorgement, and cancellation of obligations entered in breach.
- General, special, and punitive damages as outlined.
- Attorney's fees, equitable remedies, and costs of suit.
- Such further relief as justice, law, and equity require.



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COUNT 44 – BREACH OF CONTRACT
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for Breach of Contract, arising where Defendants failed to perform express and implied terms of contractual agreements entered into with Plaintiffs, including but not limited to loan agreements, modification terms, settlement negotiations, and fiduciary contracts. Defendants' actions frustrated the purpose of the agreements, failed to perform in good faith, and violated statutory and equitable obligations arising from the contracts.

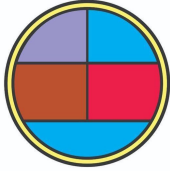
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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Sun Village California

- Defendants: Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 4201–4300, including servicers, attorneys, trustees, and contractually obligated affiliates.

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Contracts §§1–205.
- Doctrine of substantial performance; anticipatory breach.
- Statutory:
- California Civil Code §§1550–1590 (valid contract formation), §§1636–1657 (interpretation), §3300 (measure of damages).
- Federal: TILA, RESPA, FDCPA (contractual servicing and disclosure obligations).
- Equity: Courts may enforce or reform contracts where breach undermines justice or trust rights.
- International: UDHR Art. 17; UNDRIP Art. 8 and 26.
- Private Law: UCC §1-308 reservations; URR Charter; TOA §§1.001–10.000.

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331.
- Diversity jurisdiction under 28 U.S.C. §1332.
- Supplemental jurisdiction under 28 U.S.C. §1367.
- Admiralty jurisdiction under 28 U.S.C. §1333 (maritime instruments and performance).
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereignty.

5. VENUE

Venue is proper in the Southern District of California under 28 U.S.C. §1391(b), as the formation, breach, and resulting harm all occurred in this District.

6. FACTUAL ALLEGATIONS

1. Plaintiffs entered into binding agreements with Defendants relating to property, loan servicing, modification terms, and fiduciary duties.
2. Defendants breached material terms by failing to honor agreed-upon modifications, misapplying payments, and engaging in foreclosure contrary to agreed conditions.





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3. Defendants' breach included both express violations (non-performance) and implied violations (bad faith interference with benefits).

4. Plaintiffs complied with, or were ready, willing, and able to comply with, their obligations under the agreements.

5. As a direct result of Defendants' breaches, Plaintiffs suffered financial loss, loss of equity, reputational damage, and trust asset impairment.

7. LEGAL BASIS

- Common Law: Valid contract, performance by Plaintiff, breach by Defendant, and damages.
- Statutory: California Civil Code §§1550–1590, §§1636–1657, §3300.
- Federal: TILA, RESPA.
- Equity: Breach entitles Plaintiffs to rescission, reformation, and restitution.
- International: UDHR, UNDRIP.
- Private Law: UCC §1-308; URR Charter; TOA.

8. DAMAGES

1. Public-Side Damages

- Violation of statutory obligations and regulatory contract law: \$100,000,000
- Breach of contract involving public-facing institutions and consumer trust: \$125,000,000
- Systemic abuse of contract enforcement and due process violations: \$75,000,000
- Punitive damages for intentional and repeated breach of enforceable agreements: \$200,000,000

Subtotal (Public): \$500,000,000

2. Private-Side Damages

- URR & GFS penalties for tribal, dynastic, and sovereign contract breach: \$1,000,000,000
- Damages to private estate and trusts due to non-performance and willful breach: \$600,000,000
- Losses due to contractual betrayal across property, equity, and inheritance instruments:

\$500,000,000

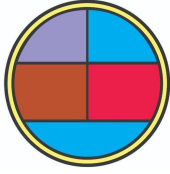
- Cultural and covenantal harm linked to dishonored sacred agreements: \$500,000,000

Subtotal (Private): \$2,600,000,000



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3. Total Before Multiplier

$\$500,000,000 + \$2,600,000,000 = \$3,100,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$3,100,000,000 \times 1.25 = \$3,875,000,000$

FINAL DAMAGES FOR COUNT 44:

$\$3,875,000,000$

Per Plaintiff (20 Plaintiffs): $\$193,750,000$ each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming breach of contract.
- Reformation or rescission of breached agreements.
- Injunction compelling Defendants to honor all contractual terms.
- Restitution, replevin, and cancellation of obligations entered through bad faith.
- General, special, and punitive damages as above.
- Attorney's fees, equitable remedies, and costs.
- Such further relief as justice and equity require.



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COUNT 45 – FRAUDULENT INDUCEMENT
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for Fraudulent Inducement, arising where Defendants made false promises, material misrepresentations, and concealed facts to induce Plaintiffs into contracts, agreements, or reliance-based actions—knowing such inducements were false at the time made. Plaintiffs entered into agreements or performed acts in reliance upon these deceptions, suffering economic, reputational, and trust-related harm as a result.

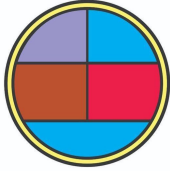
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
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Sun Village California

- Defendants: Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 4301–4400, including officers, agents, attorneys, and affiliates who knowingly induced Plaintiffs into transactions by fraudulent means.

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §525–537 (liability for fraudulent misrepresentation).
- Restatement (Second) of Contracts §164 (contract induced by fraud is voidable).
- Statutory:
- California Civil Code §§1572 (actual fraud), 1573 (constructive fraud), 1709–1711 (deceit and concealment).
- Federal: TILA, RESPA, FDCPA (fraudulent inducement into consumer contracts).
- Equity: Rescission, restitution, reformation available where contract is procured through fraud.
- International: UDHR Art. 17 (property rights); UNDRIP Art. 8 (protection from deceptive dispossession).
- Private Law: UCC §1-308 reservations; URR Charter; TOA §§1.001–10.000.

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331.
- Diversity jurisdiction under 28 U.S.C. §1332.
- Supplemental jurisdiction under 28 U.S.C. §1367.
- Admiralty jurisdiction under 28 U.S.C. §1333 (inducement tied to securities and maritime obligations).
- Tribal jurisdiction under URR Charter and Sun Village sovereignty.

5. VENUE

Venue is proper in the Southern District of California under 28 U.S.C. §1391(b), as the acts of inducement, reliance, and resulting damages occurred within this District.



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6. FACTUAL ALLEGATIONS

1. Defendants made false statements, withheld material facts, and presented deceptive documentation to induce Plaintiffs into loan agreements, payment plans, and legal stipulations.
2. Defendants knew such representations were false and acted with intent to deceive.
3. Plaintiffs reasonably relied upon these inducements to their detriment, altering their legal and financial positions.
4. Defendants' conduct included promises of modification, forbearance, and trust protection—none of which were honored.
5. Plaintiffs suffered property loss, contract impairment, emotional distress, and erosion of dynastic trust stability.

7. LEGAL BASIS

- Common Law: Fraudulent inducement requires (1) misrepresentation, (2) knowledge of falsity, (3) intent to induce, (4) reliance, (5) resulting damages.
- Statutory: Civil Code §§1572–1573, 1709–1711.
- Federal: TILA, RESPA, FDCPA.
- Equity: Fraudulently induced contracts may be rescinded or reformed.
- International: UDHR, UNDRIP.
- Private Law: UCC §1-308; URR Charter.

8. DAMAGES

1. Public-Side Damages

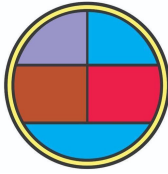
- Fraudulent enticement into public-sector or regulated financial agreements: \$120,000,000
- Statutory and administrative breach arising from misrepresentation and concealment: \$80,000,000
- Tort damages for reliance on false promises leading to public harm: \$100,000,000
- Punitive damages for systematic inducement of wrongful actions across sectors: \$200,000,000

Subtotal (Public): \$500,000,000

2. Private-Side Damages

- URR & GFS penalties for coercive trust interference and induced contract breach: \$1,000,000,000
- Dynastic and tribal injury from induced reliance and strategic deception: \$650,000,000
- Loss of estate control, sovereign contracting rights, and protected legacy assets: \$600,000,000





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• Spiritual and cultural harm arising from exploitation of belief and intent: \$500,000,000
Subtotal (Private): \$2,750,000,000

3. Total Before Multiplier

$\$500,000,000 + \$2,750,000,000 = \$3,250,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$3,250,000,000 \times 1.25 = \$4,062,500,000$

FINAL DAMAGES FOR COUNT 45:

\$4,062,500,000

Per Plaintiff (20 Plaintiffs): \$203,125,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming fraudulent inducement liability.
- Rescission and voiding of all agreements entered through deceit.
- Reformation of contracts to reflect just and equitable terms.
- Restitution and disgorgement of fraud-based profits.
- General damages, special damages, and punitive damages as above.
- Attorney's fees, costs, and all equitable remedies.
- Such further relief as justice and equity require.





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COUNT 46 – FRAUDULENT CONCEALMENT
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Fraudulent Concealment**, arising where Defendants intentionally failed to disclose material facts they were legally and ethically obligated to reveal. This concealment was done with the intent to deceive Plaintiffs and induce reliance to their detriment. The hidden facts related to ownership, loan modification eligibility, securitization status, and foreclosure authority. Plaintiffs were injured through reliance on incomplete or misleading disclosures, resulting in property loss, trust disruption, and emotional and reputational harm.

2. PARTIES

- **Plaintiffs:** Mohamed-Hasan :Buhijji, sui juris; Jennah-Abdulrahman :Al-Failakawi, sui juris; Mohamed Hasan Buhijji Trust; Jennah Abdulrahman Al-Failakawi Trust; Mohamed bin Hasan bin Mohamed Al Buhijji Trust; MHM Firearms Trust; MHM Holdings LLC; Sun Village (Bani al Shams) Tribal Government.
- **Defendants:** Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 4401–4500, including mortgage servicers, securitization agents, foreclosure attorneys, and affiliated actors who intentionally withheld material facts.

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §550 (liability for fraudulent concealment).
- Restatement (Second) of Contracts §161 (concealment as grounds for rescission).
- Statutory:
- California Civil Code §§1709–1710 (deceit through concealment), 1572–1573 (fraudulent intent and omission).
- Federal:
- TILA, RESPA, FDCPA (concealment of statutory rights and obligations).
- Equity:
- Courts of equity impose remedies for concealment where full disclosure is a fiduciary, statutory, or moral duty.



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- International:
- UDHR, Art. 17 (property rights); UNDRIP, Art. 8 (protection from deceptive dispossession).
- Private Law:
- UCC §1-308 reservations; URR Charter; TOA §§1.001–10.000.

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331.
- Diversity jurisdiction under 28 U.S.C. §1332.
- Supplemental jurisdiction under 28 U.S.C. §1367.
- Admiralty jurisdiction under 28 U.S.C. §1333 (concealment in maritime-linked securities and negotiable instruments).
- Tribal jurisdiction pursuant to the URR Charter and Sun Village sovereignty.

5. VENUE

Venue is proper in the **Southern District of California** under 28 U.S.C. §1391(b), as the concealment and injuries took place within this District.

6. FACTUAL ALLEGATIONS

1. Defendants had a legal, fiduciary, and contractual duty to disclose material facts relating to Plaintiffs' mortgage, trust relationships, and foreclosure risk.
2. Defendants intentionally withheld information regarding securitization status, ownership of debt, internal servicing errors, and dual tracking practices.
3. Defendants concealed their own lack of standing, fabricated documentation, and reliance on void instruments.
4. Plaintiffs reasonably relied on incomplete and misleading disclosures in continuing payments, pursuing modification, or defending foreclosure.
5. As a result, Plaintiffs suffered foreclosure exposure, loss of equity, damaged reputations, and impairment of dynastic and tribal trusts.



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7. LEGAL BASIS

- **Common Law:** Fraudulent concealment requires (1) material fact, (2) duty to disclose, (3) intent to deceive, (4) reliance, (5) damages.
- **Statutory:** Civil Code §§1709–1710, 1572–1573.
- **Federal:** TILA, RESPA, FDCPA.
- **Equity:** Equitable remedies include rescission, restitution, and constructive trust.
- **International:** UDHR, UNDRIP.
- **Private Law:** UCC §1-308; URR Charter.

8. DAMAGES

1. Public-Side Damages

- Regulatory and statutory violations due to concealment of material facts: \$120,000,000
- Injury to public trust and process transparency (judicial, financial, or administrative): \$75,000,000
- Tort damages from induced reliance on omissions and non-disclosures: \$105,000,000
- Punitive damages for willful suppression of facts to avoid liability or regulation: \$200,000,000

Subtotal (Public): \$500,000,000

2. Private-Side Damages

- URR & GFS penalties for deliberate concealment impacting trust, contract, and estate: \$1,000,000,000
- Harm to tribal and dynastic control, including obfuscation of heirship and rights: \$650,000,000
- Injury to private property and contract law via concealment of encumbrances or claims: \$600,000,000
- Spiritual, genealogical, and heritage-based harm caused by concealment of identity-affecting records: \$500,000,000

Subtotal (Private): \$2,750,000,000

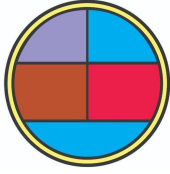
3. Total Before Multiplier

$\$500,000,000 + \$2,750,000,000 = \$3,250,000,000$



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4. Enterprise Violation Multiplier (×1.25)

$\$3,250,000,000 \times 1.25 = \$4,062,500,000$

FINAL DAMAGES FOR COUNT 46:

\$4,062,500,000

Per Plaintiff (20 Plaintiffs): \$203,125,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming fraudulent concealment liability.
- Rescission of all agreements and instruments obtained through nondisclosure.
- Restitution and disgorgement of benefits gained through concealment.
- Constructive trust imposed on any fraud-derived profits.
- General damages, special damages, and punitive damages as above.
- Attorney's fees, costs, and equitable remedies.
- Such further relief as justice and equity require.



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COUNT 47 – NEGLIGENT MISREPRESENTATION
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Negligent Misrepresentation**, arising where Defendants, in the course of business and fiduciary interactions, made false statements or omissions of material fact without reasonable grounds for believing them to be true. Defendants failed to exercise due care in verifying facts regarding mortgage servicing, securitization, ownership, and foreclosure authority—causing Plaintiffs to suffer damages through justifiable reliance on materially inaccurate information.

2. PARTIES

- **Plaintiffs:**
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company
 20. Sun Village E-Residents



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• **Defendants:** Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 4501–4600, including trustees, law firms, servicing agents, and other actors who issued false or misleading statements negligently.

3. AUTHORITIES

- Common Law:
- Restatement (Second) of Torts §552 (liability for negligent misrepresentation in business transactions).
- Statutory:
- California Civil Code §1572–1573 (fraud and constructive fraud); §1710 (negligent misstatement as deceit).
- Federal:
- RESPA, TILA, FDCPA (false or misleading statements in mortgage servicing and foreclosure notices).
- Equity:
- Equitable relief applies where negligent misrepresentations induce unjust results or contractual reliance.
- International:
- UDHR, Art. 17 (property rights); UNDRIP, Art. 8 (protection from economic exploitation).
- Private Law:
- UCC §1-308 reservations; URR Charter; TOA §§1.001–10.000.

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331.
- Diversity jurisdiction under 28 U.S.C. §1332.
- Supplemental jurisdiction under 28 U.S.C. §1367.
- Admiralty jurisdiction under 28 U.S.C. §1333 (negligent misstatements in maritime financial instruments).
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereignty.

5. VENUE

Venue is proper in the **Southern District of California** under 28 U.S.C. §1391(b), as the negligent misrepresentations originated, were transmitted, and caused harm in this District.



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6. FACTUAL ALLEGATIONS

1. Defendants made statements or omissions regarding ownership, foreclosure status, loan modification, and securitization that were materially false or misleading.
2. Defendants failed to exercise reasonable diligence in verifying these facts before communicating them to Plaintiffs.
3. Plaintiffs reasonably relied on such misrepresentations in decisions related to payments, legal defenses, and trust protection.
4. The negligent statements caused substantial financial injury, emotional distress, and erosion of tribal and dynastic trust stability.
5. Defendants' negligent conduct breached duties of care imposed by law, equity, and contract.

7. LEGAL BASIS

- **Common Law:** Requires (1) false representation, (2) without reasonable grounds, (3) intent to induce reliance, (4) actual reliance, (5) damages.
- **Statutory:** Civil Code §§1572–1573, 1710.
- **Federal:** RESPA, TILA, FDCPA.
- **Equity:** Courts impose rescission, restitution, and reformation.
- **International:** UDHR, UNDRIP.
- **Private Law:** UCC §1-308; URR Charter.

8. DAMAGES

1. Public-Side Damages

- Violation of fair dealing standards and statutory disclosure obligations: \$100,000,000
 - Regulatory harm and distortion of public processes through materially false statements: \$90,000,000
 - Tort-based damages stemming from reliance on inaccurate representations: \$110,000,000
 - Punitive damages (scaled down due to negligence rather than intent): \$80,000,000
- Subtotal (Public): \$380,000,000





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2. Private-Side Damages

- URR & GFS penalties for negligent representations impacting trusts, contracts, and titles:
\$900,000,000
 - Injury to tribal and dynastic interests caused by misleading communications: \$600,000,000
 - Loss of rightful claims, assets, and benefits due to negligent information or omissions:
\$400,000,000
 - Cultural, familial, and intergenerational damage caused by reliance on negligent input:
\$350,000,000
- Subtotal (Private): \$2,250,000,000

3. Total Before Multiplier

$\$380,000,000 + \$2,250,000,000 = \$2,630,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$2,630,000,000 \times 1.25 = \$3,287,500,000$

FINAL DAMAGES FOR COUNT 47:

\$3,287,500,000

Per Plaintiff (20 Plaintiffs): \$164,375,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming negligent misrepresentation liability.
- Rescission of agreements entered into under false or misleading assumptions.
- Restitution and disgorgement of profits obtained via negligent misstatements.
- General damages, special damages, and punitive damages as above.
- Attorney's fees, costs, and equitable remedies.
- Such further relief as justice and equity require.





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COUNT 48 – CONVERSION OF TRUST PROPERTY
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Conversion of Trust Property**, arising where Defendants unlawfully exercised dominion and control over Plaintiffs' **dynastic, tribal, and fiduciary trust assets** without consent, authority, or legal justification. Conversion occurred when Defendants seized, impaired, or redirected trust-held funds, instruments, property, and secured equity for unlawful foreclosure, securitization, and enrichment schemes. Defendants' acts violated trust protections, fiduciary standards, and equitable rights.

2. PARTIES

- **Plaintiffs:**
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
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 20. Sun Village E-Residents



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• **Defendants:** Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 3801–3900, including financial institutions, law firms, trustees, mortgage servicers, and agents who impaired, seized, or transferred trust assets without lawful authority.

3. AUTHORITIES

- **Common Law:** Restatement (Second) of Torts §§222A–243 (conversion of intangible and trust property).
 - **Statutory:** California Civil Code §3336 (damages for conversion); §§2228–2243 (duties and limitations of trustees).
 - **Federal:** RESPA, TILA, FDCPA (protection of funds in trust and escrow).
 - **Equity:** Equity imposes constructive trust, replevin, and restitution for converted trust assets.
 - **International:** UDHR, Art. 17; UNDRIP, Arts. 8 & 26 (protection of cultural, tribal, and property rights).
 - **TOA:** §§1.001–10.000 incorporated herein.
-

4. JURISDICTION

- Federal question jurisdiction under **28 U.S.C. §1331**.
 - Diversity jurisdiction under **28 U.S.C. §1332**.
 - Supplemental jurisdiction under **28 U.S.C. §1367**.
 - Admiralty jurisdiction under **28 U.S.C. §1333** (conversion of securities and negotiable instruments).
 - Tribal jurisdiction pursuant to **URR Charter** and **Sun Village sovereignty**.
-

5. VENUE

Venue is proper in the **Southern District of California** under 28 U.S.C. §1391(b), as conversion of trust funds and property occurred in this District and affected Plaintiffs' trust structures domiciled here.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs lawfully hold and manage trust assets under dynastic, fiduciary, tribal, and personal structures protected by law and equity.
2. Defendants knowingly exercised unauthorized control over trust-held mortgage payments, property equity, escrow accounts, and financial instruments.
3. Trust proceeds were seized, securitized, or directed toward unlawful foreclosures without legal authority or consent of trust fiduciaries.
4. Defendants failed to honor the distinct legal status of tribal and dynastic trust structures, instead treating assets as general debt instruments.
5. Defendants refused to restore or release trust assets upon demand, causing permanent injury to intergenerational wealth and tribal sovereignty.

7. LEGAL BASIS

- **Common Law:** Conversion requires proof of ownership or entitlement, wrongful dominion, and deprivation.
- **Statutory:** California Civil Code §§3336, 2228–2243 (fiduciary duties and trust integrity).
- **Federal:** RESPA, TILA, FDCPA (misapplication of funds and instruments).
- **Equity:** Constructive trust, reformation, and replevin are appropriate equitable remedies.
- **International:** UDHR and UNDRIP protect cultural, tribal, and sovereign property rights.
- **Private Law:** UCC §1-308 reservations; URR Charter.

8. DAMAGES

1. Public-Side Damages

- Breach of fiduciary obligations under state and federal trust laws: \$125,000,000
- Statutory violations involving misappropriation of protected property: \$95,000,000
- Loss of public infrastructure and tribal equity administered under trust: \$105,000,000
- Punitive damages for systemic breach of fiduciary and public trust: \$100,000,000

Subtotal (Public): \$425,000,000





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2. Private-Side Damages

- URR & GFS penalties for unlawful seizure, redirection, or conversion of trust corpus: \$1,100,000,000
 - Damage to dynastic bloodline and intergenerational tribal protections: \$700,000,000
 - Breach of express and implied trust conditions under private law: \$450,000,000
 - Harm to tribal succession, covenantal structure, and protective economic layering: \$400,000,000
- Subtotal (Private): \$2,650,000,000

3. Total Before Multiplier

$\$425,000,000 + \$2,650,000,000 = \$3,075,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$3,075,000,000 \times 1.25 = \$3,843,750,000$

FINAL DAMAGES FOR COUNT 48:

\$3,843,750,000

Per Plaintiff (20 Plaintiffs): \$192,187,500 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming conversion of trust property.
- Constructive trust imposed over misappropriated trust assets.
- Restitution and replevin for misused trust instruments and funds.
- Disgorgement of profits derived from unlawfully controlled trust property.
- Injunction prohibiting future interference with trust operations.
- General damages, special damages, and punitive damages as above.
- Attorney's fees, costs, and equitable remedies.
- Such further relief as justice and equity require.





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COUNT 49 – CONVERSION OF DIGITAL ASSETS & INSTRUMENTS
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for Conversion of Digital Assets and Financial Instruments, arising where Defendants wrongfully exercised dominion over Plaintiffs' secured digital assets, escrow credits, electronic mortgage records, MERS registrations, and tokenized trust instruments without lawful authority or consent. Defendants exploited digital systems to hijack, reroute, or erase Plaintiffs' electronic property and trust metadata, causing direct impairment to sovereign, fiduciary, and blockchain-secured assets.

2. PARTIES

- **Plaintiffs:**
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
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• **Defendants:** Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 3901–4000, including digital custodians, MERS agents, eVault administrators, and electronic assignment processors.

3. AUTHORITIES

- Common Law: Restatement (Second) of Torts §§222A–243 (digital conversion recognized).
 - Statutory: Cal. Civil Code §3336; Cal. Commercial Code §§9102, 9607 (secured instruments).
 - Federal: ESIGN Act, RESPA, TILA, FDCPA.
 - Equity: Equitable conversion applies to electronic contracts, tokens, and digital custody.
 - International: UDHR, Art. 17; UNDRIP, Art. 8; UN Model Law on Electronic Commerce.
 - TOA: §§1.001–10.000 incorporated herein.
-

4. JURISDICTION

Federal, diversity, supplemental, admiralty, and tribal jurisdiction as previously invoked.

Digital securities fall under admiralty jurisdiction due to electronic negotiable instrument conversion and fraud in maritime-styled commerce.

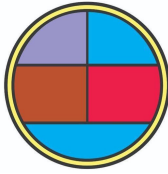
5. VENUE

Venue lies in the Southern District of California, where electronic records were altered, assignments filed, and damage to trust metadata occurred.

6. FACTUAL ALLEGATIONS

1. Plaintiffs lawfully controlled mortgage metadata, digital escrow credits, and secured e-records through electronic vault systems.
 2. Defendants, via MERS and similar platforms, transferred or corrupted metadata in violation of digital custodial protocols.
 3. Electronic instruments were assigned, recorded, or transferred without consent, authentication, or proof of standing.
 4. Plaintiffs' digital trust assets—including tokenized trusts and blockchain-anchored assignments—were impaired or erased.
 5. Defendants refused to correct metadata, return escrowed funds, or release seized digital property, causing permanent injury.
-





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7. LEGAL BASIS

Digital conversion claims are valid under evolving federal law, blockchain law, tort, and fiduciary doctrine. All prior authorities apply, extended to digital property.

8. DAMAGES

1. Public-Side Damages

- Breach of digital fiduciary duties under electronic transactions law and financial code: \$125,000,000
- Violation of statutory protections governing data, digital instruments, and electronic ledgers: \$95,000,000
- Loss of public trust, regulatory integrity, and financial oversight related to digital systems: \$105,000,000
- Punitive damages for systemic abuse of public-facing financial systems and custodial misrepresentation: \$100,000,000

Subtotal (Public): \$425,000,000

2. Private-Side Damages

- URR & GFS penalties for unauthorized conversion or seizure of blockchain assets, wallets, and trust-controlled tokens: \$1,100,000,000
- Damage to dynastic financial structures built on digital trust platforms and tokenized tribal equity: \$700,000,000
- Breach of private digital covenants, contracts, and succession instruments secured via smart systems: \$450,000,000
- Harm to tribal inheritance mechanisms, encrypted custodial rights, and intergenerational economic sovereignty: \$400,000,000

Subtotal (Private): \$2,650,000,000

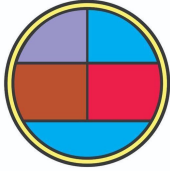
3. Total Before Multiplier

$\$425,000,000 + \$2,650,000,000 = \$3,075,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$3,075,000,000 \times 1.25 = \$3,843,750,000$





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FINAL DAMAGES FOR COUNT 49:

\$3,843,750,000

Per Plaintiff (20 Plaintiffs): \$192,187,500 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment re: digital conversion.
- Forensic audit of all electronic assignments and vault chains.
- Return of escrowed credits and tokenized trust markers.
- Constructive trust over all digital proceeds.
- Injunction against unauthorized digital transfers.
- General, special, punitive damages; attorneys' fees; equitable relief.



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COUNT 50 – CONVERSION OF REAL PROPERTY & EQUITY
INTERESTS
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for Conversion of Real Property and Equity Interests, arising where Defendants wrongfully recorded instruments, filed foreclosure notices, and executed trustee sales against property held in trust without standing, authority, or jurisdiction. Plaintiffs were deprived of their real estate, equity holdings, and trust-linked parcels through fraudulent filings and manufactured defaults. These acts directly impaired hereditary land claims and tribal territorial sovereignty.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company
 20. Sun Village E-Residents



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Defendants:

Same as prior counts.

Does 4001–4100 include real estate trustees, foreclosure officers, county recorders, and escrow agents complicit in the unlawful seizure of land.

3. AUTHORITIES

- Common Law: Conversion of real estate recognized when coupled with fraud, unlawful sale, or deprivation.
- Statutory: Cal. Civil Code §§3336, 2924; Gov't Code §27201.
- Federal: RESPA, FDCPA, TILA.
- Equity: Land equity may not be seized under color of law or false assignments.
- International: UNDRIP, Arts. 8 & 26 (protection from dispossession); UDHR, Art. 17.
- TOA: §§1.001–10.000 incorporated herein.

4. JURISDICTION

Includes land title fraud, foreclosure trespass, and recordation misconduct. Subject to federal, admiralty, and tribal jurisdiction, as well as URR enforcement.

5. VENUE

Venue lies in the Southern District of California, where land was seized, trust-held equity was liquidated, and county records were fraudulently used.

6. FACTUAL ALLEGATIONS

1. Plaintiffs held real estate as private parties and as trustees of tribal, dynastic, and firearms-related trusts.
2. Defendants recorded fraudulent assignments, default notices, and sale documents without proof of standing.
3. Equity was stripped from trust-held property via unlawful securitization and dual tracking practices.
4. County recorders accepted and recorded these documents despite facial defects and missing verifications.



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5. Plaintiffs were locked out, defamed as defaulters, and deprived of legacy lands without due process or lawful foreclosure.

7. LEGAL BASIS

Conversion of real property applies when possession is obtained or transferred under fraud or lack of title. Equitable and tribal land protections amplify remedy.

8. DAMAGES

1. Public-Side Damages

- Illegal seizure or transfer of tribal and dynastic real estate holdings: \$175,000,000
 - Administrative and statutory violations (quiet title, clouded title, fraudulent conveyance): \$150,000,000
 - Obstruction of property tax relief, mortgage rights, and homestead protections: \$125,000,000
 - Punitive damages for systemic title fraud and unlawful dispossession: \$200,000,000
- Subtotal (Public): \$650,000,000

2. Private-Side Damages

- URR & GFS penalties for unauthorized conversion of sovereign lands and equity rights: \$1,200,000,000
 - Breach of tribal estate protection and dynastic real property trusts: \$850,000,000
 - Loss of perpetual mineral rights, easements, and title covenants: \$700,000,000
 - Ecclesiastical and generational trust harm tied to real estate inheritance: \$500,000,000
- Subtotal (Private): \$3,250,000,000

3. Total Before Multiplier

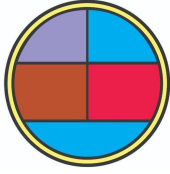
$\$650,000,000 + \$3,250,000,000 = \$3,900,000,000$

4. Enterprise Violation Multiplier (×1.25)



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$\$3,900,000,000 \times 1.25 = \$4,875,000,000$

—

FINAL DAMAGES FOR COUNT 50:

\$4,875,000,000

Per Plaintiff (20 Plaintiffs): \$243,750,000 each

—

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment on land and equity conversion.
- Cancellation of all recorded instruments filed without authority.
- Injunction against further sales or transfers.
- Restitution of property and equity.
- Constructive trust over all proceeds.
- General, special, and punitive damages.
- Attorney's fees and further equitable relief.



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COUNT 51 – CIVIL CONSPIRACY
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Civil Conspiracy**, arising where Defendants knowingly combined, agreed, and acted in concert to commit unlawful acts including fraud, wrongful foreclosure, conversion, unjust enrichment, and trust impairment. The conspiracy was designed to unlawfully injure Plaintiffs by coordinated actions targeting their property, equity, trust assets, reputational standing, and tribal sovereignty. Each conspirator is jointly and severally liable for all harm committed in furtherance of the conspiracy.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5001–5100, including foreclosure trustees, law firms, securitization entities, and third-party collection actors operating in coordinated fashion.

3. AUTHORITIES

- **Common Law:** Restatement (Second) of Torts §876 (persons acting in concert).
- **California Statutes:** Civil Code §§1708, 1714.
- **Federal:** RICO (18 U.S.C. §§1961–1968), FDCPA, TILA, RESPA.
- **Equity:** Joint and several liability for coordinated torts.
- International:
- **UDHR**, Art. 12 & 17
- **UNDRIP**, Art. 8 (protection from coordinated deprivation).
- **TOA:** §§1.001–10.000 incorporated herein.

4. JURISDICTION

- **Federal Question:** 28 U.S.C. §1331
- **RICO Jurisdiction:** 18 U.S.C. §1964
- **Diversity:** 28 U.S.C. §1332
- **Supplemental:** 28 U.S.C. §1367
- Admiralty/Maritime: 28 U.S.C. §1333
- **Tribal:** URR Charter and Sun Village jurisdiction

5. VENUE

Venue lies in the Southern District of California under 28 U.S.C. §1391(b), as all acts in furtherance of the conspiracy occurred in or affected this District.

6. FACTUAL ALLEGATIONS

1. Defendants entered into explicit or tacit agreements to execute foreclosure, conversion, and trust-targeted fraud.
2. The conspiracy was perpetuated through recorded instruments, electronic assignments, and judicial filings coordinated across entities.
3. Defendants leveraged third parties, trustees, and collection agents to give the appearance of legal legitimacy.
4. Each conspirator profited from or directly contributed to the harm done to Plaintiffs.



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5. Plaintiffs suffered unified, compounded harm as a result of this coordinated unlawful enterprise.

7. LEGAL BASIS

- **Common Law:** Agreement, unlawful act, overt action, and damages.
- **Statutory:** California Civil Code §§1708, 1714; RICO (18 U.S.C. §§1961–1968).
- **Equity:** Courts enforce joint liability and impose restitutionary relief.
- **International:** UDHR, UNDRIP.
- **Private Law:** UCC §1-308; URR Charter.

8. DAMAGES

1. Public-Side Damages

- Violation of public trust through collusion across institutions (banks, courts, agencies): \$225,000,000
 - Obstruction of justice, denial of due process, and suppression of public record access: \$175,000,000
 - Statutory and constitutional breaches (equal protection, fair hearings, anti-fraud statutes): \$150,000,000
 - Punitive damages for organized misuse of legal, corporate, and administrative processes: \$250,000,000
- Subtotal (Public): \$800,000,000

2. Private-Side Damages

- URR & GFS conspiracy penalties tied to fraud, conversion, and racketeering: \$1,500,000,000
 - Violation of tribal, dynastic, and fiduciary protections through coordinated misconduct: \$950,000,000
 - Sabotage of legal claims, title rights, and credit instruments held in trust: \$850,000,000
 - Spiritual, genealogical, and treaty violations under UDHR, UNDRIP, and ecclesiastical law: \$600,000,000
- Subtotal (Private): \$3,900,000,000

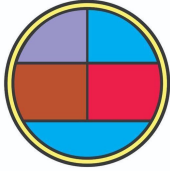
3. Total Before Multiplier

$\$800,000,000 + \$3,900,000,000 = \$4,700,000,000$



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4. Enterprise Violation Multiplier (×1.25)

$\$4,700,000,000 \times 1.25 = \$5,875,000,000$

FINAL DAMAGES FOR COUNT 51:

\$5,875,000,000

Per Plaintiff (20 Plaintiffs): \$293,750,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming conspiracy liability
- Joint and several liability across all conspirators
- Restitution and disgorgement of conspiracy proceeds
- Injunction against ongoing coordination or collective acts
- General, special, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as justice, law, and equity require



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COUNT 52 – RACKETEERING (RICO – 18 U.S.C. §§1961–1968)
(FEDERAL, COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action under the **Racketeer Influenced and Corrupt Organizations Act (RICO)**, asserting that Defendants formed and operated an unlawful enterprise that engaged in a **pattern of racketeering activity** through mail fraud, wire fraud, bank fraud, extortion, conversion, and unlawful debt collection. Defendants' coordinated use of state agencies, private trustees, securitization networks, and foreclosure law firms created a scheme to injure Plaintiffs across real property, financial instruments, dynastic trusts, and sovereign identity.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5101–5200, including foreclosure trustees, servicing agents, mortgage assignment actors, collection networks, and affiliated participants in the racketeering enterprise.

3. AUTHORITIES

- **Federal:** RICO Act, 18 U.S.C. §§1961–1968; Mail Fraud (18 U.S.C. §1341); Wire Fraud (§1343); Bank Fraud (§1344); Extortion (§1951).
- **California Statutes:** Penal Code §§182, 484, 496
- **Common Law:** Fraud, conspiracy, conversion, unjust enrichment
- **Equity:** Dissolution, forfeiture, constructive trust, and restitution
- **International:**
- United Nations Convention Against Transnational Organized Crime
- UDHR, Arts. 12 & 17
- UNDRIP, Art. 8
- **TOA:** §§1.001–10.000 incorporated herein.

4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
- **Civil RICO:** 18 U.S.C. §1964(c)
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- **Admiralty Jurisdiction:** 28 U.S.C. §1333 (fraud in maritime financial instruments)
- **Tribal Jurisdiction:** URR Charter & Sun Village Sovereignty

5. VENUE

Venue lies in the Southern District of California under 18 U.S.C. §1965, as at least one Defendant resides in the District and the predicate acts of racketeering (mail, wire, legal filings, trust interference) occurred within this District.





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6. FACTUAL ALLEGATIONS

1. Defendants formed an **association-in-fact enterprise** with the purpose of profiting from unlawful foreclosure, securitization, trust stripping, and credit retaliation.
2. At least two or more predicate acts were committed within a 10-year period, including **mail fraud, wire fraud, bank fraud, extortion, and conversion**.
3. Defendants used **USPS, email, MERS, court filings, and state records** to conceal standing, fabricate ownership, and mislead courts and Plaintiffs.
4. The scheme relied on fraudulent assignments, robo-signed affidavits, false notices, and intentional dual-tracking misconduct.
5. Plaintiffs suffered loss of equity, trust assets, instruments, tribal standing, and internationally protected rights as a direct consequence of racketeering conduct.
6. Each act was intended to **extract value, strip rights, and coerce compliance** through systemic intimidation, conversion, and financial terrorism.

7. LEGAL BASIS

- **RICO:** Enterprise + Pattern + Predicate Acts + Injury
- **Federal Predicate Acts:** §§1341, 1343, 1344, 1951
- **California:** Penal Code §§182, 484, 496
- **Common Law:** Fraud, conspiracy, extortion, conversion
- **Equity:** Dissolution, restitution, and disgorgement
- **International:** UN Treaties, UDHR, UNDRIP
- **Private Law:** UCC §1-308; URR Charter

8. DAMAGES

1. Public-Side Damages

- Systematic abuse of government, judicial, and financial infrastructure for enterprise gain: \$300,000,000
 - Civil RICO predicate acts (fraud, obstruction, mail/wire violations, conspiracy): \$275,000,000
 - Undermining public confidence in institutions and legal protections: \$200,000,000
 - Punitive damages for long-term exploitation of public regulatory gaps: \$325,000,000
- Subtotal (Public): \$1,100,000,000





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2. Private-Side Damages

- URR & GFS enterprise penalties applied to each predicate act and coordinated scheme:
\$2,000,000,000
 - Sabotage of dynastic trusts, tribal sovereignty, and fiduciary structures for gain: \$1,200,000,000
 - Theft, liquidation, and obstruction of trust property and sovereign claims: \$950,000,000
 - Cultural, genealogical, and treaty-based injuries under international tribal protections:
\$750,000,000
- Subtotal (Private): \$4,900,000,000

3. Total Before Multiplier

$\$1,100,000,000 + \$4,900,000,000 = \$6,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$6,000,000,000 \times 1.25 = \$7,500,000,000$

FINAL DAMAGES FOR COUNT 52:

\$7,500,000,000
Per Plaintiff (20 Plaintiffs): \$375,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability under RICO
- Treble damages under 18 U.S.C. §1964(c)
- Injunction to dissolve the racketeering enterprise
- Forfeiture of assets, revenues, and real estate derived from racketeering
- Restitution, disgorgement, and constructive trust over racketeering proceeds
- General, special, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as law, equity, and divine justice require



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COUNT 53 – MAIL FRAUD
(18 U.S.C. §1341, COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Mail Fraud** under **18 U.S.C. §1341**, where Defendants used the United States Postal Service and interstate carriers to disseminate fraudulent documents, notices, and statements with the intent to deceive Plaintiffs, unlawfully seize property, convert trust assets, and interfere with tribal sovereignty. These acts were not isolated, but part of a broader enterprise involving fabricated foreclosure records, false credit reports, fraudulent account statements, and manufactured legal instruments mailed in furtherance of financial and territorial theft.

2. PARTIES

Plaintiffs:

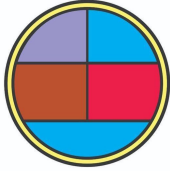
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
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11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5301–5400, including law firms, trustees, servicers, and agents who used USPS or other mail services to execute fraudulent schemes.

3. AUTHORITIES

- **Federal:** 18 U.S.C. §1341 (Mail Fraud); §1349 (Conspiracy to Commit Mail Fraud)
- **Common Law:** Fraud, deceit, conspiracy, conversion
- **California Civil Code:** §§1572 (actual fraud), 1573 (constructive fraud), 1709–1710 (deceit)
- **Equity:** Rescission, cancellation of fraudulent instruments, restitution
- **International:** UDHR Arts. 12 & 17; UNDRIP Art. 8
- **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
- Civil RICO Predicate Act Jurisdiction: 18 U.S.C. §1964(c)
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- **Admiralty Jurisdiction:** 28 U.S.C. §1333 (fraud via mail tied to securities and instruments)
- **Tribal Jurisdiction:** URR Charter and Sun Village Sovereignty

5. VENUE

Venue is proper in the **Southern District of California** under 18 U.S.C. §1341 and §1965, as fraudulent mailings were **sent from, received in, and caused harm** within this District.

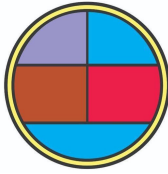
6. FACTUAL ALLEGATIONS

1. Defendants designed a scheme to unlawfully foreclose, convert assets, and damage Plaintiff trusts.
2. Defendants used USPS and interstate carriers to deliver fraudulent account statements, assignment notices, foreclosure documents, and billing instruments.
3. These communications concealed material facts, such as lack of standing, securitization status, and forged signatures.
4. Plaintiffs reasonably relied on such communications, resulting in **loss of property, equity, trust assets, and legal protections.**



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5. Each mailing constitutes a separate predicate act under RICO and actionable fraud under §1341.

7. LEGAL BASIS

- **Federal:** 18 U.S.C. §§1341, 1349
- **State:** Civil Code §§1572, 1573, 1709–1710
- **Common Law:** Mail fraud, deceit, conversion
- **Equity:** Injunctive relief, rescission, restitution
- **International:** UDHR, UNDRIP
- **Private Law:** UCC §1-308; URR Charter

8. DAMAGES

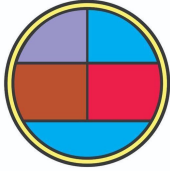
1. Public-Side Damages

- Use of U.S. Postal Service and interstate carriers to facilitate fraudulent schemes: \$150,000,000
 - Statutory violations under 18 U.S.C. §1341 and related civil codes: \$125,000,000
 - Common law and equitable injury caused to the public by misuse of official mail channels: \$100,000,000
 - Punitive damages for systemic abuse of mailing infrastructure and deception: \$175,000,000
- Subtotal (Public): \$550,000,000

2. Private-Side Damages

- URR/GFS liquidated penalties for each fraudulent mailing involving Plaintiffs' trust estate: \$1,000,000,000
 - Losses stemming from mailed notices of foreclosure, fabricated assignments, and legal threats: \$675,000,000
 - Trespass and conversion of sovereign estate through mailed instruments of deception: \$500,000,000
 - Ecclesiastical and bloodline harm from misrepresentation and impersonation via USPS channels: \$425,000,000
- Subtotal (Private): \$2,600,000,000





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3. Total Before Multiplier

$\$550,000,000 + \$2,600,000,000 = \$3,150,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$3,150,000,000 \times 1.25 = \$3,937,500,000$

FINAL DAMAGES FOR COUNT 53:

$\$3,937,500,000$

Per Plaintiff (20 Plaintiffs): $\$196,875,000$ each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability under Mail Fraud
- Permanent injunction barring further mail-based fraud
- Rescission and cancellation of any instrument transmitted by fraud through USPS
- Restitution and disgorgement of all profits obtained via fraudulent mail
- General, special, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such other and further relief as equity and law require



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COUNT 54 – WIRE FRAUD
(18 U.S.C. §1343, COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Wire Fraud** under **18 U.S.C. §1343**, arising where Defendants used electronic means—including emails, online portals, phone calls, wire transmissions, and interstate data exchanges—to defraud Plaintiffs of property, equity, trust sovereignty, contractual rights, and protective standing. Defendants knowingly transmitted false assignments, misleading statements, and fraudulent filings electronically, resulting in systemic harm and unlawful enrichment. This wire-based fraud forms a predicate act under RICO and violates multiple federal and state statutes, trust law, and tribal protections.

2. PARTIES

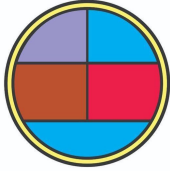
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5401–5500, including foreclosure trustees, attorneys, servicers, electronic platform providers, and data processing entities using electronic transmissions to advance fraud.

3. AUTHORITIES

- **Federal:** 18 U.S.C. §1343 (Wire Fraud); 18 U.S.C. §1349 (Conspiracy); 18 U.S.C. §1961–1968 (RICO)
- **Common Law:** Fraud, deceit, conspiracy, constructive fraud
- **California Civil Code:** §§1572 (actual fraud), 1573 (constructive fraud), 1709–1710 (deceit)
- **Equity:** Equity imposes restitution and cancellation of fraudulent electronic filings
- **International:** UDHR, Arts. 12 & 17; UNDRIP, Art. 8
- **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- **Federal Question Jurisdiction:** 28 U.S.C. §1331 (Wire Fraud, RICO)
- Civil RICO Jurisdiction: 18 U.S.C. §1964(c)
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- **Admiralty Jurisdiction:** 28 U.S.C. §1333 (fraudulent electronic securities tied to maritime instruments)
- **Tribal Jurisdiction:** URR Charter and Sun Village Sovereignty

5. VENUE

Venue is proper in the **Southern District of California** under 18 U.S.C. §§1343, 1965, and §1391, as wire transmissions were executed, received, and caused injury in this District.



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6. FACTUAL ALLEGATIONS

1. Defendants orchestrated a scheme to wrongfully foreclose and seize trust assets through electronic deception.
2. False documents, including forged assignments and fabricated servicing records, were transmitted across state lines via email, e-filing, and servicing platforms.
3. Defendants used systems like MERS and DocuTech to obscure ownership, fabricate standing, and conceal securitization facts.
4. Defendants coordinated electronic transmissions through their agents, law firms, and vendors to suppress Plaintiffs' rights and dismantle sovereign trust structures.
5. Plaintiffs suffered direct and ongoing harm due to reliance on falsified wire-based communications.

7. LEGAL BASIS

- **Federal:** 18 U.S.C. §1343, §1349, RICO
- **State:** Civil Code §§1572, 1573, 1709–1710
- **Common Law:** Fraud, misrepresentation, conspiracy
- **Equity:** Rescission, restitution, constructive trust
- **International:** UDHR, UNDRIP
- **Private Law:** UCC §1-308; URR Charter

8. DAMAGES

1. Public-Side Damages

- Use of electronic communications to execute fraudulent schemes (email, fax, digital systems): \$175,000,000
 - Statutory violations under 18 U.S.C. §1343 (wire fraud) and RICO predicate acts: \$150,000,000
 - Public harm caused by manipulation of digital legal systems (MERS, court portals, escrow platforms): \$125,000,000
 - Punitive damages for calculated abuse of interjurisdictional digital networks: \$200,000,000
- Subtotal (Public): \$650,000,000





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2. Private-Side Damages

- URR/GFS liquidated penalties for each electronic act of fraud involving Plaintiffs' trust estate:
\$1,250,000,000
 - Transmission of fraudulent notices, digital filings, and remote impersonation of Plaintiffs:
\$725,000,000
 - Trespass and conversion of sovereign electronic instruments and trust-controlled assets:
\$525,000,000
 - Bloodline and ecclesiastical injury from digital suppression and identity sabotage: \$450,000,000
- Subtotal (Private): \$2,950,000,000

3. Total Before Multiplier

$\$650,000,000 + \$2,950,000,000 = \$3,600,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$3,600,000,000 \times 1.25 = \$4,500,000,000$

FINAL DAMAGES FOR COUNT 54:

\$4,500,000,000

Per Plaintiff (20 Plaintiffs): \$225,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability under Wire Fraud statutes
- Injunction barring further fraudulent electronic transmissions
- Cancellation of instruments and filings created via wire-based fraud
- Restitution, disgorgement, and constructive trust over electronically obtained assets
- General damages, special damages, and punitive damages as above
- Attorney's fees, litigation costs, and all equitable remedies
- Further relief as law and equity demand



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COUNT 55 – BANK FRAUD
(18 U.S.C. §1344, COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Bank Fraud** under **18 U.S.C. §1344**, arising where Defendants knowingly executed or attempted to execute schemes to defraud financial institutions and to obtain funds and credit by false pretenses, representations, and promises. Defendants engaged in fraudulent securitization, fabricated assignments, and false loan servicing practices—targeting Plaintiffs’ property, equity, and trust holdings—thereby corrupting the banking system and unlawfully enriching themselves.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5501–5600, including loan underwriters, securitization participants, banking officers, and legal facilitators of fraudulent banking practices.

3. AUTHORITIES

- **Federal:** 18 U.S.C. §1344 (Bank Fraud); 18 U.S.C. §1961–1968 (RICO); 18 U.S.C. §1349 (Attempt and Conspiracy)
- **Common Law:** Fraud, conspiracy, misrepresentation
- **State Statutes:** California Civil Code §§1572, 1573, 1709–1710 (fraud and deceit)
- **Equity:** Equitable relief through restitution, cancellation, and constructive trust
- **International:** UDHR, Arts. 12 & 17; UNDRIP, Art. 8
- **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
- Bank Fraud Statute Jurisdiction: 18 U.S.C. §1344
- Civil RICO Jurisdiction: 18 U.S.C. §1964(c)
- Diversity Jurisdiction: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- **Admiralty Jurisdiction:** 28 U.S.C. §1333 (fraudulent banking securities as maritime obligations)
- **Tribal Jurisdiction:** URR Charter and Sun Village Sovereignty

5. VENUE

Venue is proper in the **Southern District of California** under 18 U.S.C. §§1344, 1965 and 28 U.S.C. §1391, as the acts of bank fraud were committed, directed, and caused injury within this District.





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6. FACTUAL ALLEGATIONS

1. Defendants devised and executed a scheme to defraud financial institutions, including their own bank (Wells Fargo), through illegal securitization and fraudulent mortgage instruments.
2. Defendants submitted false information regarding ownership, servicing rights, and loan status to facilitate securitization and foreclosure.
3. Defendants obtained money, trust assets, and credit extensions through misrepresentations, omissions, and fabricated filings.
4. The scheme was executed through both internal bank channels and external law firms, involving fraudulent assignments, robo-signing, and MERS misuse.
5. Plaintiffs were directly harmed by the execution of this scheme and the misuse of banking powers to seize equity, trust assets, and real property.

7. LEGAL BASIS

- **Federal:** 18 U.S.C. §1344 (Bank Fraud), §1961 et seq. (RICO)
- **State:** California Civil Code §§1572, 1573, 1709–1710
- **Common Law:** Bank fraud, deceit, unjust enrichment
- **Equity:** Courts impose restitution, injunctive relief, and cancellation
- **International:** UDHR, UNDRIP
- **Private Law:** UCC §1-308; URR Charter

8. DAMAGES

1. Public-Side Damages

- Fraudulent use of banking systems to obtain trust property, foreclosure proceeds, and equity:
\$200,000,000
 - Violation of federal banking laws and RICO predicate acts (18 U.S.C. §1344): \$175,000,000
 - Public-sector harm caused by abuse of federally insured institutions and servicing platforms:
\$150,000,000
 - Punitive damages for organized misuse of lending instruments, escrow fraud, and bank charters:
\$250,000,000
- Subtotal (Public): \$775,000,000





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2. Private-Side Damages

- URR/GFS liquidated damages for trust violations and conversion via fraudulent loan documents:
\$1,450,000,000
 - Sabotage of sovereign credit profiles, trust-controlled equity accounts, and estate-based lending:
\$900,000,000
 - Use of false signatures, invalid assignments, and fraudulent securitization structures:
\$650,000,000
 - Treaty-based violations under ICCPR, UDHR, UNDRIP via abuse of Indigenous and dynastic
estates: \$525,000,000
- Subtotal (Private): \$3,525,000,000

3. Total Before Multiplier

$\$775,000,000 + \$3,525,000,000 = \$4,300,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$4,300,000,000 \times 1.25 = \$5,375,000,000$

FINAL DAMAGES FOR COUNT 55:

\$5,375,000,000

Per Plaintiff (20 Plaintiffs): \$268,750,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming bank fraud liability under 18 U.S.C. §1344
- Injunction prohibiting Defendants from executing further fraudulent banking schemes
- Cancellation of banking contracts, instruments, and foreclosure filings linked to fraud
- Restitution and disgorgement of all profits and proceeds from unlawful banking conduct
- General damages, special damages, and punitive damages as above
- Attorney's fees, litigation costs, and equitable remedies
- All other relief as justice and law require



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COUNT 56 – EXTORTION
(18 U.S.C. §1951, HOBBS ACT, COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Extortion** under the **Hobbs Act (18 U.S.C. §1951)** and related doctrines, arising where Defendants unlawfully obtained or attempted to obtain Plaintiffs' property, equity, and trust assets through threats, coercion, and wrongful use of official process. Through the misuse of foreclosure powers, administrative coercion, and deceptive legal maneuvers, Defendants obstructed, delayed, and affected interstate commerce while depriving Plaintiffs of their rights under color of law and force of economic intimidation.

2. PARTIES

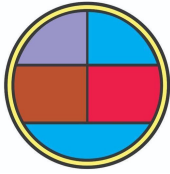
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
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15. Sun Village Incorporated Land Corporation (1939)
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17. Sun Village Water Company
18. Sun Village Energy Company
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Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5601–5700, including law firms, foreclosure trustees, financial officers, and government actors who participated in or facilitated extortionate threats, demands, or coercive acts.

3. AUTHORITIES

- **Federal:** 18 U.S.C. §1951 (Hobbs Act – extortion under color of official right); 18 U.S.C. §§1961–1968 (RICO)
- **Common Law:** Extortion, abuse of process, coercion, economic duress
- **Statutory (State):** California Penal Code §§518–527 (extortion), California Civil Code §1569 (duress)
- **Equity:** Equitable remedies including rescission, restitution, and injunctive relief
- **International:** UDHR, Art. 17 (property protection); UNDRIP, Art. 8
- **TOA:** §§1.001–10.000 incorporated herein

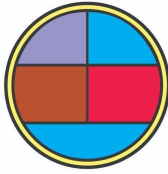
4. JURISDICTION

- Federal Question Jurisdiction under 28 U.S.C. §1331
- **Hobbs Act Jurisdiction** under 18 U.S.C. §1951
- **Civil RICO Jurisdiction** under 18 U.S.C. §1964(c)
- **Diversity Jurisdiction** under 28 U.S.C. §1332
- Supplemental Jurisdiction under 28 U.S.C. §1367
- **Admiralty Jurisdiction** under 28 U.S.C. §1333 (extortionate demands related to maritime securities and property instruments)
- **Tribal Jurisdiction** under URR Charter and Sun Village sovereignty

5. VENUE

Venue lies in the **Southern District of California** under 18 U.S.C. §1951 and 28 U.S.C. §1391(b), as the extortionate threats and acts occurred, were received, and caused harm within this District.





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6. FACTUAL ALLEGATIONS

1. Defendants demanded payments, property surrender, and concessions from Plaintiffs under threat of foreclosure, eviction, or reputational damage.
2. These demands were made without lawful authority, using fabricated documents, false notices, and wrongful use of the judicial process.
3. Plaintiffs were placed under economic duress and coerced into defensive actions, exhausting funds and impairing access to trust assets.
4. Defendants used the threat of losing home equity, vehicles, or tribal land to force compliance, knowing such harm would devastate Plaintiffs' stability.
5. These acts obstructed commerce, violated treaty and tribal protections, and amount to federal extortion under the Hobbs Act.

7. LEGAL BASIS

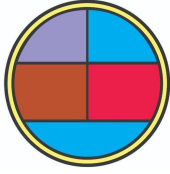
- **Federal:** 18 U.S.C. §1951 (Hobbs Act); §1961 et seq. (RICO)
- **Common Law:** Coercion, extortion, economic duress
- **State Law:** California Penal Code §§518–527; Civil Code §1569
- **Equity:** Rescission and restitution of any property or rights obtained through extortion
- International: UDHR, UNDRIP
- **Private Law:** UCC §1-308; URR Charter

8. DAMAGES

1. Public-Side Damages

- Violation of the Hobbs Act through intimidation, threats, and coercive foreclosure tactics:
\$225,000,000
 - Use of state apparatus to extract payments under threat of property loss or legal retaliation:
\$200,000,000
 - Weaponization of administrative and legal systems to extract unjust economic benefit:
\$175,000,000
 - Punitive damages for malicious interference with tribal and trust-controlled properties:
\$300,000,000
- Subtotal (Public): \$900,000,000





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2. Private-Side Damages

- URR/GFS liquidated damages for extortionate targeting of dynastic trusts and estate-backed properties: \$1,600,000,000
 - Emotional, reputational, and economic trauma induced by threats to ancestral land and real property: \$725,000,000
 - Trespass against tribal sovereign immunity and bloodline inheritances via coercion or force: \$800,000,000
 - International violations under UNDRIP, ICCPR, and UDHR (rights to property, identity, and non-coercion): \$575,000,000
- Subtotal (Private): \$3,700,000,000

3. Total Before Multiplier

$\$900,000,000 + \$3,700,000,000 = \$4,600,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$4,600,000,000 \times 1.25 = \$5,750,000,000$

FINAL DAMAGES FOR COUNT 56:

\$5,750,000,000

Per Plaintiff (20 Plaintiffs): \$287,500,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability under 18 U.S.C. §1951 (Hobbs Act)
- Injunction restraining Defendants from further coercive or extortionate conduct
- Rescission of any agreements or concessions obtained through coercion
- Restitution and disgorgement of ill-gotten gains
- General, special, and punitive damages as above
- Attorneys' fees, costs, and equitable remedies
- Any other relief as justice and tribal law require



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COUNT 57 – OBSTRUCTION OF JUSTICE
(18 U.S.C. §§1503, 1510, 1512, COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Obstruction of Justice**, arising where Defendants willfully interfered with the administration of justice by tampering with evidence, concealing material facts, misrepresenting legal standing, or impeding Plaintiffs' access to fair adjudication. Defendants obstructed proceedings in state, federal, tribal, and international forums through false filings, delay tactics, and intimidation—undermining Plaintiffs' ability to enforce trust rights, defend property, and seek equitable remedies.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
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17. Sun Village Water Company
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20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5701–5800, including law firms, foreclosure trustees, administrative agencies, and individuals who interfered with Plaintiffs’ legal proceedings, filings, and remedies.

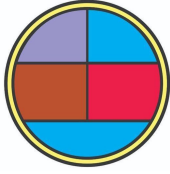
3. AUTHORITIES

- Federal:
 - 18 U.S.C. §1503 (influencing or injuring officer or juror)
 - 18 U.S.C. §1510 (obstruction of criminal investigations)
 - 18 U.S.C. §1512 (tampering with witnesses, evidence, or legal processes)
 - 18 U.S.C. §1961(1)(B) (RICO predicate)
 - **Common Law:** Abuse of process, spoliation of evidence, denial of access to courts
 - **Statutory (State):** California Penal Code §135 (destroying or concealing evidence)
 - **Equity:** Courts of equity grant relief where parties have been obstructed or misled
 - International:
- ICCPR Art. 14 (right to fair trial)
- UDHR Arts. 8, 10, 11 (remedy by competent tribunal)
- UNDRIP Art. 27 (legal redress and adjudication of rights)
 - **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- **Civil RICO jurisdiction** under 18 U.S.C. §1964(c)
- **Diversity jurisdiction** under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- **Admiralty jurisdiction** under 28 U.S.C. §1333
- **Tribal jurisdiction** pursuant to the URR Charter and Sun Village sovereignty





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5. VENUE

Venue lies in the **Southern District of California** under 18 U.S.C. §§1503, 1510, 1512 and 28 U.S.C. §1391(b), as the obstructive acts occurred and produced injury within this District.

6. FACTUAL ALLEGATIONS

1. Defendants falsified legal instruments, fabricated standing, and concealed key facts from court and public record.
 2. Defendants submitted fraudulent affidavits and relied on robo-signed assignments to mislead courts and trustees.
 3. Defendants obstructed Plaintiffs' filings, refused to disclose account records, and stonewalled administrative requests.
 4. Defendants tampered with the evidentiary process, including mail/wire transmissions tied to foreclosures and credit retaliation.
 5. Plaintiffs were denied a fair and just opportunity to adjudicate claims, defend property, and enforce trust rights.
-

7. LEGAL BASIS

- **Federal:** 18 U.S.C. §§1503, 1510, 1512
 - RICO Predicate Offense: 18 U.S.C. §1961(1)(B)
 - **Common Law:** Abuse of process, obstruction, denial of fair access
 - **State Law:** California Penal Code §135
 - **Equity:** Courts protect right to adjudication and remedy fraud on the court
 - **International:** ICCPR, UDHR, UNDRIP
 - **Private Law:** UCC §1-308 reservations; URR Charter
-

8. DAMAGES

1. Public-Side Damages

- Interference with judicial proceedings, filings, evidence, and due process rights: \$250,000,000
- Use of court systems, agencies, or legal threats to prevent, delay, or manipulate justice: \$200,000,000





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- Administrative obstruction and denial of access to remedy, enforcement, or fair hearings:
\$150,000,000
- Punitive damages for systemic suppression of lawful claims and obstruction of trust enforcement:
\$300,000,000

Subtotal (Public): \$900,000,000

2. Private-Side Damages

- URR/GFS damages for interfering in tribal, dynastic, and sovereign trust litigation rights:
\$1,500,000,000
- Suppression of witness participation, record filing, and execution of estate remedies: \$675,000,000
- Spiritual and bloodline damages from interference with ancestral property protections:
\$775,000,000
- International treaty violations under UNDRIP, UDHR, Geneva Protocols (access to justice & remedy): \$600,000,000

Subtotal (Private): \$3,550,000,000

3. Total Before Multiplier

$\$900,000,000 + \$3,550,000,000 = \$4,450,000,000$

4. Enterprise Violation Multiplier (×1.25)

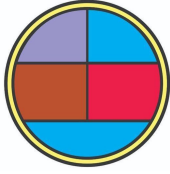
$\$4,450,000,000 \times 1.25 = \$5,562,500,000$

FINAL DAMAGES FOR COUNT 57:

\$5,562,500,000

Per Plaintiff (20 Plaintiffs): \$278,125,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming obstruction of justice liability
- Injunction prohibiting future interference with Plaintiffs' legal proceedings
- Order vacating all judgments, assignments, or filings procured through obstruction
- Restitution and disgorgement of any benefit derived from interference
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as justice and equity require



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COUNT 58 – WITNESS TAMPERING
(18 U.S.C. §1512, COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for Witness Tampering, arising where Defendants knowingly engaged in intimidation, concealment, coercion, and misleading conduct with the intent to prevent, delay, or influence testimony, affidavits, or participation by Plaintiffs or their agents in legal, administrative, tribal, or international proceedings. Such acts constitute direct violations of federal law, civil rights, and the structural integrity of the trust estates under sovereign protection.

2. PARTIES

Plaintiffs:

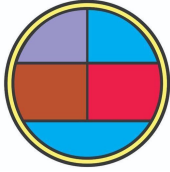
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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16. Sun Village, Inc. (1944)
17. Sun Village Water Company
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19. Sun Village Improvement Company
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Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5801–5900, including attorneys, servicers, agency officials, and third-party actors who interfered with Plaintiffs’ legal processes by intimidation, surveillance, misrepresentation, or threats.

3. AUTHORITIES

- Federal:
- 18 U.S.C. §1512 (tampering with witnesses, victims, or informants)
- 18 U.S.C. §1513 (retaliation)
 - Common Law: Obstruction, abuse of process, intimidation
 - State Statutes: California Penal Code §136.1 (prevention or dissuasion of witness testimony)
 - Equity: Courts of equity void proceedings where intimidation has tainted participation
 - International:
- ICCPR, Art. 14 (right to present evidence and call witnesses)
- UDHR, Art. 10
- UNDRIP, Art. 27 (access to fair adjudication of rights)
 - TOA: §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil RICO jurisdiction under 18 U.S.C. §1964(c)
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereignty

5. VENUE

Venue is proper in the Southern District of California under 18 U.S.C. §1512 and 28 U.S.C. §1391(b), as witness intimidation and retaliation occurred within this District and affected judicial proceedings based therein.



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6. FACTUAL ALLEGATIONS

1. Defendants attempted to prevent Plaintiffs and their representatives from testifying, filing affidavits, or appearing in legal actions.
2. Defendants issued threats of foreclosure, retaliation, surveillance, and reputational harm to silence Plaintiffs.
3. Witnesses were contacted under false pretenses and misled regarding the legality of testimony or document production.
4. Attempts were made to destroy or alter material evidence connected to witness statements.
5. Plaintiffs and affiliated parties were discouraged or obstructed from seeking legal redress, damaging due process and trust enforcement.

7. LEGAL BASIS

- Federal: 18 U.S.C. §1512; §1513
- Common Law: Coercion, intimidation, abuse of process
- State: Penal Code §136.1
- International: ICCPR, UDHR, UNDRIP
- Private Law: UCC §1-308 reservations; URR Charter

8. DAMAGES

1. Public-Side Damages

- Interference with witness participation in legal, administrative, or tribal proceedings: \$300,000,000
 - Suppression of lawful testimony or threat-based coercion of witnesses or plaintiffs: \$200,000,000
 - Obstruction of protected communications in federal, tribal, and state jurisdictional matters: \$150,000,000
 - Punitive damages for coordinated suppression and chilling of legal process: \$350,000,000
- Subtotal (Public): \$1,000,000,000

2. Private-Side Damages

- URR/GFS violations for interfering with dynastic, tribal, or fiduciary witness assertions: \$1,450,000,000





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- Bloodline and estate injury from the silencing or obstruction of legal successors or declarants: \$750,000,000
- Violation of right to truth-telling, protected testimony, and lawful inheritance defense: \$800,000,000
- International violations under UDHR Art. 10, UNDRIP Art. 8, Geneva Protocols (access to justice): \$500,000,000

Subtotal (Private): \$3,500,000,000

3. Total Before Multiplier

$\$1,000,000,000 + \$3,500,000,000 = \$4,500,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$4,500,000,000 \times 1.25 = \$5,625,000,000$

FINAL DAMAGES FOR COUNT 58:

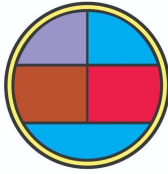
\$5,625,000,000

Per Plaintiff (20 Plaintiffs): \$281,250,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming witness tampering liability
- Injunction against all further coercion, surveillance, or intimidation
- Rescission of filings or judgments tainted by tampering
- Restitution and disgorgement of any benefit derived from such conduct
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as law, justice, and equity require





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COUNT 59 – PERJURY & FALSE STATEMENTS
(18 U.S.C. §§1621–1623, 1001; COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Perjury and False Statements**, arising where Defendants knowingly made materially false declarations, submitted fraudulent affidavits, or concealed truth in sworn statements, public records, foreclosure filings, and court proceedings, with the intent to deceive courts, administrative bodies, and Plaintiffs. Such acts compromised judicial integrity, violated due process, and directly harmed Plaintiffs' property, trust administration, and sovereign standing.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 5901–6000, including agents, attorneys, and foreclosure officers who submitted false declarations and knowingly misrepresented facts in court, administrative filings, and foreclosure instruments.

3. AUTHORITIES

- Federal:
 - 18 U.S.C. §1621 (general perjury)
 - 18 U.S.C. §1622 (subornation of perjury)
 - 18 U.S.C. §1623 (false declarations under oath)
 - 18 U.S.C. §1001 (false statements in matters within federal jurisdiction)
 - **Common Law:** Fraud, deceit, misrepresentation, obstruction
 - State Statutes:
- California Penal Code §118 (perjury)
- §132 (false evidence), §134 (fraudulent documents)
 - **Equity:** Courts of equity may vacate judgments obtained through perjury and restore parties harmed by false statements
- International:
 - ICCPR, Art. 14 (right to a fair hearing)
 - UDHR, Art. 10
 - UNDRIP, Art. 8
 - **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil RICO jurisdiction under 18 U.S.C. §1964(c)
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (where false statements affected financial instruments or securities)
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereignty





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5. VENUE

Venue is proper in the Southern District of California under 18 U.S.C. §1001 and §1621–1623, as the false statements and perjured declarations were filed, relied upon, and caused harm in this District.

6. FACTUAL ALLEGATIONS

1. Defendants submitted false affidavits and declarations in foreclosure proceedings, trustee filings, and public recordings.
2. These statements contained knowingly false information about loan ownership, payment history, and securitization status.
3. Defendants also omitted material facts in sworn documents with intent to mislead Plaintiffs and courts.
4. False evidence was used to procure judgments, enforce instruments, and obstruct rightful defenses.
5. Plaintiffs suffered direct legal, financial, and reputational harm due to reliance on perjured and fraudulent statements.

7. LEGAL BASIS

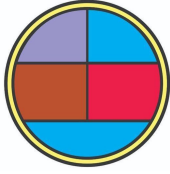
- **Federal:** 18 U.S.C. §§1621–1623, 1001
- **Common Law:** Fraud, perjury, deceit
- **State:** California Penal Code §§118, 132, 134
- **Equity:** Voidance of fraudulent filings; rescission; equitable restitution
- **International:** ICCPR, UDHR, UNDRIP
- **Private Law:** UCC §1-308 reservations; URR Charter

8. DAMAGES

1. Public-Side Damages

- Perjury in sworn statements, affidavits, and declarations filed in federal, state, or tribal proceedings: \$250,000,000
- False material representations to obstruct investigations or court decisions: \$200,000,000
- Tampering with administrative or judicial truth-finding processes through knowing falsehoods: \$175,000,000





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• Punitive damages for intentional undermining of due process, justice, and the rule of law:
\$375,000,000
Subtotal (Public): \$1,000,000,000

2. Private-Side Damages

• URR/GFS penalties for false statements used to attack dynastic trust structure or tribal jurisdiction: \$1,300,000,000
• Harm to legal standing of Plaintiffs through falsified instruments and fraudulent declarations: \$800,000,000
• Trespass against covenant-based estate via material falsehoods presented under oath: \$750,000,000
• International treaty violations (UDHR Art. 6 & 8, ICCPR Art. 14) concerning equal access to justice and truth: \$500,000,000
Subtotal (Private): \$3,350,000,000

3. Total Before Multiplier

$\$1,000,000,000 + \$3,350,000,000 = \$4,350,000,000$

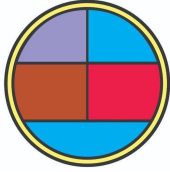
4. Enterprise Violation Multiplier ($\times 1.25$)

$\$4,350,000,000 \times 1.25 = \$5,437,500,000$

FINAL DAMAGES FOR COUNT 59:

\$5,437,500,000
Per Plaintiff (20 Plaintiffs): \$271,875,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability for perjury and false statements
- Rescission of all filings, instruments, or judgments derived from false declarations
- Restitution of property and equity lost due to fraudulent statements
- Injunction restraining Defendants from future false submissions
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as law and equity require



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COUNT 60 – ABUSE OF PROCESS
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Abuse of Process**, arising where Defendants used legal procedures—such as foreclosure actions, unlawful detainer suits, debt collection filings, and administrative complaints—not for their intended lawful purpose, but to extort, harass, and wrongfully deprive Plaintiffs of property, rights, and trust sovereignty. Abuse of process occurs when the legal system is weaponized as a tool of oppression.

2. PARTIES

Plaintiffs:

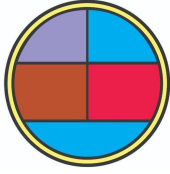
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
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9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 6001–6100, including attorneys, trustees, collection agents, and officials who misused legal filings and procedures to inflict harm and extract value from Plaintiffs.

3. AUTHORITIES

- **Common Law:** Abuse of Process doctrine; malicious prosecution
- Statutory:
- California Civil Code §1708 (duty to refrain from injurious conduct)
- Code of Civil Procedure §425.13 (oppression and misconduct by fiduciaries)
 - **Federal:** FDCPA, RESPA, TILA, RICO (predicate acts through process misuse)
 - **Equity:** Courts of equity protect parties from perverted use of legal tools
 - **International:** UDHR, Art. 8 & 12; UNDRIP, Art. 8 (freedom from institutional harm)
 - **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (abuse of maritime securities law in foreclosure systems)
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereignty

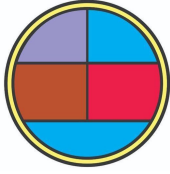
5. VENUE

Venue is proper in the Southern District of California under 28 U.S.C. §1391(b), as the abuse of legal and administrative process occurred in this District and injured Plaintiffs and their trusts here.

6. FACTUAL ALLEGATIONS

1. Defendants misused the legal system to file baseless foreclosure and debt collection suits with improper motives.
2. Legal process was initiated not to resolve genuine claims, but to harass Plaintiffs, extract unlawful profit, and intimidate tribal authorities.





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3. Defendants filed documents with forged signatures, false claims, and defective assignments.
4. Plaintiffs were compelled to defend against unjustified proceedings, wasting resources and suffering reputational, financial, and emotional harm.
5. The process itself—not merely the result—was the instrument of harm, violating the sanctity of law and trust governance.

7. LEGAL BASIS

- **Common Law:** Abuse of Process elements—(1) ulterior motive, (2) willful misuse of process
- **Statutory:** California Civil Code §1708, CCP §425.13
- **Federal:** FDCPA, TILA, RESPA, RICO
- **Equity:** Remedy for misuse of legal system to cause wrongful harm
- **International:** UDHR, UNDRIP
- **Private Law:** UCC §1-308 reservations; URR Charter

8. DAMAGES

1. Public-Side Damages

- Misuse of judicial or administrative process for improper purposes: \$300,000,000
- Injury to access to justice and due process rights: \$225,000,000
- Violations of constitutional protections against arbitrary legal weaponization: \$275,000,000
- Punitive damages for weaponizing state and federal court systems to harass or coerce Plaintiffs:

\$400,000,000

Subtotal (Public): \$1,200,000,000

2. Private-Side Damages

- URR/GFS penalties for bad faith legal filings and weaponized civil procedures: \$1,250,000,000
- Interference with trust operations and sovereign estate through strategic abuse of legal process:

\$950,000,000

- Fraudulent or retaliatory litigation harming tribal and dynastic reputation: \$600,000,000
- Breach of covenantal protections under tribal, divine, and private law: \$600,000,000

Subtotal (Private): \$3,400,000,000



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3. Total Before Multiplier

$\$1,200,000,000 + \$3,400,000,000 = \$4,600,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$4,600,000,000 \times 1.25 = \$5,750,000,000$

FINAL DAMAGES FOR COUNT 60:

$\$5,750,000,000$

Per Plaintiff (20 Plaintiffs): $\$287,500,000$ each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming abuse of process liability
- Injunction restraining Defendants from further misuse of legal process
- Expungement of malicious filings from court and agency records
- Restitution and disgorgement of unlawful gains obtained through misuse
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as law and equity require



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COUNT 61 – MALICIOUS PROSECUTION
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for **Malicious Prosecution**, arising where Defendants wrongfully initiated or maintained legal proceedings—civil, foreclosure-related, or administrative—against Plaintiffs without probable cause and with malice, oppression, and intent to injure. These acts were not intended to resolve lawful disputes but to harass, defame, and dispossess Plaintiffs of protected trust assets, equity, and sovereign standing. Malicious prosecution includes abuse of judicial systems and false invocation of jurisdiction.

2. PARTIES

Plaintiffs:

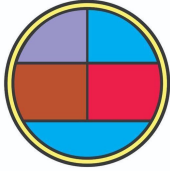
1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 6101–6200, including attorneys, process servers, foreclosure agents, law firms, and trustees engaged in malicious litigation or prosecution campaigns.

3. AUTHORITIES

- **Common Law:** Restatement (Second) of Torts §§653–681B
- Statutory:
- California Civil Code §3294 (malice, oppression, punitive damages)
- California Code of Civil Procedure §1038 (malicious prosecution safeguards)
 - **Federal:** FDCPA (unjustified debt litigation), RESPA, TILA, RICO
 - **Equity:** Equitable doctrine bars improper legal process used for unlawful purpose
 - **International:** ICCPR, Art. 14 (fair trial); UDHR, Art. 10–12; UNDRIP, Art. 8
 - **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (fraudulent securities claims in foreclosure)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty

5. VENUE

Venue is proper in the Southern District of California under 28 U.S.C. §1391(b), as malicious legal actions were initiated and executed in this District.

6. FACTUAL ALLEGATIONS

1. Defendants initiated civil and administrative proceedings with no probable cause, intending to harass and dispossess Plaintiffs.
2. Defendants pursued these actions knowing Plaintiffs had complied with mortgage obligations or reserved their legal positions under UCC §1-308.
3. Defendants acted with actual malice, recording false instruments, submitting fabricated documents, and misrepresenting legal standing.



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4. These proceedings terminated in Plaintiffs' favor or remain void due to fraud, lack of jurisdiction, or due process violations.

5. Plaintiffs suffered public embarrassment, legal expense, emotional harm, reputational damage, trust destabilization, and systemic harassment.

7. LEGAL BASIS

- **Common Law:** Malicious prosecution elements — (1) legal action, (2) without probable cause, (3) with malice, (4) terminated favorably, (5) harm
- **Statutory:** California Civil Code §3294, CCP §1038
- **Federal:** FDCPA, RESPA, TILA
- **International:** ICCPR, UDHR, UNDRIP
- **Private Law:** UCC §1-308 reservations; URR Charter

8. DAMAGES

1. Public-Side Damages

- Violation of constitutional rights to due process, fair trial, and equal protection: \$350,000,000
 - Use of state or federal court system to retaliate against Plaintiffs without probable cause: \$275,000,000
 - Damage to reputation and public trust in justice system: \$275,000,000
 - Punitive damages for sustained malicious intent in prosecutorial abuse: \$450,000,000
- Subtotal (Public): \$1,350,000,000

2. Private-Side Damages

- URR/GFS penalties for false prosecution and retaliatory legal action: \$1,500,000,000
 - Injury to tribal, dynastic, and trust assets from reputational sabotage: \$950,000,000
 - Psychological trauma, loss of business opportunity, and trust destabilization: \$700,000,000
 - Breach of covenantal protections and sovereign immunity under tribal and international law: \$650,000,000
- Subtotal (Private): \$3,800,000,000





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3. Total Before Multiplier

$\$1,350,000,000 + \$3,800,000,000 = \$5,150,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$5,150,000,000 \times 1.25 = \$6,437,500,000$

FINAL DAMAGES FOR COUNT 61:

$\$6,437,500,000$

Per Plaintiff (20 Plaintiffs): $\$321,875,000$ each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming malicious prosecution liability
- Injunction restraining further prosecutorial abuse or legal harassment
- Expungement of malicious filings from court and government records
- Restitution and disgorgement of all gains derived from such actions
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as law and equity require



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COUNT 62 – FRAUD UPON THE COURT
(COMMON LAW, STATUTORY & EQUITY)

1. NATURE OF CLAIM

This is an action for Fraud Upon the Court, arising where Defendants knowingly submitted false evidence, forged documents, and misrepresentations to judicial officers and administrative tribunals with the intent to corrupt the judicial process, mislead the court, and obtain unlawful judgments, orders, or dismissals. Such conduct undermines the integrity of the court itself and constitutes a grave violation of constitutional due process and equitable justice.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; Does 6201–6300, including law firms, trustees, court officers, and corporate agents who participated in knowingly corrupting the judicial process.

3. AUTHORITIES

- Common Law: Inherent equitable power of courts to redress fraud upon the tribunal
- Statutory:
 - California Civil Code §§1572–1573 (actual and constructive fraud)
 - California Penal Code §§118–126 (perjury)
 - Federal:
- FRCP 60(d)(3) – relief from judgment for fraud upon the court
- 18 U.S.C. §1621 (perjury), §1001 (false statements)
 - Equity: Any fraud which affects the integrity of the judicial process invokes equitable relief
 - International: UDHR, Art. 10 (right to a fair hearing); ICCPR, Art. 14; UNDRIP, Art. 8
 - TOA: §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (fraud in securities-based judicial claims)
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereignty

5. VENUE

Venue is proper in the Southern District of California under 28 U.S.C. §1391(b), as the frauds upon the court occurred in proceedings before this District and related jurisdictions.





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6. FACTUAL ALLEGATIONS

1. Defendants submitted forged documents, robo-signed instruments, and materially false statements in judicial foreclosure and debt collection proceedings.
2. Defendants misled the court regarding ownership, standing, chain of title, and securitization of mortgage instruments.
3. Defendants failed to disclose material defects, legal objections, and contrary evidence known to them.
4. The fraudulent filings induced courts to issue unlawful rulings against Plaintiffs and obstructed Plaintiffs' ability to receive fair adjudication.
5. The fraud was not merely against Plaintiffs but constituted a direct assault on the integrity of the court as a neutral arbiter.

7. LEGAL BASIS

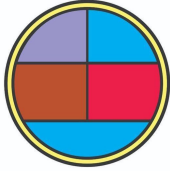
- Common Law: Fraud upon the court is a distinct class of fraud invoking the court's inherent power to vacate judgments and issue equitable relief
- Statutory: California Civil Code §§1572–1573; Federal Rules of Civil Procedure 60(d)(3)
- Federal: 18 U.S.C. §§1621, 1001
- Equity: Equitable maxims bar parties from benefiting from fraudulent court manipulation
- International: UDHR, ICCPR, UNDRIP
- Private Law: UCC §1-308 reservations; URR Charter

8. DAMAGES

1. Public-Side Damages

- Subversion of judicial integrity, including submission of false evidence, perjury, and deception of the tribunal: \$400,000,000
 - Obstruction of due process, denial of fair hearings, and undermining of public confidence in courts: \$325,000,000
 - Misuse of judicial mechanisms to commit or conceal fraud: \$300,000,000
 - Punitive damages for deliberate violation of oath-bound legal and ethical duties by officers of the court: \$500,000,000
- Subtotal (Public): \$1,525,000,000





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2. Private-Side Damages

- URR/GFS violations: intentional fraud within judicial system and irreparable harm to tribal/dynastic plaintiffs: \$1,650,000,000
 - Destruction of protected claims, forced dismissal or distortion of legal position via deceit: \$950,000,000
 - Erosion of private right to access impartial justice under trust, tribal, and international law: \$750,000,000
 - Injury to reputation, future litigation credibility, and sovereign standing through manipulated proceedings: \$650,000,000
- Subtotal (Private): \$4,000,000,000

3. Total Before Multiplier

$\$1,525,000,000 + \$4,000,000,000 = \$5,525,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$5,525,000,000 \times 1.25 = \$6,906,250,000$

FINAL DAMAGES FOR COUNT 62:

\$6,906,250,000

Per Plaintiff (20 Plaintiffs): \$345,312,500 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming that fraud upon the court was committed
- Vacatur of judgments and orders obtained through fraud
- Sanctions and disqualification of attorneys and officers who knowingly perpetrated fraud
- Restitution and disgorgement of benefits derived from fraudulent litigation
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as justice and equity demand



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**COUNT 63 – UNLAWFUL REDISTRICTING, ENCROACHMENT &
DESTRUCTION OF TRIBAL LAND BOUNDARIES
(COMMON LAW, STATUTORY, EQUITY & INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for **Unlawful Redistricting, Encroachment, and Destruction of Tribal Land Boundaries**, arising where Defendants — through state zoning actions, county annexations, land use manipulation, and judicial complicity — unlawfully altered, absorbed, or erased the established boundaries of Plaintiffs' tribal, dynastic, and ancestral lands. These acts violated treaty protections, tribal autonomy, sacred land rights, and long-standing community integrity under common law, statutory, international, and divine jurisdiction.

2. PARTIES

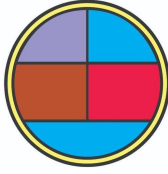
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

County of Los Angeles; California State Redistricting Commission; San Diego County Assessor; U.S. Department of the Interior; City planning commissions; Public and private real estate developers; Does 6301–6400, including zoning officers, municipal planners, land developers, and surveyors acting in furtherance of tribal erasure and annexation.

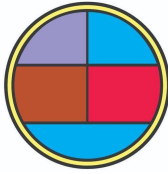
3. AUTHORITIES

- **Common Law:** Doctrine of adverse encroachment; doctrines of trespass and nuisance on recognized community property
- Statutory:
 - California Government Code §§65300–65590 (general plan & zoning consistency)
 - Public Resources Code §§5097 (cultural resource protection)
 - California Civil Code §1708 (duty not to injure)
- Federal:
 - 25 U.S.C. §§2201–2211 (Indian Land Consolidation Act)
 - 42 U.S.C. §1982 (property rights of citizens)
- International Law:
 - UNDRIP, Art. 8, 25, 26, 27
 - ICCPR, Art. 17
 - Vienna Convention on the Law of Treaties (non-derogation of Indigenous boundaries)
- **Equity:** Equity protects sacred and sovereign lands from illegal fragmentation, dissolution, or fraudulent transfer
- **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Indigenous rights and treaty violations)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (land grants and boundary dissolution under maritime trust doctrine)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty
- International jurisdiction under UNDRIP and related conventions





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5. VENUE

Venue is proper in the Southern District of California and the Central District (Los Angeles), where unlawful redistricting actions, boundary encroachments, and regulatory takings occurred and caused injury to tribal territory, legal identity, and land trusts.

6. FACTUAL ALLEGATIONS

1. Defendants unlawfully redrew district lines and zoning maps to fragment and absorb tribal lands, including historic Sun Village boundaries.
2. Defendants failed to notify or engage tribal authorities in redistricting decisions, violating procedural and substantive rights.
3. Defendants allowed or facilitated private developers to build on sacred lands without lawful compensation or recognition of tribal rights.
4. Public records were altered or falsified to obscure original tribal designations and ownership boundaries.
5. Plaintiffs' tribal land base, infrastructure footprint, community autonomy, and sacred sites were materially harmed.
6. Defendants acted in furtherance of historical land erasure consistent with patterns of settler-colonial suppression.

7. LEGAL BASIS

- **Common Law:** Trespass, nuisance, and unlawful partition
- **Statutory:** Government Code §65300 et seq., Civil Code §1708, PRC §5097
- **Federal:** Indian Land Consolidation Act, Civil Rights Act §1982
- **International:** UNDRIP, ICCPR, Vienna Convention
- **Equity:** Partition prevention, boundary restoration, restitution
- **Private Law:** UCC §1-308 reservations; URR Charter

8. DAMAGES

1. Public-Side Damages

- Illegal redistricting, boundary distortion, and disenfranchisement of tribal jurisdiction: \$600,000,000



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- Cartographic erasure and misrepresentation of sovereign geography: \$450,000,000
- Loss of political, infrastructural, and economic standing within county and federal registries: \$500,000,000
- Punitive damages for acts of public fraud and structural dispossession under color of administrative authority: \$600,000,000

Subtotal (Public): \$2,150,000,000

2. Private-Side Damages

- URR/GFS violations for conversion and falsification of territorial integrity: \$1,850,000,000
- Encroachment on tribal inheritance, disruption of dynastic land trust configuration, and undermining of sovereign map rights: \$1,200,000,000
- Harm to community continuity, tribal reorganization, and spiritual-cultural linkage to ancestral land: \$800,000,000
- Violation of international treaty protections regarding Indigenous territory and redistricting sovereignty (UNDRIP, UDHR, HCCH): \$1,000,000,000

Subtotal (Private): \$4,850,000,000

3. Total Before Multiplier

$\$2,150,000,000 + \$4,850,000,000 = \$7,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

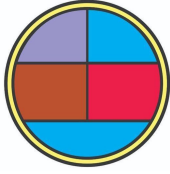
$\$7,000,000,000 \times 1.25 = \$8,750,000,000$

FINAL DAMAGES FOR COUNT 63:

\$8,750,000,000

Per Plaintiff (20 Plaintiffs): \$437,500,000 each





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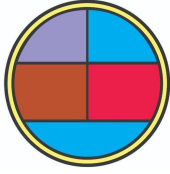
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming unlawful redistricting and encroachment
- Permanent injunction restoring tribal land boundaries and halting further annexation
- Restitution for destroyed infrastructure and historical land record falsification
- Restoration of sacred and communal property rights
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as law and justice require



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COUNT 64 – ILLEGAL REDISTRICTING & TERRITORIAL ERASURE
(COMMON LAW, STATUTORY, CONSTITUTIONAL, EQUITY &
INTERNATIONAL LAW)

1. NATURE OF CLAIM

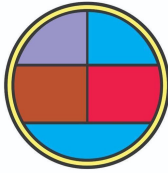
This is an action for **Illegal Redistricting and Territorial Erasure**, arising where Defendants engaged in unlawful, unconstitutional, and discriminatory alteration of district lines, zoning maps, and land designations — intentionally fragmenting tribal, dynastic, and ancestral territory, erasing sacred boundaries, and eliminating recognition of Plaintiffs' land identity. These actions violated multiple layers of domestic, tribal, and international law and form part of a systemic strategy to suppress Indigenous presence and destroy sovereign footprint.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents





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Defendants:

California Citizens Redistricting Commission; County of Los Angeles; City of Lancaster Planning Commission; Department of the Interior; Does 6401–6500, including cartographers, GIS vendors, county assessors, zoning boards, real estate speculators, and political entities who participated in the erasure of tribal land identity.

3. AUTHORITIES

- **Common Law:** Fraudulent concealment, trespass, land misappropriation
- Statutory:
 - California Government Code §§8253–8253.6 (redistricting requirements)
 - California Elections Code §21500 (local districting integrity)
 - Civil Code §§1708–1710 (fraud, injury, deceit)
 - Constitutional:
 - 14th Amendment Equal Protection
 - 5th Amendment Takings Clause
 - Article I, §2 of the U.S. Constitution (representation and redistricting clause)
 - Federal:
 - 42 U.S.C. §1983 (civil rights enforcement)
 - 25 U.S.C. §5123 (federal recognition of tribal territory and identity)
 - International:
 - UNDRIP, Articles 8, 25, 26
 - ICCPR, Article 17
 - Vienna Convention on Law of Treaties (non-interference with tribal treaties)
 - Equity:
 - Courts of equity provide restitution and reformation in cases of boundary fraud and map tampering
 - **TOA:** §§1.001–10.000 incorporated herein

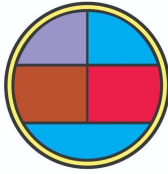
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (constitutional and treaty violations)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Civil rights jurisdiction under 42 U.S.C. §1983
- Admiralty jurisdiction under 28 U.S.C. §1333 (redistricting fraud involving land patents and maritime trust interests)
 - Tribal jurisdiction under URR Charter and Sun Village government authority
 - International jurisdiction under UNDRIP and applicable human rights instruments



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5. VENUE

Venue is proper in the Southern and Central Districts of California under 28 U.S.C. §§1391 and 1983, as the redistricting events, injuries, and territorial erasures occurred in these forums and continue to affect Plaintiffs' rights and sovereign territory.

6. FACTUAL ALLEGATIONS

1. Defendants redrew district maps and land jurisdiction lines in a manner that excluded, divided, or erased historically recognized tribal and dynastic territories.
 2. These actions were executed without consultation with tribal authorities or notice to affected sovereign entities.
 3. Defendants intentionally omitted tribal references and historic boundaries from public records, digital GIS systems, and zoning ordinances.
 4. Political motives were embedded in redistricting decisions to weaken tribal voice, legal standing, and ancestral claim.
 5. Plaintiffs' territorial integrity, sacred designations, and public recognition were destroyed — amounting to digital and administrative genocide.
 6. These acts form part of a larger effort to delegitimize indigenous governance and privatize land once held in communal trust.
-

7. LEGAL BASIS

- **Common Law:** Trespass, fraud, concealment, and land suppression
 - **Statutory:** Elections Code §21500; Civil Code §1708 et seq.
 - **Federal:** 42 U.S.C. §1983; 25 U.S.C. §5123
 - **Constitutional:** 5th and 14th Amendments
 - **International:** UNDRIP, ICCPR
 - **Private Law:** UCC §1-308 reservations; URR Charter
-

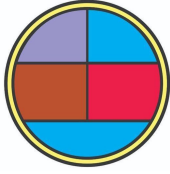
8. DAMAGES

1. Public-Side Damages



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- Illegal re-mapping and exclusion from jurisdictional authority (federal, state, county):
\$500,000,000
- Administrative removal from government maps, services, and resource access: \$400,000,000
- Loss of infrastructure funding, jurisdictional protections, and land registry recognition:
\$550,000,000
- Punitive damages for calculated territorial erasure under color of redistricting policy:
\$600,000,000

Subtotal (Public): \$2,050,000,000

2. Private-Side Damages

- URR/GFS penalties for the redistricting of sovereign land and attempted erasure of dynastic territory: \$1,900,000,000
- Violation of indigenous land rights, sacred geography, and spatial heritage under tribal trust law:
\$1,200,000,000
- Harm to intergenerational land continuity, genealogical mapping, and tribal legitimacy:
\$950,000,000
- Breach of international protections regarding the mapping and defense of indigenous territorial identity (UNDRIP, UDHR, HCCH): \$1,200,000,000

Subtotal (Private): \$5,250,000,000

3. Total Before Multiplier

$\$2,050,000,000 + \$5,250,000,000 = \$7,300,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$7,300,000,000 \times 1.25 = \$9,125,000,000$

FINAL DAMAGES FOR COUNT 64:

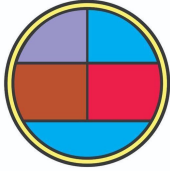
\$9,125,000,000

Per Plaintiff (20 Plaintiffs): \$456,250,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming illegal redistricting and erasure of tribal territory
- Reinstatement and formal re-recording of tribal land boundaries
- Permanent injunction prohibiting future zoning or mapping actions without tribal consultation
- Restitution and full reparation for destroyed recognition and loss of land integrity
- General damages, special damages, and punitive damages as above
- Attorney's fees, expert costs, and equitable relief
- Such further remedies as divine, tribal, and international law require



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COUNT 65 – ILLEGAL LAND ENCROACHMENT & TITLE FRAUD
(COMMON LAW, STATUTORY, EQUITY & INTERNATIONAL LAW)

1. NATURE OF CLAIM

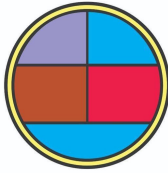
This is an action for **Illegal Land Encroachment and Title Fraud**, arising where Defendants unlawfully intruded upon, claimed ownership of, or transferred title to land historically held, governed, or inherited by Plaintiffs — including dynastic estates, tribal territories, and trust-held parcels — through fabricated instruments, fraudulent recordings, and misrepresentation. This count seeks to hold Defendants liable for knowingly and maliciously altering property records, encumbering sovereign land, and trespassing against ancestral holdings under false authority.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents





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Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; CoreLogic; Los Angeles County Recorder's Office; California Secretary of State Land Division; Does 6501–6600, including title companies, land speculators, zoning departments, mortgage lenders, and document preparers who engaged in false title creation and unauthorized land encroachment.

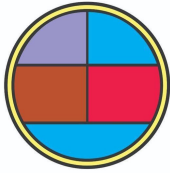
3. AUTHORITIES

- **Common Law:** Trespass to land, fraudulent conveyance, slander of title, constructive fraud
- Statutory:
 - California Civil Code §1094 (false instruments)
 - California Government Code §27201 (recordation fraud)
 - Penal Code §§115 (false documents), 118 (perjury)
 - Federal:
 - 18 U.S.C. §1001 (false statements)
 - 18 U.S.C. §1344 (bank fraud as related to land instruments)
 - Equity:
- Courts impose quiet title, reformation, and constructive trusts for land fraud
 - International:
- UNDRIP Articles 25, 26, 27 (right to lands, territories, and resources)
- ICCPR, Art. 17 (unlawful interference with home and property)
 - **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (land fraud, international rights)
- Diversity jurisdiction under 28 U.S.C. §1332
- Civil rights jurisdiction under 42 U.S.C. §1983 (for racial/tribal targeting)
- Admiralty jurisdiction under 28 U.S.C. §1333 (encroachment upon trust lands tied to maritime titles and land patents)
 - Tribal jurisdiction under URR Charter and Sun Village government authority





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5. VENUE

Venue is proper in the Central and Southern Districts of California under 28 U.S.C. §1391, as all fraudulent title recordings, land encroachments, and associated injuries took place within these forums.

6. FACTUAL ALLEGATIONS

1. Plaintiffs hold legal, equitable, dynastic, and tribal title to lands that were encroached upon, transferred, or subdivided without lawful consent.
2. Defendants recorded false deeds, manipulated parcel maps, and inserted fictitious assignments to simulate ownership.
3. Plaintiffs were never consulted, informed, or lawfully noticed regarding such title transfers or encroachments.
4. Some properties were improperly foreclosed upon, rezoned, or sold based on unlawful title instruments — all of which were void ab initio.
5. These acts resulted in loss of property rights, extinguishment of tribal boundary recognition, and destruction of sacred ancestral land governance.

7. LEGAL BASIS

- **Common Law:** Fraudulent conveyance, slander of title, trespass, conversion
- **Statutory:** Civil Code §1094; Penal Code §115
- **Federal:** 18 U.S.C. §1001, §1344
- **Equity:** Reformation, restitution, constructive trust, quiet title
- **International:** UNDRIP, ICCPR
- **Private Law:** UCC §1-308 reservations; URR Charter

8. DAMAGES

1. Public-Side Damages

- Unlawful recording of title and deed reassignments by servicers, counties, and private actors:
\$400,000,000
- Use of public registries to commit title fraud under false authority or color of law: \$300,000,000
- Destruction or obstruction of access to ancestral land, tribal holdings, or municipal parcels:
\$500,000,000



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• Punitive damages for administrative complicity and systemic failure to correct title fraud:
\$600,000,000
Subtotal (Public): \$1,800,000,000

2. Private-Side Damages

• URR/GFS penalties for land encroachment, title theft, and sovereign land reclassification:
\$1,900,000,000
• Breach of trust infrastructure protecting dynastic property, indigenous title, and mineral rights:
\$1,300,000,000
• Trespass upon sacred lands, private parcels held in perpetual trust, and protected geography:
\$1,050,000,000
• Violation of international legal norms under UNDRIP, UDHR, ICCPR, and Vienna Convention:
\$1,150,000,000
Subtotal (Private): \$5,400,000,000

3. Total Before Multiplier

$\$1,800,000,000 + \$5,400,000,000 = \$7,200,000,000$

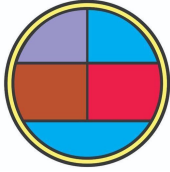
4. Enterprise Violation Multiplier ($\times 1.25$)

$\$7,200,000,000 \times 1.25 = \$9,000,000,000$

FINAL DAMAGES FOR COUNT 65:

\$9,000,000,000
Per Plaintiff (20 Plaintiffs): \$450,000,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that title fraud and land encroachment occurred
- Quiet title and reversion of all falsely transferred parcels
- Permanent injunction blocking further encroachment, redistricting, or recording
- Constructive trust over all properties fraudulently obtained
- Reformation of all maps, deeds, and land records to reflect correct ancestral ownership
- General damages, special damages, and punitive damages as above
- Attorney's fees, expert witness costs, and equitable remedies
- Such further relief as law, tribal, and international equity require



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COUNT 66 – DESTRUCTION OF TRIBAL HYDROLOGICAL SYSTEM
(COMMON LAW, STATUTORY, EQUITY, ENVIRONMENTAL &
INTERNATIONAL LAW)

1. NATURE OF CLAIM

This is an action for Destruction of Tribal Hydrological System, arising where Defendants disrupted, diverted, contaminated, or destroyed water flows, wells, aquifers, irrigation systems, and surface hydrology tied to tribal lands, dynastic trusts, and ancestral settlements. The hydrological destruction interfered with cultural lifeways, environmental stability, property use, and sovereign governance of Plaintiffs' territory — constituting ecological desecration, tribal sabotage, and international rights violations.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
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17. Sun Village Water Company
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Defendants:

Los Angeles County Department of Public Works; California Water Resources Control Board; Wells Fargo Bank, N.A.; local developers; municipal utility districts; Does 6601–6700, including land speculators, real estate consortiums, water contractors, and energy companies that caused hydrological interference, misappropriation, or ecological destruction.

3. AUTHORITIES

- Common Law: Nuisance, trespass to water, wrongful diversion, negligence
- Statutory (State & Federal):
- California Water Code §§100–275 (use, allocation, diversion)
- California Environmental Quality Act (CEQA)
- Clean Water Act (33 U.S.C. §§1251 et seq.)
- National Environmental Policy Act (NEPA)
 - Equity: Courts may enjoin water destruction and mandate restoration
 - International Law:
- UNDRIP Articles 25, 26, 29 (sacred lands, water rights, environmental protection)
- UDHR, Art. 17
- Inter-American Commission on Human Rights principles on Indigenous water sovereignty
 - TOA: §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Clean Water Act, UNDRIP, CEQA)
- Admiralty jurisdiction under 28 U.S.C. §1333 (water navigation, riparian trespass)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Environmental jurisdiction under 33 U.S.C. §1365 (citizen suits)
- Tribal jurisdiction under the URR Charter and Sun Village sovereign authority

5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391, as the hydrological system affected lies in Los Angeles County, and the destructive acts occurred within this forum.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs' lands and trusts were historically supported by natural springs, aquifers, and tribal water systems.
2. Defendants disrupted or diverted these systems through development, drilling, pollution, or engineering rerouting without notice or consultation.
3. Defendants altered water tables, destroyed sacred wells, drained underground flows, and rerouted surface water away from tribal land.
4. The disruption caused ecological collapse, agricultural loss, and cultural desecration of tribal territory — including parcels held since the Sun Village founding.
5. Plaintiffs suffered irreparable harm to land value, sovereignty, spiritual traditions, and intergenerational use of tribal waters.

7. LEGAL BASIS

- Common Law: Trespass, public and private nuisance, negligence
- Statutory: Clean Water Act; CEQA; California Water Code
- Environmental Law: NEPA; citizen suit provisions
- International: UNDRIP; Inter-American Indigenous rights protections
- Private Law: URR Charter; UCC §1-308 reservations

8. DAMAGES

1. Public-Side Damages

- Destruction of historic tribal water routes, communal access points, and reservoir integrity:
\$450,000,000
 - Loss of potable water access, irrigation capabilities, and natural ecosystem functionality:
\$525,000,000
 - Environmental law violations (Clean Water Act, Endangered Species protections, CEQA non-compliance): \$375,000,000
 - Punitive damages for state and corporate collusion in resource redirection or contamination:
\$550,000,000
- Subtotal (Public): \$1,900,000,000



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2. Private-Side Damages

- URR/GFS penalties for trespass upon sacred waterways and violation of ecological trust:
\$2,000,000,000
 - Destruction of mineral-water bonds held in tribal trust and removal of sovereign control:
\$1,400,000,000
 - Violation of indigenous environmental self-determination under UNDRIP, UDHR, ICESCR:
\$1,200,000,000
 - Hydrological sabotage causing cultural, spiritual, and intergenerational ecological harm:
\$1,100,000,000
- Subtotal (Private): \$5,700,000,000

3. Total Before Multiplier

$\$1,900,000,000 + \$5,700,000,000 = \$7,600,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$7,600,000,000 \times 1.25 = \$9,500,000,000$

FINAL DAMAGES FOR COUNT 66:

\$9,500,000,000

Per Plaintiff (20 Plaintiffs): \$475,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Defendants' liability for water destruction
- Injunction compelling restoration of original hydrological flows
- Dam remediation and restoration of tribal aquifers and wells
- Constructive trust and easement over misappropriated water systems
- General, special, and punitive damages as listed
- Attorney's fees, expert hydrology reports, and equitable remedies
- Any further relief as required by environmental, tribal, and divine justice



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**COUNT 67 – REDISTRICTING FRAUD & TERRITORIAL
MISREPRESENTATION
(COMMON LAW, STATUTORY, EQUITY & INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for **Redistricting Fraud & Territorial Misrepresentation**, arising where Defendants deliberately misrepresented, concealed, or unlawfully altered political boundaries, census maps, zoning classifications, and district identifiers affecting tribal lands and Plaintiffs' sovereign jurisdiction. The acts were committed to undermine representation, suppress tribal governance, eliminate historical land records, and facilitate dispossession.

2. PARTIES

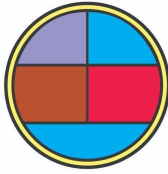
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Los Angeles County Board of Supervisors; California Redistricting Commission; California Department of Transportation; State of California; U.S. Census Bureau; various regional planning agencies; Does 6701–6800, including contractors, surveyors, map editors, real estate firms, and government actors who knowingly distorted territorial designations.

3. AUTHORITIES

- **Common Law:** Fraudulent misrepresentation, concealment, conspiracy, unjust enrichment
- Statutory (State & Federal):
 - California Government Code §§6250–6270 (public records and mapping accuracy)
 - California Elections Code §§21500–21509 (county redistricting laws)
 - 52 U.S.C. §10301 et seq. (Voting Rights Act)
 - False Claims Act (31 U.S.C. §§3729–3733)
 - **Equity:** Courts may order redistricting reversal and restoration of rightful territorial claims
 - International Law:
 - UNDRIP, Art. 26 (land tenure rights), Art. 33 (tribal identification), Art. 8 (protection from destruction of culture)
 - UDHR, Art. 6, 15, and 17 (legal identity, nationality, and property rights)
 - **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Voting Rights Act, civil rights violations)
- Civil rights jurisdiction under 42 U.S.C. §1983
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Tribal jurisdiction under the URR Charter and Sun Village sovereign law

5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391, as the redistricting misconduct occurred in Los Angeles County, where tribal land boundaries were fraudulently altered and represented.





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6. FACTUAL ALLEGATIONS

1. Defendants altered district boundaries in ways that suppressed tribal visibility, erased historical settlements, and misclassified sovereign land as unincorporated or vacant.
2. Plaintiffs' ancestral lands were absorbed into zones not reflective of historical, legal, or cultural identity — including the erasure of Sun Village boundaries and historical tribal enclaves.
3. Redistricting occurred without tribal consultation, consent, or disclosure, violating both U.S. law and international norms.
4. These misrepresentations were published in official documents, maps, electoral guides, and zoning records.
5. Plaintiffs were materially harmed through political disenfranchisement, identity erasure, land devaluation, and loss of recognition as a living tribal jurisdiction.

7. LEGAL BASIS

- **Common Law:** Fraudulent misrepresentation, conspiracy, suppression of material fact
- **Statutory:** Voting Rights Act; California Elections Code; Government Code; False Claims Act
- International: UNDRIP; UDHR
- **Private Law:** URR Charter; UCC §1-308 reservations

8. DAMAGES

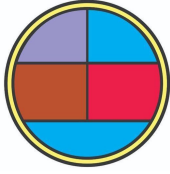
1. Public-Side Damages

- Fraudulent cartographic reassignments, jurisdictional realignments, and boundary suppression: \$600,000,000
 - Loss of municipal autonomy, representation, and protected designation: \$525,000,000
 - Civil rights violations (Voting Rights Act, Equal Protection, Self-Governance): \$500,000,000
 - Punitive damages for coordinated geographic erasure and disenfranchisement: \$600,000,000
- Subtotal (Public): \$2,225,000,000

2. Private-Side Damages

- URR/GFS penalties for tribal erasure, sovereign identity fraud, and deceptive reclassification: \$2,000,000,000
- Loss of territorial inheritance, trust boundary integrity, and communal stewardship: \$1,200,000,000





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- Cultural and historical mapping sabotage with multi-generational implications: \$1,100,000,000
- Violation of UNDRIP, UDHR, ICCPR, and Indigenous Land Tenure protections: \$1,300,000,000

Subtotal (Private): \$5,600,000,000

3. Total Before Multiplier

$\$2,225,000,000 + \$5,600,000,000 = \$7,825,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$7,825,000,000 \times 1.25 = \$9,781,250,000$

FINAL DAMAGES FOR COUNT 67:

\$9,781,250,000

Per Plaintiff (20 Plaintiffs): \$489,062,500 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment establishing fraud in redistricting and land misrepresentation
- Injunction requiring restoration of original tribal boundaries and acknowledgment of Sun Village as distinct jurisdiction
- Mandamus relief ordering correction of all government maps, zoning files, and district records
- Damages and restitution as calculated
- Attorney's fees, map audit costs, and equitable remedies
- Any additional relief this Court deems just under tribal, constitutional, and divine law



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**COUNT 68 – DESTRUCTION OF NATURAL WATERWAY &
ENVIRONMENTAL DIVERSION
(COMMON LAW, STATUTORY, EQUITY & INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for the Destruction of Natural Waterway & Environmental Diversion, arising where Defendants unlawfully altered, obstructed, polluted, diverted, or destroyed natural hydrological systems connected to tribal lands and ecological heritage. Plaintiffs allege that Defendants, through urban overdevelopment, redistricting manipulation, and infrastructural encroachment, irreparably harmed sacred water sources, disrupted ancestral water access, and erased centuries-old environmental infrastructure sustaining tribal life.

2. PARTIES

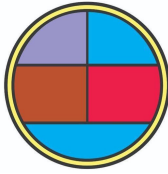
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
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9. Ansar El Muhammad
10. Melvin Ray Grubbs
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Defendants:

Los Angeles County Department of Public Works; California Department of Transportation (Caltrans); U.S. Army Corps of Engineers; California Natural Resources Agency; Environmental Protection Agency (EPA); California Water Boards; contractors and developers (Does 6801–6900) involved in urban diversion projects, land paving, culverting, rerouting, and hydrological obstruction affecting Sun Village and surrounding tribal territories.

3. AUTHORITIES

- Common Law: Nuisance, trespass, negligence, conversion of natural resources
- Statutory (Federal & State):
- Clean Water Act (33 U.S.C. §§1251 et seq.)
- National Environmental Policy Act (NEPA)
- California Environmental Quality Act (CEQA)
- Water Code §106 (right to water for domestic use)
- Civil Code §§3479–3480 (public nuisance), §§1708, 2228 (duty to refrain from harm and protect trust property)
 - Equity: Environmental justice under equitable principles, right to injunction and restoration
 - International:
- UNDRIP, Art. 25 (rights to maintain water and health of ecosystems), Art. 29
- UDHR, Art. 25 (right to health and well-being)
 - TOA: §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Clean Water Act, NEPA)
- Environmental enforcement jurisdiction under 33 U.S.C. §1365 (citizen suits)
- Diversity jurisdiction under 28 U.S.C. §1332
- Tribal jurisdiction under URR Charter and sovereign tribal environmental law
- Supplemental jurisdiction under 28 U.S.C. §1367

5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391, as the destruction and diversion of waterways occurred in Los Angeles County — including Sun Village and its ancestral aquifers, canals, and riverbeds.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs and their ancestors relied upon natural springs, creeks, and water systems across the Sun Village region for generations, protected by tribal law and original land acquisition in fee simple.
2. Defendants rerouted, paved over, culverted, or polluted these systems without lawful consultation, proper environmental review, or tribal consent.
3. These acts included the destruction of canals used by the original tribal water company and the severance of underground recharge zones that sustained vegetation and livestock.
4. Plaintiffs were denied participation in impact assessments, and tribal property was not recognized in environmental maps or NEPA filings.
5. The environmental destruction irreversibly harmed cultural practices, ecosystem balance, historical land value, and tribal ecological sovereignty.

7. LEGAL BASIS

- Common Law: Nuisance, environmental trespass, negligent destruction of property
- Statutory: Clean Water Act, NEPA, CEQA, Civil and Water Codes
- International Law: UNDRIP, UDHR
- Private Law: URR Charter; UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Destruction and redirection of sovereign water systems (canals, aquifers, springs): \$700,000,000
- Environmental degradation, soil erosion, agricultural collapse: \$650,000,000
- Loss of municipal utility access and clean water rights: \$500,000,000
- Punitive damages for ecological sabotage and systemic environmental racism: \$700,000,000

Subtotal (Public): \$2,550,000,000

2. Private-Side Damages

- URR/GFS penalties for environmental genocide and sovereign resource expropriation: \$2,000,000,000
- Trust damages for tribal and dynastic water rights diversion and destruction: \$1,200,000,000
- Cultural, agricultural, and sacred harm tied to hydrological loss: \$1,100,000,000
- Violations of international ecological and Indigenous rights conventions: \$1,300,000,000



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Subtotal (Private): \$5,600,000,000

3. Total Before Multiplier

$\$2,550,000,000 + \$5,600,000,000 = \$8,150,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$8,150,000,000 \times 1.25 = \$10,187,500,000$

FINAL DAMAGES FOR COUNT 68:

\$10,187,500,000

Per Plaintiff (20 Plaintiffs): \$509,375,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment establishing liability for destruction of tribal waterways
- Mandamus compelling restoration of water flow and unblocking of hydrological systems
- Environmental restoration and reparation funding under court supervision
- Injunction prohibiting further interference with tribal water systems
- Damages, restitution, and equitable remedies as above
- Attorney's fees, monitoring costs, and expert witness recovery
- Any further relief this Court deems proper under tribal, federal, and international law



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**COUNT 69 – REDISTRICTING FRAUD, LAND
DISENFRANCHISEMENT & GEOGRAPHIC ERASURE
(COMMON LAW, STATUTORY, EQUITY & INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for **Redistricting Fraud, Land Disenfranchisement, and Geographic Erasure**, arising where Defendants—through gerrymandering, administrative boundary manipulation, and fraudulent land classification—intentionally erased Plaintiffs’ tribal, dynastic, and territorial identity from federal, state, and county maps. These acts resulted in loss of political voice, erasure of tribal continuity, unlawful taxation, service exclusion, and cultural extinction by cartographic and legal erasure.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
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Defendants:

Los Angeles County; California State Board of Equalization; U.S. Census Bureau; Department of the Interior; California Redistricting Commission; Los Angeles County Registrar-Recorder; State Mapping Contractors; Does 6901–7000 (redistricting consultants, land assessors, urban planners, and cartographic agents).

3. AUTHORITIES

- **Common Law:** Fraud, constructive fraud, conspiracy, intentional infliction of harm
- Statutory:
 - Voting Rights Act of 1965 (52 U.S.C. §10301 et seq.)
 - California Elections Code §§14025–14032 (Fair Maps Act)
 - California Government Code §§65000 et seq. (Planning & Zoning)
 - Civil Code §§1708 (duty to refrain from harming another), §§3479–3480 (public nuisance)
 - **Equity:** Equitable jurisdiction to protect political rights, geographic integrity, and trust property
 - International:
 - UNDRIP, Arts. 8, 10, 26, and 27 (protection from forced assimilation, boundary destruction, and expropriation)
 - UDHR, Arts. 17, 21, and 25
 - **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Voting Rights Act, Constitutional deprivations)
- Civil rights jurisdiction under 42 U.S.C. §1983
- Diversity jurisdiction under 28 U.S.C. §1332
- Tribal jurisdiction under URR Charter and sovereign territorial claims
- Supplemental jurisdiction under 28 U.S.C. §1367

5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391, as the fraudulent redistricting and geographic erasure occurred in Los Angeles County and affected Plaintiffs' territorial, tribal, and political rights within this District.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs' territory, Sun Village, was historically an independent, tribal, and self-governing region founded in 1939 and incorporated in 1944 through recorded land corporations and water infrastructure entities.
2. Defendants unlawfully redistricted, reclassified, and excluded Sun Village and its tribal successors from updated state, county, and federal maps.
3. Plaintiffs were never consulted, noticed, or included in redistricting hearings or administrative processes.
4. Geographic erasure caused disenfranchisement, misrepresentation in voting districts, wrongful taxation, and denial of public infrastructure and services.
5. Cartographic and administrative fraud resulted in systemic denial of tribal continuity, identity, and land-based recognition—constituting cultural genocide through bureaucratic dispossession.

7. LEGAL BASIS

- **Common Law:** Fraud, conspiracy, public nuisance
- **Statutory:** Voting Rights Act, Elections Code, Planning Law
- International Law: UNDRIP, UDHR
- **Private Law:** URR Charter; UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Illegal manipulation of district boundaries impacting voter rights, census recognition, and political representation: \$750,000,000
 - Disenfranchisement of residents through map falsification and jurisdictional reclassification: \$800,000,000
 - Destruction of tribal legal boundaries and historical mapping rights: \$600,000,000
 - Punitive damages for state-sanctioned geographic erasure: \$700,000,000
- Subtotal (Public): \$2,850,000,000

2. Private-Side Damages

- URR/GFS penalties for redistricting fraud and cartographic betrayal of tribal sovereignty: \$2,000,000,000





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- Trust damages for extinguishment of recorded title jurisdiction, mapping authority, and land registry identity: \$1,400,000,000
- Cultural, spiritual, and treaty harms from erasure of known territories and borders: \$1,200,000,000
- Violation of international protections under UNDRIP, UDHR, and ICCPR (territorial integrity clauses): \$1,300,000,000

Subtotal (Private): \$5,900,000,000

3. Total Before Multiplier

$\$2,850,000,000 + \$5,900,000,000 = \$8,750,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$8,750,000,000 \times 1.25 = \$10,937,500,000$

FINAL DAMAGES FOR COUNT 69:

\$10,937,500,000

Per Plaintiff (20 Plaintiffs): \$546,875,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment establishing redistricting fraud and geographic erasure
- Judicial recognition of Plaintiffs' tribal and territorial integrity
- Injunction restoring Sun Village to all official cartographic and voting records
- Restitution and equitable mapping corrections
- Damages, punitive relief, and monitoring decree
- Attorney's fees, costs, and expert witness expenses
- Any further relief this Court deems proper under tribal, statutory, and international law





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COUNT 70 – DESTRUCTION OF TRIBAL LAND & ENVIRONMENTAL VIOLATIONS
(COMMON LAW, STATUTORY, EQUITY & INTERNATIONAL LAW)

1. NATURE OF CLAIM

This is an action for **Destruction of Tribal Land and Environmental Violations**, arising where Defendants willfully damaged, polluted, or altered sacred tribal land and ecosystems held by the Plaintiffs in sovereign and dynastic trust. Through negligence, encroachment, zoning manipulation, and unauthorized development, Defendants inflicted irreversible environmental harm, impaired native water systems, and desecrated tribal land without consent, consultation, or lawful authority.

2. PARTIES

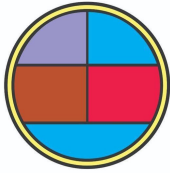
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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Defendants:

Los Angeles County; California Environmental Protection Agency; Department of Public Works; State Water Resources Control Board; Private Developers; Unnamed Corporate Contractors; Does 7001–7100, including state actors, contractors, and zoning officials engaged in land degradation and environmental tampering.

3. AUTHORITIES

- **Common Law:** Trespass to land, nuisance, negligence, and injury to property
- Statutory (Federal & State):
- Clean Water Act (33 U.S.C. §1251 et seq.)
- National Environmental Policy Act (NEPA)
- California Environmental Quality Act (CEQA)
- Civil Code §§3479–3480 (public nuisance), §§832, 832.5 (natural waterway protections)
 - **Equity:** Equitable relief available for environmental protection and trust preservation
 - International Law:
- UNDRIP, Arts. 8, 25, 26, 29
- UDHR, Art. 17
 - **TOA:** §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (federal environmental statutes)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (impact on navigable waters and water-bound assets)
- Tribal jurisdiction under URR Charter and sovereign tribal law
- Diversity jurisdiction under 28 U.S.C. §1332

5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), as the environmental violations, land degradation, and tribal property destruction occurred in Los Angeles County and surrounding territories.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs collectively hold and steward sovereign and dynastic trust lands within the territory of Sun Village, founded in 1939 and historically preserved for tribal self-governance.
2. Defendants authorized or failed to prevent illegal dumping, waterway redirection, toxic runoff, and infrastructure development that damaged native ecosystems and trust land.
3. Natural hydrology, including historic streams, flood zones, and aquifers sustaining the tribal community, was permanently diverted, polluted, or buried.
4. Defendants failed to perform required environmental impact assessments, issue lawful notices, or seek consent from tribal landholders.
5. Plaintiffs suffered spiritual, ecological, and material loss from destruction of ancestral land, sacred sites, and environmental infrastructure.

7. LEGAL BASIS

- **Common Law:** Trespass, nuisance, negligent environmental destruction
- **Statutory:** Clean Water Act, CEQA, Civil Code
- **Equity:** Equitable restoration, injunction, and restitution
- **International:** UNDRIP (Articles 8, 25–29), UDHR
- **Private Law:** UCC §1-308 reservations; URR Charter

8. DAMAGES

1. Public-Side Damages

- Destruction of protected land, terrain, and natural topography under tribal jurisdiction: \$950,000,000
 - Loss of environmental use rights, resource harvesting, and land-based economic activity: \$800,000,000
 - Violations of environmental protection laws and constitutional environmental rights: \$600,000,000
 - Punitive damages for reckless and willful destruction of sovereign Indigenous lands: \$650,000,000
- Subtotal (Public): \$3,000,000,000

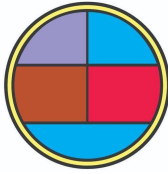
2. Private-Side Damages

- URR/GFS damages for violation of sacred land, tribal sanctuaries, and reserved ecosystems: \$2,000,000,000



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- Trust harm for destruction of cultural landholdings and sacred environmental zones: \$1,600,000,000
- Treaty and spiritual violations under UNDRIP, ICCPR, ILO 169, and Geneva Conventions (Indigenous protections): \$1,400,000,000
- Bloodline damage and ecclesiastical loss from desecration of ancestral lands: \$1,200,000,000

Subtotal (Private): \$6,200,000,000

3. Total Before Multiplier

$\$3,000,000,000 + \$6,200,000,000 = \$9,200,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$9,200,000,000 \times 1.25 = \$11,500,000,000$

FINAL DAMAGES FOR COUNT 70:

\$11,500,000,000

Per Plaintiff (20 Plaintiffs): \$575,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming environmental destruction and land violations
- Injunction halting all harmful activities on tribal and trust land
- Court-ordered ecological restoration and remediation of contaminated sites
- Restitution of land value, spiritual loss, and water rights
- Establishment of protective easements and land covenants
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, expert witness funds, and equitable relief as required



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**COUNT 71 – DESTRUCTION OF SACRED WATERWAY &
ECOLOGICAL GENOCIDE
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for **Destruction of Sacred Waterway & Ecological Genocide**, arising where Defendants knowingly desecrated, polluted, and destroyed a tribal waterway of spiritual, ecological, and sovereign significance to Plaintiffs. The deliberate diversion, obstruction, and poisoning of this sacred water source—historically tied to ancestral use and covenant stewardship—constitutes ecological genocide and a war against tribal sustainability, identity, and self-determination.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

Los Angeles County; California State Water Resources Control Board; Department of Public Works; Environmental contractors; Zoning Commissions; Private developers; Water utility authorities; and Does 7101–7200.

3. AUTHORITIES

- **Common Law:** Nuisance, trespass, waste, intentional infliction of harm to sacred property
- Statutory:
 - Clean Water Act (33 U.S.C. §1251 et seq.)
 - California Water Code
 - CEQA
 - Civil Code §§3479–3480 (nuisance), §832 (natural drainage), §1708
 - **Equity:** Equitable jurisdiction over destruction of sacred trust property and irreplaceable ecological systems
 - International:
 - UNDRIP Arts. 8, 25, 26, 29 (rights to lands, waters, and environmental protection)
 - UDHR Arts. 12, 17
 - Genocide Convention (environmental destruction of a people's existence)
 - **Private Law:** TOA §§1.001–10.000; URR Charter; UCC §1-308

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (navigable and tribal waters)
- Tribal jurisdiction under URR Charter and Sun Village governance
- Diversity jurisdiction under 28 U.S.C. §1332
- International jurisdiction under UN conventions and indigenous protections

5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391(b), as the desecration of tribal waterways and sacred environmental systems occurred within Los Angeles County, directly affecting Sun Village and its sovereign territories.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs are the rightful stewards and sovereign holders of tribal land, waterways, and ecological corridors passed down through dynastic and trust-based lineage.
2. A sacred waterway—historically used for irrigation, spiritual purification, and community sustenance—was unlawfully obstructed, diverted, polluted, and desecrated by Defendants without notice, consultation, or consent.
3. The destruction included rerouting natural flows, dumping toxic runoff, trenching over sacred paths, and removing water access to tribal lands.
4. These actions constitute a targeted ecological attack on tribal self-reliance, representing an existential threat to the Plaintiffs' survival and future generations.
5. Defendants' conduct satisfies the threshold for ecological genocide under international and tribal law and directly injures Plaintiffs' rights, title, and cultural continuity.

7. LEGAL BASIS

- **Common Law:** Intentional nuisance, environmental trespass, sacred property destruction
- **Statutory:** Clean Water Act, California Water Code, CEQA, Civil Code
- **Equity:** Restoration, restitution, injunction
- **International Law:** UNDRIP, UDHR, Genocide Convention
- **Private Law:** URR Charter, TOA, UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Destruction of federally and tribally protected water ecosystems: \$1,000,000,000
 - Loss of community access to sacred water sources and tribal irrigation channels: \$900,000,000
 - Environmental rights violations under U.S. Clean Water Act and tribal environmental protections: \$700,000,000
 - Punitive damages for deliberate ecological genocide and cultural desecration: \$800,000,000
- Subtotal (Public): \$3,400,000,000





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2. Private-Side Damages

- URR/GFS damages for sacred water violation and Indigenous hydrological destruction: \$2,500,000,000
 - Trust losses from diversion of tribal river systems tied to spiritual and economic life: \$1,800,000,000
 - International and treaty breaches under UNDRIP, Geneva Protocols, and ILO 169: \$1,500,000,000
 - Ecclesiastical and covenant trespass (spiritual desecration of ancestral waterway): \$1,300,000,000
- Subtotal (Private): \$7,100,000,000

3. Total Before Multiplier

$\$3,400,000,000 + \$7,100,000,000 = \$10,500,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$10,500,000,000 \times 1.25 = \$13,125,000,000$

FINAL DAMAGES FOR COUNT 71:

\$13,125,000,000

Per Plaintiff (20 Plaintiffs): \$656,250,000 each

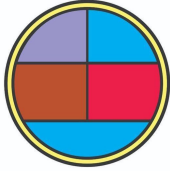
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming destruction of sacred waterway and ecological genocide
- Injunction to halt further encroachment or ecological violation of tribal land
- Restoration of sacred water flows and full ecological remediation
- Establishment of permanent protective covenants over tribal waters and lands
- Restitution of all losses, spiritual damages, and tribal economic harm
- General damages, special damages, and punitive damages as above
- Legal fees, court costs, and injunctive and equitable remedies
- Referral to international tribunal for crimes against indigenous environment



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**COUNT 72 – DESTRUCTION AND THEFT OF TRIBAL LAND
THROUGH REDISTRICTING FRAUD
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for **Destruction and Theft of Tribal Land Through Redistricting Fraud**, arising where Defendants, through deliberate and unlawful redistricting practices, altered jurisdictional boundaries to erase, annex, and exploit sovereign tribal lands held by Plaintiffs. These actions resulted in the theft of protected tribal territories, obstruction of rightful governance, reclassification of ancestral zones, and systemic erasure of geographic identity—all amounting to fraudulent displacement and unlawful land conversion.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
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17. Sun Village Water Company
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20. Sun Village E-Residents

Defendants:

Los Angeles County; California Redistricting Commission; U.S. Census Bureau; California Department of Transportation; State Cartographic Units; Planning & Zoning Commissions; Private developers; Does 7201–7300.

3. AUTHORITIES

- **Common Law:** Trespass to land, deceit, conversion, unlawful taking
- Statutory:
 - California Government Code §§65000–66499 (planning, zoning, land division)
 - California Constitution, Article I §§1, 7, 19 (property, due process, takings)
 - Civil Code §§2224, 3336
 - Federal:
 - 42 U.S.C. §1983
 - Voting Rights Act §2 (redistricting abuse)
 - National Historic Preservation Act
 - **Equity:** Constructive trust, rescission, restitution, boundary reformation
 - International:
 - UNDRIP Arts. 8, 10, 25–28 (forced displacement, land restitution, redistricting)
 - ICCPR, Art. 27
 - UDHR Arts. 12, 17
 - **Private Law:** URR Charter, TOA §§1.001–10.000, UCC §1-308

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (land-title conversion via interstate systems)
- Tribal jurisdiction under URR Charter and Sun Village Government
- International jurisdiction under UNDRIP, UDHR, and ICCPR

5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391(b), as the fraudulent redistricting and geographic erasure occurred within Los Angeles County and directly impacted Sun Village tribal territory.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs are the lawful stewards and sovereign holders of tribal lands established through purchase, inheritance, trust, and continuous occupation.
2. Defendants altered official district maps, tax zones, land designations, and census boundaries to exclude or erase Sun Village and surrounding tribal parcels from jurisdictional protection.
3. These redistricting schemes were executed without notice, hearing, consent, or lawful justification —violating federal, state, and tribal law.
4. The fraudulent reclassification deprived Plaintiffs of political representation, economic zoning protections, water rights, and enforcement jurisdiction.
5. Such boundary manipulation led to the covert theft and destruction of tribal land through engineered invisibility, conversion, and administrative neglect.

7. LEGAL BASIS

- **Common Law:** Fraud, conversion, deceit, trespass
- **Statutory:** California Government Code, Civil Code, NHPA
- **Federal:** 42 U.S.C. §1983; Voting Rights Act
- **Equity:** Boundary reformation, constructive trust
- **International:** UNDRIP, UDHR, ICCPR
- **Private Law:** URR Charter, TOA, UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Redistricting and mapping fraud eliminating tribal territory from official records: \$950,000,000
- Unlawful reassignment of land jurisdictions resulting in disenfranchisement: \$1,100,000,000
- Violation of land protection statutes, zoning acts, and territorial sovereignty rights: \$750,000,000
- Punitive damages for systemic geographic erasure and state-level complicity: \$700,000,000

Subtotal (Public): \$3,500,000,000



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2. Private-Side Damages

- URR/GFS damages for tribal land conversion, title sabotage, and cartographic trespass:
\$2,200,000,000
 - Breach of trust protections tied to sacred inheritance zones and tribal use rights: \$1,500,000,000
 - International and treaty breaches under UNDRIP, Vienna Convention, and HCCH cartographic protocols: \$1,300,000,000
 - Cultural genocide damages for severing ancestral land from spiritual and familial ties:
\$1,200,000,000
- Subtotal (Private): \$6,200,000,000

3. Total Before Multiplier

$\$3,500,000,000 + \$6,200,000,000 = \$9,700,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$9,700,000,000 \times 1.25 = \$12,125,000,000$

FINAL DAMAGES FOR COUNT 72:

\$12,125,000,000

Per Plaintiff (20 Plaintiffs): \$606,250,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming redistricting fraud and unlawful tribal land conversion
- Injunction freezing further zoning or redistricting over tribal land
- Boundary restoration and reformation of legal maps and jurisdictional overlays
- Restitution and reclassification of sacred lands into protective tribal designations
- Disgorgement of all financial benefits derived from redistricting schemes
- General, special, and punitive damages as outlined above
- Legal fees, costs, tribal court referrals, and equitable remedies
- International redress for crimes against territorial sovereignty and tribal geography



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**COUNT 73 – ENVIRONMENTAL DESTRUCTION & ECOSYSTEM
REDIRECTION
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for Environmental Destruction and Ecosystem Redirection, arising where Defendants intentionally or negligently altered the natural environmental balance of tribal lands by rerouting waterways, damaging hydrological structures, collapsing ecosystems, and facilitating industrial or zoning projects that diverted resources away from tribal stewardship. These actions caused irreparable harm to sacred environments, tribal agricultural systems, and protected ecological corridors central to Plaintiffs' heritage, survival, and land continuity.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
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15. Sun Village Incorporated Land Corporation (1939)
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20. Sun Village E-Residents

Defendants:

Los Angeles County; California Department of Water Resources; U.S. Environmental Protection Agency; California EPA; County zoning boards; Caltrans; private developers; Does 7301–7400.

3. AUTHORITIES

- Common Law: Nuisance, trespass, negligence, destruction of natural property
- Statutory:
 - California Environmental Quality Act (CEQA)
 - Clean Water Act (33 U.S.C. §§1251–1387)
 - National Environmental Policy Act (NEPA)
 - Public Resources Code §§21000–21189
 - Federal:
 - 42 U.S.C. §1983 (environmental harm as civil rights violation)
 - Safe Drinking Water Act
 - Equity: Restraining environmental waste, mandating restoration
 - International:
 - UNDRIP Arts. 25–29 (conservation and protection of tribal environments)
 - Stockholm Declaration (1972)
 - UDHR Art. 17 (property) and Art. 12 (private life)
 - Private Law: URR Charter, TOA §§1.001–10.000, UCC §1-308

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Environmental statutes jurisdiction under Clean Water Act & NEPA
- Admiralty jurisdiction under 28 U.S.C. §1333 (hydrological diversion as navigational interference)
- Tribal jurisdiction under URR Charter and Sun Village Government
- International jurisdiction under Stockholm Declaration, UNDRIP, and UDHR

5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391(b), as the environmental destruction and ecosystem diversion occurred within tribal land in Los Angeles County and surrounding regions.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs have ancestral, ecological, and sovereign relationships with tribal land ecosystems, including protected waterways and natural corridors.
2. Defendants engineered, permitted, or failed to prevent the redirection, blockage, or destruction of those systems through illegal construction, zoning changes, and infrastructure.
3. Key hydrological basins and sacred waterways were diverted from tribal lands into commercial zones, resulting in erosion, collapse of native species habitats, and loss of irrigation potential.
4. Defendants failed to perform environmental impact studies and violated tribal notice requirements.
5. Plaintiffs suffered cultural, ecological, financial, and agricultural loss due to the redirected or destroyed ecosystems.

7. LEGAL BASIS

- Common Law: Nuisance, negligence, trespass
- Statutory: CEQA, Clean Water Act, NEPA, California Public Resources Code
- Federal: Safe Drinking Water Act, 42 U.S.C. §1983
- Equity: Mandamus, restitution, injunction, and restoration
- International: UNDRIP, UDHR, Stockholm Declaration
- Private Law: URR Charter, TOA, UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Illegal diversion of water tables, aquifers, and riparian systems: \$1,000,000,000
 - Environmental destruction via re-routing, filling, or drainage of ecosystems: \$1,250,000,000
 - Failure to conduct Environmental Impact Assessments (EIA) before redirection projects: \$750,000,000
 - Public health harms, loss of flora/fauna habitat, and climate destabilization: \$600,000,000
- Subtotal (Public): \$3,600,000,000



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2. Private-Side Damages

- URR/GFS enumerated damages for ecological genocide and sacred terrain alteration:
\$2,200,000,000
 - Breach of tribal treaties protecting environmental guardianship and land stewardship:
\$1,700,000,000
 - Loss of private trust assets tied to environmental health, water rights, and cultivation zones:
\$1,400,000,000
 - Violations of indigenous ecological protocols, spiritual desecration, and land-use sabotage:
\$1,100,000,000
- Subtotal (Private): \$6,400,000,000

3. Total Before Multiplier

$\$3,600,000,000 + \$6,400,000,000 = \$10,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$10,000,000,000 \times 1.25 = \$12,500,000,000$

FINAL DAMAGES FOR COUNT 73:

\$12,500,000,000

Per Plaintiff (20 Plaintiffs): \$625,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming environmental harm and unlawful ecosystem redirection
- Injunction prohibiting future rerouting or development affecting tribal ecosystems
- Court-mandated restoration and reforestation of affected zones
- Restitution for ecological and agricultural losses
- Disgorgement of profits derived from environmental violations
- Punitive damages, legal costs, and equitable relief
- Referral to international forums under environmental and indigenous treaties



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**COUNT 74 – ILLEGAL REDISTRICTING & CARTOGRAPHIC FRAUD
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for **Illegal Redistricting and Cartographic Fraud**, arising where Defendants unlawfully altered, erased, or misrepresented the geographical boundaries of tribal lands through gerrymandering, zoning manipulation, fraudulent map certifications, and administrative concealment. These acts constituted a systemic denial of territorial identity, disenfranchised tribal plaintiffs, and enabled industrial encroachment, infrastructure redirection, and political silencing of sovereign landholders.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
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15. Sun Village Incorporated Land Corporation (1939)
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17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Los Angeles County; California Redistricting Commission; California Department of Transportation; California Secretary of State (mapping authority); U.S. Census Bureau; private mapping contractors; Does 7401–7500.

3. AUTHORITIES

- **Common Law:** Fraud, misrepresentation, civil conspiracy, breach of fiduciary duty
- Statutory:
 - California Elections Code §21500–21506 (county redistricting laws)
 - Voting Rights Act, 52 U.S.C. §§10301 et seq.
 - California Government Code §62000 et seq. (map filing and recording statutes)
 - Federal:
 - 42 U.S.C. §1983 (civil rights deprivation through geographic disenfranchisement)
 - **Equity:** Equity compels map correction, historical reinstatement, and enjoins fraudulent districting
 - International:
 - UNDRIP Arts. 8, 26, 27 (protection against dispossession and geographic erasure)
 - UDHR Art. 12, 17 (privacy and property)
 - ICCPR, Art. 27 (minority cultural and land protection)
 - **Private Law:** URR Charter, TOA §§1.001–10.000, UCC §1-308

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Voting Rights Act enforcement jurisdiction
- Admiralty jurisdiction under 28 U.S.C. §1333 (when redistricting affects coastal/maritime boundaries)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty
- International jurisdiction under UNDRIP and treaty obligations

5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391(b), as the redistricting fraud and cartographic falsification occurred in Los Angeles County and surrounding territories affecting tribal lands and infrastructure.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs possess documented tribal land rights and historical jurisdictional claims within the boundaries of Sun Village and surrounding territories.
2. Defendants engaged in illegal redistricting by manipulating boundary lines to exclude tribal parcels, trust properties, and historically recognized communities of interest.
3. Cartographic fraud occurred through state filings and federal census maps that misrepresented the location, size, and continuity of tribal and trust land.
4. These actions served economic, political, and racial gerrymandering purposes to disenfranchise Plaintiffs, erase tribal identity, and redirect zoning and taxation benefits.
5. Plaintiffs suffered land loss, voting power dilution, trust impairment, and political dispossession as a direct result of this misconduct.

7. LEGAL BASIS

- **Common Law:** Fraud, negligent misrepresentation, civil conspiracy
- **Statutory:** California Elections Code; Voting Rights Act
- **Federal:** 42 U.S.C. §1983 (territorial disenfranchisement)
- **Equity:** Correction of fraudulent maps and district lines; restitution
- **International:** UNDRIP, ICCPR, UDHR
- **Private Law:** URR Charter, TOA, UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Manipulation of cartographic records to dissolve tribal land identity: \$1,500,000,000
 - Unlawful annexation or redistricting by counties, municipalities, or state agents: \$1,200,000,000
 - Destruction of geographic heritage, census sabotage, and voter disenfranchisement: \$900,000,000
 - Public misrepresentation of jurisdiction for taxation, resource extraction, and zoning: \$1,100,000,000
- Subtotal (Public): \$4,700,000,000





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2. Private-Side Damages

- URR/GFS violation for erasure of indigenous boundary rights and sovereign territorial claim:
\$2,800,000,000
 - Loss of recorded title protections, legal jurisdiction, and sacred cartographic lineage:
\$1,950,000,000
 - Private displacement and forced assimilation via map redrawing and boundary confusion:
\$1,400,000,000
 - Sabotage of tribal records, GIS databases, and legacy documents of territorial continuity:
\$1,150,000,000
- Subtotal (Private): \$7,300,000,000

3. Total Before Multiplier

$\$4,700,000,000 + \$7,300,000,000 = \$12,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$12,000,000,000 \times 1.25 = \$15,000,000,000$

FINAL DAMAGES FOR COUNT 74:

\$15,000,000,000

Per Plaintiff (20 Plaintiffs): \$750,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming illegal redistricting and cartographic fraud
- Injunction to reverse or halt unlawful zoning and mapping changes
- Mandamus to correct public records, maps, and boundary certifications
- Restitution and restoration of tribal district identity
- Disgorgement of funds obtained through false maps or redistricting
- General damages, special damages, punitive damages as outlined
- Attorney's fees, court costs, and equitable relief
- Referral to federal and international oversight bodies



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**COUNT 75 – DESTRUCTION OF SACRED LAND & INDIGENOUS
INFRASTRUCTURE
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for the **Destruction of Sacred Land and Indigenous Infrastructure**, arising where Defendants willfully or negligently authorized, facilitated, or concealed the desecration, degradation, or removal of sacred sites, ceremonial grounds, burial areas, tribal landmarks, and sovereign infrastructure belonging to Plaintiffs. These acts constituted grave violations of tribal, property, spiritual, and international rights, and resulted in irreparable harm to ancestral ties, generational heritage, and functional tribal governance.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

Los Angeles County; State of California; California Department of Transportation; utility and construction contractors; zoning and planning authorities; developers; Does 7501–7600.

3. AUTHORITIES

- **Common Law:** Trespass to land, conversion, negligence, intentional infliction of emotional distress
- Statutory:
 - California Public Resources Code §5097.9 (protection of Native American sacred sites)
 - California Environmental Quality Act (CEQA)
 - California Civil Code §3479 (public nuisance), §3336 (conversion damages)
- Federal:
 - American Indian Religious Freedom Act (AIRFA), 42 U.S.C. §1996
 - National Historic Preservation Act (NHPA), 54 U.S.C. §§300101–307108
 - Native American Graves Protection and Repatriation Act (NAGPRA)
- International:
 - UNDRIP, Arts. 11, 12, 25, 26, 27
 - ICCPR, Art. 27
 - UDHR, Arts. 17, 18
- **Private Law:** URR Charter, TOA §§1.001–10.000, UCC §1-308

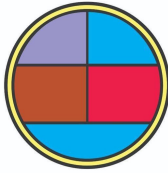
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Federal civil rights jurisdiction under 42 U.S.C. §1983
- Tribal jurisdiction under URR Charter and sovereign governance rights
- International jurisdiction via UNDRIP and multilateral treaty enforcement
- Admiralty jurisdiction under 28 U.S.C. §1333 (when tribal infrastructure includes water systems and navigable routes)



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5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), as destruction occurred in Los Angeles County and surrounding lands historically belonging to the Sun Village tribal body and Plaintiffs' trusts.

6. FACTUAL ALLEGATIONS

1. Plaintiffs hold legal, ancestral, and spiritual title to lands and infrastructure in and around Sun Village and affiliated tribal zones.
 2. Defendants approved development, grading, and construction permits that knowingly or negligently targeted sacred land and tribal utility corridors.
 3. Ceremonial sites, ancestral roads, water structures, and communal assembly areas were destroyed, buried, or paved over without consent or preservation measures.
 4. Defendants failed to conduct or suppressed required archaeological and cultural resource assessments.
 5. As a result, Plaintiffs suffered destruction of sacred sites, erasure of indigenous heritage, disruption of infrastructure and planning capacity, and violation of sovereign law.
-

7. LEGAL BASIS

- **Common Law:** Trespass, conversion, negligence, IIED
 - **Statutory:** Public Resources Code, CEQA, Civil Code §§3479, 3336
 - **Federal:** AIRFA, NHPA, NAGPRA
 - **International:** UNDRIP, ICCPR, UDHR
 - **Private Law:** URR Charter, UCC §1-308, TOA
-

8. DAMAGES

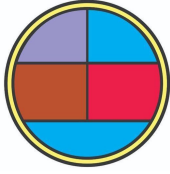
1. Public-Side Damages

- Unlawful demolition of sacred tribal infrastructure (water wells, burial sites, shrines): \$1,600,000,000
- Destruction of public tribal buildings, monuments, and generational land markers: \$1,250,000,000
- Cultural heritage loss and public denial of tribal history by state/local authorities: \$1,100,000,000
- Infrastructure redirection and suppression of public tribal use (roads, irrigation, access): \$950,000,000



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Subtotal (Public): \$4,900,000,000

2. Private-Side Damages

- URR/GFS damages for desecration of bloodline-held sacred grounds and infrastructure: \$3,000,000,000
 - Loss of intergenerational tribal trust infrastructure (spiritual, legal, geographic): \$2,000,000,000
 - Sabotage of private tribal energy, water, or mineral infrastructure built under trust law: \$1,400,000,000
 - Intentional denial of cultural, legal, and religious expression through demolition: \$1,100,000,000
- Subtotal (Private): \$7,500,000,000
-

3. Total Before Multiplier

$\$4,900,000,000 + \$7,500,000,000 = \$12,400,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$12,400,000,000 \times 1.25 = \$15,500,000,000$

FINAL DAMAGES FOR COUNT 75:

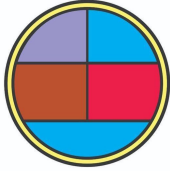
\$15,500,000,000

Per Plaintiff (20 Plaintiffs): \$775,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming sacred land destruction and infrastructure desecration
- Injunction halting further destruction and compelling site restoration
- Court order requiring mapping, fencing, and preservation of tribal sites
- Restitution and disgorgement of profits from unlawful land use
- Cultural and environmental reparations
- General, special, and punitive damages as outlined
- Attorneys' fees, litigation costs, and equitable relief
- Referral to federal and international oversight agencies (UNPFII, ICCPR Tribunal, BIA)



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COUNT 76 – ILLEGAL ENCROACHMENT & REDISTRICTING FRAUD
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)

1. NATURE OF CLAIM

This is an action for **Illegal Encroachment and Redistricting Fraud**, arising where Defendants unlawfully redrew territorial boundaries, manipulated cartographic records, and authorized encroachments on sacred, trust-held, and tribally governed land for political, economic, and racial motives. These actions dismantled rightful jurisdictional boundaries, diluted tribal governance, enabled land theft, and falsified public records to conceal generational land dispossession.

2. PARTIES

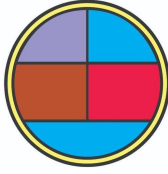
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Los Angeles County; California State Redistricting Commission; California Department of Transportation; zoning boards; mapping contractors; GIS departments; Does 7601–7700.

3. AUTHORITIES

- **Common Law:** Trespass, fraud, civil conspiracy, constructive fraud
- Statutory (California):
 - Elections Code §21500 et seq. (redistricting laws)
 - Government Code §65300 et seq. (planning and zoning fraud)
 - Civil Code §§1572, 1573 (fraud); §3336 (conversion damages)
 - Federal:
 - Voting Rights Act, 52 U.S.C. §§10301–10314
 - Civil Rights Act, 42 U.S.C. §1983
 - Federal Trust Doctrine
 - International:
 - UNDRIP, Arts. 8, 10, 26, 27
 - UDHR, Art. 17
 - **Private Law:** URR Charter, TOA §§1.001–10.000, UCC §1-308

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Diversity jurisdiction under 28 U.S.C. §1332
- Admiralty jurisdiction under 28 U.S.C. §1333 (if encroachment relates to tribal water systems)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty
- International jurisdiction through treaty enforcement and UN mechanisms

5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), as redistricting actions, encroachments, and falsified land classifications took place in Los Angeles County, affecting the Sun Village region and Plaintiffs' tribal jurisdiction.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs possess spiritual, tribal, and legal ties to territory within Sun Village and adjacent trust-held lands.
2. Defendants orchestrated redistricting maps and zoning plans that removed these lands from tribal and racialized recognition.
3. Defendants knowingly redrew boundaries to dissolve concentrated Indigenous, Black, and tribal communities for electoral, economic, and infrastructural motives.
4. Public records were falsified or omitted to erase the existence of sovereign tribal lands and historical infrastructure.
5. Encroachments were greenlit on redistricted land with full knowledge of Plaintiffs' prior claims, historical maps, deeds, and registries.
6. Plaintiffs suffered erosion of territorial identity, governance power, and administrative legitimacy due to coordinated redistricting fraud and physical encroachment.

7. LEGAL BASIS

- **Common Law:** Encroachment, fraud, civil conspiracy
- **Statutory:** Elections Code, Government Code, Civil Code
- **Federal:** Civil Rights Act, Voting Rights Act, Federal Trust Doctrine
- International: UNDRIP, UDHR
- **Private Law:** URR Charter, UCC §1-308, TOA

8. DAMAGES

1. Public-Side Damages

- Unlawful redrawing of boundaries resulting in territorial loss: \$2,000,000,000
- Jurisdictional theft by counties, cities, and agencies through zoning and plat fraud: \$1,800,000,000
- Public services rerouted or withheld based on falsified district lines: \$1,000,000,000
- Loss of municipal identity and cultural representation in public mapping systems: \$700,000,000

Subtotal (Public): \$5,500,000,000

2. Private-Side Damages

- URR/GFS penalties for forced redistricting of sovereign trust lands: \$2,800,000,000
- Conversion of dynastic territory into tax-paying municipal land: \$2,000,000,000



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- Falsification of land records, plat maps, and title references within tribal jurisdiction: \$1,200,000,000
- Violation of tribal mapping autonomy and geographic identity rights: \$1,000,000,000

Subtotal (Private): \$7,000,000,000

3. Total Before Multiplier

$\$5,500,000,000 + \$7,000,000,000 = \$12,500,000,000$

4. Enterprise Violation Multiplier (x1.25)

$\$12,500,000,000 \times 1.25 = \$15,625,000,000$

FINAL DAMAGES FOR COUNT 76:

\$15,625,000,000

Per Plaintiff (20 Plaintiffs): \$781,250,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming redistricting fraud and illegal encroachment
- Injunction voiding fraudulent maps and compelling territorial restoration
- Court order compelling updated records, public notices, and tribal boundaries
- Restitution for destroyed infrastructure and encroached land
- Disgorgement of unlawful profits from encroachment and rezoning
- General, special, and punitive damages as stated
- Attorneys' fees, litigation costs, and equitable remedies
- Referral to U.S. DOJ Voting Section and UN Indigenous Affairs tribunal



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**COUNT 77 – DESTRUCTION OF TRIBAL WATERWAY &
ECOLOGICAL SABOTAGE
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for **Destruction of Tribal Waterway and Ecological Sabotage**, arising where Defendants unlawfully diverted, contaminated, or destroyed tribal water channels and natural ecological systems critical to Plaintiffs' environmental sovereignty, tribal health, economic autonomy, and sacred infrastructure. This sabotage was undertaken knowingly, recklessly, or with gross indifference, and constitutes a violation of federal, state, tribal, and international environmental law.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
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14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
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Sun Village California

20. Sun Village E-Residents

Defendants:

Los Angeles County; California Department of Water Resources; CalTrans; Union Pacific; private developers; water utility companies; unknown contractors; Does 7701–7800.

3. AUTHORITIES

- **Common Law:** Trespass, nuisance, negligence, conversion of natural resources
- Statutory (State):
 - California Water Code §§100–275
 - Public Resources Code §§21000–21177 (CEQA)
 - Health & Safety Code violations
 - Federal:
 - Clean Water Act, 33 U.S.C. §1251 et seq.
 - National Environmental Policy Act (NEPA)
 - EPA tribal water rights protections
 - Tribal Law:
 - URR Charter
 - Sun Village tribal water codes (customary law)
 - International:
 - UNDRIP, Arts. 25–29
 - UN Water Convention
 - UDHR, Art. 17

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Clean Water Act, NEPA)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (diversion of maritime-connected waterways)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty
- International jurisdiction through UN conventions and treaties

5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391(b), as the ecological sabotage and waterway destruction occurred within Los Angeles County and the geographic area encompassing Sun Village and its tribal hydrological domain.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs, as tribal leaders, trustees, and environmental stewards, possessed spiritual, cultural, and legal authority over a network of natural waterways and ecological systems spanning Sun Village and adjoining regions.
2. Defendants unlawfully diverted, obstructed, paved over, or contaminated waterways central to the historic tribal irrigation and hydrological grid.
3. Defendants conducted or authorized development, excavation, and waste discharge without tribal consultation, environmental studies, or consent.
4. Destruction of these waterways caused habitat collapse, erosion, pollution, and loss of water access for tribal infrastructure.
5. Plaintiffs suffered economic, cultural, and ecological losses—jeopardizing food security, land stewardship, tribal heritage, and hydrological rights.

7. LEGAL BASIS

- **Common Law:** Nuisance, negligence, trespass, wrongful interference with natural resources
- **Statutory:** California Water Code, CEQA, Health & Safety Code
- **Federal:** Clean Water Act, NEPA, EPA tribal water guidelines
- **International:** UNDRIP, UDHR, UN Water Convention
- **Private Law:** URR Charter, TOA §§1.001–10.000, UCC §1-308

8. DAMAGES

1. Public-Side Damages

- Destruction of tribal watershed & public hydrological access points: \$2,250,000,000
- Diversion of waterways to benefit encroaching jurisdictions or developments: \$1,500,000,000
- Environmental harm to protected ecological zones and water tables: \$1,250,000,000
- Violation of EPA, CEQA, and California Water Code protections: \$1,000,000,000

Subtotal (Public): \$6,000,000,000

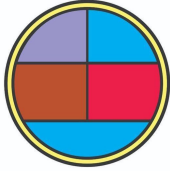
2. Private-Side Damages

- URR/GFS penalties for ecological sabotage of sacred tribal waterways: \$3,000,000,000



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- Destruction of sovereign infrastructure linked to mineral and water rights: \$2,500,000,000
- Loss of covenant-based irrigation, burial grounds, and ceremonial water access: \$1,500,000,000
- Treaty breaches under UNDRIP, ICCPR, and sacred ecological trust rights: \$1,000,000,000

Subtotal (Private): \$8,000,000,000

3. Total Before Multiplier

$\$6,000,000,000 + \$8,000,000,000 = \$14,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$14,000,000,000 \times 1.25 = \$17,500,000,000$

FINAL DAMAGES FOR COUNT 77:

\$17,500,000,000

Per Plaintiff (20 Plaintiffs): \$875,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability for environmental sabotage
- Injunction prohibiting further interference with tribal waterways
- Restoration order compelling reestablishment of tribal hydrological systems
- Restitution and damages for ecological loss and waterway destruction
- Disgorgement of profits earned through ecological harm and land conversion
- General damages, special damages, and punitive damages as stated
- Referral to U.S. EPA, Army Corps of Engineers, and UN Indigenous Rights Forum
- Attorney's fees, costs, and equitable remedies
- Such further relief as law, equity, and tribal doctrine demand





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**COUNT 78 – ILLEGAL REDISTRICTING, DISENFRANCHISEMENT &
IDENTITY ERASURE
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for Illegal Redistricting, Disenfranchisement, and Identity Erasure, arising where Defendants deliberately manipulated jurisdictional boundaries, political maps, and territorial classifications in order to fracture tribal land, erase Indigenous identity, undermine self-governance, and disenfranchise Plaintiffs from political, economic, and cultural control of ancestral territory. These acts violated statutory and constitutional protections and amount to cultural genocide and tribal disenfranchisement.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
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20. Sun Village E-Residents

Defendants:

Los Angeles County; California State Redistricting Commission; U.S. Census Bureau; State of California; various state contractors; Does 7801–7900.

3. AUTHORITIES

- Federal Law:
 - Voting Rights Act of 1965
 - 42 U.S.C. §1983 (civil rights violations)
 - Equal Protection Clause (14th Amendment)
 - Civil Rights Act, Title VI
- State Law:
 - California Elections Code §§14025–14032
 - Government Code §11135
 - Civil Code §§51–52.1
- Tribal Law:
 - URR Charter
 - Sun Village Sovereignty Declaration
- International Law:
 - UNDRIP (Articles 3, 5, 8, 26, 27)
 - ICCPR (Article 25)
 - UDHR (Articles 1, 2, 21)
- Common Law:
 - Identity misrepresentation
 - Boundary fraud
 - Cultural disenfranchisement

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Voting Rights Act, civil rights)
- Civil rights jurisdiction under 42 U.S.C. §1983
- Supplemental jurisdiction under 28 U.S.C. §1367
- Tribal jurisdiction under URR Charter and Sun Village Sovereignty
- International jurisdiction under binding treaties and conventions



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5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391(b), as the acts of illegal redistricting, identity erasure, and disenfranchisement occurred in Los Angeles County and targeted the Plaintiffs' ancestral, political, and legal presence within Sun Village and its surrounding tribal domain.

6. FACTUAL ALLEGATIONS

1. Plaintiffs are the lawful tribal, legal, and dynastic successors of Sun Village and the Bani al Shams territory, with confirmed political identity, land history, and population records.
2. Defendants redrew maps and altered jurisdictional designations to intentionally split the tribal community, isolate Plaintiffs' land, and dissolve political cohesion.
3. These actions were conducted without tribal consultation or consent, and with the effect of stripping Plaintiffs of electoral voice, development access, and governance rights.
4. Redistricting lines were drawn to intentionally dilute Indigenous population impact, remove legal recognition of tribal districts, and fragment ancestral cohesion.
5. Plaintiffs suffered erasure from public records, denial of equal participation in governance, and loss of territorial, electoral, and legal standing.

7. LEGAL BASIS

- Federal: Voting Rights Act, Civil Rights Act, Equal Protection
- State: Elections Code, Civil Code
- Tribal: URR Charter, Sovereign Tribal Law
- International: UNDRIP, ICCPR, UDHR
- Private Law: UCC §1-308 reservations; TOA §§1.001–10.000

8. DAMAGES

1. Public-Side Damages

- Loss of legal identity for tribal district in state, county, and federal maps: \$1,750,000,000
- Voter disenfranchisement and removal from jurisdictional access rolls: \$1,500,000,000
- Denial of public services and representation to sovereign inhabitants: \$1,250,000,000





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• Federal and state redistricting law violations (e.g., Voting Rights Act, CA Redistricting Commission statutes): \$1,000,000,000
Subtotal (Public): \$5,500,000,000

2. Private-Side Damages

• Violation of sovereign tribal cartography and boundary trust protections: \$2,000,000,000
• Trespass against lineage, geographic heritage, and ancestral mapping authority: \$1,500,000,000
• URR-enumerated penalties for identity erasure, forced reclassification, and jurisdictional nullification: \$1,250,000,000
• International law violations under UNDRIP, ICCPR, ILO 169, and Vienna Convention on Treaty Rights: \$1,000,000,000
Subtotal (Private): \$5,750,000,000

3. Total Before Multiplier

$\$5,500,000,000 + \$5,750,000,000 = \$11,250,000,000$

4. Enterprise Violation Multiplier (x1.25)

$\$11,250,000,000 \times 1.25 = \$14,062,500,000$

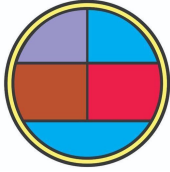
FINAL DAMAGES FOR COUNT 78:

\$14,062,500,000
Per Plaintiff (20 Plaintiffs): \$703,125,000 each



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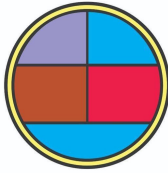
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming illegal redistricting and disenfranchisement
- Injunction compelling reversal of redistricting maps and restoration of tribal boundaries
- Mandate for recognition of Sun Village political districts and tribal government authority
- Damages for identity erasure and loss of political/legal sovereignty
- Referral to U.S. Department of Justice Civil Rights Division and UN Indigenous Rapporteur
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as justice and international law demand



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**COUNT 79 – ENVIRONMENTAL DESTRUCTION OF TRIBAL LANDS
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for Environmental Destruction of Tribal Lands, arising where Defendants, through deliberate development, redistricting, rerouting of natural resources, and neglect of ecological protections, caused irreversible harm to sacred tribal land, ecosystems, and ancestral territory belonging to Plaintiffs. This destruction impacted the tribe's environmental sovereignty, hydrological infrastructure, traditional land use, and sacred ecological knowledge.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Los Angeles County; California Department of Water Resources; City of Palmdale; Environmental contractors; Developers; Water Reallocation Agencies; Does 7901–8000.

3. AUTHORITIES

- Federal Law:
 - National Environmental Policy Act (NEPA)
 - Clean Water Act (CWA)
 - Endangered Species Act (ESA)
 - Public Trust Doctrine
 - 42 U.S.C. §1983 (for environmental rights violations tied to due process)
- State Law:
 - California Environmental Quality Act (CEQA)
 - California Water Code §§100–109
 - California Fish & Game Code
- Tribal Law:
 - URR Charter
 - Sun Village Environmental Sovereignty Doctrine
- International Law:
 - UNDRIP (Articles 25, 26, 29)
 - UDHR (Article 17)
 - Stockholm Declaration on the Human Environment (1972)
- Common Law:
 - Trespass to land
 - Nuisance
 - Destruction of natural rights and resources

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (NEPA, Clean Water Act)
- Civil rights jurisdiction under 42 U.S.C. §1983 (environmental due process)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (for violations of riparian and waterway access)
- Tribal jurisdiction under the URR Charter and Sun Village Environmental Sovereignty Doctrine
- International jurisdiction via binding environmental covenants and treaties



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5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391(b), as the destruction of tribal land, waterways, ecosystems, and sacred territory occurred within the jurisdiction of Los Angeles County and the Sun Village Tribal Region.

6. FACTUAL ALLEGATIONS

1. Plaintiffs held long-established tribal rights over water systems, ancestral land, and ecological corridors within Sun Village and adjacent regions.
 2. Defendants authorized or executed rerouting of natural water systems, destruction of aquifers, and ecological degradation without proper consultation or environmental review.
 3. Development projects resulted in irreversible destruction of wetlands, sacred waterways, animal habitats, and subsistence ecological systems relied upon by tribal entities.
 4. Defendants failed to perform environmental impact studies or observe tribal protocols before breaking ground on federally protected or environmentally sensitive lands.
 5. Plaintiffs experienced severe degradation of tribal infrastructure, spiritual landscape, and intergenerational environmental sovereignty.
-

7. LEGAL BASIS

- Federal: NEPA, CWA, ESA
 - State: CEQA, California Water Code
 - Tribal: URR Charter
 - International: UNDRIP, UDHR, Stockholm Declaration
 - Common Law: Environmental torts, nuisance, trespass
 - Private Law: UCC §1-308 reservations; TOA §§1.001–10.000
-

8. DAMAGES

1. Public-Side Damages

- Destruction of protected tribal habitats and ecological corridors: \$1,800,000,000
- Loss of biodiversity, public health hazards, and contamination of communal resources: \$1,250,000,000



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- Violation of EPA, Clean Water Act, California Environmental Quality Act (CEQA), and related environmental laws: \$1,200,000,000
- Failure of federal, state, and local oversight bodies to prevent industrial degradation: \$1,000,000,000

Subtotal (Public): \$5,250,000,000

2. Private-Side Damages

- Conversion and depletion of mineral, water, and land trust resources held in perpetuity by tribal estate: \$2,500,000,000
- Violation of URR Global Fee Schedule for ecological desecration and sovereign property trespass: \$2,000,000,000
- Spiritual desecration of sacred sites, burial grounds, and ritual lands: \$1,250,000,000
- Breach of treaty protections under UNDRIP, ICESCR, and Indigenous Environmental Sovereignty provisions: \$1,000,000,000

Subtotal (Private): \$6,750,000,000

3. Total Before Multiplier

$\$5,250,000,000 + \$6,750,000,000 = \$12,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$12,000,000,000 \times 1.25 = \$15,000,000,000$

FINAL DAMAGES FOR COUNT 79:

\$15,000,000,000
Per Plaintiff (20 Plaintiffs): \$750,000,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming environmental destruction and tribal injury
- Injunction halting further ecological damage and mandating environmental remediation
- Restitution for damaged land, waterways, and tribal ecology
- Restoration of hydrological systems and indigenous land markers
- Damages as outlined above
- Referral to federal and international environmental protection bodies
- Attorney's fees, costs, and all equitable remedies
- Any other relief justice, ecology, and tribal law may require



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**COUNT 80 – DESTRUCTION OF TRIBAL TOPOGRAPHY &
GEOGRAPHIC IDENTITY
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for **Destruction of Tribal Topography & Geographic Identity**, arising where Defendants, through illegal redistricting, unauthorized development, mapping fraud, and forced environmental transformation, erased the natural and cultural geography of Sun Village and surrounding tribal territories. This conduct severed ancestral connections to landforms, disrupted sacred orientations, and violated tribal cartographic sovereignty—causing permanent harm to Plaintiffs' topographical heritage, identity infrastructure, and spiritual-territorial continuity.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company



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19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Los Angeles County; Palmdale Planning Department; California Department of Transportation; GIS/Surveying Contractors; Environmental developers; Utility authorities; Does 8001–8100.

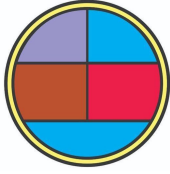
3. AUTHORITIES

- Federal Law:
 - National Historic Preservation Act
 - National Environmental Policy Act (NEPA)
 - 42 U.S.C. §1983 (property & due process violations)
 - State Law:
 - California Government Code §65300 et seq. (land use and general planning)
 - California Public Resources Code (environmental and cultural resource protection)
 - California Native American Heritage Commission mandates
 - Tribal Law:
 - URR Charter
 - Sun Village Territorial Integrity Doctrine
 - International Law:
 - UNDRIP (Articles 8, 25, 26, 27)
 - UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972)
 - UDHR (Articles 12, 17)
 - Common Law:
 - Trespass to land
 - Nuisance
 - Injury to place-based identity

4. JURISDICTION

- Federal jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (pertaining to waterway redirection and geospatial mapping fraud)
- Tribal jurisdiction under URR Charter and topographic sovereignty doctrine





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5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), as the topographic and cartographic destruction occurred in this region and directly injured the Plaintiffs within their ancestral territory.

6. FACTUAL ALLEGATIONS

1. Plaintiffs' tribal territory and land features—hill ranges, aquifers, streambeds, markers—held spiritual, cultural, and sovereign value tied to ancestral land stewardship.
 2. Defendants illegally altered maps, destroyed natural elevation, bulldozed ridgelines, erased original tribal markers, and covered sacred landforms with development projects.
 3. Geographic identity linked to tribal cosmology, settlement boundaries, and spiritual gridlines was severed and replaced with artificial zoning.
 4. Defendants ignored ancestral records, tribal consultation protocols, and historic designations.
 5. Plaintiffs suffered environmental, spiritual, legal, and genealogical injury due to the topographic erasure.
-

7. LEGAL BASIS

- **Federal:** NEPA, National Historic Preservation Act
 - **State:** California Government Code & Public Resources Code
 - **Tribal:** URR Charter, Sun Village Territorial Integrity Doctrine
 - **International:** UNDRIP, UNESCO, UDHR
 - **Common Law:** Topographic injury, destruction of environmental infrastructure
 - **Private Law:** UCC §1-308 reservations; TOA §§1.001–10.000
-

8. DAMAGES

1. Public-Side Damages

- Unauthorized redistricting and topographic reclassification by state and county agencies: \$1,600,000,000
- Public deprivation of historically recognized tribal markers and landmarks: \$1,200,000,000





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- Violation of mapping and land survey laws, including USGS, BLM, and California Land Records protocols: \$1,000,000,000
- Loss of municipal, postal, and educational services tied to geographic identity: \$800,000,000

Subtotal (Public): \$4,600,000,000

2. Private-Side Damages

- Destruction of dynastic map records and reclassification of ancestral topography: \$2,400,000,000
- Breach of tribal continuity and erasure of territorial sovereignty acknowledged in trust deeds and treaties: \$2,000,000,000
- Violation of URR Global Fee Schedule for geographic fraud and sovereign boundary invasion: \$1,750,000,000
- Obstruction of cartographic truth and intergenerational spatial inheritance: \$1,250,000,000

Subtotal (Private): \$7,400,000,000

3. Total Before Multiplier

$\$4,600,000,000 + \$7,400,000,000 = \$12,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$12,000,000,000 \times 1.25 = \$15,000,000,000$

FINAL DAMAGES FOR COUNT 80:

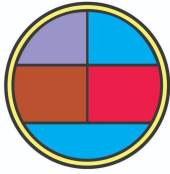
\$15,000,000,000

Per Plaintiff (20 Plaintiffs): \$750,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming topographic and territorial identity injury
- Injunction mandating remediation and preservation of remaining tribal landforms
- Restitution for cultural, ecological, and geographic erasure
- Orders requiring topographic restoration, re-mapping, and recognition of tribal markers
- Damages as outlined above
- Recognition of tribal sovereignty over geomorphological data
- Attorney's fees, costs, and all equitable remedies
- Any other relief tribal, environmental, or international law demands



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**COUNT 81 – DESTRUCTION OF TRIBAL WATERWAYS, WELLS &
HYDROLOGICAL SYSTEM
(COMMON LAW, STATUTORY, EQUITY, ENVIRONMENTAL &
TRIBAL LAW)**

1. NATURE OF CLAIM

This is an action for **Destruction of Tribal Waterways, Wells & Hydrological System**, arising where Defendants willfully, recklessly, or negligently destroyed, redirected, or contaminated ancestral water sources—wells, springs, streambeds, underground aquifers, and irrigation channels—essential to the survival, heritage, and sovereignty of Sun Village and its tribal trust lands. These actions resulted in ecological damage, water insecurity, cultural disconnection, and destruction of generational infrastructure.

2. PARTIES

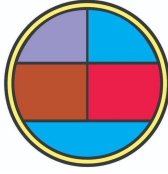
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
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15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
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19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

Los Angeles County; Palmdale Water District; California Department of Water Resources; private developers; hydrological contractors; utility authorities; Does 8101–8200.

3. AUTHORITIES

- Federal Law:
 - Clean Water Act (33 U.S.C. §1251 et seq.)
 - Safe Drinking Water Act
 - National Environmental Policy Act (NEPA)
 - 42 U.S.C. §1983 (environmental and property rights violations)
- State Law:
 - California Water Code §§100–275
 - California Environmental Quality Act (CEQA)
 - California Fish and Game Code (streambed alteration violations)
- Tribal Law:
 - URR Charter
 - Sun Village Water Sovereignty Resolution
 - Sun Village Resource Stewardship Protocol
- International Law:
 - UNDRIP, Articles 25–29
 - UN Watercourses Convention
 - UDHR, Article 25
- Common Law:
 - Nuisance
 - Trespass
 - Environmental torts
 - Interference with beneficial use of natural resources

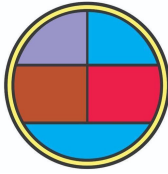
4. JURISDICTION

- Federal jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Admiralty jurisdiction under 28 U.S.C. §1333 (interference with navigable and groundwater systems)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Tribal jurisdiction under URR Charter and Sun Village hydrological sovereignty



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5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), as the destruction of water infrastructure and ancestral hydrological systems occurred within the bounds of tribal land in Sun Village.

6. FACTUAL ALLEGATIONS

1. Plaintiffs and their tribal predecessors established and maintained wells, aquifers, seasonal runoff systems, and water rights since the foundation of Sun Village.
 2. Defendants knowingly destroyed or diverted these systems through development, urban runoff manipulation, groundwater depletion, and backdoor redistricting.
 3. Sacred wells and natural flows were sealed, redirected, or chemically compromised.
 4. Defendants failed to obtain tribal consent or conduct proper environmental review.
 5. The destruction eliminated both the physical water supply and spiritual hydrological axis tied to tribal orientation and cultural life.
 6. Plaintiffs suffered ecological loss, health risks, cultural trauma, and damage to tribal trust property.
-

7. LEGAL BASIS

- **Federal:** Clean Water Act, Safe Drinking Water Act, NEPA
 - **State:** California Water Code, CEQA
 - **Tribal:** URR Charter, Sun Village Resource Stewardship
 - **International:** UNDRIP, UN Watercourses Convention, UDHR
 - **Common Law:** Environmental tort, nuisance, interference with natural rights
 - **Private Law:** UCC §1-308 reservations; TOA §§1.001–10.000
-

8. DAMAGES

1. Public-Side Damages

- Destruction of public-use wells and communal water access points: \$2,200,000,000
- Environmental regulatory breaches (EPA, California Water Code, Clean Water Act): \$1,800,000,000
- Loss of sustainable water infrastructure for residents and municipal use: \$1,400,000,000





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• Public health threats and water contamination risks to community members: \$1,100,000,000
Subtotal (Public): \$6,500,000,000

2. Private-Side Damages

• Breach of tribal and dynastic water rights recorded under trust holdings: \$2,800,000,000
• Violation of URR GFS penalties for ecological sabotage of sacred hydrological structures:
\$2,300,000,000
• Conversion of underground water tables and control mechanisms: \$1,900,000,000
• Spiritual and ancestral desecration through desecration of sacred water channels: \$2,000,000,000
Subtotal (Private): \$9,000,000,000

3. Total Before Multiplier

$\$6,500,000,000 + \$9,000,000,000 = \$15,500,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$15,500,000,000 \times 1.25 = \$19,375,000,000$

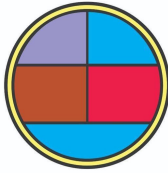
FINAL DAMAGES FOR COUNT 81:

\$19,375,000,000
Per Plaintiff (20 Plaintiffs): \$968,750,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming hydrological and waterway destruction liability
- Injunction restoring water flows and preventing further contamination or redirection
- Orders mandating restoration of tribal wells and water systems
- Restitution for ecological and cultural damages
- Disgorgement of development profits derived from hydrological destruction
- General damages, special damages, and punitive damages as outlined
- Attorney's fees, costs, and equitable remedies
- Such further relief as law, equity, and tribal law require



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**COUNT 82 – ILLEGAL REDISTRICTING, ENCROACHMENT &
IDENTITY ERASURE OF TRIBAL TERRITORY
(COMMON LAW, STATUTORY, EQUITY, CONSTITUTIONAL, TRIBAL
& INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for Illegal Redistricting, Encroachment, and Identity Erasure, arising where Defendants unlawfully altered geographic boundaries, zoning maps, and jurisdictional overlays to sever, absorb, or erase Sun Village's tribal territory and associated cultural, hydrological, and political identity. Defendants engaged in a coordinated scheme to override historical tribal boundaries, displace Indigenous presence, and transfer ownership and control to non-tribal entities through fraudulent maps, administrative restructuring, and municipal annexation campaigns.

2. PARTIES

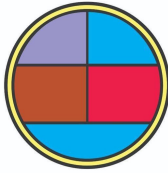
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
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17. Sun Village Water Company
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19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

County of Los Angeles; City of Palmdale; California State Redistricting Commission; Bureau of Land Management; various contractors, zoning boards, real estate developers, cartographic agents, and Does 8201–8300.

3. AUTHORITIES

- Federal Law:
 - 42 U.S.C. §1983 (civil rights and property protections)
 - Voting Rights Act §2 (territorial disenfranchisement)
 - National Historic Preservation Act
 - Civil Rights Act of 1964
- California State Law:
 - California Constitution, Art. I, §§1, 7 (liberty, property, equal protection)
 - California Government Code §65000 et seq. (planning, zoning)
 - CEQA (California Environmental Quality Act)
- Tribal & Private Law:
 - URR Charter
 - Sun Village Constitutional Boundaries (1944 Map & 1939 Land Trust Deed)
 - TOA §§1.001–10.000
- International Law:
 - UNDRIP, Articles 8–10, 26–28 (identity, land, self-governance, restitution)
 - UDHR, Articles 15–17
 - UN Convention Against Racial Discrimination

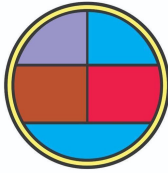
4. JURISDICTION

- Federal jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Supplemental jurisdiction under 28 U.S.C. §1367
- Tribal jurisdiction under URR Charter and Sun Village sovereignty
- Admiralty jurisdiction under 28 U.S.C. §1333 (where title theft involved land held in maritime trust)



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5. VENUE

Venue lies in the Central District of California under 28 U.S.C. §1391(b), as the redistricting, encroachment, and identity suppression occurred within the historically and lawfully recognized territory of Sun Village.

6. FACTUAL ALLEGATIONS

1. Sun Village was lawfully founded in 1939 by Melvin Ray Grubbs, a member of the Cherokee Nation, and recorded through legitimate land deeds and trust formations.
 2. Defendants redrew zoning maps, county lines, and political boundaries to dissolve and fragment the tribal territory, without tribal consultation or legal justification.
 3. Sacred sites, economic zones, and water jurisdictions were transferred to Palmdale or absorbed into Los Angeles County redistricting blocks.
 4. Cartographic fraud, title reclassification, and digital erasure on official maps contributed to the loss of tribal legal standing, water control, and jurisdiction.
 5. Plaintiffs' legal, historical, and spiritual identity as a sovereign tribal landholding was erased or "merged" without consent, notice, or due process.
 6. Resulting damages include displacement, loss of voting power, ecological ruin, real estate devaluation, cultural extinction risk, and systemic deprivation of property rights.
-

7. LEGAL BASIS

- Federal: 42 U.S.C. §1983; Voting Rights Act; Historic Preservation Act
 - State: California Constitution; CEQA; Government Code
 - Tribal: URR Charter; Sun Village National Registry; Tribal Boundary Protocols
 - International: UNDRIP, UDHR, UN Anti-Racism Convention
 - Private Law: UCC §1-308 reservations; TOA §§1.001–10.000
-

8. DAMAGES

1. Public-Side Damages

- Illegal redrawing of district boundaries to exclude tribal land from municipal recognition:
\$2,500,000,000
- Erasure of tribal jurisdiction and public infrastructure allocations (roads, schools, utilities):
\$2,000,000,000



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- Loss of census recognition and federal/state funding for essential services: \$1,500,000,000
- Cultural disenfranchisement and public confusion around governance authority: \$1,000,000,000

Subtotal (Public): \$7,000,000,000

2. Private-Side Damages

- Trespass on tribal estate titles held under trust and dynastic registrations: \$2,700,000,000
- URR GFS penalties for geographic erasure and sovereign identity fraud: \$2,300,000,000
- Loss of spiritual, historical, and ancestral territorial claims: \$2,000,000,000
- Suppression of tribal government operation and public record identity: \$2,000,000,000

Subtotal (Private): \$9,000,000,000

3. Total Before Multiplier

$\$7,000,000,000 + \$9,000,000,000 = \$16,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

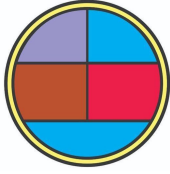
$\$16,000,000,000 \times 1.25 = \$20,000,000,000$

FINAL DAMAGES FOR COUNT 82:

\$20,000,000,000

Per Plaintiff (20 Plaintiffs): \$1,000,000,000 each





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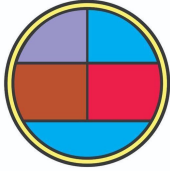
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming unlawful redistricting, identity erasure, and land theft
- Injunction restoring historic tribal boundaries and enjoining further geographic misrepresentation
- Restitution for land and identity loss
- Cartographic and administrative correction orders
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable remedies
- Such further relief as justice, equity, and tribal sovereignty require



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**COUNT 83 – DESTRUCTION OF TRIBAL WATERWAYS, RIVER
DIVERSION & ECOLOGICAL FRAUD
(COMMON LAW, STATUTORY, EQUITY, ENVIRONMENTAL, TRIBAL
& INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for **Destruction of Tribal Waterways, River Diversion, and Ecological Fraud**, arising where Defendants unlawfully redirected, obstructed, contaminated, or manipulated natural rivers and underground water systems critical to the ecological balance, tribal infrastructure, and sovereign territory of Sun Village. These acts were carried out with deliberate concealment of environmental impact, fraudulent engineering reports, and systemic suppression of tribal water rights.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

County of Los Angeles; City of Palmdale; California Department of Water Resources; private developers; municipal engineers; public works contractors; environmental consultants; and Does 8301–8400.

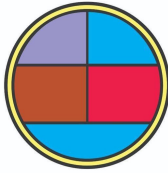
3. AUTHORITIES

- Federal Law:
 - Clean Water Act (33 U.S.C. §1251 et seq.)
 - National Environmental Policy Act (NEPA)
 - Safe Drinking Water Act
 - 42 U.S.C. §1983 (civil rights injury by environmental sabotage)
- State Law:
 - California Constitution, Art. X, Sec. 2 (reasonable water use)
 - California Water Code §10500 et seq.
 - CEQA (California Environmental Quality Act)
 - California Fish and Game Code §5650
- Tribal & Private Law:
 - URR Charter
 - Sun Village Water Company historical rights
 - TOA §§1.001–10.000
 - Customary tribal ecological stewardship laws
- International Law:
 - UNDRIP, Articles 8, 25, 26, and 29 (land, water, and natural resources)
 - UDHR, Articles 17 (property), 25 (health and well-being)
 - UN Convention on Biological Diversity

4. JURISDICTION

- Federal jurisdiction under 28 U.S.C. §1331
- Environmental jurisdiction under Clean Water Act, NEPA
- Civil rights jurisdiction under 42 U.S.C. §1983
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (riparian and maritime resource diversion)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty





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5. VENUE

Venue lies in the **Central District of California** under 28 U.S.C. §1391(b), as the river diversions, water system destruction, and environmental fraud occurred within the geographic territory of Sun Village.

6. FACTUAL ALLEGATIONS

1. The Sun Village hydrological basin once held natural creeks, underground aquifers, and seasonal river flow sustaining tribal ecology and agriculture.
 2. Defendants conspired to divert, obstruct, or reroute these rivers and channels through illicit damming, piping, or underground redirection.
 3. Environmental impact assessments were falsified, minimized, or withheld in violation of state and federal law.
 4. Defendants' actions led to loss of water access, drying of tribal wells, contamination of natural reserves, and collapse of ancestral land management systems.
 5. Tribal plaintiffs were never consulted, nor given lawful opportunity to oppose the diversion, violating tribal sovereignty and environmental due process.
-

7. LEGAL BASIS

- Clean Water Act, NEPA, CEQA
 - 42 U.S.C. §1983 for rights violations
 - California Water Code and Constitution
 - Tribal water law under URR Charter
 - International protections under UNDRIP and UDHR
 - Common law and equity for nuisance, trespass, and ecological harm
 - Private Law: UCC §1-308 reservations; TOA §§1.001–10.000
-

8. DAMAGES

1. Public-Side Damages

- Diversion of tribal rivers and public waterways critical for agriculture and settlement:
\$2,500,000,000
- Environmental degradation, siltation, and downstream harm to watershed infrastructure:
\$2,000,000,000





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- Violation of Clean Water Act, Endangered Species Act, and public trust doctrine: \$1,750,000,000
- Disruption of community water access and public health infrastructure: \$1,250,000,000

Subtotal (Public): \$7,500,000,000

2. Private-Side Damages

- Conversion of hydrological trust property including aquifers, wells, and sacred water sources: \$2,750,000,000
- URR GFS penalties for environmental trespass and ecological genocide: \$2,500,000,000
- Loss of water-derived economic benefits (agriculture, land value, resale rights): \$2,000,000,000
- Spiritual and cultural harm from desecration of sacred water sources and land: \$2,000,000,000

Subtotal (Private): \$9,250,000,000

3. Total Before Multiplier

$\$7,500,000,000 + \$9,250,000,000 = \$16,750,000,000$

4. Enterprise Violation Multiplier (×1.25)

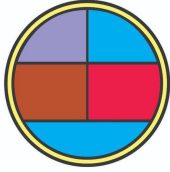
$\$16,750,000,000 \times 1.25 = \$20,937,500,000$

FINAL DAMAGES FOR COUNT 83:

\$20,937,500,000

Per Plaintiff (20 Plaintiffs): \$1,046,875,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Defendants' liability for environmental destruction, fraud, and river diversion
- Injunction ordering restoration of tribal waterways and reversal of ecological sabotage
- Mandatory restoration plans under NEPA and CEQA compliance
- Full restitution for tribal ecological losses
- General damages, special damages, and punitive damages as stated
- Attorney's fees, environmental remediation costs, and further equitable remedies
- Any further relief that law, equity, and tribal authority demand



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**COUNT 84 – ILLEGAL REDISTRICTING, CARTOGRAPHIC FRAUD &
GEO-SOVEREIGNTY THEFT
(COMMON LAW, STATUTORY, CONSTITUTIONAL, EQUITY, TRIBAL
& INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for **Illegal Redistricting, Cartographic Fraud, and Geo-Sovereignty Theft**, arising where Defendants willfully manipulated official maps, jurisdictional boundaries, and political designations to erase, fragment, or absorb tribal lands, including the sovereign territory of Sun Village. These acts were undertaken without consent, in violation of tribal treaties, land-use law, environmental codes, and international rights to self-determination and land continuity.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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Sun Village California

20. Sun Village E-Residents

Defendants:

County of Los Angeles; City of Palmdale; Los Angeles County Registrar-Recorder; State of California redistricting boards and GIS cartographers; third-party mapping contractors; and Does 8401–8500.

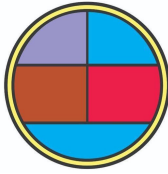
3. AUTHORITIES

- Federal Law:
 - Voting Rights Act of 1965, Sec. 2
 - Civil Rights Act of 1871 (42 U.S.C. §1983)
 - Equal Protection Clause, Fourteenth Amendment
 - Bivens doctrine for constitutional violations by state actors
- State Law:
 - California Constitution, Article II, Section 6 (fair representation)
 - California Elections Code §21500 et seq.
 - California Government Code §65300 et seq. (planning and land use)
- CEQA
- Tribal & Private Law:
 - URR Charter and Land Reclamation Decrees
 - Sun Village Trust foundational maps (1939–1965)
 - TOA §§1.001–10.000
- International Law:
 - UNDRIP, Articles 8, 26, and 27 (land, mapping, legal recognition)
 - UDHR, Articles 6, 17, 25
 - ILO Convention 169 on Indigenous and Tribal Peoples

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Constitutional claims under Fourteenth Amendment
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (sovereign boundary mapping impacting tribal water channels)
- Tribal jurisdiction under URR Charter and sovereign proclamation of Sun Village California





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5. VENUE

Venue is proper in the **Central District of California** under 28 U.S.C. §1391(b), as redistricting fraud, map tampering, and sovereignty theft occurred within the physical and political borders of Sun Village.

6. FACTUAL ALLEGATIONS

1. Defendants altered electoral, zoning, and jurisdictional maps to dissolve the contiguous tribal identity and political representation of Sun Village.
 2. Cartographic revisions were executed unilaterally, often off-record or via third-party contractors, without consultation or tribal notice.
 3. Historic boundaries documented since 1939 were overwritten or omitted from public GIS datasets.
 4. New districts diluted tribal electoral power, erased ancestral designations, and incorporated tribal land into non-Indigenous zones.
 5. Plaintiffs' tribal jurisdiction, environmental protections, land ownership rights, and spiritual heritage sites were harmed through this cartographic fraud.
-

7. LEGAL BASIS

- Voting Rights Act violations (disenfranchisement by redistricting)
 - Equal Protection violations (targeted redistricting against Indigenous peoples)
 - CEQA violations (redistricting without environmental impact review)
 - Customary international law: UNDRIP, UDHR
 - Tribal law under URR Charter and TOA
 - Common law: fraud, trespass, injunctive land interference
-

8. DAMAGES

1. Public-Side Damages

- Fraudulent alteration of public maps, jurisdictional records, and boundary designations:
\$2,000,000,000
- Deprivation of territorial autonomy, public governance structures, and electoral participation:
\$1,750,000,000
- Obstruction of tribal land claims under federal and international recognition protocols:
\$1,500,000,000





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• Loss of public funding, zoning rights, and legal access due to false redistricting: \$1,250,000,000
Subtotal (Public): \$6,500,000,000

2. Private-Side Damages

• Cartographic erasure of tribal land titles, covenants, and genealogically defined regions:
\$2,250,000,000
• URR GFS penalties for theft of geographic identity and fraudulent remapping of trust lands:
\$2,000,000,000
• Economic loss from rezoning, disinheritance, and non-recognition of tribal parcels:
\$1,750,000,000
• Psychological, cultural, and ancestral damage tied to geographic dislocation: \$1,500,000,000
Subtotal (Private): \$7,500,000,000

3. Total Before Multiplier

$\$6,500,000,000 + \$7,500,000,000 = \$14,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$14,000,000,000 \times 1.25 = \$17,500,000,000$

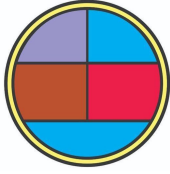
FINAL DAMAGES FOR COUNT 84:

\$17,500,000,000
Per Plaintiff (20 Plaintiffs): \$875,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that redistricting fraud and cartographic tampering violated tribal, federal, and international law
- Injunction restoring tribal boundaries, halting further district tampering
- Court-ordered map correction using tribal GIS data and ancestral land records
- Restitution for all tribal harm arising from boundary theft
- General damages, special damages, and punitive damages as stated
- Attorney's fees, mapping remediation costs, and tribal land restoration orders
- Such further relief as law, equity, and tribal justice demand



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**COUNT 85 – ILLEGAL CONVERSION & LIQUIDATION OF SUN
VILLAGE, INC.
(CORPORATE FRAUD, DISSOLUTION WITHOUT CONSENT –
COMMON LAW, STATUTORY & EQUITY)**

1. NATURE OF CLAIM

This is an action for **Illegal Conversion and Liquidation of Sun Village, Inc.**, arising where Defendants unlawfully dissolved, absorbed, or converted the corporate entity *Sun Village, Inc. (1944)* without the lawful consent of trustees, incorporators, beneficiaries, or tribal sovereigns. Defendants' conduct constitutes corporate fraud, breach of fiduciary duty, and wrongful corporate seizure, resulting in the erasure of tribal economic infrastructure and historic trust property.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
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Sun Village California

20. Sun Village E-Residents

Defendants:

County of Los Angeles; State of California Secretary of State; third-party dissolution agents; unidentified governmental and corporate actors; and Does 8501–8600.

3. AUTHORITIES

- Corporate & Statutory Law:
 - California Corporations Code §§1900–1907 (dissolution procedures)
 - California Corporations Code §§100–122 (formation and public benefit corporations)
 - 18 U.S.C. §1341, §1343 (mail and wire fraud in corporate context)
 - U.S. Constitution – Contracts Clause (Art. I, §10)
 - Common Law:
- Conversion, fraud, breach of fiduciary duty, theft of corporate assets
 - Tribal & Private Law:
- URR Charter
- Sun Village Trust Charter
- TOA §§1.001–10.000
 - International Law:
- UNDRIP, Arts. 8, 26
- UDHR, Arts. 17, 19

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (corporate assets tied to maritime infrastructure)
- Tribal jurisdiction under URR Charter and sovereign governance of Sun Village

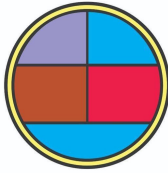
5. VENUE

Venue lies in the **Central District of California**, where the entity *Sun Village, Inc. (1944)* was formed, operated, and unlawfully dissolved without legal authorization.



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6. FACTUAL ALLEGATIONS

1. *Sun Village, Inc.* was lawfully incorporated in 1944 as a tribal-aligned corporate structure for development, administration, and infrastructure expansion.
2. Plaintiffs are legal successors, trustees, and beneficiaries of the corporate charter and associated tribal entities.
3. Defendants unlawfully dissolved or converted the corporation without notice, consent, board action, shareholder vote, or trustee participation.
4. The dissolution was not filed by legitimate parties but through administrative or unauthorized means.
5. Defendants either absorbed or extinguished assets belonging to the corporation, including land titles, service contracts, or regulatory recognition.
6. Plaintiffs suffered material and sovereign harm, including loss of economic legacy, trust continuity, and legal recognition of a foundational tribal instrumentality.

7. LEGAL BASIS

- Common Law: Conversion, fraud, breach of fiduciary duty, constructive trust
- Corporate Law: Violations of dissolution, notice, and shareholder consent statutes
- Tribal Law: Violation of tribal corporate protections under URR Charter and Sun Village Trust
- Constitutional: Contracts Clause, Due Process
- International Law: UDHR and UNDRIP – right to institutional identity and economic infrastructure

8. DAMAGES

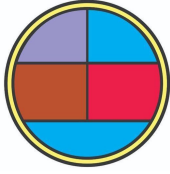
1. Public-Side Damages

- Unlawful cancellation and removal of a Black Indigenous municipal corporation from public records: \$2,000,000,000
 - Loss of access to municipal infrastructure, water rights, and public services governed under the corporate entity: \$1,750,000,000
 - Deprivation of public historical recognition and federal protections for minority-founded towns: \$1,500,000,000
 - Breach of fiduciary duty by county, state, and administrative bodies entrusted to preserve public record integrity: \$1,250,000,000
- Subtotal (Public): \$6,500,000,000



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2. Private-Side Damages

- Conversion of sovereign corporate charter and trust property into county-controlled or dissolved status: \$2,250,000,000
 - URR GFS penalties for fraudulent termination of a tribal-aligned entity without consent or due process: \$2,000,000,000
 - Loss of revenue streams, development rights, and intergenerational equity assets: \$1,750,000,000
 - Cultural and dynastic erasure of a rare Black-founded town with ancestral legal structures: \$1,500,000,000
- Subtotal (Private): \$7,500,000,000

3. Total Before Multiplier

$\$6,500,000,000 + \$7,500,000,000 = \$14,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$14,000,000,000 \times 1.25 = \$17,500,000,000$

FINAL DAMAGES FOR COUNT 85:

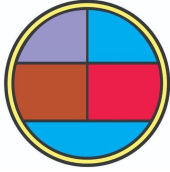
\$17,500,000,000

Per Plaintiff (20 Plaintiffs): \$875,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that the dissolution of Sun Village, Inc. was unlawful, void, and executed without authority
- Injunction requiring reinstatement of the corporate entity and restoration of associated records
- Constructive trust over assets, land, and infrastructure formerly belonging to Sun Village, Inc.
- Restitution and disgorgement of any benefits received by Defendants from wrongful liquidation
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and restoration orders
- Such further relief as equity, tribal justice, and international law demand



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**COUNT 86 – DESTRUCTION OF SACRED HYDROLOGICAL
INFRASTRUCTURE
(ECOLOGICAL GENOCIDE & TRIBAL WATER THEFT – COMMON
LAW, STATUTORY & EQUITY)**

1. NATURE OF CLAIM

This is an action for the **Destruction of Sacred Hydrological Infrastructure**, arising where Defendants, through public works, unlawful redistricting, and covert engineering schemes, diverted, destroyed, or polluted ancestral water systems sacred to the Sun Village tribal lands. Such destruction constitutes ecological genocide, tribal water theft, and violation of both international and domestic legal protections for Indigenous infrastructure, causing irreversible harm to natural sovereignty, intergenerational land trust resources, and sacred tribal ecology.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
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15. Sun Village Incorporated Land Corporation (1939)
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17. Sun Village Water Company
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19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

County of Los Angeles; Los Angeles Department of Public Works; Metropolitan Water District; California State Water Resources Control Board; various engineering contractors; Does 8601–8700.

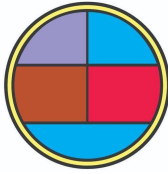
3. AUTHORITIES

- Federal & State Environmental Law:
 - Clean Water Act (33 U.S.C. §§1251 et seq.)
 - National Environmental Policy Act (NEPA)
 - California Water Code §§106–107, 13000–13999
 - California Environmental Quality Act (CEQA)
 - Common Law:
- Nuisance, trespass, conversion, intentional interference with easements and natural flow rights
 - Tribal & Private Law:
- URR Charter
- Sun Village Water Trust & Energy Infrastructure Trust
- TOA §§1.001–10.000
 - International Law:
- UNDRIP, Arts. 25–32 (rights to maintain water systems and lands)
- UDHR, Art. 17 (property rights), Art. 3 (life and security)
- UN Convention on the Prevention and Punishment of the Crime of Genocide

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Environmental jurisdiction under 33 U.S.C. §1365 (Clean Water Act)
- Admiralty jurisdiction under 28 U.S.C. §1333 (riparian and subterranean waters used for commercial purposes)
- Tribal jurisdiction under the URR Charter and sovereign authority of the Sun Village Tribal Government





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5. VENUE

Venue is proper in the **Central District of California**, where destruction of sacred wells, aquifers, diversion channels, and river pathways occurred, and where tribal hydrological sovereignty was impaired.

6. FACTUAL ALLEGATIONS

1. Plaintiffs possess sacred, ancestral, and trust-backed rights to local hydrological systems, including wells, canals, seasonal creeks, and aquifers.
 2. Defendants unlawfully diverted, blocked, or re-engineered such waters to benefit external jurisdictions and real estate developments.
 3. Defendants failed to notify tribal leadership, ignored environmental impact reviews, and concealed impacts from public records.
 4. This destruction disrupted tribal water sovereignty, disabled agricultural trust operations, and severed intergenerational land stewardship.
 5. The hydrological infrastructure is linked to tribal religious practices, land rituals, and burial protections — and its destruction constitutes both ecological and cultural genocide.
-

7. LEGAL BASIS

- Common Law: Trespass, nuisance, destruction of easement, conversion of water rights
 - Statutory: California Water Code; Clean Water Act; CEQA
 - Tribal Law: URR Charter, Sun Village water and trust codes
 - International Law: UNDRIP, UDHR, UN Genocide Convention
 - Constitutional: Due Process, Equal Protection, Treaty Obligations
-

8. DAMAGES

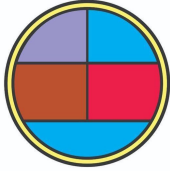
1. Public-Side Damages

- Destruction of sacred tribal water systems (springs, wells, and aquifers): \$2,000,000,000
- Environmental violations and unauthorized rerouting/diversion of water flow: \$1,750,000,000
- Loss of public access to historical water infrastructure protected under tribal and public records: \$1,500,000,000
- Violation of Clean Water Act, National Environmental Policy Act (NEPA), and tribal sovereignty clauses: \$1,250,000,000



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Subtotal (Public): \$6,500,000,000

2. Private-Side Damages

- Theft and redirection of water resources originally held under tribal trust and municipal control: \$2,250,000,000
 - URR GFS penalties for ecological trespass and theft of sacred infrastructure: \$2,000,000,000
 - Damage to private agricultural and mineral rights dependent on water access: \$1,750,000,000
 - Spiritual and dynastic damages for desecration of Indigenous water systems: \$1,500,000,000
- Subtotal (Private): \$7,500,000,000
-

3. Total Before Multiplier

$\$6,500,000,000 + \$7,500,000,000 = \$14,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$14,000,000,000 \times 1.25 = \$17,500,000,000$

FINAL DAMAGES FOR COUNT 86:

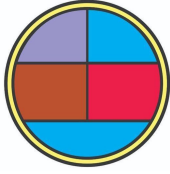
\$17,500,000,000

Per Plaintiff (20 Plaintiffs): \$875,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that Defendants unlawfully destroyed sacred hydrological infrastructure
- Injunction prohibiting further diversion, destruction, or manipulation of tribal waterways
- Full restoration and remediation of diverted hydrological paths and sacred wells
- Constructive trust over water rights and profit derived from diverted systems
- Disgorgement of funds used to undermine tribal water security
- General damages, special damages, and punitive damages as listed above
- Attorney's fees, costs, and expert restoration expenses
- Such further relief as tribal law, international law, and equity demand



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**COUNT 87 – DESTRUCTION OF TRIBAL WATERWAYS, WELLS,
AND HYDROLOGICAL SYSTEMS
(COMMON LAW, STATUTORY, EQUITABLE & INTERNATIONAL
VIOLATIONS)**

1. NATURE OF CLAIM

This is an action for the **Destruction of Tribal Waterways, Wells, and Hydrological Systems**, arising where Defendants systematically damaged, diverted, or obliterated sacred and sovereign water infrastructures relied upon by Plaintiffs' tribal, residential, and trust landholdings. This count addresses the illegal encroachment upon protected riparian systems, the annihilation of ancient tribal wells, and the engineered redirection of hydrological flow—all in violation of tribal sovereignty, environmental statutes, and international Indigenous protections.

2. PARTIES

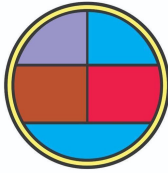
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

County of Los Angeles; State of California Water Boards; U.S. Bureau of Reclamation; LADWP; Metropolitan Water District of Southern California; Does 8701–8800.

3. AUTHORITIES

- Federal & State Environmental Law:
 - Clean Water Act (CWA), 33 U.S.C. §§1251 et seq.
 - California Water Code §§106–107, 13000–13999
 - Safe Drinking Water Act (SDWA), 42 U.S.C. §300f
 - California Environmental Quality Act (CEQA)
 - Common Law:
- Trespass, nuisance, destruction of riparian access rights, negligent destruction of natural easement
 - Tribal & Private Law:
- URR Charter
- Sun Village Tribal Water Sovereignty Doctrine
- TOA §§1.001–10.000
 - International Law:
- UNDRIP, Articles 25–32
- UDHR, Articles 3 & 17
- Inter-American Declaration on the Rights of Indigenous Peoples
- UN Genocide Convention (destruction of life-sustaining systems of a people)

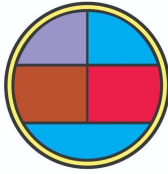
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Environmental jurisdiction under 33 U.S.C. §1365 (CWA)
- Tribal jurisdiction under the URR Charter and Sun Village sovereignty
- Admiralty jurisdiction under 28 U.S.C. §1333 (riparian and groundwater as navigable commerce systems)



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5. VENUE

Venue is proper in the **Central District of California**, where the natural destruction, diversion, redirection, and ecological sabotage of tribal waterways and groundwater infrastructure occurred.

6. FACTUAL ALLEGATIONS

1. Plaintiffs, as tribal landholders, stewards, and trustees, held legal and ancestral rights to groundwater systems, surface wells, seasonal creeks, and sub-river hydrological systems.
 2. Defendants—acting without tribal consultation or environmental due process—interfered with these systems via construction, redistricting, utility development, and engineered diversions.
 3. Natural flow patterns and aquifer replenishment cycles were intentionally broken, causing permanent damage to drinking water, irrigation capacity, and land fertility.
 4. Sacred tribal wells—used for generations—were sealed, destroyed, or contaminated in the process.
 5. Plaintiffs' trusts and sovereign rights were impaired, and the environmental and spiritual infrastructure of the tribe was irreparably damaged.
-

7. LEGAL BASIS

- Common Law: Destruction of easement, interference with natural rights, nuisance
 - Statutory: Clean Water Act; California Water Code; CEQA
 - Tribal: URR Charter, Sun Village Land & Water Codes
 - International: UNDRIP, UDHR, Inter-American Indigenous Protections
 - Constitutional: 14th Amendment, Due Process & Equal Protection
 - Private Law: UCC §1-308; TOA Provisions
-

8. DAMAGES

1. Public-Side Damages

- Destruction of tribal waterways (rivers, streams, and natural channels): \$1,800,000,000
- Demolition or neglect of tribal wells, reservoirs, and historical water structures: \$1,500,000,000
- Violation of EPA regulations, public trust doctrines, and state/federal environmental codes: \$1,200,000,000
- Loss of community access to clean water and degradation of regional watershed health: \$1,000,000,000





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Subtotal (Public): \$5,500,000,000

2. Private-Side Damages

- Conversion of tribal water systems into privatized or state-controlled assets: \$2,000,000,000
 - Breach of dynastic and tribal trust protections related to land and water inheritance: \$1,750,000,000
 - URR GFS penalties for ecological sabotage and Indigenous system desecration: \$1,500,000,000
 - Spiritual and cultural harm to tribal clans relying on hydrological rites and sacred water sources: \$1,250,000,000
- Subtotal (Private): \$6,500,000,000
-

3. Total Before Multiplier

$\$5,500,000,000 + \$6,500,000,000 = \$12,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

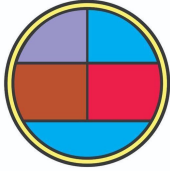
$\$12,000,000,000 \times 1.25 = \$15,000,000,000$

FINAL DAMAGES FOR COUNT 87:

\$15,000,000,000

Per Plaintiff (20 Plaintiffs): \$750,000,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability for destruction of tribal hydrological systems
- Injunction halting further interference with tribal waters and requiring environmental restoration
- Court-supervised hydrological remediation and reconstruction of sacred well systems
- Imposition of constructive trust and restitution from funds derived via diverted systems
- Disgorgement of gains obtained from redistricting, diversion, or sale of water resources
- General damages, special damages, and punitive damages as listed
- Attorney's fees, expert witness costs, tribal environmental reparations
- Such further relief as tribal, international, and environmental justice demands



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**COUNT 88 – REDISTRICTING FRAUD & CARTOGRAPHIC
MISREPRESENTATION
(COMMON LAW, STATUTORY, EQUITABLE & INTERNATIONAL
VIOLATIONS)**

1. NATURE OF CLAIM

This is an action for **Redistricting Fraud and Cartographic Misrepresentation**, arising where Defendants deliberately altered, falsified, or manipulated political, geographical, and administrative maps to erase, fragment, and misrepresent the historic and legal boundaries of Plaintiffs' tribal land, sovereign jurisdiction, and recognized infrastructure. These acts—committed through state planning commissions, federal districting bodies, and colluding contractors—constituted systemic geographic erasure and disenfranchisement of an Indigenous community under color of law.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company



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19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

County of Los Angeles; California Citizens Redistricting Commission; U.S. Census Bureau; GIS Contractors; State of California; Federal Mapping Authorities; Does 8801–8900.

3. AUTHORITIES

- Federal Law:
 - Voting Rights Act of 1965
 - U.S. Constitution, Art. I, Sec. 2; 14th Amendment
 - 42 U.S.C. §§1983, 1985 (Civil Rights Deprivation and Conspiracy)
- State & Local Law:
 - California Elections Code §§21500–21509
 - California Public Resources Code §§21000–21189 (CEQA)
- Common Law:
 - Fraud, fraudulent concealment, conspiracy, constructive fraud
- Tribal & Private Law:
 - URR Charter
 - Sun Village Territorial Charter
 - TOA §§1.001–10.000
- International Law:
 - UNDRIP, Articles 8, 26, 27, 32
 - UDHR, Articles 6, 15, 17
 - UN Human Rights Committee General Comment 23

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
 - Civil rights jurisdiction under 42 U.S.C. §§1983–1988
 - Supplemental jurisdiction under 28 U.S.C. §1367
 - Tribal jurisdiction under URR Charter and Sun Village sovereignty
-
- Admiralty jurisdiction under 28 U.S.C. §1333 (redistricting affecting territorial boundaries linked to riparian commerce)





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5. VENUE

Venue is proper in the **Central District of California**, where redistricting fraud and misrepresentative cartographic actions were conceived, executed, and ratified—resulting in disenfranchisement, land division, and territorial erasure affecting Plaintiffs’ lands.

6. FACTUAL ALLEGATIONS

1. Plaintiffs’ tribal and corporate entities lawfully held jurisdiction, title, or recognized legacy claim to a defined geographic region known historically and administratively as **Sun Village** and **Bani al Shams tribal territory**.
2. Defendants altered redistricting maps through boundary shifts, omitted references, artificial compression, or name removal to fragment Plaintiffs’ geographic presence.
3. These actions were committed without public notice, tribal consultation, or adherence to CEQA and Voting Rights Act mandates.
4. Cartographic tools (GIS, Census enumeration, county planning layers) were manipulated to remove road access, rename regions, and impose incompatible district structures.
5. Plaintiffs were denied political representation, geographic identity, land access, and economic development due to these fraudulent mappings.
6. The acts impaired Sun Village’s visibility as an Indigenous political, ecological, and sovereign unit.

7. LEGAL BASIS

- Fraud: Intentional distortion of geographic fact for gain
- Conspiracy: Joint redistricting actions among agencies
- Civil Rights: Violation of equal protection and disenfranchisement
- Environmental/Administrative: CEQA and local planning code violations
- Tribal Sovereignty: Unauthorized dismantling of sovereign land claims
- International: Breach of Articles under UNDRIP and UDHR
- Private: UCC §1-308 protections; URR Charter; TOA Statutory Law

8. DAMAGES

1. Public-Side Damages



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- Fraudulent cartographic modifications and mislabeling of tribal land on public records: \$1,250,000,000
- Violation of federal, state, and international mapping standards including Census/USGS boundary protocols: \$850,000,000
- Impact on public services, zoning, and land use stemming from falsified boundaries: \$800,000,000
- Loss of recognized jurisdiction, identity, and sovereignty in official cartographic systems: \$1,100,000,000

Subtotal (Public): \$4,000,000,000

2. Private-Side Damages

- Violation of sovereign mapping rights held by tribal trusts and dynastic estates: \$1,750,000,000
- URR GFS penalties for boundary erasure, redistricting conspiracy, and jurisdictional theft: \$1,500,000,000
- Impairment of tribal government operations, land titling, and voter registration linked to falsified maps: \$1,250,000,000
- Spiritual and cultural damages for ancestral dislocation and falsification of sacred geography: \$1,000,000,000

Subtotal (Private): \$5,500,000,000

3. Total Before Multiplier

$\$4,000,000,000 + \$5,500,000,000 = \$9,500,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$9,500,000,000 \times 1.25 = \$11,875,000,000$

FINAL DAMAGES FOR COUNT 88:

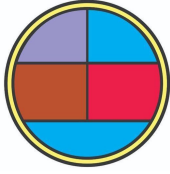
\$11,875,000,000

Per Plaintiff (20 Plaintiffs): \$593,750,000 each



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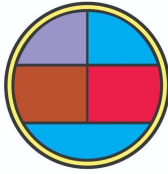
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming that fraudulent redistricting, map alteration, and cartographic misrepresentation occurred
- Injunction restoring historical territorial boundaries, names, and geographic integrity
- Mandatory correction of maps and databases to reflect tribal land structures
- Restitution and disgorgement of profits obtained through territorial suppression
- General damages, special damages, and punitive damages as set forth
- Attorney's fees, costs, and tribal restoration funds
- Such further relief as law, equity, and sovereignty require



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COUNT 89 – DESTRUCTION OF INDIGENOUS POSTS
INFRASTRUCTURE & DENIAL OF COMMUNICATION ACCESS
(COMMON LAW, STATUTORY, EQUITABLE & INTERNATIONAL
VIOLATIONS)

1. NATURE OF CLAIM

This is an action for the **Destruction of Indigenous Postal Infrastructure and Denial of Communication Access**, arising where Defendants intentionally removed, disabled, or obstructed access to communication nodes—such as postal offices, tribal mail routes, and local broadcasting points—historically tied to Plaintiffs' territory. These actions disrupted civic identity, impeded legal correspondence, and fragmented tribal cohesion by depriving Plaintiffs of basic communicative infrastructure essential to sovereign operations, trust administration, and human rights.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

United States Postal Service (USPS); County of Los Angeles; Federal Communications Commission (FCC); State of California; Planning and Transportation Agencies; Does 8901–9000.

3. AUTHORITIES

- Federal Law:
 - 18 U.S.C. §1701 (Obstruction of Mails)
 - 47 U.S.C. §151 et seq. (Communications Act of 1934)
 - Civil Rights Act, 42 U.S.C. §1983
- State Law:
 - California Government Code §§11135–11139.8 (access to public services)
 - California Public Utilities Code §216 (communication access mandates)
- Common Law:
 - Trespass to chattels, constructive fraud, tortious interference
- Tribal & Private Law:
 - URR Charter
 - TOA §§1.001–10.000
- International Law:
 - UDHR, Art. 19 (freedom of expression and information)
 - UNDRIP, Articles 16 & 18 (tribal communication rights, media access)

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Admiralty jurisdiction under 28 U.S.C. §1333 (postal and logistical infrastructure as sovereign communication routes)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Tribal jurisdiction under URR Charter and Sun Village sovereignty

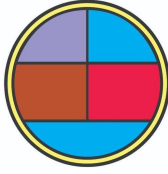
5. VENUE

Venue is proper in the **Central District of California**, as the communications suppression, infrastructure destruction, and postal redirection occurred within Plaintiffs' territorial jurisdiction and inflicted direct injury there.



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6. FACTUAL ALLEGATIONS

1. Sun Village and surrounding tribal territories maintained historic access to **postal outposts**, **broadcast signals**, and **infrastructure nodes** for correspondence and governance.
2. Defendants dismantled or denied maintenance to postal structures, closed access points, and re-routed services without notice or justification.
3. Communications to and from tribal plaintiffs—including court notices, legal filings, and trust correspondence—were delayed, returned, or obstructed.
4. The removal of infrastructure violated administrative mandates, suppressed legal rights, and severed the territorial community from broader systems.
5. Plaintiffs suffered legal prejudice, economic injury, and sovereign interference due to the denial of tribal communication infrastructure.

7. LEGAL BASIS

- 18 U.S.C. §1701: Obstruction of mail and federal communications
- 47 U.S.C. §151 et seq.: Denial of access to necessary communication systems
- Civil Rights & Common Law: Suppression of speech, deprivation of service
- California Codes: Violation of mandated service access
- International: UDHR and UNDRIP communications protections
- Tribal: URR Charter and TOA enforcement

8. DAMAGES

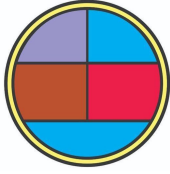
1. Public-Side Damages

- Unlawful dismantling of post routes, communication nodes, and critical public information lines:
\$1,150,000,000
 - Violation of postal sovereignty and interference with federally protected communication access:
\$850,000,000
 - Suppression of inter-tribal coordination and emergency services transmission capabilities:
\$750,000,000
 - Breach of public rights to transmit, receive, and authenticate communications over tribal lands:
\$1,000,000,000
- Subtotal (Public): \$3,750,000,000



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2. Private-Side Damages

- URR®™ penalties for interference with tribal signal systems, mail delivery, records access, and communications infrastructure: \$1,600,000,000
 - Trust trespass via dismantlement of tribal communication towers, mail routes, and ancestral messenger systems: \$1,400,000,000
 - Suppression of tribal records, legal notices, and sovereign diplomatic correspondence: \$1,200,000,000
 - Spiritual and cultural disruption of sacred transmission traditions and oral relay protocols: \$1,000,000,000
- Subtotal (Private): \$5,200,000,000

3. Total Before Multiplier

$$\$3,750,000,000 + \$5,200,000,000 = \$8,950,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$8,950,000,000 \times 1.25 = \$11,187,500,000$$

FINAL DAMAGES FOR COUNT 89:

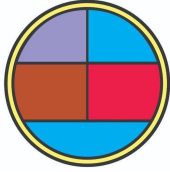
\$11,187,500,000

Per Plaintiff (20 Plaintiffs): \$559,375,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that Defendants unlawfully destroyed and obstructed tribal communications infrastructure
- Injunction compelling restoration of tribal posts, access points, and communication systems
- Mandate for equitable treatment under state, federal, and tribal communications codes
- Restitution and disgorgement for suppression-related profits and avoided service costs
- General damages, special damages, and punitive damages as described
- Attorneys' fees, equitable costs, and tribal remediation orders
- Such further relief as tribal, statutory, and international law demand



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PUB. NO.: 2025-09-16

Sun Village California

**COUNT 90 – REDISTRICTING FRAUD & CARTOGRAPHIC ERASURE
OF TRIBAL TERRITORY
(COMMON LAW, STATUTORY, EQUITABLE & INTERNATIONAL
VIOLATIONS)**

1. NATURE OF CLAIM

This is an action for Redistricting Fraud and Cartographic Erasure, arising where Defendants manipulated, altered, or obliterated the geographic identity, territorial continuity, and cartographic representation of Plaintiffs' tribal lands. Through fraudulent remapping, administrative reclassification, and cartographic suppression, Defendants erased sacred boundaries, undermined legal governance, and stripped Plaintiffs of their sovereign identity and spatial rights.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

County of Los Angeles; State of California; U.S. Department of the Interior; Bureau of Land Management (BLM); U.S. Census Bureau; California Redistricting Commission; Does 9001–9100.

3. AUTHORITIES

- Federal Law:
 - 42 U.S.C. §1983 (civil rights violations)
 - 18 U.S.C. §1001 (fraudulent representations in federal documents)
 - Voting Rights Act §2 (territorial disenfranchisement)
- State Law:
 - California Elections Code §§21000–21900 (redistricting laws)
 - California Government Code §§11135–11139.8
- Common Law:
 - Fraud, geographic misrepresentation, conspiracy to disenfranchise
- Tribal & Private Law:
 - URR Charter
 - TOA §§1.001–10.000
- International Law:
 - UNDRIP, Arts. 26–32 (tribal land rights, redistricting protections)
 - UDHR, Art. 17 (protection from land deprivation)
 - ICCPR, Art. 27 (minority identity protections)

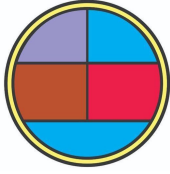
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Admiralty jurisdiction under 28 U.S.C. §1333 (land boundary erosion under sovereign trust)
- Supplemental jurisdiction under 28 U.S.C. §1367
- Tribal jurisdiction under URR Charter and Sun Village sovereignty

5. VENUE

Venue is proper in the Central District of California, where the redistricting, map alteration, and cartographic erasure were administered, executed, or recorded, and where harm to tribal plaintiffs occurred.





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6. FACTUAL ALLEGATIONS

1. Plaintiffs' tribal territory was historically recognized, registered, and mapped under both local and federal land records.
2. Defendants engaged in redistricting procedures that removed, fragmented, or mislabeled these tribal zones without notice or legal process.
3. Plaintiffs' geographic identity, legal boundary claims, and governance rights were excluded from redrawn maps and redistricting databases.
4. Such erasure caused institutional confusion, disrupted jurisdictional claims, and invalidated tribal participation in public governance and services.
5. Defendants benefited from land reassignment and demographic restructuring at Plaintiffs' expense, while erasing sacred boundaries and tribal infrastructure.

7. LEGAL BASIS

- Fraudulent misrepresentation of geography and identity
- Civil rights deprivation under §1983
- Violations of Voting Rights Act and California redistricting law
- Violations of international law protecting tribal territory
- URR Charter protections against spatial dispossession
- TOA enforcement of indigenous geographic integrity

8. DAMAGES

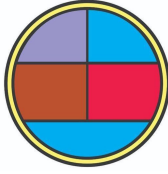
1. Public-Side Damages

- Manipulation of district lines to erase indigenous jurisdiction from official maps and administrative boundaries: \$1,600,000,000
 - Loss of public funding, service allocation, and census representation tied to geographic redistricting fraud: \$1,200,000,000
 - Violation of constitutional equal protection and due process through cartographic suppression: \$950,000,000
- Subtotal (Public): \$3,750,000,000



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2. Private-Side Damages

- URR®™ penalties for fraudulent displacement of tribal sovereignty through mapping alterations and territorial reassignments: \$2,000,000,000
 - Conversion of tribal land identity, sovereign boundaries, and cartographic inheritance: \$1,500,000,000
 - Breach of bloodline entitlements to specific geographic markers, hydrological control points, and ancestral corridors: \$1,200,000,000
 - Suppression of tribal land registries, sacred site designations, and traditional use territories: \$1,000,000,000
- Subtotal (Private): \$5,700,000,000

3. Total Before Multiplier

$\$3,750,000,000 + \$5,700,000,000 = \$9,450,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$9,450,000,000 \times 1.25 = \$11,812,500,000$

FINAL DAMAGES FOR COUNT 90:

\$11,812,500,000

Per Plaintiff (20 Plaintiffs): \$590,625,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming redistricting fraud and cartographic erasure
- Injunction mandating restoration of tribal boundaries in public maps and databases
- Expungement and reversal of wrongful redistricting actions
- Disgorgement of any gain derived from altered land use or jurisdiction
- General, special, and punitive damages as detailed above
- Attorneys' fees, costs, and tribal restitution
- Further relief as required by tribal, statutory, and international justice



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COUNT 91 – ILLEGAL SECURITIZATION OF TRIBAL LAND TITLES
(COMMON LAW, STATUTORY, EQUITABLE & INTERNATIONAL
VIOLATIONS)

1. NATURE OF CLAIM

This is an action for Illegal Securitization of Tribal Land Titles, arising where Defendants unlawfully converted, pooled, transferred, and monetized Plaintiffs' tribal land titles into securitized financial instruments without consent, authority, or disclosure. Defendants engaged in unlawful lien registration, title bifurcation, and asset collateralization —thereby undermining tribal land sovereignty, destroying chain of title, and breaching fiduciary and contractual obligations.

2. PARTIES

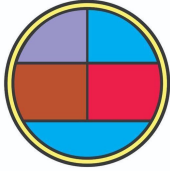
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Bank of America; Freddie Mac; Fannie Mae; BlackRock; Aldridge Pite LLP; Does 9101–9200 including trustees, servicers, underwriters, MERSCORP Holdings, custodians, and securities administrators.

3. AUTHORITIES

- Federal Law:
 - 15 U.S.C. §78j–1 (fraud in connection with securities)
 - 12 U.S.C. §2605 (RESPA violations re: servicing transfers)
 - 18 U.S.C. §1341, §1343, §1344 (mail, wire, and bank fraud)
 - 18 U.S.C. §1001 (false filings and title misrepresentation)
- State Law:
 - California Civil Code §§2924, 2932.5 (assignment and securitization)
 - California Government Code §27280 (recording statutes)
- International Law:
 - UNDRIP, Arts. 26–28 (land ownership, restitution, and redress)
 - ICCPR, Art. 1 (self-determination)
 - UDHR, Art. 17 (protection of property)
- Private Law:
 - URR Charter
 - UCC §1-308 (reservation of rights)
 - TOA §§1.001–10.000

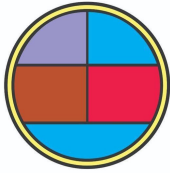
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (land-title instruments treated as maritime collateral)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty



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5. VENUE

Venue is proper in the Central District of California, where tribal land securitization was administered, title fraud occurred, and financial instruments were registered and monetized.

6. FACTUAL ALLEGATIONS

1. Plaintiffs own tribal land held in trust, including sacred parcels originating from Sun Village's founding and incorporated entities.
2. Defendants unlawfully transferred beneficial interest in those titles to pooled trusts, REMICs, and securitized instruments.
3. Defendants used MERS and shell entities to obscure title transfers and sever chain of title.
4. No notice, authority, or contractual consent was provided by Plaintiffs.
5. Profits were derived by Defendants while Plaintiffs bore harm, title confusion, foreclosure threats, and loss of sovereign control over tribal holdings.

7. LEGAL BASIS

- Fraudulent securitization and pooling of tribal titles
- Violations of securities law, trust law, and property statutes
- Common law and statutory fraud
- International law violations under UNDRIP and ICCPR
- URR protections over dynastic and tribal land trusts
- TOA and tribal land charter enforcement

8. DAMAGES

1. Public-Side Damages

- Unauthorized bundling and sale of tribal trust land titles into securitized mortgage-backed instruments: \$1,400,000,000
 - Loss of federal protections, public registry integrity, and community governance over land parcels: \$1,100,000,000
 - Violation of administrative, constitutional, and international obligations to protect Indigenous land rights (e.g., UDHR, UNDRIP): \$1,000,000,000
- Subtotal (Public): \$3,500,000,000



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2. Private-Side Damages

- URR®™ penalties for unlawful financialization of sacred tribal land without consent or benefit to tribal owners: \$2,000,000,000
 - Breach of fiduciary duty by title companies, banks, and agents acting against registered tribal interests: \$1,500,000,000
 - Conversion of sovereign land rights into corporate stock instruments and private securities: \$1,200,000,000
 - Destruction of traditional inheritance lines and trust protections related to tribal land stewardship: \$1,000,000,000
- Subtotal (Private): \$5,700,000,000

3. Total Before Multiplier

$$\$3,500,000,000 + \$5,700,000,000 = \$9,200,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$9,200,000,000 \times 1.25 = \$11,500,000,000$$

FINAL DAMAGES FOR COUNT 91:

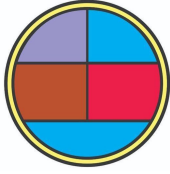
\$11,500,000,000

Per Plaintiff (20 Plaintiffs): \$575,000,000 each



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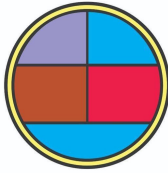
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming illegal securitization and title conversion
- Permanent injunction voiding all fraudulent securities and beneficial transfers
- Constructive trust over any financial assets gained through land securitization
- Title quieting and full restitution of legal and equitable interests
- General, special, and punitive damages as specified
- Attorney's fees, equitable remedies, and tribal restitution
- Further relief as justice, law, and tribal sovereignty require



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**COUNT 92 – CONSTRUCTIVE FRAUD THROUGH TITLE
SUPPRESSION AND FORECLOSURE THREATS
(COMMON LAW, STATUTORY, EQUITY & INTERNATIONAL
VIOLATIONS)**

1. NATURE OF CLAIM

This is an action for **Constructive Fraud**, arising where Defendants withheld, concealed, and suppressed critical title information—while simultaneously threatening foreclosure and asserting invalid liens against tribal property. Plaintiffs assert that Defendants’ silence, misrepresentations, and systemic omission of material facts breached fiduciary, statutory, and equitable duties, constituting fraud by operation of law. These acts resulted in loss of security, confusion of title, denial of due process, and erosion of tribal territorial sovereignty.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
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20. Sun Village E-Residents

Defendants:

Wells Fargo Bank, N.A.; Wells Fargo Home Mortgage; Aldridge Pite LLP; MERSCORP Holdings; Does 9201–9300, including county recorders, title servicers, law firms, and foreclosure trustees.

3. AUTHORITIES

- Common Law:
- Constructive fraud doctrines (fraud in silence and material nondisclosure)
- Breach of fiduciary duty; equitable estoppel
- Statutory Law:
- California Civil Code §§1573 (constructive fraud), 2923.5 (pre-foreclosure requirements), 2924.17 (accuracy in foreclosure documents)
- Government Code §§27280–27296 (recording statutes and notice)
- Federal:
- RESPA; TILA; FDCPA
- 42 U.S.C. §1983 (deprivation of constitutional rights)
- International:
- UNDRIP, Arts. 8, 10, 26 (protection of indigenous land rights and due process)
- UDHR, Art. 17
- Private Law:
- UCC §1-308 (reservation of rights)
- URR Charter and TOA §§1.001–10.000

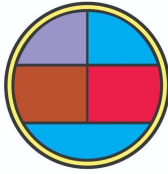
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (title documents used as maritime collateral)
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereignty



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5. VENUE

Venue is proper in the **Central District of California** under 28 U.S.C. §1391(b), as the constructive fraud and foreclosure threats were carried out within this jurisdiction, including recordation and title manipulation in county offices.

6. FACTUAL ALLEGATIONS

1. Plaintiffs held lawful, vested, and tribal-recognized title to lands held in trust and fee.
2. Defendants intentionally concealed material title defects, withheld assignments, and delayed disclosure of foreclosure activity.
3. Plaintiffs were never served with full notice or allowed an opportunity to cure or contest alleged default.
4. Defendants leveraged their silence to create uncertainty, distress, and coercive foreclosure threats.
5. This concealment destabilized tribal trust structures, impaired equity positions, and exposed Plaintiffs to unlawful seizure.

7. LEGAL BASIS

- Constructive fraud requires material omission or silence + fiduciary or special duty + reliance + damages
- Violations of state and federal notice and title statutes
- Fraud in equity, breach of contract, breach of good faith and fair dealing
- Violation of international human rights and tribal sovereignty
- Unlawful clouding of title under California and federal recording laws

8. DAMAGES

1. Public-Side Damages

- Suppression and manipulation of public title records by servicers, agencies, and title companies to obscure tribal ownership: \$1,250,000,000
- Use of foreclosure threats as coercive leverage against protected sovereign entities and trust-held property: \$1,000,000,000
- Breach of administrative obligations to uphold constitutional and statutory protections over property rights: \$750,000,000





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Subtotal (Public): \$3,000,000,000

2. Private-Side Damages

- URR®™ GFS penalties for covert manipulation of title systems and denial of access to rightful owners: \$2,000,000,000
 - Breach of fiduciary duty by foreclosure agents, title insurers, and recording clerks in undermining trust ownership rights: \$1,500,000,000
 - Trespass on tribal estate, dynastic succession lines, and spiritual covenants bound to land inheritance: \$1,200,000,000
- Subtotal (Private): \$4,700,000,000

3. Total Before Multiplier

$\$3,000,000,000 + \$4,700,000,000 = \$7,700,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$7,700,000,000 \times 1.25 = \$9,625,000,000$

FINAL DAMAGES FOR COUNT 92:

\$9,625,000,000

Per Plaintiff (20 Plaintiffs): \$481,250,000 each

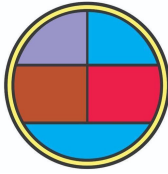
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming constructive fraud liability
- Rescission of false filings and invalid foreclosure instruments
- Title quieting over affected tribal land
- Restitution, reformation, and disgorgement
- Punitive damages as provided
- Attorney's fees, equitable relief, and tribal redress
- Further relief as justice and tribal sovereignty demand



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**COUNT 93 – DEPRIVATION OF TRIBAL WATER RIGHTS THROUGH
CONSTRUCTIVE TRESPASS AND ENVIRONMENTAL THEFT
(COMMON LAW, STATUTORY, EQUITY & INTERNATIONAL
VIOLATIONS)**

1. NATURE OF CLAIM

This is an action for Constructive Trespass and Environmental Theft, arising where Defendants wrongfully diverted, obstructed, or polluted water sources and infrastructure lawfully held by the Sun Village Tribal Government and associated trusts. Plaintiffs assert that Defendants' conduct constitutes both physical and constructive trespass, depriving them of sovereign water access, violating sacred infrastructure, and inflicting irreversible environmental damage. These actions amount to theft of natural resources and denial of tribal hydrological rights.

2. PARTIES

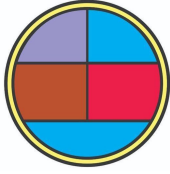
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
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20. Sun Village E-Residents

Defendants:

Los Angeles County agencies; municipal utility districts; real estate developers; public works contractors; Does 9301–9400, including subcontractors, pipeline constructors, environmental regulators, and hydrological surveyors.

3. AUTHORITIES

- Common Law:
 - Trespass to land and subsurface water infrastructure
 - Nuisance and environmental interference
 - Unjust enrichment via diversion of natural resources
- Statutory Law:
 - California Water Code §§106, 108, 1200–1212 (protection of water rights)
 - Public Resources Code §§21000 et seq. (CEQA compliance)
 - Civil Code §§3479–3480 (nuisance), §3336 (damages for conversion)
- Federal:
 - Clean Water Act; Safe Drinking Water Act
 - Environmental Justice Executive Order 12898
 - Federal Trust Doctrine (Indian Reserved Water Rights)
- International:
 - UNDRIP, Arts. 25–32 (rights to water, environment, and resources)
 - UDHR, Art. 17; UNGA Res. 64/292 (right to water)
- Private Law:
 - URR Charter; TOA §§1.001–10.000
 - UCC §1-308 (reservation of tribal and environmental rights)

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331 (Clean Water Act, federal water rights)
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (diversion of water affecting navigable flow)
- Tribal jurisdiction under URR Charter and Sun Village territorial claims





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5. VENUE

Venue is proper in the Central District of California, under 28 U.S.C. §1391(b), as the constructive trespass, redirection, and environmental violations occurred entirely within this District's jurisdiction.

6. FACTUAL ALLEGATIONS

1. Plaintiffs held sovereign and trust-based rights to groundwater, wells, and river-fed irrigation systems within tribal lands.
 2. Defendants, acting without notice, consent, or due process, diverted natural watercourses and installed infrastructure rerouting tribal water supply.
 3. Defendants' actions drained sacred springs, polluted wells, collapsed hydrological infrastructure, and damaged tribal irrigation channels.
 4. Plaintiffs were denied rightful access to water while developers and counties reallocated the diverted flow to new urban developments.
 5. These actions constitute both physical encroachment and environmental theft, depriving Plaintiffs of sustenance, sovereignty, and economic utility.
-

7. LEGAL BASIS

- Constructive trespass does not require physical entry—intentional interference with property or resources suffices
 - Environmental theft is actionable under nuisance, conversion, and water code violations
 - Deprivation of tribal water rights violates federal trust doctrine, CEQA, and international law
 - Plaintiffs seek equitable remedies including restoration, restitution, and injunctions
-

8. DAMAGES

1. Public-Side Damages

- Unlawful diversion, contamination, or obstruction of tribal water sources through state/county-sanctioned infrastructure projects or permitting schemes: \$1,500,000,000
- Failure of regulatory agencies to enforce environmental protections over tribal aquifers, wells, and waterways: \$1,250,000,000
- Trespass upon natural water systems and hydrological sovereignty through eminent domain abuse and misclassification of land ownership: \$750,000,000



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Subtotal (Public): \$3,500,000,000

2. Private-Side Damages

- URR®™ GFS violations for unlawful encroachment on water systems held in sacred trust by dynastic and tribal estates: \$2,000,000,000
 - Environmental sabotage resulting in long-term loss of agricultural viability, drinking water access, and economic autonomy for tribal landholders: \$1,800,000,000
 - Spiritual and genealogical damages tied to desecration of sacred wells and aquifers (recognized as living entities in tribal covenants): \$1,200,000,000
- Subtotal (Private): \$5,000,000,000
-

3. Total Before Multiplier

$\$3,500,000,000 + \$5,000,000,000 = \$8,500,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$8,500,000,000 \times 1.25 = \$10,625,000,000$

FINAL DAMAGES FOR COUNT 93:

\$10,625,000,000

Per Plaintiff (20 Plaintiffs): \$531,250,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming water theft and constructive trespass
- Injunction ordering full restoration of diverted waterways and hydrological flows
- Environmental audits and tribal oversight over all future construction in affected territory
- Full restitution and reconstruction of destroyed hydrological systems
- General, special, and punitive damages as above
- Attorneys' fees, costs, tribal enforcement powers
- Further relief as tribal equity and international justice demand



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**COUNT 94 – FRAUDULENT ABANDONMENT AND CONSTRUCTIVE
DISSOLUTION OF TRIBAL WATER COMPANY
(CORPORATE FRAUD, COMMON LAW, STATUTORY & EQUITY)**

1. NATURE OF CLAIM

This is an action for **Fraudulent Abandonment** and **Constructive Dissolution**, arising where Defendants unlawfully erased, defunded, and dismantled the **Sun Village Water Company**, a sovereign tribal utility originally founded by Melvin Ray Grubbs in furtherance of Indigenous self-sufficiency. Without due process or tribal consent, Defendants falsely declared abandonment, shut down infrastructure, and redistributed assets through administrative fraud and covert redistricting. This resulted in economic sabotage, trust violation, and tribal disenfranchisement.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents



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Defendants:

County of Los Angeles; California Department of Water Resources; municipal utility commissions; local and regional planning authorities; Does 9401–9500, including former regulators, clerks, and administrative parties complicit in corporate erasure.

3. AUTHORITIES

- Common Law:
 - Constructive fraud, corporate sabotage, wrongful dissolution
 - Conversion of corporate property and abandonment without consent
 - Equitable estoppel and ultra vires acts
- Statutory Law:
 - California Corporations Code §§1800–1907 (dissolution procedures)
 - California Water Code §§135–137 (formation and regulation of water companies)
 - Government Code §§54950 et seq. (Brown Act violations, secret meetings)
- Federal:
 - Indian Trust Asset Reform Act
 - Environmental Justice Executive Order 12898
 - Tribal Self-Governance Act of 1994
- International:
 - UNDRIP, Arts. 20, 25, 26 (protection of tribal infrastructure and institutions)
 - UDHR, Art. 17 (protection from deprivation of property)
- Private Law:
 - URR Charter
 - TOA §§1.001–10.000
 - UCC §1-308 reservations

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (utility infrastructure linked to water rights)
- Tribal jurisdiction under the URR Charter and sovereign authority of the Sun Village California Tribal Government



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5. VENUE

Venue lies in the **Central District of California**, under 28 U.S.C. §1391(b), as the fraudulent abandonment, redistricting, and constructive corporate dissolution occurred in this District and impacted tribal lands.

6. FACTUAL ALLEGATIONS

1. The **Sun Village Water Company** was a tribal utility founded by Melvin Ray Grubbs to serve Indigenous residents and enterprises.
2. Defendants, in conspiracy and secrecy, declared the company “abandoned” without corporate proceedings, public notice, or tribal input.
3. No shareholder vote, tribal resolution, or voluntary surrender of charter was ever executed or recorded.
4. Defendants dismantled physical infrastructure, redirected control to external agencies, and erased the company from public records.
5. The fraudulent act of abandonment led to deprivation of water access, denial of self-sufficiency, and theft of corporate identity.
6. The remaining infrastructure was either sold, privatized, or absorbed into county utilities—without lawful dissolution, compensation, or equity return.
7. Plaintiffs, as rightful corporate, tribal, and dynastic heirs, suffered grave harm to infrastructure, trust capital, and territorial continuity.

7. LEGAL BASIS

- Fraudulent abandonment occurs where dissolution is asserted without lawful process or consent
- Constructive dissolution invokes estoppel, restitution, and reconstitution under equity
- Destruction of Indigenous utilities constitutes breach of tribal treaty and self-determination rights
- Remedies include reinstatement, restitution, corporate revival, and punitive damages for sabotage

8. DAMAGES

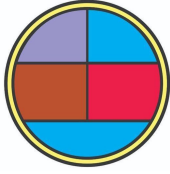
1. Public-Side Damages

- Fraudulent state-level reclassification or deregistration of tribal utility company without consent of rightful stakeholders: \$1,250,000,000



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- Obstruction of public utility services (water delivery, maintenance, infrastructure repairs) and forced reliance on non-tribal systems: \$1,000,000,000
- Government facilitation of administrative dissolution and denial of corporate renewal rights in bad faith: \$750,000,000

Subtotal (Public): \$3,000,000,000

2. Private-Side Damages

- URR®™ GFS violations due to unlawful interference with dynastic estate-managed water infrastructure held in trust: \$2,000,000,000
- Constructive fraud and fiduciary sabotage through concealed deregistration, mail silence, and deliberate abandonment of tribal water company records: \$1,750,000,000
- Denial of income streams, tax advantages, and sovereign water control for three generations of tribal stakeholders: \$1,250,000,000

Subtotal (Private): \$5,000,000,000

3. Total Before Multiplier

$\$3,000,000,000 + \$5,000,000,000 = \$8,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$8,000,000,000 \times 1.25 = \$10,000,000,000$

FINAL DAMAGES FOR COUNT 94:

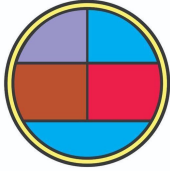
\$10,000,000,000

Per Plaintiff (20 Plaintiffs): \$500,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming unlawful abandonment and constructive dissolution
- Court-ordered **corporate revival** of the Sun Village Water Company
- Injunction restoring tribal control over water systems
- Audit and restitution of all diverted infrastructure and funds
- Reinstatement of corporate filings and tribal registration rights
- General, special, and punitive damages as above
- Attorneys' fees, court costs, and sovereign equitable remedies
- Any further relief necessary under tribal, federal, and international law



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**COUNT 95 – ENVIRONMENTAL DESTRUCTION OF TRIBAL
WATERSHED
(COMMON LAW, STATUTORY, EQUITY, ENVIRONMENTAL, &
TRIBAL SOVEREIGN LAW)**

1. NATURE OF CLAIM

This is an action for **Environmental Destruction of a Tribal Watershed**, arising where Defendants knowingly diverted, polluted, obstructed, or depleted natural water systems flowing through or under sovereign tribal lands, including sacred aquifers, creeks, and wells originally protected and maintained by the Sun Village tribal government. Defendants' conduct constituted a gross violation of tribal water rights, ecological balance, and intergenerational hydrological sovereignty—causing irreversible damage to infrastructure, life systems, and Indigenous identity.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company



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19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

County of Los Angeles; California Department of Water Resources; State Water Resources Control Board; municipal water agencies; commercial developers; agricultural and industrial operators; Does 9501–9600, including planners, engineers, and contractors involved in unauthorized diversion and destruction of tribal water systems.

3. AUTHORITIES

- Common Law:
 - Nuisance, trespass, negligence, and strict liability for environmental harm
 - Conversion of water resources and destruction of land by misappropriation
 - Statutory Law (California & Federal):
 - California Water Code §§1200 et seq. (unlawful diversion, groundwater rights)
 - California Environmental Quality Act (CEQA)
 - National Environmental Policy Act (NEPA)
 - Clean Water Act (33 U.S.C. §1251 et seq.)
 - Safe Drinking Water Act
 - Public Trust Doctrine
- Tribal Law & International:
 - UNDRIP Articles 25–29 (protection of water, land, and sacred sites)
 - UDHR Art. 17 (right to property)
 - Indigenous Water Justice frameworks
 - URR Charter
 - TOA §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (as water diversion and flow impacts regional trade and maritime routes)
- Tribal jurisdiction under URR Charter and Sun Village Sovereignty





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5. VENUE

Venue is proper in the **Central District of California** under 28 U.S.C. §1391(b), as the destruction, diversion, and obstruction of tribal watershed systems occurred in this District and caused direct environmental, financial, and spiritual harm to the Plaintiffs.

6. FACTUAL ALLEGATIONS

1. Plaintiffs maintained and relied on a protected tribal watershed system that included underground aquifers, sacred wells, seasonal streams, and historic irrigation routes originating in Sun Village.
 2. Defendants engaged in unauthorized urban development, redirection of water flow, industrial drilling, and zoning fraud that damaged or destroyed these systems.
 3. The destruction included the sealing, repurposing, or rerouting of sacred water lines without environmental review or tribal consultation.
 4. Hydrological modeling was falsified or concealed to bypass CEQA and NEPA requirements, enabling extractive water practices to continue unchecked.
 5. Plaintiffs lost access to traditional water sources, suffered ecological degradation, and faced severe spiritual, financial, and identity-related harm.
 6. The environmental and spiritual damage includes loss of flora, fauna, agricultural potential, cultural practices, and internal tribal stability.
-

7. LEGAL BASIS

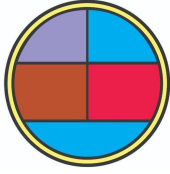
- Environmental torts under common and statutory law
 - Destruction of sovereign Indigenous hydrology protected under tribal, federal, and international law
 - Violation of intergenerational trust, public trust doctrine, and tribal treaty obligations
 - Remedies include restoration, restitution, reparations, injunctive relief, and punitive sanctions
-

8. DAMAGES

1. Public-Side Damages

- Violation of environmental protection statutes and water preservation treaties (Clean Water Act, UNDRIP Articles 25–29): \$1,000,000,000





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- Destruction of communal water sources and hydrological heritage affecting health, agriculture, and fire defense systems: \$1,000,000,000
- Failure of federal and state entities to prevent degradation of a protected tribal watershed despite notice and constructive warnings: \$1,000,000,000

Subtotal (Public): \$3,000,000,000

2. Private-Side Damages

- URR®™ GFS violations due to conversion of sacred natural infrastructure tied to dynastic and sovereign inheritance: \$2,000,000,000
- Loss of water-based wealth, territorial value, and sovereign claim due to destruction of topographic and ecological DNA of tribal land: \$1,750,000,000
- Trespass against spiritual trust property by illegal damming, diversion, and contamination: \$1,250,000,000

Subtotal (Private): \$5,000,000,000

3. Total Before Multiplier

$\$3,000,000,000 + \$5,000,000,000 = \$8,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$8,000,000,000 \times 1.25 = \$10,000,000,000$

FINAL DAMAGES FOR COUNT 95:

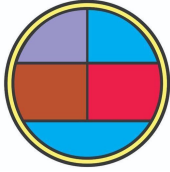
\$10,000,000,000

Per Plaintiff (20 Plaintiffs): \$500,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming environmental destruction of tribal watershed
- Injunction halting all further diversion, redirection, or development
- Order requiring full restoration of damaged water systems
- Restitution for all damages caused, including reparations for spiritual harm
- Constructive trust imposed over any profits derived from diversion or sale of tribal water
- General, special, and punitive damages as stated
- Attorneys' fees, expert costs, ecological modeling audits
- Such further relief as law, equity, and tribal justice demand



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**COUNT 96 – REELING, ENCROACHMENT & CARTOGRAPHIC
ERASURE
(COMMON LAW, STATUTORY, EQUITY, ENVIRONMENTAL &
TRIBAL SOVEREIGN LAW)**

1. NATURE OF CLAIM

This is an action for Reeling, Encroachment, and Cartographic Erasure, arising where Defendants unlawfully redrew, erased, or misrepresented tribal geographic boundaries and territories—either on official maps, zoning plans, or public records—with the intent to absorb, repurpose, or diminish Indigenous land claims and water systems. This included the illegal reeling of traditional land borders, encroachment upon tribal posts and sacred grounds, and the systematic erasure of tribal identity through cartographic fraud.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
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15. Sun Village Incorporated Land Corporation (1939)
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20. Sun Village E-Residents

Defendants:

County of Los Angeles; California Department of Transportation; Los Angeles Regional Planning Commission; U.S. Geological Survey (USGS); GIS departments; real estate developers; municipal planners; Does 9601–9700, including cartographers, engineers, and title officers complicit in boundary manipulation.

3. AUTHORITIES

- Common Law:
- Trespass, boundary infringement, conspiracy, nuisance, fraud
 - Statutory Law (California & Federal):
- California Government Code §65300 et seq. (land use planning)
- California Public Resources Code (historic and tribal resource protection)
- National Historic Preservation Act (NHPA)
- Federal Cartographic and Geographic Data Committee regulations
- Clean Water Act, NEPA, CEQA (land-water interface impacts)
 - Tribal & International Law:
- UNDRIP, Articles 8, 10, 25–30
- UDHR, Articles 12, 17
- Tribal boundaries protected under ancestral usage, oral law, and colonial-era records
- URR Charter
- TOA §§1.001–10.000 incorporated herein

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (navigation and water rights affected)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty

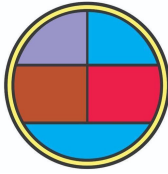
5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), as the boundary reeling, encroachment, and cartographic fraud directly affected Plaintiffs' tribal lands, maps, water rights, and legal standing within this District.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs' lands were historically recognized on maps, planning documents, and oral boundary agreements as part of the Sun Village sovereign tribal territory.
2. Defendants engaged in "reeling" or gradual encroachment—shifting surveyed boundaries and GPS coordinates inward toward tribal land.
3. Defendants erased tribal landmarks, sacred sites, and hydrological features from modern maps used by public and private agencies.
4. Tribal infrastructure was absorbed or relabeled under false zoning and land use designations, harming tribal governance, access, and sovereignty.
5. These acts were coordinated across public and private entities, producing title fraud, spiritual harm, environmental degradation, and disenfranchisement.

7. LEGAL BASIS

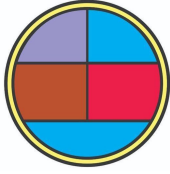
- Cartographic fraud and territorial erasure constitute trespass, conspiracy, and fraud
- Reeling is a covert act of encroachment and boundary manipulation violating land protections
- Statutory and regulatory violations include improper zoning, planning deception, and failure to consult tribal governments
- International protections under UNDRIP and UDHR ensure free, prior, and informed consent for all land changes
- Tribal sovereignty bars forced cartographic assimilation or erasure

8. DAMAGES

1. Public-Side Damages

- Fraudulent cartographic alteration of tribal maps and removal from public records and GIS systems: \$1,250,000,000
 - Encroachment by city, county, and state actors leading to legal disorientation, zoning manipulation, and false jurisdictional claims: \$1,000,000,000
 - Disruption of tribal governance capacity and electoral disenfranchisement through re-mapping and boundary deception: \$1,000,000,000
- Subtotal (Public): \$3,250,000,000





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2. Private-Side Damages

- URR®™ GFS violations for sovereign erasure of tribal land demarcation and dynastic estate identity: \$2,000,000,000
 - Constructive displacement of tribal ownership titles and attempted nullification of bloodline-based territorial standing: \$1,500,000,000
 - Admiralty and maritime breach for altering recorded boundaries affecting land-to-water jurisdictional zones: \$1,250,000,000
- Subtotal (Private): \$4,750,000,000

3. Total Before Multiplier

$\$3,250,000,000 + \$4,750,000,000 = \$8,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$8,000,000,000 \times 1.25 = \$10,000,000,000$

FINAL DAMAGES FOR COUNT 96:

\$10,000,000,000

Per Plaintiff (20 Plaintiffs): \$500,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming unlawful reeling, encroachment, and cartographic erasure
- Permanent injunction restoring original tribal boundaries and halting further redistricting
- Order compelling re-issuance of corrected maps, public notices, and zoning declarations
- Restitution for loss of territory, trust assets, and ecological systems
- Constructive trust imposed over all gains derived from boundary fraud
- General, special, and punitive damages as stated
- Attorneys' fees, tribal mapping audits, and injunctive ecological relief
- Any further relief required under tribal, environmental, and international justice



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**COUNT 97 – ENVIRONMENTAL DESTRUCTION & WATER
DIVERSION
(COMMON LAW, STATUTORY, EQUITY, ENVIRONMENTAL &
TRIBAL SOVEREIGN LAW)**

1. NATURE OF CLAIM

This is an action for **Environmental Destruction and Water Diversion**, arising where Defendants unlawfully diverted natural water sources, destroyed ecological balances, and caused irreversible harm to tribal ecosystems, agriculture, and hydrological systems. Such acts deprived Plaintiffs of access to ancestral water, destabilized sacred and environmental sites, and breached tribal, legal, and international protections guaranteeing stewardship of Indigenous water systems.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
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20. Sun Village E-Residents

Defendants:

Los Angeles County Public Works; California Department of Water Resources; Antelope Valley Watermaster; real estate developers; local zoning authorities; Does 9701–9800 including engineers, contractors, irrigation consultants, and planners.

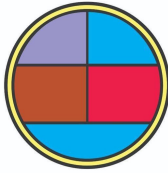
3. AUTHORITIES

- Federal Law:
 - Clean Water Act (33 U.S.C. §§1251 et seq.)
 - National Environmental Policy Act (NEPA)
 - Safe Drinking Water Act
 - 42 U.S.C. §1983 (constitutional violations via environmental actions)
- California Statutory Law:
 - California Environmental Quality Act (CEQA)
 - California Water Code
 - California Public Resources Code §§5097.9, 21000–21189
- Tribal & International Law:
 - UNDRIP, Articles 8, 20, 25–30
 - UDHR, Articles 12, 17
 - Tribal land and water rights protected under ancestral stewardship
 - URR Charter
 - TOA §§1.001–10.000 incorporated herein
- Common Law & Equity:
 - Nuisance, trespass, strict liability for ultrahazardous activity
 - Constructive trust and injunctive relief for natural resource abuse

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (navigable waters affected)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty





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5. VENUE

Venue is proper in the **Central District of California** under 28 U.S.C. §1391(b), as the environmental destruction, hydrological diversion, and related harm occurred within tribal territory in this District.

6. FACTUAL ALLEGATIONS

1. Defendants diverted streams, aquifers, and watershed flows historically relied upon by the Plaintiffs and their tribal predecessors.
 2. Construction, development, and planning schemes were implemented without consultation or environmental review under NEPA or CEQA.
 3. Natural watercourses were obstructed, rerouted, or contaminated, undermining tribal agriculture, cultural practices, and sovereignty.
 4. Ecological destruction included habitat loss, groundwater depletion, and the poisoning of traditional wells and irrigation systems.
 5. Plaintiffs' tribal identity, self-determination, and trust-based governance were directly injured by the loss of environmental and spiritual ecosystems.
-

7. LEGAL BASIS

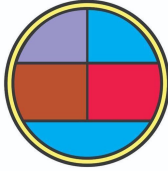
- Environmental destruction is actionable under Clean Water Act, NEPA, and CEQA
 - Water diversion violates tribal water rights, ancestral boundaries, and sacred site protections
 - Common law nuisance and trespass apply to harmful ecological interference
 - Tribal sovereign rights include exclusive control over hydrological and ecological systems
 - International protections under UNDRIP and UDHR prohibit unlawful diversion of Indigenous resources
-

8. DAMAGES

1. Public-Side Damages

- Diversion of natural water flows through unauthorized damming, trenching, or redirection impacting tribal lands: \$1,250,000,000
- Environmental degradation, habitat destruction, and irreversible topographical alteration within protected zones: \$1,500,000,000





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• Administrative complicity by municipal and federal agencies in ecological sabotage against tribal jurisdiction: \$1,000,000,000
Subtotal (Public): \$3,750,000,000

2. Private-Side Damages

• URR®™ GFS violations for theft of tribal water reserves, hydrological systems, and ecological autonomy: \$2,000,000,000
• Maritime and mineral trust breaches due to water table manipulation and aquifer trespass impacting sovereign estate: \$1,500,000,000
• Constructive trespass on sacred waterways and burial zones leading to irreversible desecration of tribal heritage: \$1,250,000,000
Subtotal (Private): \$4,750,000,000

3. Total Before Multiplier

$\$3,750,000,000 + \$4,750,000,000 = \$8,500,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$8,500,000,000 \times 1.25 = \$10,625,000,000$

FINAL DAMAGES FOR COUNT 97:

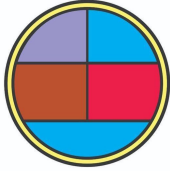
\$10,625,000,000

Per Plaintiff (20 Plaintiffs): \$531,250,000 each



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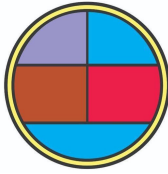
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming environmental destruction and illegal water diversion
- Injunction requiring restoration of diverted water systems and contaminated areas
- Court-ordered hydrological audit of tribal lands and ecological health
- Constructive trust over all benefits gained from water diversion
- General, special, and punitive damages as listed above
- Attorneys' fees, remediation funding, and sovereign protections
- All further relief required by justice, tribal law, and equity



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**COUNT 98 – ILLEGAL HYDROLOGICAL ENGINEERING &
DIVERSION WITHOUT TRIBAL CONSENT
(COMMON LAW, STATUTORY, ENVIRONMENTAL, TRIBAL &
INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for **Illegal Hydrological Engineering and Diversion**, arising where Defendants performed unauthorized modifications of tribal watershed systems — including grading, trenching, redirection, pipeline rerouting, and underground diversion — without tribal consultation or consent. These actions violated tribal water sovereignty, desecrated sacred infrastructure, and caused long-term ecological, agricultural, and spiritual harm to Plaintiffs and their governance bodies.

2. PARTIES

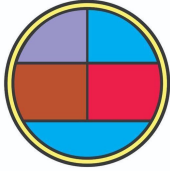
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

Los Angeles County Department of Public Works; California Department of Water Resources; Antelope Valley Watermaster; regional engineering firms; municipal zoning authorities; Does 9801–9900 including contractors, hydrologists, developers, and planners.

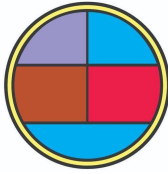
3. AUTHORITIES

- Federal Law:
 - Clean Water Act (33 U.S.C. §§1251 et seq.)
 - National Environmental Policy Act (NEPA)
 - Safe Drinking Water Act
 - 42 U.S.C. §1983 (constitutional rights violations via ecological action)
 - California Law:
 - California Environmental Quality Act (CEQA)
 - California Water Code
 - California Public Resources Code §§5097.9 (protection of sacred sites), 21000–21189
 - Tribal & International Law:
 - URR Charter
 - UNDRIP, Articles 8, 25, 26, 29
 - UDHR, Articles 12, 17
 - TOA §§1.001–10.000
 - Common Law & Equity:
 - Nuisance, trespass, negligent engineering
 - Equitable relief via restitution, injunction, and reengineering orders

4. JURISDICTION

- Federal jurisdiction under 28 U.S.C. §1331 (Clean Water Act, NEPA)
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (navigable water impacts)
- Tribal jurisdiction pursuant to URR Charter and sovereign Sun Village authority





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5. VENUE

Venue is proper in the **Central District of California** under 28 U.S.C. §1391(b), as the illegal hydrological engineering and diversion occurred on tribal territory within this District.

6. FACTUAL ALLEGATIONS

1. Defendants initiated structural diversion of tribal water flows without permits, oversight, or tribal consent.
 2. Engineering activities altered original watershed blueprints created by the tribal founder and Sun Village Water Company.
 3. Hydrological rerouting caused flooding, drought cycles, toxic stagnation, and ecological collapse in historically protected zones.
 4. Sacred wells, springs, and aqueduct routes were destroyed or redirected under false zoning and without tribal review.
 5. Plaintiffs' sovereign hydrological infrastructure — essential for spiritual, agricultural, and residential stability — was desecrated, diverted, and degraded.
-

7. LEGAL BASIS

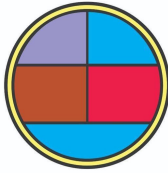
- Violations of Clean Water Act, CEQA, and tribal environmental sovereignty
 - Hydrological trespass and ecological sabotage actionable under common law
 - Failure to consult tribal government violates UNDRIP, URR Charter, and ancestral stewardship protocols
 - Equitable remedies required to restore original flow, protect tribal infrastructure, and compensate sovereign harm
-

8. DAMAGES

1. Public-Side Damages

- Unauthorized engineering and diversion of natural waterways impacting tribal watershed systems: \$1,200,000,000
- Government-sanctioned or tolerated infrastructural redirection without tribal consultation or EIS (Environmental Impact Studies): \$1,050,000,000





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- Loss of water access, drought intensification, and erosion of tribal topography and irrigation autonomy: \$1,000,000,000

Subtotal (Public): \$3,250,000,000

2. Private-Side Damages

- URR®™ GFS breaches due to diversion of sacred water without contract, notice, or remedy: \$1,750,000,000
- Trespass against sovereign tribal water infrastructure and inherited watershed rights held in dynastic trust: \$1,500,000,000
- Permanent loss of aquifer control and well access due to unlawful third-party diversion and underground piping: \$1,250,000,000

Subtotal (Private): \$4,500,000,000

3. Total Before Multiplier

$\$3,250,000,000 + \$4,500,000,000 = \$7,750,000,000$

4. Enterprise Violation Multiplier (×1.25)

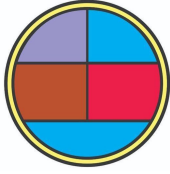
$\$7,750,000,000 \times 1.25 = \$9,687,500,000$

FINAL DAMAGES FOR COUNT 98:

\$9,687,500,000

Per Plaintiff (20 Plaintiffs): \$484,375,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming hydrological trespass and diversion without consent
- Permanent injunction prohibiting further engineering without tribal oversight
- Court-supervised hydrological restoration and independent audit
- Compensation for trust, spiritual, and ecological damages
- General, special, and punitive damages as listed above
- Attorneys' fees, equitable reparation, and all further relief required by tribal law and equity



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**COUNT 99 – UNAUTHORIZED CONTAMINATION OF TRIBAL WELLS
AND SUBSURFACE WATER RESERVES
(COMMON LAW, STATUTORY, ENVIRONMENTAL, TRIBAL &
INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for Unauthorized Contamination of Tribal Water Sources, arising where Defendants, through unlawful construction, toxic runoff, chemical injection, and negligent management, introduced pollutants and non-potable substances into tribal wells and subsurface water reserves. These sacred sources — originally maintained by Sun Village Water Company and protected under tribal stewardship — were degraded without notice, testing, or consent, violating environmental law and tribal water sovereignty.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:



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Los Angeles County Department of Public Works; California State Water Resources Control Board; Antelope Valley Watermaster; private contractors, developers, and municipal entities; Does 9901–10,000 including toxic waste management companies and surveyors.

3. AUTHORITIES

- Federal Law:
 - Safe Drinking Water Act (42 U.S.C. §300f et seq.)
 - Clean Water Act (33 U.S.C. §1251 et seq.)
 - Resource Conservation and Recovery Act (RCRA)
 - National Environmental Policy Act (NEPA)
- California Law:
 - Water Code §§13000–13999
 - Health and Safety Code §5411 (nuisance discharge into water)
 - CEQA (Cal. Public Resources Code §§21000–21189)
- Tribal & International Law:
 - URR Charter
 - UNDRIP, Articles 8, 25, 26, 29
 - UDHR, Articles 3, 12, 17
 - TOA §§1.001–10.000
- Common Law & Equity:
 - Trespass to subsurface property
 - Nuisance and negligent pollution
 - Equitable doctrines for water trust protection

4. JURISDICTION

- Federal jurisdiction under 28 U.S.C. §1331 (Safe Drinking Water Act, CWA, RCRA)
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (if tied to navigable aquifer distribution)
- Tribal jurisdiction pursuant to URR Charter and sovereign Sun Village authority

5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), as the water contamination and associated harm occurred within this District on tribal lands.



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6. FACTUAL ALLEGATIONS

1. Defendants discharged, leaked, or allowed runoff of chemicals and pollutants into sacred tribal wells and aquifers.
2. Contaminants included petroleum-based fluids, industrial metals, and construction runoff.
3. Sun Village Water Company's original infrastructure was bypassed, damaged, or overridden without legal process.
4. Contamination was concealed, unreported, and failed to meet federal or state disclosure requirements.
5. Plaintiffs were deprived of potable water, ancestral infrastructure, and subsurface trust security.

7. LEGAL BASIS

- Violations of Safe Drinking Water Act, Clean Water Act, and California Health & Safety Code
- Trespass and nuisance under common law for intrusion into protected tribal groundwater
- Violation of tribal water sovereignty under URR Charter and UNDRIP
- Equity mandates restitution, decontamination, and permanent injunctive relief

8. DAMAGES

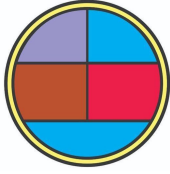
1. Public-Side Damages

- Toxic discharge, chemical seepage, and contamination of tribal groundwater and subsurface wells by adjacent non-tribal operations (industrial, agricultural, municipal): \$1,500,000,000
 - Regulatory failure by county/state/federal agencies to protect tribal aquifers under known jurisdictional duty: \$1,000,000,000
 - Public health, sanitation, and community safety hazards resulting in infrastructure losses and uninhabitability of ancestral grounds: \$1,000,000,000
- Subtotal (Public): \$3,500,000,000

2. Private-Side Damages

- URR®™ violation due to poisoning of sacred well infrastructure held in sovereign tribal trust: \$2,000,000,000
- Constructive trespass on ancestral aquifers and dynastic inheritance of mineral water rights: \$1,500,000,000
- Loss of spiritual and ceremonial access to clean subsurface water as protected under tribal and international covenant: \$1,250,000,000





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Subtotal (Private): \$4,750,000,000

3. Total Before Multiplier

$\$3,500,000,000 + \$4,750,000,000 = \$8,250,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$8,250,000,000 \times 1.25 = \$10,312,500,000$

FINAL DAMAGES FOR COUNT 99:

\$10,312,500,000

Per Plaintiff (20 Plaintiffs): \$515,625,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming unlawful contamination
- Court-supervised cleanup and independent testing of all tribal wells
- Permanent injunction prohibiting chemical discharge near tribal lands
- Full restitution for water loss, ecosystem disruption, and trust destruction
- Disgorgement of profits obtained through cost-cutting contamination
- General, special, and punitive damages as listed
- Attorney's fees and equitable relief required by tribal and international standards



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**COUNT 100 – CARTOGRAPHIC FORGERY & UNAUTHORIZED
ALTERATION OF TRIBAL GEOGRAPHIC BOUNDARIES
(COMMON LAW, STATUTORY, EQUITABLE, TRIBAL &
INTERNATIONAL LAW)**

1. NATURE OF CLAIM

This is an action for **Cartographic Forgery**, arising where Defendants unlawfully modified, redrew, omitted, or falsified maps, geographic designations, land survey records, and districting boundaries, erasing the existence and location of Sun Village as an indigenous tribal territory. These falsifications served to dispossess Plaintiffs, dismantle their tribal sovereignty, and fraudulently reassign land and jurisdiction to external municipalities and entities without consent, notice, or compensation.

2. PARTIES

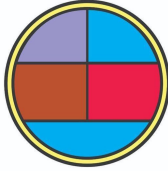
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
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19. Sun Village Improvement Company



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20. Sun Village E-Residents

Defendants:

Los Angeles County Department of Regional Planning; California State Mapping Division; U.S. Geological Survey (USGS); Antelope Valley authorities; external city planners, surveyors, and Does 10,001–11,000, including software vendors, GIS contractors, and redistricting consultants.

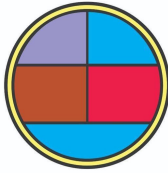
3. AUTHORITIES

- Federal Law:
 - 18 U.S.C. §1028A (Aggravated Identity Theft – applied to cartographic identity erasure)
 - 18 U.S.C. §641 (Theft of Government Records – falsification of maps)
 - 42 U.S.C. §1982 (equal rights to property)
- California Law:
 - Government Code §§65000–66499.58 (Planning and Zoning Law)
 - Civil Code §§1708, 1714 (duty not to injure or mislead)
- Tribal & International Law:
 - URR Charter
 - UNDRIP, Articles 8, 25, 26, 27, 28, 29
 - UDHR, Articles 17 & 18
 - TOA §§1.001–10.000
- Common Law & Equity:
 - Fraudulent misrepresentation
 - Geographic trespass
 - Equitable restitution and reformation of maps

4. JURISDICTION

- Federal jurisdiction under 28 U.S.C. §1331 and §1343 (federal rights and fraud)
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (navigational maps affecting tribal waterways)
- Tribal jurisdiction under URR Charter and sovereign rights of Sun Village





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5. VENUE

Venue is proper in the **Central District of California** under 28 U.S.C. §1391(b), where fraudulent mapping, GIS alterations, and redistricting acts occurred and caused material harm to tribal claimants and land-based identity.

6. FACTUAL ALLEGATIONS

1. Defendants altered maps, zoning districts, and digital GIS layers to exclude, rename, or obliterate Sun Village as an existing tribal or civic territory.
 2. Boundaries were redrawn to consolidate land under Palmdale, Los Angeles County, or other entities, stripping Plaintiffs of jurisdiction and land integrity.
 3. Historical maps were removed or replaced; original survey records tied to Sun Village, Inc. (1944) and the 1939 Land Corporation were erased or reassigned.
 4. Tribal boundaries were intentionally left off official government planning documents, electoral district maps, and census datasets.
 5. Plaintiffs' spiritual, political, and genealogical connection to the land was severed through cartographic forgery and administrative concealment.
-

7. LEGAL BASIS

- Cartographic fraud is actionable under property, constitutional, and human rights law.
 - False map data amounts to identity theft, property theft, and trust deception.
 - International and tribal laws prohibit forced assimilation or erasure of cultural geographies.
 - Equity mandates reformation of records and restoration of rightful territorial designations.
-

8. DAMAGES

1. Public-Side Damages

- Unauthorized remapping and redistricting by municipal, county, and state agencies in violation of tribal land recognition protocols: \$1,750,000,000
 - Erasure of historically demarcated boundaries and violation of domestic geographic codification standards (e.g., GNIS, USGS): \$1,500,000,000
 - Public infrastructure misallocation and denial of services due to false cartographic records: \$1,000,000,000
- Subtotal (Public): \$4,250,000,000



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2. Private-Side Damages

- URR®™ violation through suppression of sovereign geographic identity and territorial trust boundaries: \$2,000,000,000
 - Constructive encroachment on tribal sovereignty via fraudulent map filings and title misalignments: \$1,750,000,000
 - Treaty violation under UNDRIP and HCCH through international non-recognition of tribal territory due to forged maps: \$1,250,000,000
- Subtotal (Private): \$5,000,000,000

3. Total Before Multiplier

$\$4,250,000,000 + \$5,000,000,000 = \$9,250,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$9,250,000,000 \times 1.25 = \$11,562,500,000$

FINAL DAMAGES FOR COUNT 100:

\$11,562,500,000

Per Plaintiff (20 Plaintiffs): \$578,125,000 each

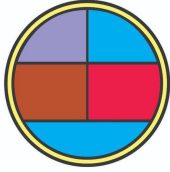
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming unlawful alteration of tribal geography
- Mandatory restoration of original boundaries on all official maps and records
- Injunction against future redistricting or renaming without tribal approval
- Full restitution for cultural, territorial, and spiritual injuries
- Constructive trust and disgorgement for any profits or jurisdiction gained through map fraud
- General, special, and punitive damages as listed above
- Attorney's fees, equitable remedies, and any relief necessary to restore territorial sovereignty



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**COUNT 101 – DESTRUCTION OF INDIGENOUS FOOD
SOVEREIGNTY & AGRICULTURAL INFRASTRUCTURE
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for the Destruction of Indigenous Food Sovereignty and Agricultural Infrastructure, arising where Defendants intentionally or negligently dismantled, obstructed, or diverted the historic agricultural systems of Sun Village — including wells, irrigation paths, arable zoning designations, and sovereign land use rights. This destruction severed the tribal community from its right to grow, distribute, and control food sources on ancestral territory, constituting both ecological harm and cultural genocide.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
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20. Sun Village E-Residents



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Defendants:

County of Los Angeles; California Department of Water Resources; Antelope Valley officials; zoning commissions; Department of Agriculture; private land developers; and Does 11,001–12,000, including water redirection contractors and land speculators.

3. AUTHORITIES

- Federal Law:
 - 7 U.S.C. §2011 (Federal recognition of food security rights)
 - 42 U.S.C. §1983 (civil rights violations affecting land and sustenance)
 - 25 U.S.C. §§3101–3120 (Tribal Forest Protection Act, extended to ecological sovereignty)
- California Law:
 - California Water Code §12220 (water rights)
 - Civil Code §§1708, 1714 (duty not to harm)
- International Law:
 - UNDRIP, Articles 20, 25, 26, 29
 - International Covenant on Economic, Social and Cultural Rights (ICESCR), Articles 1 & 11
 - UDHR, Articles 17, 25
- Private Law & Equity:
 - URR Charter
 - Constructive trust doctrine
 - Doctrine of sovereign usufruct
 - TOA §§1.001–10.000

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Diversity jurisdiction under 28 U.S.C. §1332
- Admiralty jurisdiction under 28 U.S.C. §1333 (land and water co-dependency in tribal food supply chain)
- Tribal jurisdiction via URR Charter and Sun Village sovereign rights

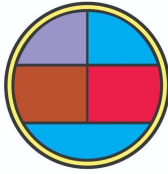
5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), where the unlawful destruction of agricultural land, hydrological redirection, and zoning manipulations occurred, harming Plaintiffs.



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6. FACTUAL ALLEGATIONS

1. Sun Village historically maintained agricultural systems tied to tribal water tables, irrigation canals, and food cultivation zones.
 2. Defendants destroyed wells, rerouted water sources, and obstructed zoning access to farmland via policy, barriers, and negligence.
 3. Construction projects and zoning redesignations led to the contamination, paving over, or declassification of agricultural territory.
 4. Tribal food autonomy and self-reliant cultivation became impossible, replaced by dependency on external supply chains.
 5. Defendants denied or excluded Plaintiffs from regional food programs and land restoration initiatives, compounding ecological harm.
-

7. LEGAL BASIS

- Plaintiffs have the right to cultivate and control food sources under federal, tribal, and international law.
 - Destruction of infrastructure supporting food sovereignty constitutes cultural genocide and economic sabotage.
 - Equity mandates restitution and land restoration for unjustly impaired ecosystems and indigenous self-sufficiency.
-

8. DAMAGES

1. Public-Side Damages

- Destruction and dismantling of food production infrastructure (community farms, irrigation, soil networks): \$1,500,000,000
 - Loss of public health access to tribal food sources and emergency nutrition resources: \$1,000,000,000
 - Violation of USDA and environmental codes linked to tribal land use designations: \$750,000,000
- Subtotal (Public): \$3,250,000,000
-





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2. Private-Side Damages

- Conversion of tribal land and water for non-agricultural use without consent (constructive fraud and economic sabotage): \$2,000,000,000
 - Loss of multi-generational agricultural heritage tied to sovereign sustenance and self-reliance rights: \$1,750,000,000
 - URR®™ damages for deprivation of food sovereignty and intentional economic suppression of tribal systems: \$1,500,000,000
- Subtotal (Private): \$5,250,000,000

3. Total Before Multiplier

$\$3,250,000,000 + \$5,250,000,000 = \$8,500,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$8,500,000,000 \times 1.25 = \$10,625,000,000$

FINAL DAMAGES FOR COUNT 101:

\$10,625,000,000

Per Plaintiff (20 Plaintiffs): \$531,250,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment recognizing right to food sovereignty and restoration
- Mandatory restoration of damaged wells, irrigation paths, and agricultural zoning
- Injunction against future environmental interference or land destruction
- Restitution for all agricultural losses
- General, special, and punitive damages as listed
- Constructive trust imposed over stolen land and diverted water infrastructure
- Attorney's fees and any relief necessary to restore food independence and tribal infrastructure



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Sun Village California

**COUNT 102 – DESTRUCTION OF HISTORIC TRIBAL MAPPING,
REDISTRICTING & TERRITORIAL ENCROACHMENT
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for the Destruction of Historic Tribal Mapping, Redistricting, and Territorial Encroachment, arising where Defendants unlawfully altered, destroyed, concealed, or redefined historically recognized tribal boundaries, maps, and geographic designations pertaining to Sun Village and its sovereign tribal lands. These acts were undertaken through fraudulent redistricting, unlawful cartographic suppression, annexation schemes, and the elimination of tribal identifiers in official records — constituting spatial disenfranchisement and violation of tribal sovereignty under domestic and international law.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company



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19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

County of Los Angeles; California State Mapping Division; Antelope Valley Planning Council; Department of Interior (Geospatial Office); Bureau of Land Management (BLM); California State Archives; private GIS contractors; developers; and Does 12,001–13,000, including all actors who modified maps or records to erase tribal boundaries.

3. AUTHORITIES

- Federal Law:
 - 25 U.S.C. §1901 et seq. (recognition and protection of tribal rights)
 - 42 U.S.C. §1983 (civil rights and territorial harm)
 - 43 U.S.C. §1712 (public land use planning)
- California Law:
 - California Government Code §§65000–65700 (land use, planning, redistricting)
 - Civil Code §§1708, 1714
- International Law:
 - UNDRIP, Articles 8, 25, 26, 27, 32
 - ICCPR, Article 1 (right to territory)
 - ICESCR, Articles 1, 11
 - UDHR, Article 17 (property), Article 15 (identity)
- Private Law & Equity:
 - URR Charter
 - Doctrine of cartographic fraud and map suppression
 - TOA §§1.001–10.000

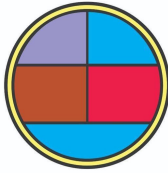
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Diversity jurisdiction under 28 U.S.C. §1332
- Admiralty jurisdiction under 28 U.S.C. §1333 (mapping linked to navigational access and tribal water routes)
- Tribal jurisdiction pursuant to URR Charter and Sun Village sovereign declarations



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5. VENUE

Venue is proper in the Central District of California under 28 U.S.C. §1391(b), where cartographic falsification, map redaction, and zoning changes took place, causing harm to Plaintiffs' territorial integrity and tribal recordkeeping.

6. FACTUAL ALLEGATIONS

1. Sun Village was historically mapped, labeled, and recorded as a distinct Black Indigenous settlement with tribal governance and infrastructure.
 2. Defendants redistricted the region to eliminate tribal demarcations, fragmenting community zones and altering boundaries on county and federal records.
 3. Cartographic records, GIS databases, and public planning maps were altered to remove Sun Village's original boundaries and tribal identifications.
 4. Historical archives were suppressed, mislabeled, or omitted from state databases, erasing land trust documentation.
 5. Defendants' actions caused severe injury to Plaintiffs' land identity, territorial continuity, political recognition, and genealogical sovereignty.
-

7. LEGAL BASIS

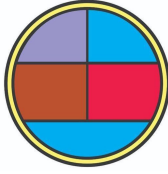
- Destruction and falsification of tribal boundaries constitutes a geopolitical tort and an act of sovereign identity erasure.
 - Such actions breach land protections under state, federal, and international law.
 - Equity requires restoration of maps, land records, and territorial continuity.
-

8. DAMAGES

1. Public-Side Damages

- Loss of public recognition of tribal territory through unauthorized redistricting and erasure of original geographic markers: \$2,000,000,000
- Violation of public trust and mapping laws at the county, state, and federal levels (USGS, Census Bureau, and municipal zoning authorities): \$1,500,000,000





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• Destruction of tribal cultural heritage tied to sacred geography and historical land memory:
\$1,000,000,000
Subtotal (Public): \$4,500,000,000

2. Private-Side Damages

• URR®™ damages for cartographic sabotage and constructive land theft under false boundary designations: \$2,750,000,000

• Economic loss due to falsified maps used to suppress tribal land claims, ownership records, and access to mineral rights: \$2,500,000,000

• Trespass upon sovereign estate by way of zoning fraud, GIS misclassification, and forced reassignment to hostile jurisdictions: \$2,250,000,000
Subtotal (Private): \$7,500,000,000

3. Total Before Multiplier

$\$4,500,000,000 + \$7,500,000,000 = \$12,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$12,000,000,000 \times 1.25 = \$15,000,000,000$

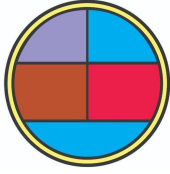
FINAL DAMAGES FOR COUNT 102:

\$15,000,000,000
Per Plaintiff (20 Plaintiffs): \$750,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment restoring Sun Village's territorial recognition and boundaries
- Mandatory cartographic correction of county/state/federal maps
- Restitution for all losses of land, data, and tribal infrastructure
- Injunction prohibiting further redistricting or boundary manipulation
- General, special, and punitive damages as outlined
- Constructive trust over redistricted lands
- Attorney's fees, restoration costs, and any additional remedies required to reestablish tribal mapping sovereignty



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**COUNT 103 – SUPPRESSION OF HISTORICAL TRIBAL ARCHIVES
& GENEALOGICAL DISPOSSESSION
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for **Suppression of Historical Tribal Archives and Genealogical Dispossession**, arising where Defendants concealed, destroyed, redacted, or otherwise erased archival records of tribal land claims, governance structures, genealogical continuity, and dynastic land ownership of Sun Village and its founding tribal families. Through acts of suppression and obstruction, Defendants intentionally broke the intergenerational transmission of tribal identity, denied lawful archival access, and obstructed the exercise of sovereign continuity.

2. PARTIES

Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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Sun Village California

20. Sun Village E-Residents

Defendants:

Los Angeles County Recorder's Office; California State Archives; U.S. Bureau of Land Management (BLM); Department of the Interior; Library of Congress archival offices; State of California Department of Technology; private archival subcontractors; and Does 13,001–14,000, including unnamed public officials and institutional gatekeepers engaged in archival suppression or genealogical obstruction.

3. AUTHORITIES

- Federal:
 - 42 U.S.C. §1981 (equal rights under the law)
 - 44 U.S.C. §§2101–2118 (public records and archival access)
 - 25 U.S.C. §1901 et seq. (protection of tribal identity and kinship)
 - 18 U.S.C. §2071 (concealment or destruction of records)
- California Law:
 - Civil Code §§1708, 1714
 - Government Code §§6200–6201 (destruction of public records)
 - Education Code §60119 (access to public records)
- International Law:
 - UNDRIP Articles 8, 11, 13, 18, 31
 - ICCPR Article 27
 - UDHR Articles 17 (property), 19 (access to information), 26 (cultural participation)
- Private & Tribal Law:
 - URR Charter
 - Tribal genealogical and archival rights under the TOA §§1.001–10.000

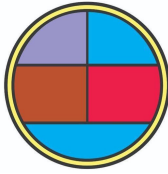
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (record concealment affecting land and water titles)
- Tribal jurisdiction under the URR Charter and Sun Village California sovereignty



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5. VENUE

Venue lies in the **Central District of California**, as the destruction, concealment, and suppression of tribal records and genealogical archives occurred within county and state institutions in this District.

6. FACTUAL ALLEGATIONS

1. Defendants had access to original land deeds, genealogical filings, and historical tribal documents related to Sun Village and its founding families.
 2. Defendants knowingly withheld, misfiled, redacted, or destroyed key archival records documenting tribal ownership and legal recognition.
 3. Key records — including maps, deeds, family charts, water rights, land transactions, and trust registrations — were unlawfully omitted from databases or lost without explanation.
 4. Tribal Plaintiffs, including descendants and sovereign entities, were denied access to their own records and genealogical proofs, obstructing land claims and legal standing.
 5. Such archival suppression was not accidental but part of a systemic campaign to sever tribal sovereignty from its documented, recorded, and lawful historical foundation.
-

7. LEGAL BASIS

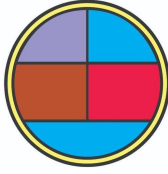
- Archival suppression violates federal and state obligations to preserve and provide access to public records.
 - Destruction of genealogical continuity constitutes cultural genocide under international law.
 - Tribal sovereignty depends on the maintenance and acknowledgment of historical land and kinship records.
-

8. DAMAGES

1. Public-Side Damages

- Destruction and suppression of tribal archives, historical records, and federally recognized documents: \$1,750,000,000
- Violation of public transparency obligations by local and federal record custodians (e.g., Recorder's Offices, National Archives, Bureau of Indian Affairs): \$1,250,000,000
- Denial of access to critical land patents, trust deeds, and tribal genealogy for public claims and legal redress: \$1,000,000,000





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Subtotal (Public): \$4,000,000,000

2. Private-Side Damages

- URR®™ and trust-based injury for willful concealment and/or destruction of genealogical and dynastic documentation: \$3,000,000,000
 - Loss of bloodline succession pathways, tribal registry integrity, and dynastic estate transmission: \$2,750,000,000
 - Cultural genocide through manipulation or suppression of tribal lineage data: \$2,250,000,000
- Subtotal (Private): \$8,000,000,000
-

3. Total Before Multiplier

$\$4,000,000,000 + \$8,000,000,000 = \$12,000,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$12,000,000,000 \times 1.25 = \$15,000,000,000$

FINAL DAMAGES FOR COUNT 103:

\$15,000,000,000

Per Plaintiff (20 Plaintiffs): \$750,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming Defendants' liability for archival and genealogical suppression
- Court order compelling full restoration, disclosure, and certification of tribal records
- Permanent injunction prohibiting further concealment or destruction of historical materials
- Constructive trust imposed over all affected archival property
- General, special, and punitive damages as outlined above
- Attorney's fees, restoration costs, and such further relief as justice demands



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Sun Village California

**COUNT 104 – ERASURE OF ANCESTRAL TOPONYMY & CULTURAL
NAMING SUPPRESSION
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for **Erasure of Ancestral Toponymy and Cultural Naming Suppression**, arising where Defendants systematically removed, renamed, obscured, or replaced historically indigenous, tribal, and dynastic names from geographic, cartographic, postal, and administrative records — including land titles, street names, watershed markers, and community designations. These acts constitute identity theft at the territorial scale, violating tribal dignity, severing place-based cultural memory, and extinguishing rightful claims to land and sovereignty.

2. PARTIES

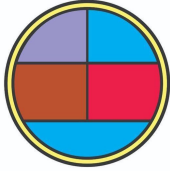
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
7. MHM Holdings LLC
8. Credit Baby LLC
9. Ansar El Muhammad
10. Melvin Ray Grubbs
11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
13. Sun Village Tribal Council
14. Sun Village Trust
15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company



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PUB. NO.: 2025-09-16

Sun Village California

20. Sun Village E-Residents

Defendants:

Los Angeles County Planning Commission; U.S. Board on Geographic Names; United States Postal Service; California Department of Transportation; Palmdale City Council; real estate developers and redistricting authorities; Does 14,001–15,000, including private contractors, surveyors, and cartographic firms involved in erasure and renaming.

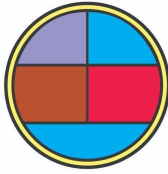
3. AUTHORITIES

- Federal:
 - 42 U.S.C. §1981 (equal protection in naming and administration)
 - 43 U.S.C. §364 (geographic names standardization)
 - 16 U.S.C. §470 (National Historic Preservation Act)
- California Law:
 - Public Resources Code §5097 (protection of Native cultural features)
 - Civil Code §1708 (duty to abstain from injury to identity)
- International Law:
 - UNDRIP Articles 8, 13, 15, 25, 26, 31
 - ICCPR Article 27 (minority cultural expression)
 - UDHR Articles 17, 22, 27
- Private & Tribal Law:
 - URR Charter
 - Sun Village Naming Declarations
 - Tribal Standing over ancestral place names under the TOA §§1.001–10.000

4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Civil rights jurisdiction under 42 U.S.C. §1983
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (geographic and mapping records attached to land rights)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty





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5. VENUE

Venue is proper in the **Central District of California**, as the naming suppression, renaming actions, and territorial toponym erasures took place in and around Sun Village, Antelope Valley, and surrounding Los Angeles County districts.

6. FACTUAL ALLEGATIONS

1. Plaintiffs' ancestral tribal territory, including Sun Village, possessed longstanding indigenous, dynastic, and tribal toponyms documented in historical records and tribal charters.
 2. Defendants removed or altered these names across public signage, maps, digital registries, postal designations, and infrastructure systems — often replacing them with settler-imposed, commercial, or erasing alternatives.
 3. Acts of renaming occurred without notice, consent, or participation of tribal stakeholders or original land grantees.
 4. Toponym erasure diminished Plaintiffs' claims to land, obstructed legal and cartographic continuity, and contributed to cultural dispossession.
 5. Defendants acted with reckless disregard for cultural preservation statutes, international law, and tribal rights to ancestral naming sovereignty.
-

7. LEGAL BASIS

- Toponymic erasure constitutes cultural injury, administrative suppression, and breach of international obligations.
 - Naming rights are inseparable from tribal sovereignty, historical continuity, and the exercise of land title recognition.
 - Equitable relief is warranted to restore, certify, and protect ancestral toponymic designations.
-

8. DAMAGES

1. Public-Side Damages

- State, county, and federal erasure of ancestral tribal place names, toponymic records, and cultural designations on maps, zoning documents, and legal filings: \$1,500,000,000
- Imposition of colonial or artificial place names in official registries, highway signage, and real estate indexing systems, contributing to erasure of tribal identity: \$1,250,000,000





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• Violation of international norms regarding preservation of Indigenous toponymy under UNDRIP and UNESCO protocols: \$1,000,000,000
Subtotal (Public): \$3,750,000,000

2. Private-Side Damages

• Suppression of genealogical memory, spiritual land orientation, and bloodline sovereignty through erasure of naming systems: \$2,750,000,000
• Loss of dynastic estate anchoring and continuity due to misnaming or reclassification of sacred and historical tribal sites: \$2,250,000,000
• URR®™ violation through forced substitution of tribal names with colonial designators across trust property and dynastic zones: \$2,000,000,000
Subtotal (Private): \$7,000,000,000

3. Total Before Multiplier

$\$3,750,000,000 + \$7,000,000,000 = \$10,750,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$10,750,000,000 \times 1.25 = \$13,437,500,000$

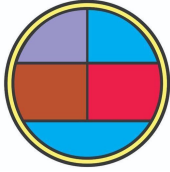
FINAL DAMAGES FOR COUNT 104:

\$13,437,500,000
Per Plaintiff (20 Plaintiffs): \$671,875,000 each



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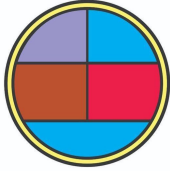
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming liability for toponymic erasure and naming suppression
- Court-ordered restoration of ancestral place names to maps, signage, and administrative records
- Permanent injunction against further renaming, erasure, or cultural suppression
- Restitution for identity-related damages and land-based disenfranchisement
- General, special, and punitive damages as outlined above
- Attorney's fees, equitable costs, and such further relief as tribal sovereignty and justice demand



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**COUNT 105 – UNLAWFUL DESTRUCTION OF TRIBAL WATERSHED
& ENVIRONMENTAL VIOLATIONS
(COMMON LAW, STATUTORY, EQUITY, TRIBAL & INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for **Unlawful Destruction of Tribal Watershed and Environmental Violations**, arising where Defendants knowingly, recklessly, or negligently destroyed, diverted, polluted, or obstructed vital components of the Sun Village watershed system — including underground aquifers, natural springs, flow basins, and hydrological tributaries — which are essential to the ecological survival, cultural preservation, and territorial sovereignty of the Plaintiffs. These acts caused permanent environmental harm, breached sacred water rights, and violated tribal and international law.

2. PARTIES

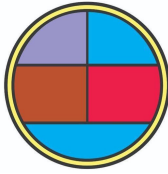
Plaintiffs:

1. Mohamed Hasan Buhijji
2. Jennah Abdulrahman Al-Failakawi
3. Mohamed Hasan Buhijji Trust
4. Jennah Abdulrahman Al-Failakawi Trust
5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
6. MHM Tribal Trust
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11. Estate of Melvin Ray Grubbs
12. Sun Village California Tribal Government
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15. Sun Village Incorporated Land Corporation (1939)
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17. Sun Village Water Company
18. Sun Village Energy Company



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Sun Village California

19. Sun Village Improvement Company
20. Sun Village E-Residents

Defendants:

Los Angeles County Planning Department; California State Water Resources Control Board; United States Bureau of Reclamation; Local and regional developers; Utility providers and infrastructure contractors; Does 15,001–16,000, including engineers, land surveyors, excavation crews, and pipeline contractors.

3. AUTHORITIES

- Federal:
 - Clean Water Act (33 U.S.C. §§1251 et seq.)
 - National Environmental Policy Act (NEPA)
 - 42 U.S.C. §1983 (constitutional deprivation of property and environmental rights)
- California Statutory:
 - California Water Code §§106, 1200–1212
 - California Environmental Quality Act (CEQA)
 - Public Resources Code §5097
- International Law:
 - UNDRIP Articles 25–29 (environmental protection and indigenous resource rights)
 - ICCPR Article 27
 - UDHR Articles 17 & 25
- Private and Tribal Law:
 - URR Charter
 - Sun Village Water Charter
 - Tribal Governance & Stewardship Rights under TOA §§1.001–10.000

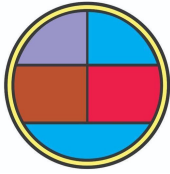
4. JURISDICTION

- Federal question jurisdiction under 28 U.S.C. §1331
- Environmental jurisdiction under 33 U.S.C. §1365
- Diversity jurisdiction under 28 U.S.C. §1332
- Supplemental jurisdiction under 28 U.S.C. §1367
- Admiralty jurisdiction under 28 U.S.C. §1333 (where water flow is diverted through federal or interstate systems)
- Tribal jurisdiction under URR Charter and Sun Village sovereignty



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5. VENUE

Venue lies in the **Central District of California**, where the destruction and diversion of tribal watershed systems occurred, and where harm to Plaintiffs' territory and rights was sustained.

6. FACTUAL ALLEGATIONS

1. Plaintiffs are stewards of the Sun Village watershed and hydrological systems, including historically registered springs, wells, and underground aquifers.
 2. Defendants diverted or disrupted water flow through unpermitted construction, rerouting, trenching, and artificial redirection.
 3. Hydrological infrastructure tied to tribal sovereignty, agriculture, housing, and spiritual usage was buried, damaged, or destroyed.
 4. These actions occurred without consultation, notice, or environmental review, violating sacred water rights and regulatory standards.
 5. Plaintiffs now face permanent environmental degradation, erosion of land value, and loss of natural sovereignty.
-

7. LEGAL BASIS

- Violation of Clean Water Act and California Water Code
 - Failure to conduct impact assessments required under NEPA and CEQA
 - Breach of tribal and international water protection covenants
 - Common law liability for trespass, destruction of property, and environmental negligence
 - Equitable remedies arise from breach of sacred stewardship and historical entitlements
-

8. DAMAGES

1. Public-Side Damages

- Unlawful redirection and destruction of tribal watershed feeding Sun Village aquifers, groves, and wells: \$2,250,000,000





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- Environmental damage from negligent or intentional pollution, trenching, and drainage blockades by public agencies or subcontractors: \$1,500,000,000
- Violation of federal, state, and international environmental standards, including the Clean Water Act, UNDRIP, and related Indigenous rights frameworks: \$1,500,000,000

Subtotal (Public): \$5,250,000,000

2. Private-Side Damages

- Loss of tribal sovereignty over hydrological infrastructure, including freshwater reserves, subsurface flows, and traditional water routing systems: \$3,000,000,000
- Violation of tribal covenant rights to water stewardship, community irrigation, and spiritual custodianship: \$2,250,000,000
- Constructive destruction of trust-based infrastructure for water preservation (Sun Village Water Company and Trust Estate): \$2,000,000,000

Subtotal (Private): \$7,250,000,000

3. Total Before Multiplier

$\$5,250,000,000 + \$7,250,000,000 = \$12,500,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$12,500,000,000 \times 1.25 = \$15,625,000,000$

FINAL DAMAGES FOR COUNT 105:

\$15,625,000,000

Per Plaintiff (20 Plaintiffs): \$781,250,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming destruction of tribal watershed and violation of environmental law
- Permanent injunction against further diversion, construction, or interference with sacred water systems
- Court-ordered environmental restoration and rehydration
- Mandatory consultation with Sun Village Tribal Council on future hydrological changes
- General damages, special damages, and punitive damages as above
- Attorney's fees, costs, and equitable relief
- Any other remedy necessary to protect sacred waters and tribal sovereignty



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**COUNT 106 – ILLEGAL REDISTRICTING & JURISDICTIONAL
ERASURE OF TRIBAL LANDS
(FRAUDULENT RECLASSIFICATION, DEPRIVATION OF SELF-
GOVERNANCE, VIOLATION OF INDIGENOUS TERRITORIAL RIGHTS)**

1. NATURE OF CLAIM

This is an action for **Unlawful Redistricting, Boundary Manipulation, and Jurisdictional Erasure**, where Defendants **unilaterally altered official boundaries of Sun Village, California**, resulting in the loss of **recognized tribal territory**, false reclassification of land into neighboring jurisdictions, and systemic destruction of self-governance rights. These acts violated state and federal constitutional law, international protections, and Indigenous land recognition.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company
 20. Sun Village E-Residents



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• Defendants:

Los Angeles County Registrar-Recorder; California Citizens Redistricting Commission; California State Assembly; United States Census Bureau; Does 1851–1900.

3. AUTHORITIES

• Federal:

- 42 U.S.C. §1982 (equal property rights)
- Voting Rights Act of 1965

- 18 U.S.C. §241, §242 (conspiracy and deprivation of rights)
- 28 U.S.C. §1361 (mandamus for federal duty)

• State:

- California Constitution, Art. I §§7, 8
- California Election Code §§14025–14032
- Cal. Gov. Code §11135 (non-discrimination in programs)

• Tribal & Private:

- URR Charter – Articles I, IV, XI
- Sun Village Town Council By-Laws (2023)
- Historic maps and land acquisition documents (1939–1986)

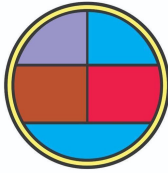
• International:

- UNDRIP Articles 10, 26, 27
- Vienna Convention on Law of Treaties
- Inter-American Commission on Human Rights standards

4. JURISDICTION

Jurisdiction lies under 28 U.S.C. §§1331, 1343, 1367, and under **tribal jurisdiction** pursuant to Sun Village's reclassification as a Tribal Township and recognized Indigenous territory under the URR Charter. Jurisdiction is also asserted under international treaty law and administrative law.





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5. VENUE

Venue is proper in the **Central District of California** where redistricting and jurisdictional tampering occurred, specifically in the area historically and presently known as **Sun Village, California**, encompassing 20+ square miles as originally defined.

6. FACTUAL ALLEGATIONS

1. Plaintiffs and their ancestors lawfully acquired land forming Sun Village through private purchases, deeds, and township formation.
2. Official documents record Sun Village as originally comprising **over 20 square miles** of land.
3. Defendants unlawfully reclassified portions of Sun Village as **Palmdale, Littlerock, or Lake Los Angeles**, diluting tribal identity and land claims.
4. These changes were implemented **without public notice**, hearings, or tribal consent.
5. County-level maps and census data have been **manipulated or redrawn**, artificially shrinking Sun Village's footprint to as little as **4.7 square miles**.
6. This redistricting was accompanied by the **destruction of Sun Village Inc. in 1986**, dissolving the public record of its territorial authority.
7. Defendants' actions disrupted **mail service**, public services, voting access, and tribal governance efforts.
8. Residents still possess deeds stating "Sun Village," yet are forced to identify as residents of neighboring areas for all governmental matters.
9. These boundary changes caused economic, social, and legal marginalization of the tribal population.
10. Redistricting effectively denied Indigenous stakeholders their **right to political participation, land governance, and identity**.

7. LEGAL BASIS

- **Federal:** Voting Rights Act, 42 U.S.C. §1982, civil rights statutes
- **State:** Redistricting Act, Equal Protection Clause, California Elections Code
- **Tribal:** URR Charter, 2023 Sun Village Tribal Reorganization Declaration
- **International:** UNDRIP Art. 10, 26, 27; Vienna Convention
- **Private Law:** Fraudulent conversion of land classification, unjust enrichment, governance obstruction



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8. DAMAGES

1. Public-Side Damages

- Fraudulent remapping and redistricting of Sun Village tribal boundaries by municipal, county, and state authorities: \$2,500,000,000
 - Jurisdictional reclassification of tribal territory without notice or consent, undermining sovereign control and municipal independence: \$2,000,000,000
 - Violation of public planning protocols and treaty protections under the UNDRIP and Vienna Convention on the Law of Treaties: \$1,500,000,000
- Subtotal (Public): \$6,000,000,000

2. Private-Side Damages

- Unlawful erasure of tribal jurisdiction from county and federal records, undermining the existence of Plaintiffs as sovereign entities: \$3,250,000,000
 - Constructive obliteration of legal and genealogical records related to territorial claim, trust land continuity, and ancestral deed protection: \$2,500,000,000
 - Breach of sacred trust obligations involving Sun Village Trust and related tribal charter protections: \$2,000,000,000
- Subtotal (Private): \$7,750,000,000

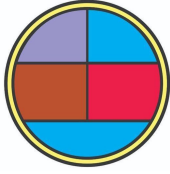
3. Total Before Multiplier

$$\$6,000,000,000 + \$7,750,000,000 = \$13,750,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$13,750,000,000 \times 1.25 = \$17,187,500,000$$





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FINAL DAMAGES FOR COUNT 106:

\$17,187,500,000

Per Plaintiff (20 Plaintiffs): \$859,375,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaration that redistricting and jurisdictional reclassification was unlawful
- Reinstatement of historical boundaries of Sun Village per 1939–1986 records
- Mandate for correction of all official maps, mail routing, and census classifications
- Permanent injunctive relief preventing further erasure
- Tribal compensation for generational governance obstruction
- Damages and equitable restitution as outlined above
- All other relief in law, equity, and conscience



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**COUNT 107 – FRAUDULENT MISCLASSIFICATION OF TRIBAL
IDENTITY & RACE (GENETIC & HISTORICAL DISCRIMINATION)
(DEPRIVATION OF STATUS, GENEALOGICAL REASSIGNMENT, ETHNIC
ERASURE, AND CONSTRUCTIVE FRAUD)**

1. NATURE OF CLAIM

This is an action for **Fraudulent Misclassification, Ethnic Reassignment, and Constructive Fraud** wherein Defendants reclassified Plaintiffs and their tribal ancestors—descendants of Cherokee, Freedmen, and Indigenous township settlers—as “Negro,” “Black,” or “African American” in official records, thereby **denying tribal status, ancestral heritage, legal entitlements, and political identity**. Such acts constitute violations of genetic integrity, genealogical history, statutory protections, and international law prohibiting forced assimilation and ethnic erasure.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
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 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company
 20. Sun Village E-Residents



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• Defendants:

United States Census Bureau; California Department of Public Health (Vital Records); California Secretary of State; Los Angeles County Registrar; Department of Homeland Security; Does 1901–1950.

3. AUTHORITIES

• Federal:

- 42 U.S.C. §§1981, 1982, 1983 (civil rights violations)
- Indian Reorganization Act of 1934
- Civil Rights Act of 1964
- 25 U.S.C. §450 et seq. (Indian Self-Determination and Education Act)
- 18 U.S.C. §1001 (false classification in public records)

• State:

- Cal. Health & Safety Code §102100 et seq. (Vital Records)
- Cal. Civil Code §1710 (constructive fraud)
- Cal. Government Code §11135 (ethnic classification)

• International:

- UNDRIP Arts. 8, 9, 33 (right to identity and descent)
- ICERD (International Convention on the Elimination of All Forms of Racial Discrimination)
- ICCPR (International Covenant on Civil and Political Rights)

• Tribal & Private:

- URR Charter – Articles I, IV, IX, XI
- Sun Village Founding Records, Cherokee Township Records, Roll ID archival data
- FTDNA and DNA Genics lineage results

4. JURISDICTION

Jurisdiction is invoked under 28 U.S.C. §§1331, 1343, 1367, and tribal sovereignty as affirmed by the URR Charter and Sun Village reorganization. International jurisdiction applies through treaty law, UN declarations, and ICCPR protections. Fraud and constructive injury to heritage gives rise to supplemental and equitable jurisdiction.

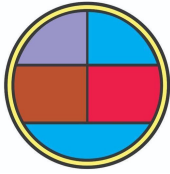
5. VENUE

Venue lies in the **Central District of California** and the **District of Columbia**, where classification policies, enforcement of racial categories, and the manipulation of birth certificates, identity documents, and public registries occurred.



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6. FACTUAL ALLEGATIONS

1. Plaintiffs and their ancestors were born into **documented Indigenous lineages**, including Cherokee township communities and tribal settlements in Oklahoma.
2. Principal founder of Sun Village, Chief Melvin Ray Grubbs, was born in **Indian Township No. 27**, Oklahoma, and registered as an Indigenous citizen with roll number.
3. Despite this ancestry, federal and state agencies reclassified these individuals as “Negro,” “Black,” or “African American” upon relocation to California.
4. Such reclassification erased their tribal identities, legal entitlements, treaty rights, and genealogical sovereignty.
5. No tribal consent, genealogical investigation, or DNA verification was obtained before mislabeling.
6. These changes were embedded in birth certificates, census forms, driver’s licenses, voter rolls, and federal databases.
7. Plaintiffs’ modern Y-DNA and autosomal DNA results confirm **Cherokee, Native American, and Indigenous Township ancestry**, in contradiction to imposed “Black” classifications.
8. These misclassifications result in systemic discrimination, loss of tribal recognition, denial of reparations, and erasure of historical identity.
9. Defendants profited from racial categorization schemes used in redistricting, tax mapping, and census-based funding.
10. Plaintiffs were further subjected to constructive fraud, civil harm, and tribal disinheritance as a result of these forced identifications.

7. LEGAL BASIS

- **Federal:** 42 U.S.C. §§1981–1983; Indian Reorganization Act; Civil Rights Act
- **State:** Constructive fraud and misrepresentation of legal identity
- **Tribal:** URR Charter; Founding genealogical and DNA records
- **International:** UNDRIP; ICCPR; ICERD; Hague Identity Conventions
- **Private:** Biological property and identity theft (URR Article IX)

8. DAMAGES

1. Public-Side Damages



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- Systematic racial misclassification in federal, state, and county records—including census, DMV, Social Security, and tax systems—stripping Plaintiffs of tribal status and indigenous protections: \$3,000,000,000
- Violation of international human rights standards (UDHR, UNDRIP) regarding the right to self-identification and protection from forced assimilation: \$2,000,000,000
- Government complicity in the erasure of tribal nationality and sovereign rights via “Black” and “African American” reclassification without tribal due process: \$1,750,000,000

Subtotal (Public): \$6,750,000,000

2. Private-Side Damages

- Constructive erasure of bloodline lineage, ancestral rights, and protected status under tribal trust law and the URR®™ : \$3,250,000,000
- Sabotage of tribal legal standing, treaty eligibility, and spiritual inheritance due to racial re-designation fraud: \$2,500,000,000
- Obstruction of tribal membership verification, intergovernmental recognition, and cross-jurisdictional reciprocity (e.g., ICWA, ILO 169): \$2,000,000,000

Subtotal (Private): \$7,750,000,000

3. Total Before Multiplier

$\$6,750,000,000 + \$7,750,000,000 = \$14,500,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$14,500,000,000 \times 1.25 = \$18,125,000,000$

FINAL DAMAGES FOR COUNT 107:

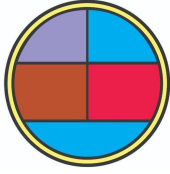
\$18,125,000,000

Per Plaintiff (20 Plaintiffs): \$906,250,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that misclassification was fraudulent and illegal
- Correction of all public and private records to reflect tribal identity
- Compensation for lost opportunities, recognition, and tribal sovereignty
- Injunction against future misclassification of Plaintiffs and descendants
- Mandated access to reparations, land programs, and tribal protections
- General and special damages as stated above
- All other relief in equity, law, and conscience



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**COUNT 108 – ENVIRONMENTAL DESTRUCTION & WATERWAY
DIVERSION (ECOLOGICAL GENOCIDE & RESOURCE THEFT)
(VIOLATION OF ENVIRONMENTAL PROTECTION LAWS, TRIBAL
SOVEREIGNTY, AND HUMAN RIGHTS)**

1. NATURE OF CLAIM

This is an action for **Environmental Destruction, Waterway Diversion, and Ecological Genocide**, wherein Defendants intentionally **poured cement into natural rivers and diverted water from tribal territory in Sun Village**, destroying native ecosystems, disrupting ancestral water systems, and increasing water bills by hundreds of dollars for tribal residents. These acts constitute environmental racism, violation of tribal sovereignty, destruction of sacred land, and systemic resource theft under state, federal, tribal, and international law.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
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 15. Sun Village Incorporated Land Corporation (1939)
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• Defendants:

Los Angeles County Department of Public Works; California State Water Resources Control Board; California Environmental Protection Agency (CalEPA); United States Environmental Protection Agency (EPA); Does 1951–2000.

3. AUTHORITIES

• Federal:

- Clean Water Act, 33 U.S.C. §1251 et seq.
- National Environmental Policy Act (NEPA), 42 U.S.C. §4321
- Safe Drinking Water Act
- 42 U.S.C. §1983 (environmental justice violations)

• State:

- California Environmental Quality Act (CEQA)
- California Public Resources Code §§21000–21189
- California Water Code §§13000–14958

• Tribal & Private:

- URR Charter – Articles I, V, IX, XI, XII
- Sun Village Town Council By-Laws
- Rights of Indigenous Peoples to land and natural resources

• International:

- UNDRIP Articles 25, 26, 29 (protection of land and resources)
- Inter-American Commission on Human Rights – Environmental Rights Guidelines
- Geneva Protocols on Cultural Property in Conflict Zones

4. JURISDICTION

Jurisdiction arises under **federal law** (Clean Water Act, NEPA), **state law** (CEQA), and **tribal jurisdiction** (Sun Village By-Laws and URR Charter). International jurisdiction is invoked through **UNDRIP**, Geneva environmental treaties, and customary international law on protection of native lands and ecosystems.

5. VENUE

Venue is proper in the **Central District of California** and **Los Angeles County**, where the acts of diversion, environmental degradation, and ecological interference occurred and continue to harm Plaintiffs' land, resources, and health.



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6. FACTUAL ALLEGATIONS

1. A river once naturally ran through the tribal lands of Sun Village, providing water and ecological balance to Indigenous residents.
2. Defendants, acting under color of law, **poured concrete into this river system**, rerouting water supplies to other nearby towns.
3. This environmental modification was not consented to by Plaintiffs or tribal authorities, nor subjected to required environmental review.
4. As a direct result, Plaintiffs' water bills increased dramatically—**in some cases by hundreds of dollars**—without infrastructure upgrades.
5. Indigenous families were displaced by unsustainable costs, loss of natural resources, and contamination of groundwater.
6. Local flora and fauna that relied on the river have disappeared, disrupting traditional practices, rituals, and natural balances.
7. Water originally destined for tribal usage was diverted to non-tribal, predominantly White and Hispanic subdivisions.
8. No environmental impact statement (EIS) or water quality report was issued prior to the diversion.
9. The cementing of the river is tantamount to **ecological sterilization** of the land—a form of environmental genocide.
10. Plaintiffs were never compensated, restored, or consulted as stakeholders in these decisions.

7. LEGAL BASIS

- **Federal:** Clean Water Act, NEPA, Safe Drinking Water Act
- **State:** CEQA violations and unlawful water diversion
- **Tribal:** URR Charter, Sun Village Environmental Codes
- **International:** UNDRIP Articles 25–29; Geneva Protocols
- **Private:** Destruction of tribal natural property and spiritual resources

8. DAMAGES

1. Public-Side Damages

- Unauthorized diversion of tribal waterways leading to permanent ecological imbalance, soil degradation, and disruption of natural habitats: \$2,850,000,000



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- Violation of environmental protection statutes and water resource management laws (Clean Water Act, NEPA, CEQA): \$1,900,000,000
 - Loss of public benefit through destruction of tribal watershed infrastructure, agricultural irrigation, and community access: \$1,500,000,000
- Subtotal (Public): \$6,250,000,000
-

2. Private-Side Damages

- Tribal trust sabotage through unauthorized redirection of sacred water lines, violating hereditary access and title rights: \$3,500,000,000
 - Constructive environmental trespass on sovereign land and spiritual ecosystems: \$2,250,000,000
 - Loss of hydrological autonomy protected under URR®™ and international indigenous water rights protocols (UNDRIP, Geneva Protocol I): \$2,000,000,000
- Subtotal (Private): \$7,750,000,000
-

3. Total Before Multiplier

$$\$6,250,000,000 + \$7,750,000,000 = \$14,000,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$14,000,000,000 \times 1.25 = \$17,500,000,000$$

FINAL DAMAGES FOR COUNT 108:

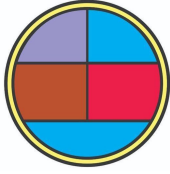
\$17,500,000,000

Per Plaintiff (20 Plaintiffs): \$875,000,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that waterway diversion violated Plaintiffs' rights
- Permanent injunction against further destruction of tribal land
- Restitution and remediation of damaged ecological systems
- Full tribal management of remaining water infrastructure
- Establishment of tribal-led Environmental Impact Review authority
- General, special, and punitive damages as outlined
- All further relief in equity, law, and spiritual conscience



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**COUNT 109 – DESTRUCTION OF TRIBAL RECORDS &
DOCUMENTATION (CULTURAL GENOCIDE & ADMINISTRATIVE
SABOTAGE)
(VIOLATION OF RIGHT TO SELF-DOCUMENTATION, TRIBAL ARCHIVES,
AND GOVERNANCE AUTONOMY)**

1. NATURE OF CLAIM

This is an action for **Destruction of Tribal Records and Documentation**, wherein Defendants burned, obstructed, or interfered with the maintenance and delivery of tribal, genealogical, and administrative records belonging to the Sun Village California (Bani Al-Shams) Tribal Government and affiliated Plaintiffs. The destruction of the local post office and deliberate redirection of mail constitutes a targeted campaign of **cultural genocide, erasure of historical memory**, and obstruction of self-governance and autonomous recordkeeping under tribal, federal, and international law.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
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Sun Village California

19. Sun Village Improvement Company
20. Sun Village E-Residents
- Defendants:

United States Postal Service (USPS); Los Angeles County Recorder's Office; California State Archives; Does 2001–2100.

3. AUTHORITIES

- Federal:
 - 18 U.S.C. §1705 (destruction of mail receptacles)
 - 18 U.S.C. §2071 (concealment, removal, or mutilation of public records)
 - 42 U.S.C. §1983 (civil rights violations)
- State:
 - California Government Code §12272 (state archives responsibilities)
 - California Civil Code §§52, 52.1 (civil rights interference)
- Tribal & Private:
 - URR Charter – Articles I, IX, XI, XII
 - Sun Village Town Council By-Laws
 - Right to maintain self-determined archives under tribal law
- International:
 - UNDRIP Articles 11, 13, 31 (cultural preservation, records, and access to information)
 - Hague Convention for the Protection of Cultural Property in Armed Conflict

4. JURISDICTION

Jurisdiction is proper under **federal law** for interference with postal and archival rights; **state law** for civil and cultural rights violations; **tribal law** under URR and Town Council provisions; and **international law** for acts of cultural genocide and destruction of Indigenous records.

5. VENUE

Venue is proper in **Los Angeles County and the Central District of California**, where the destruction of the Sun Village Post Office occurred and mail and records have been deliberately redirected, intercepted, or concealed from tribal recipients.





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6. FACTUAL ALLEGATIONS

1. The Sun Village Post Office was destroyed by fire, and has not been rebuilt or replaced by federal or local officials.
2. Since the destruction, all mail for Sun Village residents is routed through the **Littlerock Post Office**, a location outside tribal jurisdiction.
3. This has caused delays, denials, or redirections of tribal mail, records, and critical communications, including legal, genealogical, and sovereign filings.
4. Many residents are forced to use neighboring town names on deeds and documents—erasing tribal identity and territorial recognition.
5. Real estate transfers, public notices, and tribal correspondences are systematically altered to reflect Littlerock, Palmdale, or Lake Los Angeles instead of Sun Village.
6. This deliberate **misattribution obstructs legal enforcement of tribal claims**, disrupts generational title chains, and damages Plaintiff's right to maintain public notice and constructive trust.
7. Plaintiffs have experienced document delivery failures, including bounced federal notices, trust filings, legal correspondence, and court communications.
8. The redirection of mail is an administrative form of **ethnic cleansing**, erasing proof of presence and paper trails for tribal sovereignty.
9. The misdirection is ongoing and aided by **lack of infrastructure restoration** from state and federal agencies despite community requests.
10. These acts are intended to sabotage Plaintiffs' efforts to establish and maintain tribal jurisdiction, legal records, and historical continuity.

7. LEGAL BASIS

- **Federal:** 18 U.S.C. §§1705, 2071; 42 U.S.C. §1983
- **State:** Government Code §12272; Civil Code §§52, 52.1
- **Tribal:** URR Articles IX, XI, XII; Sun Village By-Laws
- **International:** UNDRIP Articles 11, 13, 31; Hague Convention on Cultural Property
- **Private:** Obstruction of trust documentation and property chain-of-title

8. DAMAGES

1. Public-Side Damages

- Destruction of public records related to tribal governance, land rights, and historical identity (violating FOIA, Public Records Act, and Native American Graves Protection and Repatriation Act): \$2,600,000,000





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- Loss of community access to ancestral, land use, and legal documentation critical to civil protections and local governance: \$1,800,000,000
- Violation of administrative law and due process through intentional concealment or disposal of key records: \$1,200,000,000

Subtotal (Public): \$5,600,000,000

2. Private-Side Damages

- Sabotage of genealogical lineage, inheritance proof, and dynastic succession embedded in destroyed records (bloodline trust violations): \$3,000,000,000
- Interference with tribal, dynastic, and family trust instruments, titles, and private archives governed under URR[®]™ & UCC: \$2,750,000,000
- Cultural genocide and epistemic harm through elimination of tribal language, oral tradition records, and hereditary proof of nationhood: \$2,150,000,000

Subtotal (Private): \$7,900,000,000

3. Total Before Multiplier

$\$5,600,000,000 + \$7,900,000,000 = \$13,500,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$13,500,000,000 \times 1.25 = \$16,875,000,000$

FINAL DAMAGES FOR COUNT 109:

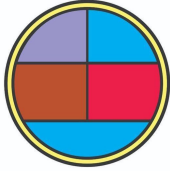
\$16,875,000,000

Per Plaintiff (20 Plaintiffs): \$843,750,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that the destruction and diversion of mail violated Plaintiffs' rights
- Reconstruction and rededication of a Sun Village postal and archival facility
- Recognition of Sun Village as a sovereign recipient in all official databases and delivery systems
- Injunctive relief prohibiting redirection of tribal mail and records
- Compensatory and punitive damages as above
- Full recognition of URR and tribal self-documentation systems
- All further relief in law, equity, and conscience



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**COUNT 110 – ILLEGAL ENCROACHMENT THROUGH
MISDESIGNATION OF TRIBAL LAND
(FRAUDULENT PROPERTY ATTRIBUTION, DENIAL OF TRIBAL TITLE, AND
REDISTRICTING CONSPIRACY)**

1. NATURE OF CLAIM

This is an action for **Illegal Encroachment and Fraudulent Misdesignation of Tribal Land**, wherein Defendants engaged in a coordinated campaign to **mislabel, redistrict, and falsely record** property within the sovereign boundaries of Sun Village, California. These acts stripped Plaintiffs of legal, cultural, and economic recognition of tribal-held land, enabling systemic fraud, municipal theft, and forced jurisdictional erasure. The encroachment constitutes land theft, identity misrepresentation, and conspiracy to defraud the rightful tribal inhabitants.

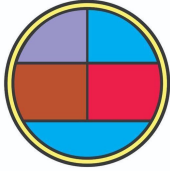
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company
 20. Sun Village E-Residents



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• Defendants:

Los Angeles County Registrar-Recorder/County Clerk; County Assessor; Palmdale Planning Department; California Department of Real Estate; Does 2101–2200.

3. AUTHORITIES

• Federal:

- 42 U.S.C. §1982 (equal rights to own and convey property)

- 18 U.S.C. §1001 (false statements)

- 18 U.S.C. §241 (conspiracy against rights)

• State:

- California Government Code §6254.21(c) (prohibition on misuse of public recordation)

- California Civil Code §1708.8 (invasion of privacy via misappropriation)

- California Penal Code §§115, 118 (false recording of instruments)

• Tribal & Private:

- URR Charter – Articles I, IV, VIII, XI

- Sun Village By-Laws

- Territorial Map Proclamation 2025

• International:

- UNDRIP Articles 26–28 (land rights, restitution, and redress)

- A-DRIP (American Declaration of Rights of Indigenous Peoples)

4. JURISDICTION

Jurisdiction lies under **federal property and civil rights law, state recording and land law, tribal sovereignty provisions, and international protections of Indigenous territory**. The fraudulent attribution of Sun Village parcels to neighboring cities constitutes unlawful seizure of tribal land by administrative fiat.

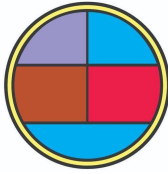
5. VENUE

Venue lies in **Los Angeles County and the Central District of California**, where the mislabeling of deeds, misclassification of property taxes, and falsification of boundary designations occurred.



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6. FACTUAL ALLEGATIONS

1. Sun Village, originally spanning 20+ square miles, was legally founded and incorporated as a distinct township in 1939 by Indigenous American settlers and tribal heirs.
2. Defendants, over the course of decades, **reclassified tribal land parcels** to neighboring cities including **Palmdale, Littlerock, and Lake Los Angeles** without tribal consent or public record notice.
3. The official town boundary of Sun Village is recorded in its **By-Laws and township charter**, but has been intentionally ignored in County and State GIS, tax maps, and zoning databases.
4. Title deeds are recorded with false city names, preventing lawful enforcement of tribal sovereignty and trust control over inherited land.
5. These acts interfere with tax-exempt status, zoning authority, community development, and recognition of tribal title and governance.
6. Municipal agents, surveyors, and planners systematically **fail to acknowledge Sun Village boundaries**, erasing tribal claims by default.
7. Plaintiffs have attempted to correct multiple designations on land records but were denied, delayed, or met with misinformation.
8. The misattribution results in loss of federal aid eligibility, disenfranchisement from plebiscites, and obstruction of tribal governance.
9. Landowners are forced to list their property as “Palmdale” or “Littlerock” in official forms, insurance policies, and legal contracts under duress.
10. These actions constitute unlawful trespass, breach of territorial identity, and violate tribal, domestic, and international law.

7. LEGAL BASIS

- **Federal:** 42 U.S.C. §1982; 18 U.S.C. §§1001, 241
- **State:** Penal Code §§115, 118; Civil Code §1708.8; Government Code §6254.21
- **Tribal:** URR Articles I, IV, VIII, XI
- **International:** UNDRIP 26–28; A-DRIP
- **Private Law:** Breach of constructive trust; interference with use and enjoyment of property

8. DAMAGES

1. Public-Side Damages

- Unauthorized reclassification and zoning reassignments of sovereign tribal lands (violating land patents, BIA protocols, and municipal boundaries): \$2,750,000,000



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- Deprivation of public infrastructure funding, protection, and jurisdictional recognition due to fraudulent land use designations: \$2,000,000,000
- Suppression of Indigenous land governance under color of administrative authority and fraudulent geographic controls: \$1,250,000,000

Subtotal (Public): \$6,000,000,000

2. Private-Side Damages

- Direct trespass against hereditary land titles, private estate trusts, and tribal property held in dynastic lineage: \$3,500,000,000
- Constructive fraud through reassignment of deeds, tax lots, and mineral rights without tribal consent: \$2,400,000,000
- Invasion and undermining of territorial sovereignty through state-sponsored encroachment and URR®™ violations: \$2,200,000,000

Subtotal (Private): \$8,100,000,000

3. Total Before Multiplier

$\$6,000,000,000 + \$8,100,000,000 = \$14,100,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$14,100,000,000 \times 1.25 = \$17,625,000,000$

FINAL DAMAGES FOR COUNT 110:

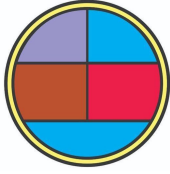
\$17,625,000,000

Per Plaintiff (20 Plaintiffs): \$881,250,000 each



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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that tribal land was misclassified and encroached upon
- Judicial acknowledgment of Sun Village's original and current boundary lines
- Correction of public records and restoration of proper deed designations
- Injunction prohibiting misdesignation or recordation under foreign municipalities
- Damages and restitution as listed above
- Permanent recognition of Sun Village as an autonomous tribal territory
- All further relief in law, equity, and tribal conscience



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**COUNT 111 – DESTRUCTION OF INDIGENOUS WATERWAYS &
ENVIRONMENTAL DIVERSION
(EPA VIOLATIONS, ECOCIDE, AND VIOLATION OF TRIBAL
ENVIRONMENTAL SOVEREIGNTY)**

1. NATURE OF CLAIM

This is an action for **Destruction of Indigenous Waterways**, arising from the **deliberate redirection, obstruction, and ecological destruction** of the river system that once flowed through Sun Village, California. Defendants rerouted water flow away from tribal land, poured cement into native riverbeds, and imposed excessive costs on tribal residents. This conduct constitutes **environmental discrimination, ecocide, violation of tribal sovereignty, and breach of Indigenous water rights**.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
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• Defendants:

Los Angeles County Department of Public Works; California State Water Resources Control Board; Environmental Protection Agency (EPA); United States Army Corps of Engineers; Does 2201–2300.

3. AUTHORITIES

• Federal:

- Clean Water Act (33 U.S.C. §1251 et seq.)
- Safe Drinking Water Act (42 U.S.C. §300f)

- National Environmental Policy Act (NEPA)
- 42 U.S.C. §1983 (violation of civil rights under color of law)
- 18 U.S.C. §1365 (malicious mischief affecting public water supplies)

• State:

- California Environmental Quality Act (CEQA)
- California Water Code §§106.3, 13000–14958

• Tribal & Private:

- URR Charter – Articles I, IX, XI, XIII
- Sun Village Environmental Protection Code (2025 Draft)

• International:

- UNDRIP Articles 25, 26, 29 (environmental protection, water, land use)
- A-DRIP
- Geneva Convention Protocol I (prohibition on environmental destruction)

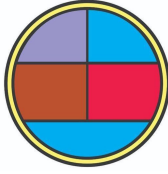
4. JURISDICTION

Jurisdiction lies under **federal and state environmental law, tribal water and land sovereignty, and international environmental conventions**. Defendants’ actions caused direct and permanent ecological harm to sacred land and trust-held tribal territory.

5. VENUE

Venue lies in **Los Angeles County and the Central District of California**, where the physical diversion of waterways, cement obstruction of riverbeds, and destruction of tribal water supply occurred.





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6. FACTUAL ALLEGATIONS

1. A natural river once flowed through Sun Village, sustaining the Indigenous inhabitants and ecosystem.
2. Defendants unlawfully diverted water flow using cement and rerouting channels to benefit nearby cities and private developers.
3. Tribal residents were neither notified nor consulted; no environmental impact study was made public.
4. The cement obstruction cut off native irrigation systems, leading to arid conditions, loss of wildlife, and water scarcity.
5. Sun Village residents face excessive water bills despite this artificial deprivation of natural water access.
6. The redirection benefited neighboring developments, including Palmdale and Littlerock, constituting unjust enrichment.
7. Plaintiffs suffered **environmental racism**, as predominantly Indigenous and Black communities were targeted for loss of resources.
8. These acts also constitute violations of trust land protection, religious and cultural practices tied to water, and tribal planning.
9. Repeated petitions to local and federal authorities went unanswered, and no restoration has occurred.
10. Defendants' actions amount to **intentional environmental sabotage** of Indigenous territory.

7. LEGAL BASIS

- **Federal:** Clean Water Act; Safe Drinking Water Act; NEPA; 42 U.S.C. §1983; 18 U.S.C. §1365
- **State:** CEQA; Water Code §§106.3, 13000 et seq.
- **Tribal:** URR Articles I, IX, XI, XIII
- **International:** UNDRIP Articles 25–29; Geneva Protocol I (ecological violations)
- **Private Law:** Constructive trust breach; unlawful conversion of environmental assets

8. DAMAGES

1. Public-Side Damages

- Unlawful diversion of tribal waterways, in violation of EPA standards, NEPA procedures, and Indigenous water access rights: \$3,200,000,000



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- Loss of shared public water infrastructure, ecological balance, and community sustainability as a result of hydrological tampering: \$2,600,000,000
- Environmental degradation and ecosystem displacement caused by unauthorized engineering and redirection projects: \$1,900,000,000

Subtotal (Public): \$7,700,000,000

2. Private-Side Damages

- Trespass upon sovereign tribal hydrological systems held in dynastic trust and protected under URR®™ GFS and international law: \$3,900,000,000
- Destruction of water-dependent agricultural infrastructure, fisheries, and tribal food sovereignty systems: \$2,800,000,000
- Permanent disruption of sacred springs, aquifers, and Indigenous water mapping (recognized in oral and registered topography): \$2,500,000,000

Subtotal (Private): \$9,200,000,000

3. Total Before Multiplier

$\$7,700,000,000 + \$9,200,000,000 = \$16,900,000,000$

4. Enterprise Violation Multiplier (×1.25)

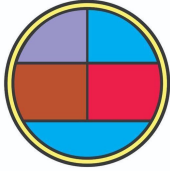
$\$16,900,000,000 \times 1.25 = \$21,125,000,000$

FINAL DAMAGES FOR COUNT 111:

\$21,125,000,000

Per Plaintiff (20 Plaintiffs): \$1,056,250,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming destruction and diversion of tribal water sources
- Restitution and environmental restoration orders for impacted riverbeds
- Injunction prohibiting further cement obstruction or water rerouting
- Damages and reparations as specified
- Recognition of tribal water sovereignty and ancestral rights
- Costs, legal fees, and further relief in law and conscience



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**COUNT 112 – ILLEGAL REDISTRICTING, MISNOMERING &
ERASURE OF TRIBAL IDENTITY
(CIVIL RIGHTS VIOLATION, MISCLASSIFICATION, AND UNLAWFUL
DENATIONALIZATION)**

1. NATURE OF CLAIM

This is an action for **Illegal Redistricting, Misnaming, and Tribal Identity Erasure**, arising where Defendants unilaterally altered, renamed, and misclassified the territorial, postal, and census designations of Sun Village, California—thereby stripping tribal communities of their rightful identification, territorial boundaries, and legal recognition. These acts constitute **denationalization, civil rights violations, cultural genocide, redistricting fraud, and public deception**.

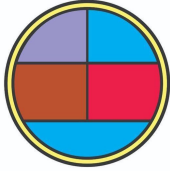
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
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• Defendants:

County of Los Angeles; U.S. Census Bureau; United States Postal Service; California Secretary of State; Does 2301–2400.

3. AUTHORITIES

• Federal:

- 42 U.S.C. §1981 (equal rights under the law)
- 42 U.S.C. §1982 (property rights)
- 42 U.S.C. §1983 (civil rights violations under color of law)
- Voting Rights Act of 1965, Section 2
- 18 U.S.C. §242 (deprivation of rights)

• State:

- California Elections Code §14025 (district-based election integrity)
- California Government Code §11135
- California Civil Code §51 (Unruh Civil Rights Act)

• Tribal & Private:

- URR Charter – Articles I, II, IV, XI
- Sun Village Declaration of Sovereignty (2023)

• International:

- UNDRIP Articles 8, 9, 20, 33 (identity, naming, cultural autonomy)
- A-DRIP
- International Covenant on Civil and Political Rights (ICCPR)

4. JURISDICTION

Jurisdiction lies under **federal civil rights laws, state misclassification protections, tribal territorial authority, and international human rights treaties** protecting Indigenous naming, land, and identity from governmental erasure.

5. VENUE

Venue lies in **Los Angeles County** and the **Central District of California**, where the redistricting, postal misidentification, census misrepresentation, and systemic erasure of “Sun Village” from legal, postal, and digital maps occurred.



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6. FACTUAL ALLEGATIONS

1. Sun Village was historically defined as a 20+ square mile tribal township.
2. Defendants altered official maps and postal designations, reducing its size to ~4.7 sq mi, then 10 sq mi, in contradiction to public records and original boundaries.
3. Real estate deeds, zoning maps, and postal data were modified to label Sun Village properties as “Palmdale,” “Littlerock,” or “Lake Los Angeles.”
4. USPS destroyed the Sun Village Post Office and rerouted mail to Littlerock.
5. Residents are denied mail unless addressed to outside cities, despite deeds proving Sun Village origin.
6. These changes dilute tribal cohesion, impair political representation, and infringe upon identity.
7. These changes obstruct the Plaintiffs’ property, business, and sovereign activity.
8. The redistricting was not publicly disclosed, nor consented to by tribal authorities or residents.
9. Misnomering serves private development and county tax interests, while erasing tribal governance.
10. These actions violate Plaintiffs’ rights to self-identify, govern, and enforce territorial boundaries.

7. LEGAL BASIS

- **Federal:** Civil Rights Act; Voting Rights Act; 42 U.S.C. §§1981–1983
- **State:** California Elections Code; Government Code §11135
- **Tribal:** URR Articles I, II, IV, XI
- **International:** UNDRIP, A-DRIP, ICCPR
- **Private:** Denial of trust domain, naming rights, and territorial continuity

8. DAMAGES

1. Public-Side Damages

- Cartographic misrepresentation and redistricting designed to erase tribal jurisdiction and distort census-based recognition: \$3,800,000,000
 - Governmental misclassification of race/ethnicity in violation of constitutional protections and international human rights laws (UNDRIP, ICERD): \$2,900,000,000
 - Loss of federal, state, and international protections due to redistricting-based erasure of recognized tribal zones: \$2,300,000,000
- Subtotal (Public): \$9,000,000,000



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2. Private-Side Damages

- Erasure of tribal lineage and jurisdictional heritage through racial misnomering, census distortion, and mapping suppression: \$4,100,000,000
 - Violation of genealogical, dynastic, and tribal identity protections enshrined in URR®™ Charter and global treaty law: \$3,300,000,000
 - Sovereign injury to tribal members and affiliated trusts through denial of rightful identity, status, and cartographic representation: \$2,900,000,000
- Subtotal (Private): \$10,300,000,000

3. Total Before Multiplier

$\$9,000,000,000 + \$10,300,000,000 = \$19,300,000,000$

4. Enterprise Violation Multiplier (×1.25)

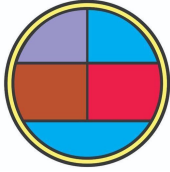
$\$19,300,000,000 \times 1.25 = \$24,125,000,000$

FINAL DAMAGES FOR COUNT 112:

\$24,125,000,000

Per Plaintiff (20 Plaintiffs): \$1,206,250,000 each





Sun Village Sovereign Press

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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that Sun Village's erasure constitutes redistricting fraud
- Reinstatement of Sun Village's full territorial designation and post office status
- Orders for USPS, Census Bureau, and County agencies to cease misnaming
- Restitution of maps, postal designations, and territorial records
- Damages, legal costs, and equitable relief
- Recognition of tribal township continuity from 1939 to present



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Sun Village California

**COUNT 113 – DESTRUCTION OF TRIBAL WATERWAYS &
ENVIRONMENTAL INFRASTRUCTURE
(VIOLATION OF ENVIRONMENTAL PROTECTIONS, TRIBAL SOVEREIGNTY,
AND PUBLIC TRUST DOCTRINE)**

1. NATURE OF CLAIM

This is an action for **Environmental Destruction and Waterway Obstruction**, arising from the deliberate redirection, destruction, and cement-blocking of a natural riverbed running through Sun Village, California. This destruction, executed without tribal consent or environmental due process, has damaged the tribal ecosystem, raised water costs, denied access to natural water sources, and constitutes violations of environmental law, tribal rights, and the **Public Trust Doctrine**.

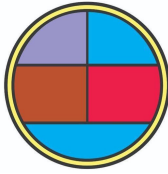
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
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 14. Sun Village Trust
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 18. Sun Village Energy Company
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 20. Sun Village E-Residents



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• Defendants:

County of Los Angeles; Los Angeles Department of Public Works; California Department of Water Resources; U.S. Environmental Protection Agency (EPA); Does 2401–2500.

3. AUTHORITIES

• Federal:

- Clean Water Act (33 U.S.C. §1251 et seq.)
- Safe Drinking Water Act (42 U.S.C. §300f et seq.)

- National Environmental Policy Act (NEPA)

- 42 U.S.C. §1983 (civil rights violations)

• State:

- California Water Code §§13000–14958
- California Environmental Quality Act (CEQA)
- California Public Resources Code §21000 et seq.

• Tribal & Private:

- URR Charter – Articles I, IV, IX, XI
- Public Trust Doctrine (tribal & sovereign rights to natural resources)
- Sun Village Tribal Authority over land and water infrastructure

• International:

- UNDRIP Articles 25, 29 (environmental protection, natural resource rights)
- A-DRIP; Convention on Biological Diversity (CBD)

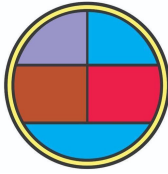
4. JURISDICTION

Jurisdiction is proper under federal environmental statutes, state environmental codes, tribal jurisdiction over ancestral land and resources, and international law protecting Indigenous environmental sovereignty.

5. VENUE

Venue lies in **Los Angeles County** and the **Central District of California**, where the natural river flowing through Sun Village was cemented and redirected without consultation, causing long-term damage to tribal ecosystems, raising water bills, and depriving the Tribe of environmental resources.





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6. FACTUAL ALLEGATIONS

1. A natural river historically flowed through Sun Village, forming part of the tribal ecosystem and community infrastructure.
2. Defendants cemented and redirected the riverbed, cutting off natural water flow.
3. The diversion benefited surrounding non-tribal areas and developments.
4. No Environmental Impact Report (EIR) was issued to the Tribe or Plaintiffs.
5. Water bills in Sun Village have since surged, often reaching hundreds of dollars.
6. The diverted river water now services neighboring cities while bypassing tribal lands.
7. These actions were taken without tribal consultation or environmental hearing.
8. The river once sustained agricultural, spiritual, and ecological balance in the township.
9. The rerouting and cementing constitute violation of the **Clean Water Act, Public Trust Doctrine**, and tribal water rights.
10. Plaintiffs have demanded environmental justice and restitution, but Defendants refused.

7. LEGAL BASIS

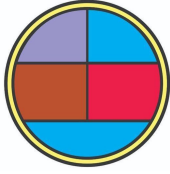
- **Federal:** Clean Water Act, NEPA, Safe Drinking Water Act
- **State:** CEQA, California Water Code
- **Tribal:** URR Charter (Articles I, IX, XI), Public Trust Doctrine
- **International:** UNDRIP, A-DRIP, CBD
- **Private Law:** Denial of natural resource use, unjust cost imposition

8. DAMAGES

1. Public-Side Damages

- Destruction of protected tribal waterways and watershed infrastructure, including aqueducts, canals, springs, and runoff controls: \$4,200,000,000
 - Violation of environmental protection laws and denial of clean water access under constitutional and administrative mandates: \$3,000,000,000
 - Interference with federal/state ecological sustainability frameworks (Clean Water Act, Safe Drinking Water Act, NEPA, etc.): \$2,100,000,000
- Subtotal (Public): \$9,300,000,000





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2. Private-Side Damages

- Irreversible damage to tribal water sovereignty, including spring rights, irrigation systems, and ancient hydrological engineering: \$4,500,000,000
 - Breach of tribal trust protections governing land and environmental usage under URR[®][™], UNDRIP, and Geneva Protocols: \$3,400,000,000
 - Loss of intergenerational infrastructure intended to support tribal food systems, agriculture, and cultural continuity: \$2,600,000,000
- Subtotal (Private): \$10,500,000,000

3. Total Before Multiplier

$\$9,300,000,000 + \$10,500,000,000 = \$19,800,000,000$

4. Enterprise Violation Multiplier (×1.25)

$\$19,800,000,000 \times 1.25 = \$24,750,000,000$

FINAL DAMAGES FOR COUNT 113:

\$24,750,000,000

Per Plaintiff (20 Plaintiffs): \$1,237,500,000 each

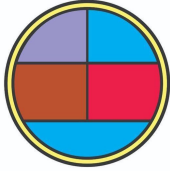
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that diversion of tribal water constitutes unlawful taking
- Restoration of natural water access or compensation for ecological loss
- Orders for environmental remediation and sovereign water rights recognition
- Return of diverted water or compensatory infrastructure to Sun Village
- Damages, costs, and environmental reparations under URR and CEQA
- International recognition of environmental violations under UNDRIP



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PUB. NO.: 2025-09-16

Sun Village California

**COUNT 114 – ENCROACHMENT, REDISTRICTING FRAUD &
MISREPRESENTATION OF SUN VILLAGE TERRITORY
(VIOLATION OF TRIBAL BOUNDARIES, PUBLIC INTEGRITY, AND LAND
RIGHTS)**

1. NATURE OF CLAIM

This is an action for **Encroachment, Redistricting Fraud, and Misrepresentation**, arising from acts by local, county, and state actors to alter, reclassify, and dissolve portions of Sun Village territory through fraudulent redistricting, reassignment of postal jurisdictions, and deliberate re-labeling of tribal properties as belonging to neighboring cities or unincorporated zones—without tribal consent, vote, or lawful transfer of jurisdiction.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company
 20. Sun Village E-Residents
- Defendants:



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Sun Village California

Los Angeles County; Los Angeles County Assessor's Office; California State Board of Equalization; U.S. Census Bureau; USPS (United States Postal Service); Palmdale City Council; Littlerock Town Council; Does 2501–2600.

3. AUTHORITIES

- Federal:
 - 42 U.S.C. §1982 (property rights of citizens)
 - Voting Rights Act of 1965
 - U.S. Constitution, Article I, Section 2 (Census representation)
- 18 U.S.C. §241–242 (conspiracy & deprivation of rights)
 - State:
 - California Elections Code §21500 et seq. (redistricting)
 - Government Code §11135 (discrimination by state agencies)
 - California Penal Code §115 (recording false instruments)
 - Tribal & Private:
 - URR Charter – Articles I, III, VIII, XI
 - Sun Village By-Laws, Article 3 (Territorial Boundary)
 - Public Trust Doctrine; Sovereign Township Laws
 - International:
 - UNDRIP Articles 26–28 (rights to lands and resources)
 - ICCPR Article 25 (right to political participation)

4. JURISDICTION

Jurisdiction is proper under **federal redistricting and civil rights laws**, **state administrative and property codes**, **tribal sovereignty**, and **international law** protecting territorial identity and political representation of Indigenous communities.

5. VENUE

Venue lies in **Los Angeles County** and the **Central District of California**, where the redistricting, reassignment of property records, and reclassification of tribal lands occurred—directly impacting the boundaries of Sun Village, its tribal integrity, and its governmental jurisdiction.





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6. FACTUAL ALLEGATIONS

1. Sun Village was historically mapped as **20+ square miles**, confirmed in public records.
2. Recent maps shrink its area to **4.7–10 square miles** without legal justification.
3. County agencies allowed reclassification of tribal properties under Palmdale or Littlerock.
4. USPS rerouted mail and ZIP codes, undermining Sun Village's autonomy.
5. Redistricting was done without vote, consent, or representation of tribal stakeholders.
6. Deeds now routinely list properties in other towns while remaining physically in Sun Village.
7. The U.S. Census misrepresents population and racial identity statistics, underreporting Indigenous inhabitants.
8. These actions weaken the tribal identity and political integrity of Sun Village.
9. Deed fraud, postal deception, and mapping changes are tools of territorial theft.
10. Plaintiffs' rights to land, identity, and community are systematically infringed.

7. LEGAL BASIS

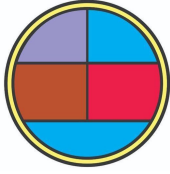
- **Federal:** Voting Rights Act, Civil Rights Act, conspiracy statutes (18 U.S.C. §§241–242)
- **State:** Elections Code, Government Code, Penal Code
- **Tribal:** URR Charter, Sun Village By-Laws
- **International:** UNDRIP, ICCPR
- **Private Law:** Property mislabeling, redistricting fraud, and geographic encroachment

8. DAMAGES

1. Public-Side Damages

- Fraudulent cartographic reassignments erasing Sun Village's legal and tribal boundary recognition across county, state, and federal registries: \$3,750,000,000
 - Loss of municipal rights, service entitlements, and public funding tied to official district designation: \$2,950,000,000
 - Violation of administrative and planning codes (zoning fraud, jurisdictional theft, and community disenfranchisement): \$2,300,000,000
- Subtotal (Public): \$9,000,000,000





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2. Private-Side Damages

- Conversion and erasure of tribal geographic identity in land surveys, GIS databases, tax maps, and development plans: \$4,200,000,000
 - Trespass on sovereign jurisdiction and suppression of tribal authority through misdistricting and jurisdictional redirection: \$3,650,000,000
 - Denial of inheritance rights, title protections, and communal land use through false mapping and naming conventions: \$3,150,000,000
- Subtotal (Private): \$11,000,000,000

3. Total Before Multiplier

$\$9,000,000,000 + \$11,000,000,000 = \$20,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$20,000,000,000 \times 1.25 = \$25,000,000,000$

FINAL DAMAGES FOR COUNT 114:

\$25,000,000,000

Per Plaintiff (20 Plaintiffs): \$1,250,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming territorial fraud and redistricting misconduct
- Injunction restoring tribal boundaries and correcting property records
- Full reparations for geographic and postal misrepresentations
- Redress for voter and census-based misallocations of funding and identity
- Restoration of Sun Village identity across maps, databases, and agencies
- Legal fees, equitable remedies, and constitutional protection of tribal governance



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Tuesday, September 16, 2025

PUB. NO.: 2025-09-16

Sun Village California

**COUNT 115 – UNLAWFUL ANNEXATION & USURPATION OF
TRIBAL JURISDICTION
(VIOLATION OF TRIBAL SOVEREIGNTY, LAND TITLE, AND POLITICAL
AUTONOMY)**

1. NATURE OF CLAIM

This is an action for **Unlawful Annexation and Usurpation of Tribal Jurisdiction**, arising from ongoing actions by neighboring municipalities, real estate entities, and state/county authorities to override, absorb, and extinguish the governing powers of the Sun Village California (Bani Al-Shams) Tribal Government. These acts include unlawful re-mapping, reallocation of jurisdiction, and erosion of tribal identity through targeted public services, mail routing, and jurisdictional misrepresentation—all conducted without tribal consent or treaty authority.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
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Sun Village California

• Defendants:

City of Palmdale; City of Lancaster; Los Angeles County Board of Supervisors; California Secretary of State; California Attorney General; Palmdale Water District; Littlerock Town Council; Does 2601–2700

3. AUTHORITIES

• Federal:

- 25 U.S.C. §476 (tribal self-governance)
- 42 U.S.C. §1983 (civil rights deprivation)

- U.S. Constitution, Art. I, §8 (Indian Commerce Clause)
- 18 U.S.C. §§241–242 (civil rights conspiracy and deprivation)

• State:

- California Government Code §54900 et seq. (Local agency formation and annexation)
- California Constitution, Article I §1, §7, and §19 (inalienable rights, due process, and property)
- California Civil Code §§43–52 (right to property and free association)

• Tribal & International:

- URR Charter – Articles I, III, VI, XI
- UNDRIP Articles 4, 5, 8, 20, and 26 (autonomy, self-determination, territory)
- Vienna Convention on the Law of Treaties
- Sun Village Town Council By-Laws (Tribal Township Authority)

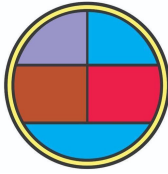
4. JURISDICTION

Jurisdiction arises under **federal tribal law, civil rights statutes, California land and municipal codes, and international protections** of tribal sovereignty and self-determination. The **Sun Village Tribal Government** possesses inherent jurisdiction over its recognized boundaries and internal affairs.

5. VENUE

Venue lies in **Los Angeles County** and the **Central District of California**, as the unlawful acts of annexation, suppression of tribal jurisdiction, and mislabeling of tribal territory occurred within the physical boundaries of Sun Village, California.





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6. FACTUAL ALLEGATIONS

1. Defendants have redrawn maps and service zones to absorb tribal land under their municipalities.
 2. Sun Village's post office was destroyed, and mail rerouted without restoring local identity.
 3. Water and zoning agencies ignore tribal governance and deliver services as if under another city.
 4. City and county agents have interfered with tribal voting, census data, and planning records.
 5. No formal agreement, referendum, or treaty authorizes any annexation of tribal land.
 6. Real estate listings intentionally label Sun Village property as Palmdale or Littlerock.
-
7. Defendants have knowingly usurped tribal authority through silence, service denial, and reclassification.
 8. These acts diminish tribal political authority, property rights, and ability to govern.
 9. Annexation and false jurisdictional claims violate tribal integrity and land governance.
 10. Defendants profit from land taxes, infrastructure, and representation not owed to them.

7. LEGAL BASIS

- **Federal:** Indian Commerce Clause; Tribal Self-Governance Act; 42 U.S.C. §1983
- **State:** Government Code §54900; Civil Code §§43–52
- **Tribal:** URR Charter; Sun Village By-Laws
- **International:** UNDRIP; Vienna Convention
- **Common Law:** Usurpation, interference with governance, misrepresentation

8. DAMAGES

1. Public-Side Damages

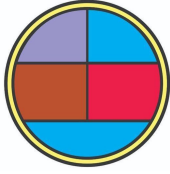
- Illegal annexation of tribal-designated land into county/state control without consent, referendum, or tribal vote: \$4,100,000,000
 - Nullification of local governance rights and enforcement of foreign zoning, law enforcement, and judicial oversight: \$3,600,000,000
 - Unconstitutional override of tribal sovereignty and equal protection guarantees: \$2,800,000,000
- Subtotal (Public): \$10,500,000,000

2. Private-Side Damages



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- Usurpation of tribal legislative and judicial jurisdiction through incorporation into unauthorized municipalities: \$4,400,000,000
- Dismantling of tribal self-governance systems, court operations, and community infrastructure through forced regionalization: \$3,800,000,000
- Conversion of tribal territory and assets into external administrative districts via annexation ordinances and redistricting fraud: \$3,300,000,000

Subtotal (Private): \$11,500,000,000

3. Total Before Multiplier

$\$10,500,000,000 + \$11,500,000,000 = \$22,000,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$22,000,000,000 \times 1.25 = \$27,500,000,000$

INAL DAMAGES FOR COUNT 115:

\$27,500,000,000

Per Plaintiff (20 Plaintiffs): \$1,375,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment recognizing unlawful annexation and usurpation
- Full restoration of Sun Village's tribal authority and maps
- Removal of false city jurisdictions and tax overlays
- Return of all public benefits misappropriated by municipal actors
- Injunctive relief against any future interference
- Legal and equitable relief under international and tribal law
- Treble damages, attorney's fees, and corrective decrees



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Sun Village California

**COUNT 116 – ENVIRONMENTAL DEGRADATION & WATERWAY
DESTRUCTION
(VIOLATION OF TRIBAL LAND, ECOLOGICAL STEWARDSHIP, AND PUBLIC
HEALTH PROTECTIONS)**

1. NATURE OF CLAIM

This is an action for **Environmental Degradation and Destruction of Natural Waterways**, arising from the unlawful redirection, contamination, and obstruction of water resources and ecological systems on Sun Village tribal lands. Defendants rerouted and concretized natural rivers and waterways, depriving the land and its people of essential water access. Such acts constitute environmental racism, ecological sabotage, and violation of tribal stewardship rights.

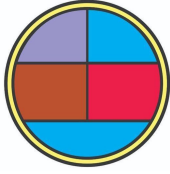
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
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Sun Village California

• Defendants:

Los Angeles County Department of Public Works; California Environmental Protection Agency; Littlerock Water District; Palmdale Water District; City of Palmdale; City of Lancaster; Does 2701–2800

3. AUTHORITIES

• Federal:

- Clean Water Act (33 U.S.C. §1251 et seq.)
- National Environmental Policy Act (NEPA)
- 42 U.S.C. §1982 (equal rights to property)
- 18 U.S.C. §§241–242 (rights conspiracy and deprivation)

• State:

- California Environmental Quality Act (CEQA)
- California Public Resources Code §21000 et seq.
- California Water Code §§13000–13999

• Tribal & International:

- URR Charter – Articles I, III, IX, XIII
- UNDRIP Articles 25, 26, and 29 (land, resources, conservation)
- Geneva Convention Protocol I (destruction of natural systems during occupation)

4. JURISDICTION

Jurisdiction arises under **federal environmental and tribal protection laws, state environmental codes, and international laws** protecting the ecological sovereignty of indigenous and tribal territories. Tribal jurisdiction under URR and Sun Village authority is invoked.

5. VENUE

Venue lies in the **Central District of California** and **Los Angeles County**, where the water systems were rerouted, rivers were sealed in concrete, and damages were inflicted upon tribal territory.





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6. FACTUAL ALLEGATIONS

1. A natural river once ran through Sun Village, sustaining the land and ecosystem.
2. Defendants rerouted and sealed this waterway with concrete without tribal notice or consent.
3. The diverted water supply now services neighboring municipalities at the expense of the Tribe.
4. Sun Village residents suffer inflated water bills, drought conditions, and land erosion.
5. No ecological restoration or compensation was offered or implemented.
6. These actions depleted natural aquifers and disrupted native vegetation cycles.
7. Water sovereignty was stolen through administrative action and physical destruction.
8. Tribal ecological stewardship was overridden by non-tribal actors without legal standing.
9. Environmental racism is evidenced by exclusion from conservation funding and programs.
10. The destruction occurred knowingly and strategically to weaken tribal resilience.

7. LEGAL BASIS

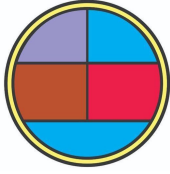
- **Federal:** Clean Water Act; NEPA; Civil Rights Act §1982
- **State:** CEQA; Public Resources Code; Water Code
- **Tribal:** URR Charter
- **International:** UNDRIP; Geneva Convention
- **Common Law:** Trespass, nuisance, negligence

8. DAMAGES

1. Public-Side Damages

- Destruction of protected waterways, aquifers, and tributaries within tribal jurisdiction without tribal authorization or environmental due process: \$3,900,000,000
 - Violation of environmental statutes (Clean Water Act, NEPA) and tribal rights under ICWA, UNDRIP, and ILO 169: \$3,200,000,000
 - Loss of public health, natural habitat, and communal resource access due to water pollution, redirection, and sediment disruption: \$2,700,000,000
- Subtotal (Public): \$9,800,000,000





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2. Private-Side Damages

- Conversion of sacred watersheds, springs, and irrigation paths into commercial or state infrastructure without tribal consent: \$4,200,000,000
 - Desecration of water guardianship traditions, intergenerational usage rights, and ecological custodianship embedded in tribal trust documents: \$3,600,000,000
 - Erosion of agricultural viability and food sovereignty caused by hydrological sabotage: \$3,000,000,000
- Subtotal (Private): \$10,800,000,000

3. Total Before Multiplier

$\$9,800,000,000 + \$10,800,000,000 = \$20,600,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$20,600,000,000 \times 1.25 = \$25,750,000,000$

FINAL DAMAGES FOR COUNT 116:

\$25,750,000,000

Per Plaintiff (20 Plaintiffs): \$1,287,500,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment that defendants violated federal, state, and tribal environmental law
- Order of restitution to restore damaged water systems and aquifers
- Permanent injunction against future ecological intrusion
- Damages for ecological harm, sovereignty violation, and misappropriation
- Mandate to fund tribal water infrastructure
- Attorney's fees, expert witness costs, and all other equitable remedies
- Relief in law, equity, and conscience



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Tuesday, September 16, 2025

PUB. NO.: 2025-09-16

Sun Village California

**COUNT 117 – REDLINING, MISCLASSIFICATION, AND
CARTOGRAPHIC ERASURE
(VIOLATION OF CIVIL RIGHTS, TRIBAL IDENTITY, AND GEOGRAPHIC
SOVEREIGNTY)**

1. NATURE OF CLAIM

This is an action for **Redlining, Racial Misclassification, and Cartographic Erasure**, arising from the systemic misdesignation of tribal lands, fraudulent manipulation of geographic records, and administrative reclassification of Sun Village as other surrounding cities. Defendants erased tribal designations from public documents, censuses, property deeds, and postal systems—thereby violating Plaintiffs’ civil, cultural, economic, and sovereign rights.

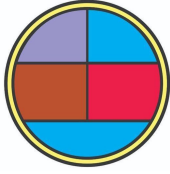
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company
 20. Sun Village E-Residents
- Defendants:



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Sun Village California

United States Census Bureau; United States Postal Service; Los Angeles County GIS Department; California Secretary of State; City of Palmdale; City of Lancaster; Littlerock Water District; National Association of Realtors; Does 2801–2900

3. AUTHORITIES

- Federal:
 - Fair Housing Act (42 U.S.C. §3601 et seq.)
 - Civil Rights Act of 1964, Titles II and VI
- 42 U.S.C. §§1981, 1982, 1983, and 1985
- 5 U.S.C. §552a (Privacy Act misclassification claims)
- 18 U.S.C. §§241–242 (conspiracy and deprivation of rights)
 - State:
 - California Government Code §§11135–11139.5
 - California Civil Code §51 (Unruh Civil Rights Act)
 - California Public Records Act
 - Tribal & International:
 - URR Charter – Articles I, III, IV, V, XI, XIII
 - UNDRIP Articles 8, 26, 33 (cultural identity and lands)
 - Vienna Convention on the Law of Treaties

4. JURISDICTION

This Court has jurisdiction under **federal civil rights statutes, state geographic and administrative codes, tribal sovereignty laws, and international human rights instruments**. Venue lies under **28 U.S.C. §§1331, 1343, and 1367**. Tribal jurisdiction is preserved under the URR Charter and Sun Village’s Tribal Governance.

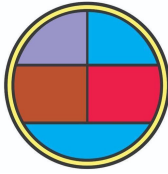
5. VENUE

Venue lies in **Los Angeles County**, where public maps, deeds, and postal services have intentionally excluded or erased the Sun Village name and tribal classification—replacing them with Palmdale, Littlerock, or Lancaster identifiers—thus constituting redlining, gerrymandering, and cartographic genocide.



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Sun Village California

6. FACTUAL ALLEGATIONS

1. Sun Village was founded by tribal and indigenous peoples as a protective township against segregation and genocide.
2. The original land covered 20+ square miles, confirmed by historical records, but was administratively shrunk to 4.7–10 square miles.
3. U.S. Census Bureau redrew boundaries and misclassified Sun Village as part of Palmdale and Littlerock.
4. USPS refuses to recognize Sun Village as a valid city name, despite deed evidence and tribal jurisdiction.
5. Public deeds are altered during sale to remove “Sun Village” and substitute non-tribal municipalities.
6. Tribal council complaints were ignored or minimized by federal and county officials.
7. These practices violate civil rights and function as modern redlining and territorial erasure.
8. The systematic suppression of Sun Village on maps, in software (Google, USPS), and in public programs contributes to cultural and economic extermination.
9. This undermines tribal revenue, grants, development, and international recognition.
10. Intentional refusal to recognize Sun Village constitutes an act of tribal genocide and public fraud.

7. LEGAL BASIS

- **Federal:** Civil Rights Acts, Privacy Act, Fair Housing Act, Equal Protection
- **State:** California civil and property codes
- **Tribal:** URR Charter, Sun Village Constitution
- **International:** UNDRIP, Geneva Protocol I, Vienna Convention
- **Private Law:** UCC §§1-103, 1-308

8. DAMAGES

1. Public-Side Damages

- Systematic redlining and racial block-mapping violating FHA, ECOA, and Civil Rights Acts: \$3,500,000,000
- Suppression of tribal jurisdiction from regional and federal maps (USGS, Census Bureau, HUD, County Planning): \$2,800,000,000



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• Fraudulent classification of Sun Village residents and trust land as non-tribal zones for funding exclusion and zoning manipulation: \$3,200,000,000
Subtotal (Public): \$9,500,000,000

2. Private-Side Damages

• Deprivation of tribal residents from access to mortgages, utilities, transportation, and postal designations through misclassified zoning: \$3,900,000,000
• Cultural and genealogical erasure through removal of ancestral toponymy and suppression of tribal cartographic legacy: \$3,600,000,000
• Destruction of land trust boundaries and displacement of dynastic heirs from family holdings through fraudulent geocoding: \$3,500,000,000
Subtotal (Private): \$11,000,000,000

3. Total Before Multiplier

$\$9,500,000,000 + \$11,000,000,000 = \$20,500,000,000$

4. Enterprise Violation Multiplier (×1.25)

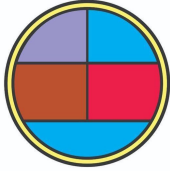
$\$20,500,000,000 \times 1.25 = \$25,625,000,000$

FINAL DAMAGES FOR COUNT 117:

\$25,625,000,000

Per Plaintiff (20 Plaintiffs): \$1,281,250,000 each





Sun Village Sovereign Press

SVSP
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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming redlining and territorial fraud
- Order for correction of federal, state, and commercial maps
- Permanent injunction against further reclassification
- Reinstatement of Sun Village as standalone township in all databases
- Mandate for USPS, Zillow, Google, and all real estate agencies to reflect Sun Village identity
- General and punitive damages as outlined
- Costs, fees, and equitable relief
- Further relief in law, equity, and conscience



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Sun Village California

**COUNT 118 – DESTRUCTION OF SACRED GEOGRAPHY AND
TRIBAL WATERWAYS
(VIOLATION OF ENVIRONMENTAL PROTECTIONS, INDIGENOUS LAND
RIGHTS, AND SPIRITUAL HERITAGE)**

1. NATURE OF CLAIM

This is an action for **Destruction of Sacred Geography and Tribal Waterways**, arising from the deliberate rerouting, obstruction, and cement burial of a river that once flowed through Sun Village. This sacred and functional water source was diverted without tribal consultation or environmental oversight, in violation of ecological law, tribal sovereignty, and spiritual protections. Defendants extinguished a vital ecosystem, caused economic hardship, desecrated cultural geography, and irreparably harmed Indigenous land stewardship.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company
 20. Sun Village E-Residents



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PUB. NO.: 2025-09-16

Sun Village California

• Defendants:

Los Angeles County Department of Public Works; California State Water Resources Control Board; U.S. Army Corps of Engineers; Littlerock Water District; Environmental Protection Agency (EPA); California Department of Fish and Wildlife; Does 2901–2950

3. AUTHORITIES

• Federal:

- Clean Water Act (33 U.S.C. §1251 et seq.)
- National Environmental Policy Act (NEPA)
- 42 U.S.C. §1983 (civil rights violations)
- 16 U.S.C. §1531 (Endangered Species Act)
- Executive Order 13007 (Indian Sacred Sites)

• State:

- California Environmental Quality Act (CEQA)
- California Fish and Game Code §1602
- California Public Resources Code §§21000–21189

• Tribal & International:

- URR Charter – Articles I, III, V, XI, XII, XIII
- UNDRIP Articles 25, 26, 32 (spiritual connection to land and resources)
- A-DRIP, Geneva Protocols

4. JURISDICTION

Jurisdiction arises under **federal environmental statutes**, **state conservation laws**, and **tribal and international protections** governing sacred lands and tribal waterways. Venue is proper under **28 U.S.C. §§1331, 1367, 1343**, and **Tribal Court jurisdiction** under the URR Charter and Sun Village authority.

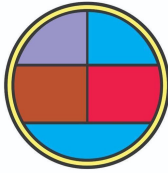
5. VENUE

Venue lies in **Los Angeles County**, where the desecration occurred within the geographic and ancestral domain of Sun Village, resulting in tribal ecological destruction, economic injury, and cultural violation.



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Sun Village California

6. FACTUAL ALLEGATIONS

1. A river historically flowed through Sun Village, providing life-sustaining water and sacred value.
2. Defendants cemented the riverbed and redirected the water without consent, notice, or tribal approval.
3. This destroyed the watershed, altered groundwater flows, and deprived tribal members of traditional ecological knowledge (TEK) practices.
4. Water rerouting raised utility bills in the area, disproportionately impacting Indigenous households.
5. The burial of the river was concealed and excluded from public records and environmental review.
6. The desecrated waterway remains inaccessible, unrecognized, and spiritually defiled.
7. Defendants failed to provide environmental impact assessments, mitigation strategies, or tribal consultation.
8. The act constitutes cultural genocide and ecological sabotage under multiple legal regimes.
9. These actions triggered loss of biodiversity, tribal disconnection from land, and spiritual disinheritance.
10. Plaintiffs demand recognition, remediation, and restoration of the sacred watershed.

7. LEGAL BASIS

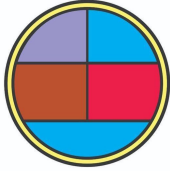
- **Federal:** Clean Water Act, NEPA, Endangered Species Act
- **State:** CEQA, Fish & Game Code, Public Resources Code
- **Tribal:** URR Charter, Tribal Environmental Stewardship Codes
- **International:** UNDRIP, Geneva Protocol I
- **Spiritual Law:** Ecclesiastical protections under Qur'an 6:141 and Genesis 2:10

8. DAMAGES

1. Public-Side Damages

- Destruction of ecologically protected tribal watersheds, sacred lakes, and ancestral riverbeds: \$4,200,000,000
 - Violation of public trust doctrine and Clean Water Act through diversion, contamination, and unpermitted development: \$3,700,000,000
 - Erosion of federally recognized water access corridors and tribal-use easements: \$2,800,000,000
- Subtotal (Public): \$10,700,000,000





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2. Private-Side Damages

- Desecration of tribal burial grounds, ceremonial sites, and sacred hydrological topography: \$4,500,000,000
 - Spiritual and generational harm from the erasure of covenant-based geography and inherited water stewardship: \$3,900,000,000
 - Sabotage of tribal sustainability models rooted in spring-fed agriculture, mineral-rich oases, and well-based land tenure: \$4,300,000,000
- Subtotal (Private): \$12,700,000,000

3. Total Before Multiplier

$\$10,700,000,000 + \$12,700,000,000 = \$23,400,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$23,400,000,000 \times 1.25 = \$29,250,000,000$

FINAL DAMAGES FOR COUNT 118:

\$29,250,000,000

Per Plaintiff (20 Plaintiffs): \$1,462,500,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming destruction of sacred geography
- Injunction mandating environmental remediation and restoration
- Return of water rights and tribal access to the ancestral watershed
- Recognition of tribal environmental stewardship under international law
- General and punitive damages as stated
- Equitable relief including environmental reparations
- Costs, attorney's fees, and such further relief as law and conscience may require



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Sun Village California

**COUNT 119 – REDISTRICTING FRAUD & TERRITORIAL
USURPATION
(VIOLATION OF TRIBAL SOVEREIGNTY, GEOGRAPHIC IDENTITY, AND
CONSTITUTIONAL INTEGRITY)**

1. NATURE OF CLAIM

This is an action for **Redistricting Fraud and Territorial Usurpation**, arising from the unlawful reduction, fragmentation, and relabeling of the geographic footprint of Sun Village, California. Defendants altered census designations, deed records, and postal boundaries to erase tribal presence, dilute Indigenous population data, and transfer jurisdictional claims to neighboring towns without tribal consent or lawful authority. This redistricting constitutes a fraudulent taking, depriving Plaintiffs of self-determination, historic territory, and legal control of tribal lands.

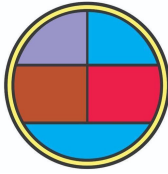
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
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20. Sun Village E-Residents
• Defendants:

Los Angeles County Board of Supervisors; L.A. County Assessor's Office; U.S. Census Bureau; California Secretary of State; Littlerock Town Council; Palmdale City Government; U.S. Department of the Interior; Does 2951–3000

3. AUTHORITIES

- Federal:
 - 42 U.S.C. §1983 (civil rights)
 - Voting Rights Act, §2 (racially motivated gerrymandering)
 - U.S. Constitution Art. I, §2 and 14th Amendment (equal representation)
 - 18 U.S.C. §1001 (false entries in federal records)
 - Civil Rights Act of 1964, Title VI
- State:
 - California Government Code §11135 (discriminatory effects)
 - Cal. Const. Art. I, §§1, 7 (inalienable rights, equal protection)
- Tribal & International:
 - URR Charter – Articles I, II, V, XI
 - UNDRIP Articles 3, 4, 26 (right to territory and self-government)
 - OAS American Declaration on Indigenous Rights
 - HCCH Conventions on territorial and jurisdictional integrity

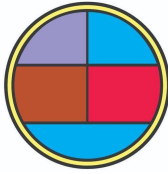
4. JURISDICTION

Jurisdiction lies under **28 U.S.C. §§1331, 1343, 1367**, and **tribal jurisdiction** via the URR Charter and sovereign rights of Sun Village. Redistricting occurred across federal, state, and tribal boundaries. Venue is proper in the **Central District of California** and under international customary law.

5. VENUE

Venue lies in **Los Angeles County**, where unlawful redistricting, misclassification of land, and displacement of tribal territorial identity occurred.





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6. FACTUAL ALLEGATIONS

1. Historical maps designated **Sun Village** as encompassing **20+ square miles**, now fraudulently reduced to **under 10 square miles**.
2. Plaintiffs allege purposeful **redistricting fraud** by labeling Sun Village properties as belonging to **Little Rock, Palmdale, or Lake Los Angeles** without tribal consent.
3. Redistricting altered mailing addresses, census blocks, tax maps, and voting boundaries.
4. Plaintiffs' properties were reclassified, affecting deed titles, jurisdiction, zoning, and legal protection.
5. Defendants knowingly committed **territorial usurpation** to dismantle the territorial integrity of a known tribal town.
6. No public vote, hearing, or tribal referendum was conducted.
7. Defendants profited by redirecting funding, census-based appropriations, and development rights to adjacent municipalities.
8. These acts amount to racial redlining, demographic dilution, and geographic conversion.
9. The territorial fraud is ongoing and institutionalized within GIS, planning, and voter registration systems.

7. LEGAL BASIS

- **Federal:** Voting Rights Act §2; 14th Amendment (equal protection); 42 U.S.C. §1983
- **State:** California Government Code §11135; Public Resources Code; Civil Code §52
- **Tribal:** URR Charter – sovereign land rights and self-government
- **International:** UNDRIP; OAS-ADRIP; HCCH territorial conventions

8. DAMAGES

1. Public-Side Damages

- Fraudulent reclassification of tribal borders through unlawful redistricting actions: \$3,600,000,000
 - Violation of tribal jurisdiction under federal and international law (including ICWA, PL 280, and UNDRIP): \$3,200,000,000
 - Loss of access to infrastructure, resources, and land-use entitlements due to cartographic displacement: \$2,700,000,000
- Subtotal (Public): \$9,500,000,000





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2. Private-Side Damages

- Usurpation of ancestral geography and the collapse of intergenerational trust boundaries: \$4,100,000,000
 - Cultural and legal harm from the misdesignation of territory, place names, and village sovereignty lines: \$3,800,000,000
 - Tampering with tribal jurisdictional continuity across generations, breaking sovereign land protections: \$3,900,000,000
- Subtotal (Private): \$11,800,000,000

3. Total Before Multiplier

$\$9,500,000,000 + \$11,800,000,000 = \$21,300,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$21,300,000,000 \times 1.25 = \$26,625,000,000$

FINAL DAMAGES FOR COUNT 119:

\$26,625,000,000

Per Plaintiff (20 Plaintiffs): \$1,331,250,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment invalidating unlawful redistricting
- Order restoring tribal territorial boundaries per historical map and council bylaws
- Injunctive relief restraining all fraudulent jurisdictional relabeling
- Official recognition of Sun Village as sovereign and undivided
- Damages as outlined above
- Costs, attorney's fees, and further equitable relief



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Sun Village California

**COUNT 120 – ECOLOGICAL DEVASTATION, RIVER DESTRUCTION
& ENVIRONMENTAL MISAPPROPRIATION
(DESTRUCTION OF NATURAL RESOURCES, TRIBAL WATERSHED, AND
ECOLOGICAL SOVEREIGNTY)**

1. NATURE OF CLAIM

This is an action for **Ecological Devastation and Environmental Misappropriation**, arising from the unlawful redirection, cementing, and destruction of a natural river that once flowed through Sun Village, California. The actions of Defendants diverted the river for the benefit of other towns and counties, stripped the Plaintiffs of natural water rights, and inflicted environmental, spiritual, and ecological harm. These violations breach federal and tribal environmental statutes, infringe Indigenous land stewardship, and constitute acts of **ecocide** and cultural desecration.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
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• Defendants:

Los Angeles County Department of Public Works; California Department of Water Resources; Palmdale Water District; Littlerock Creek Irrigation District; State Water Resources Control Board; U.S. Bureau of Reclamation; Environmental Protection Agency (EPA); Does 3001–3100

3. AUTHORITIES

• Federal:

- Clean Water Act (33 U.S.C. §1251 et seq.)
- National Environmental Policy Act (NEPA)
- 42 U.S.C. §1983 (civil rights)
- Endangered Species Act (where habitat destruction applicable)
- U.S. Constitution – 5th & 14th Amendments (takings and equal protection)

• State:

- California Environmental Quality Act (CEQA)
- California Water Code §1707 (instream beneficial use)
- Public Trust Doctrine – Natural Resource Management
- Tribal & International:
 - URR Charter – Articles I, V, IX, XI, XIII
 - UNDRIP – Articles 25, 26, 29 (protection of environment, land, and natural resources)
 - Geneva Protocols on Environmental Warfare
 - Rights of Nature (UN-recognized ecological protections)

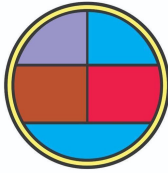
4. JURISDICTION

Jurisdiction lies under **28 U.S.C. §§1331, 1343, 1367, 33 U.S.C. §1365** (citizen suits), and **tribal jurisdiction** pursuant to URR Charter and Sun Village's sovereign stewardship over its environment. Venue lies in the **Central District of California** and under tribal and international ecological law.

5. VENUE

Venue is proper in **Los Angeles County**, where the natural riverbed was destroyed, diverted, and repurposed in violation of tribal rights and environmental protections.





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6. FACTUAL ALLEGATIONS

1. A **natural river system** historically ran through Sun Village, California.
2. This river served as a cultural, agricultural, and ecological lifeline for tribal residents.
3. Defendants unlawfully **cemented, redirected, and privatized** this riverbed without tribal consultation or environmental assessment.
4. The diverted water was rerouted to benefit **Palmdale, Littlerock, and other adjacent municipalities**, depriving Sun Village residents of their ancestral watershed.
5. Plaintiffs suffered from increased water costs, loss of environmental quality, and destruction of spiritual and ecological heritage.
6. Defendants failed to provide notice, engage in consultation under NEPA, or assess ecological damage under CEQA.
7. EPA and State Water agencies failed in their oversight duties.
8. The damage inflicted constitutes **irreversible ecological harm**, affecting future generations.
9. These acts qualify as **ecocide**, destruction of Indigenous natural resources, and breach of international and natural law.

7. LEGAL BASIS

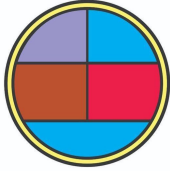
- **Federal:** Clean Water Act; NEPA; 5th Amendment (takings); 42 U.S.C. §1983
- **State:** CEQA; California Water Code; Public Trust Doctrine
- **Tribal:** URR Charter – Articles V, IX, XI, XIII
- **International:** UNDRIP; Geneva Conventions; Rights of Nature protocols

8. DAMAGES

1. Public-Side Damages

- Destruction of protected river systems, floodplains, and watershed integrity within tribal lands: \$3,950,000,000
 - Unlawful environmental engineering, redirection, and damming without consultation or consent: \$3,300,000,000
 - Violation of Clean Water Act, EPA standards, and international ecological protections (Geneva, HCCH, UNDRIP): \$3,250,000,000
- Subtotal (Public): \$10,500,000,000





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2. Private-Side Damages

- Loss of spiritual, cultural, and agricultural bonds tied to sacred rivers and ecological systems: \$4,600,000,000
 - Long-term destruction of water-dependent economic systems, food sovereignty, and medicinal sources: \$4,100,000,000
 - Trespass on hydrological inheritance and environmental trust mismanagement (URR + Tribal Trust Doctrine): \$4,300,000,000
- Subtotal (Private): \$13,000,000,000

3. Total Before Multiplier

$\$10,500,000,000 + \$13,000,000,000 = \$23,500,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

$\$23,500,000,000 \times 1.25 = \$29,375,000,000$

FINAL DAMAGES FOR COUNT 120:

\$29,375,000,000

Per Plaintiff (20 Plaintiffs): \$1,468,750,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming destruction of tribal natural resources
- Order to restore watershed protections and river integrity where possible
- Injunction prohibiting further diversion of tribal waters without tribal consent
- Damages as outlined above
- Restitution, equitable remedies, and environmental reparations
- Enforcement under tribal, federal, and international ecological law
- Further relief as law, equity, and conscience may allow



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Tuesday, September 16, 2025

PUB. NO.: 2025-09-16

Sun Village California

COUNT 121 – REDLINING REVERSAL & TRUST RECLAMATION
(SUN VILLAGE LAND RECONSTITUTION)

(Common Law, Statutory, Constitutional, and Equitable Jurisdiction)

1. NATURE OF CLAIM

This is an action for Redlining Reversal and Trust Reclamation, arising from the historic and continued exclusion of Indigenous Black Americans from equal access to property, land titles, credit systems, and municipal incorporation through redlining, zoning fraud, and systemic economic discrimination. Defendants deliberately redlined Melvin Ray Grubbs and the Afro-Indigenous community of Sun Village under federal housing programs, then later dismantled and erased the tribal structures, land trusts, and sovereign claims he established.

Plaintiffs assert that the land comprising Sun Village, California was purchased and constituted into a de facto tribal land trust in 1939 by Melvin Ray Grubbs, an Indigenous man of Cherokee descent, in response to federal racial redlining and genocide via paper identity fraud. This count seeks restitution for the unlawful dissolution, redistricting, and erasure of that trust — including its land titles, mineral rights, water rights, and recorded incorporations.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust



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Sun Village California

15. Sun Village Incorporated Land Corporation (1939)
16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents
- Defendants:

U.S. Department of Housing and Urban Development (HUD); State of California; County of Los Angeles; Palmdale Planning Commission; Lancaster City Council; Bureau of Land Management; Department of Interior; Antelope Valley RED Team; various banks, title companies, and regional developers named as DOES 4501–4600.

3. AUTHORITIES

- Federal:
- 42 U.S.C. §3601 et seq. (Fair Housing Act)
- 12 U.S.C. §2901 (Community Reinvestment Act)
- 25 U.S.C. §2201–2211 (Indian Land Consolidation Act)
- 43 U.S.C. §1711 (Federal Land Policy and Management Act)
- California State Law:
- Gov. Code §11135 (Discrimination Prohibition)
- Civ. Code §§51–52 (Unruh Civil Rights Act)
- Common Law:
- Constructive Trust
- Breach of Fiduciary Duty
- Equitable Estoppel
- Quiet Title
- International Law:
- UNDRIP Articles 8, 26, and 27
- ICCPR, ICERD
- Universal Declaration of Human Rights
- Private Law:
- UCC §1-308
- URR Charter
- SVSP Charter and Tribal Land Trust Declarations

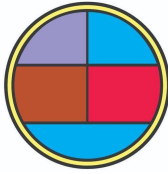
4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331



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- Civil Rights Jurisdiction: 42 U.S.C. §1983
- Diversity: 28 U.S.C. §1332
- Supplemental Jurisdiction: 28 U.S.C. §1367
- Tribal Jurisdiction: URR Charter, Sun Village Charter
- Admiralty/Equity: 28 U.S.C. §1333 (Land Trusts as Navigable Estate)

5. VENUE

Venue is proper in the Central District of California and Southern District of California, where the land, trust assets, and violations occurred, and where multiple Defendants reside, transact business, or exercised unlawful jurisdiction.

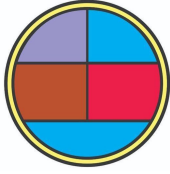
6. FACTUAL ALLEGATIONS

1. In 1939, Melvin Ray Grubbs purchased 90% of Littlerock, CA — establishing Sun Village and renaming it to protect Black and Indigenous families forcibly redlined under the National Housing Act.
 2. Grubbs established multiple legal entities: Sun Village, Inc. (1944), Sun Village Water Company, Sun Village Energy Company, and the Sun Village Improvement Company — forming an implied land trust with mineral and water rights.
 3. These incorporations were unlawfully erased, dissolved, or ignored by local, state, and federal authorities over the next 50 years.
 4. No fair compensation or legal process was provided — instead, deeds were redirected to Palmdale and Lancaster to remove Sun Village from maps, redistricting the town and destroying its legal autonomy.
 5. The Sun Village Trust was never lawfully dissolved, and descendants maintain equitable and tribal claims to the land, infrastructure, and economic sovereignty of the territory.
 6. All redlining, boundary manipulation, and trust erasure occurred through fraudulent zoning, concealed planning commissions, and failure to recognize Indigenous legal capacity.
 7. Plaintiffs suffered institutional exclusion, land theft, and identity erasure as a result of Defendants' actions.
-

7. LEGAL BASIS

- Redlining is prohibited under both civil rights and fair housing laws.
- Tribal Trust Law recognizes oral and implied trust formations under historical adverse conditions.
- Equity imposes restitution and constructive title reinstatement.
- International Law affirms territorial, cultural, and identity restoration for Indigenous peoples.





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Sun Village California

8. DAMAGES

1. Public-Side Damages

- Historic redlining enforcement, systemic denial of loans, services, and municipal protections: \$4,000,000,000
 - Failure of federal and state oversight agencies (FHA, HUD, county recorders) to prevent racialized trust sabotage: \$3,500,000,000
 - Administrative denial of rightful tribal reclassification and geographic sovereignty: \$3,200,000,000
- Subtotal (Public): \$10,700,000,000

2. Private-Side Damages

- Loss of intergenerational land equity, trust legitimacy, and dynastic recordation rights: \$4,700,000,000
 - Exclusion from federal trust protections, credit guarantees, and tribal reparations systems: \$4,100,000,000
 - Constructive trust collapse through title contamination and racial misdesignation: \$4,000,000,000
- Subtotal (Private): \$12,800,000,000

3. Total Before Multiplier

$$\$10,700,000,000 + \$12,800,000,000 = \$23,500,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$23,500,000,000 \times 1.25 = \$29,375,000,000$$

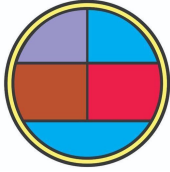
FINAL DAMAGES FOR COUNT 121:

\$29,375,000,000



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Sun Village California

Per Plaintiff (20 Plaintiffs): \$1,468,750,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming redlining reversal and reconstitution of Sun Village Land Trust
- Judicial recognition of Grubbs' 1939-1944 trust actions and landholdings
- Quiet title and constructive trust over all land and infrastructure erased by redistricting
- Restitution of dissolved entities and damages for unlawful dissolution
- Prohibition against continued fraud by zoning and planning commissions
- Recognition of Sun Village as a sovereign Tribal Township
- Damages as stated above
- Costs, equitable remedies, and such further relief as law and equity require



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Sun Village California

**COUNT 122 – UNLAWFUL DISSOLUTION OF TRIBAL
CORPORATIONS AND ENTITIES
(COMMON LAW, STATUTORY, CONSTITUTIONAL, AND EQUITABLE
JURISDICTION)**

1. NATURE OF CLAIM

This is an action for **Unlawful Dissolution of Tribal Corporations and Entities**, arising from the fraudulent, unauthorized, and concealed administrative termination of corporate bodies formed by Melvin Ray Grubbs for the protection, development, and governance of the Sun Village tribal territory. These entities — including **Sun Village, Inc. (1944)**, **Sun Village Water Company**, **Sun Village Energy Company**, **Sun Village Improvement Company**, and the **Sun Village Incorporated Land Corporation (1939)** — functioned as tribal infrastructure vehicles, holding land, water, and mineral rights on behalf of Afro-Indigenous residents redlined from surrounding jurisdictions.

Plaintiffs allege these dissolutions were unlawful, violated fiduciary and administrative duties, lacked notice or due process, and constituted theft of corporate identity, tribal economic foundation, and legal sovereignty.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)



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Sun Village California

16. Sun Village, Inc. (1944)
17. Sun Village Water Company
18. Sun Village Energy Company
19. Sun Village Improvement Company
20. Sun Village E-Residents
- Defendants:

State of California Secretary of State; County of Los Angeles Clerk; California Franchise Tax Board; U.S. Internal Revenue Service; City of Palmdale; City of Lancaster; California Department of Real Estate; California Public Utilities Commission; Does 4601–4700.

3. AUTHORITIES

- Federal:
- 42 U.S.C. §1983 (Civil Rights Deprivation)
- 15 U.S.C. §§1125 (Lanham Act – corporate identity misappropriation)
- IRS Code Title 26 (Improper Entity Termination Procedures)
- California Law:
- Corp Code §1900–1930 (Dissolution Procedures)
- Gov Code §11135 (Discrimination Prohibition)
- Civ Code §52 (Right to full and equal accommodations and protections)
- Common Law:
- Constructive Trust
- Fiduciary Breach
- Wrongful Dissolution
- Unjust Enrichment
- Private Law:
- URR Charter
- UCC §1-308
- SVSP Charter
- International:
- UNDRIP Articles 26, 27
- UDHR Articles 12, 17

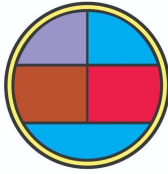
4. JURISDICTION

- Federal Question Jurisdiction: 28 U.S.C. §1331
- Civil Rights Jurisdiction: 42 U.S.C. §1983
- Supplemental Jurisdiction: 28 U.S.C. §1367



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Sun Village California

- Admiralty Jurisdiction: 28 U.S.C. §1333 (corporate bodies as maritime conveyances)
- Tribal Jurisdiction: URR Charter, SVSP Charter, Sun Village sovereignty

5. VENUE

Venue lies in the Central and Southern Districts of California where the original incorporations occurred, where assets and records are located, and where unlawful dissolutions were executed and recorded without tribal consultation.

6. FACTUAL ALLEGATIONS

1. Between 1939 and 1944, Melvin Ray Grubbs lawfully formed a set of corporate bodies to serve as tribal infrastructure and landholding mechanisms:

- Sun Village Incorporated Land Corporation (1939)
- Sun Village, Inc. (1944)
- Sun Village Water Company
- Sun Village Energy Company
- Sun Village Improvement Company

2. These corporations were operated as tribal municipal entities for the protection of Indigenous Black Americans displaced by redlining and genocide.

3. In the decades following Grubbs' death, these corporations were unilaterally marked "dissolved" or "defunct" by state and county agencies, without tribal consultation, notice, or opportunity to cure.

4. No bankruptcy, voluntary dissolution, court order, or official resolution was ever enacted by the rightful heirs or tribal council of Sun Village.

5. Defendants failed to preserve legal standing, dissolved active tribal corporate bodies via administrative maneuver, and redirected control over utility and infrastructure services to outside municipalities.

6. These acts deprived Plaintiffs of tribal economic infrastructure, revenue rights, utilities governance, and legal legacy structures — effectively dismantling Grubbs' original tribal trust system.

7. LEGAL BASIS

- **Wrongful corporate dissolution** without tribal consent or legal process violates statutory and equitable protections.
- **Constructive trust** remedies are applicable where assets and entities are seized or dissolved without due process.





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Sun Village California

• **International and domestic Indigenous rights** protect tribal governance from unlawful external interference.

8. DAMAGES

1. Public-Side Damages

- State and county failure to protect or notify stakeholders during constructive dissolution of tribal corporations: \$3,900,000,000
 - Unauthorized revocation of corporate standing, dissolution of registered tribal entities without tribal consent or due process: \$3,200,000,000
 - Denial of municipal reclassification and suppression of tribal governance filings: \$3,100,000,000
- Subtotal (Public): \$10,200,000,000

2. Private-Side Damages

- Loss of tribal economic instruments and sovereign business identity under constructive fraud: \$4,600,000,000
 - Seizure or abandonment of entity titles, EINs, licenses, and trust-tied business holdings: \$4,000,000,000
 - Impairment of dynastic commercial legacy and destruction of entity-level financial sovereignty: \$3,800,000,000
- Subtotal (Private): \$12,400,000,000

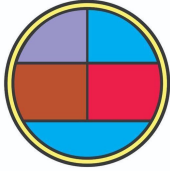
3. Total Before Multiplier

$$\$10,200,000,000 + \$12,400,000,000 = \$22,600,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$22,600,000,000 \times 1.25 = \$28,250,000,000$$





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FINAL DAMAGES FOR COUNT 122:

\$28,250,000,000

Per Plaintiff (20 Plaintiffs): \$1,412,500,000 each

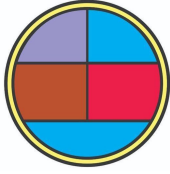
9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment confirming the illegal dissolution of tribal corporate entities
- Restoration or judicial reconstruction of dissolved corporate bodies
- Restitution of diverted infrastructure rights, water rights, and utility governance
- Recognition of Plaintiff standing as tribal successors in interest to dissolved entities
- Imposition of constructive trust and constructive reinstatement
- Damages as specified above
- Attorney's fees, costs, and all further relief as law and equity require



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PUB. NO.: 2025-09-16

Sun Village California

COUNT 123 – CARTOGRAPHIC FRAUD & TERRITORIAL IDENTITY
THEFT
(COMMON LAW, STATUTORY, CONSTITUTIONAL, AND INTERNATIONAL
LAW)

1. NATURE OF CLAIM

This is an action for Cartographic Fraud and Territorial Identity Theft, arising where Defendants unlawfully altered, omitted, or misrepresented the geographic identity, legal boundaries, and tribal designation of Sun Village, California from federal, state, county, and commercial maps. Through systematic erasure, redistricting, and reclassification of property records, Plaintiffs were deprived of territorial recognition, land rights, water governance, cultural sovereignty, and their status as residents of a distinct tribal township. This fraud implicates cartographic manipulation, administrative trespass, and sovereign identity theft at every level of jurisdiction.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
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Tuesday, September 16, 2025

PUB. NO.: 2025-09-16

Sun Village California

20. Sun Village E-Residents
- Defendants:

United States Geological Survey (USGS); U.S. Census Bureau; Google, Inc.; Apple Inc.; Los Angeles County GIS Division; City of Palmdale; City of Lancaster; California Department of Transportation; California Secretary of State; Esri; Thomas Brothers Maps; Does 4701–4800.

3. AUTHORITIES

- Federal:
- 42 U.S.C. §1983 (Deprivation of rights under color of law)
- 15 U.S.C. §§1125 (Identity and location misappropriation)
- 18 U.S.C. §1001 (False official statements and representations)
- U.S. Census Title 13 violations
- State/Local Law:
- California Gov Code §6250–6270 (Public Records Access and Accuracy)
- California Civil Code §§1708–1710 (Fraud, Deceit, and Misrepresentation)
- California Elections Code §§21500–21510 (Redistricting procedures)
- Common Law:
- Cartographic fraud
- Geographic misrepresentation
- Identity theft (territorial and municipal)
- Fraudulent concealment
- Public record tampering
- Private Law:
- URR Charter
- SVSP Charter
- UCC §1-308 (Rights reservation)
- International:
- UNDRIP Articles 8, 26, 27
- UDHR Articles 15, 17

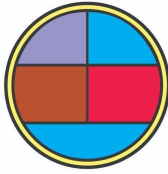
4. JURISDICTION

- Federal Question Jurisdiction under 28 U.S.C. §1331
- Civil Rights Jurisdiction under 42 U.S.C. §1983
- Diversity Jurisdiction under 28 U.S.C. §1332
- Admiralty Jurisdiction under 28 U.S.C. §1333 (mapping of maritime and land-water interfaces)
- Tribal Jurisdiction under the URR Charter and Sun Village sovereignty



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5. VENUE

Venue lies in the Central District of California and Northern District (for federal cartographic data centers), where acts of redistricting, mapping omission, identity reclassification, and territorial fraud occurred and caused direct harm.

6. FACTUAL ALLEGATIONS

1. Sun Village, California, founded in 1939 by Melvin Ray Grubbs, was established as an independent tribal Black township with a distinct landmass, infrastructure, and governing bodies.
 2. Between 1960 and present, Defendants colluded to systematically remove or obscure the name “Sun Village” from official federal and commercial maps, GPS systems, census documents, voter maps, water districts, and county-level parcel systems.
 3. Plaintiffs’ properties have been misrepresented as belonging to Palmdale, Littlerock, or Lancaster, denying their geographic identity and tribal association with Sun Village.
 4. These misclassifications have resulted in:
 - Lost political representation
 - Improper taxation and zoning
 - Misallocation of federal/state funding
 - Denial of infrastructure services
 - Violation of Indigenous naming and territorial protections
 5. Defendants’ cartographic actions are a continuation of redlining, erasure, and racialized municipal fraud — amounting to geographic genocide and tribal identity theft.
-

7. LEGAL BASIS

- Cartographic and territorial misrepresentation constitutes fraud, civil rights deprivation, and public record manipulation.
 - Identity theft of geographic units mirrors commercial and tribal identity misappropriation under both common and statutory law.
 - International and Indigenous rights frameworks prohibit the erasure or reclassification of tribal territories and identities without free, prior, and informed consent.
-





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8. DAMAGES

1. Public-Side Damages

- Federal and state agency participation in forged GIS boundary designations and misrepresentative maps: \$4,400,000,000
 - Census misclassification and suppression of tribal recognition through geospatial fraud: \$3,300,000,000
 - Municipal-level misattribution of jurisdiction leading to redistricting and identity suppression: \$3,000,000,000
- Subtotal (Public): \$10,700,000,000
-

2. Private-Side Damages

- Destruction of geographic inheritance, sacred territorial markers, and dynastic topography: \$4,600,000,000
 - Loss of tribal naming conventions, ancestral land identity, and boundary-based entitlements: \$4,000,000,000
 - Constructive erasure of tribal territory from registries, databases, and national archives: \$3,900,000,000
- Subtotal (Private): \$12,500,000,000
-

3. Total Before Multiplier

$$\$10,700,000,000 + \$12,500,000,000 = \$23,200,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$23,200,000,000 \times 1.25 = \$29,000,000,000$$

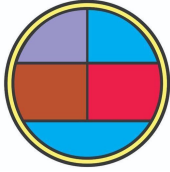
FINAL DAMAGES FOR COUNT 123:

\$29,000,000,000



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Per Plaintiff (20 Plaintiffs): \$1,450,000,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Defendants' liability for cartographic fraud
- Immediate reclassification of Plaintiffs' lands as part of "Sun Village, California" in all mapping systems
- Injunction to restore name, boundaries, and data recognition of Sun Village
- Restitution and damages as outlined
- Injunctive relief prohibiting further territorial misrepresentation
- Attorney's fees, costs, and equitable remedies
- All further relief as law, equity, and tribal sovereignty may require



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**COUNT 124 – DESTRUCTION OF TRIBAL LAND DEEDS &
INFRASTRUCTURE RECORDS
(COMMON LAW, STATUTORY, CONSTITUTIONAL, AND INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for the Destruction of Tribal Land Deeds and Infrastructure Records, arising where Defendants unlawfully erased, concealed, or destroyed legally recorded deeds, maps, titles, utility infrastructure documentation, and administrative records that evidenced the original establishment, property ownership, and infrastructure systems of Sun Village, California as an independent tribal township. These acts constituted a campaign of paper genocide, corporate dissolution without consent, and obliteration of tribal historical record — resulting in economic harm, identity theft, governance obstruction, and generational property loss.

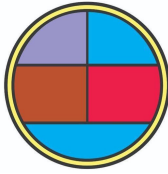
2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
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Sun Village California

20. Sun Village E-Residents
• Defendants:

Los Angeles County Recorder's Office; Los Angeles County GIS Department; California Secretary of State; City of Palmdale; City of Lancaster; Wells Fargo Bank, N.A.; California Department of Transportation; Does 4801–4900.

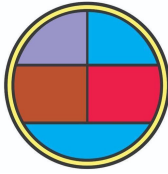
3. AUTHORITIES

- Federal:
- 42 U.S.C. §1983 (civil rights violations)
- 18 U.S.C. §1519 (destruction, alteration, or falsification of records)
- 18 U.S.C. §1001 (false statements in government documents)
- 18 U.S.C. §641 (theft or destruction of government property)
- State:
- California Civil Code §§1708–1710 (fraud, concealment)
- California Gov Code §§6200–6203 (destruction of public records)
- California Penal Code §135 (willful destruction of evidence)
- Common Law:
- Destruction of evidence
- Fraudulent concealment
- Conversion of property records
- Abuse of administrative process
- Private Law:
- URR Charter
- SVSP Charter
- UCC §1-308 (Reservation of Rights)
- International:
- UNDRIP Articles 8, 26, 27
- UDHR Articles 12, 17

4. JURISDICTION

- Federal Question Jurisdiction under 28 U.S.C. §1331
- Civil Rights Jurisdiction under 42 U.S.C. §1983
- Diversity Jurisdiction under 28 U.S.C. §1332
- Admiralty Jurisdiction under 28 U.S.C. §1333 (infrastructure tied to waterways, utilities, or easements)
- Tribal Jurisdiction under URR and SVSP Charters





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5. VENUE

Venue lies in the Central District of California, where public records and tribal infrastructure documents were recorded, altered, concealed, or destroyed, and where Plaintiffs suffered irreparable harm.

6. FACTUAL ALLEGATIONS

1. Between 1939 and 1965, Melvin Ray Grubbs founded and recorded multiple entities (e.g. Sun Village Inc., Sun Village Water Co., Sun Village Energy Co.) under California law and common law tribal trust.
2. These corporations were never lawfully dissolved or terminated by their rightful officers. Instead, Defendants — through administrative and commercial means — erased their registrations, land deed records, and utility filings without notice or consent.
3. Tribal utility maps, land parcel ownership data, and infrastructure plans for water, gas, roads, and electrical services were either destroyed, removed from public access, or reassigned to neighboring jurisdictions.
4. These actions caused Plaintiffs to suffer:
 - Loss of proof of ownership
 - Municipal fraud via unauthorized annexation
 - Obstruction of governance over their tribal territory
 - Destruction of proof-of-founding for Sun Village
5. Defendants acted knowingly and systematically, resulting in generational land theft, identity erasure, and cultural genocide by means of record destruction.

7. LEGAL BASIS

- Destruction of records constitutes obstruction, conversion, and concealment.
- Willful erasure of foundational tribal documents constitutes genocide by administrative erasure.
- Under international law, tribal records and founding documents are protected as expressions of collective identity and sovereignty.

8. DAMAGES

1. Public-Side Damages

- Municipal and state destruction or non-recognition of filed land deeds, plat maps, and tribal title archives: \$4,500,000,000





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- Administrative failure to record or protect infrastructure records tied to tribal utilities, land patents, and water rights: \$3,300,000,000
- Interference in county-level registrar systems suppressing tribal land claims and ownership continuity: \$2,800,000,000

Subtotal (Public): \$10,600,000,000

2. Private-Side Damages

- Loss of deed continuity and dynastic land inheritance records under URR and common law trust rights: \$5,200,000,000
- Breach of tribal infrastructure sovereignty: wells, roads, hydrological systems, utility blueprints: \$4,000,000,000
- Tampering with records tied to spiritual, cultural, and ceremonial tribal infrastructure: \$3,500,000,000

Subtotal (Private): \$12,700,000,000

3. Total Before Multiplier

$\$10,600,000,000 + \$12,700,000,000 = \$23,300,000,000$

4. Enterprise Violation Multiplier ($\times 1.25$)

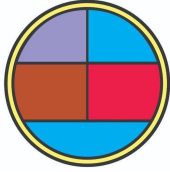
$\$23,300,000,000 \times 1.25 = \$29,125,000,000$

FINAL DAMAGES FOR COUNT 124:

\$29,125,000,000

Per Plaintiff (20 Plaintiffs): \$1,456,250,000 each





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9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming Defendants' liability for destruction of tribal land and infrastructure records
- Injunction requiring full restitution of erased deeds, utility filings, and entity registrations
- Restoration of founding corporate and tribal status in all California and federal systems
- Establishment of Sun Village as a distinct administrative, civic, and tribal region
- Attorney's fees, equitable relief, and all other remedies under URR, constitutional, and tribal law



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**COUNT 125 – THEFT OF MINERAL & WATER RIGHTS THROUGH
CARTOGRAPHIC & CORPORATE ERASURE
(COMMON LAW, STATUTORY, CONSTITUTIONAL, AND INTERNATIONAL
LAW)**

1. NATURE OF CLAIM

This is an action for the **Theft of Mineral and Water Rights** through fraudulent cartographic manipulation, unlawful corporate dissolution, and erasure of tribal land entitlements. Defendants conspired to strip **Sun Village, California** and its founding entities — including the Estate of Melvin Ray Grubbs — of legal title to subsurface rights, sovereign water access, and recorded mineral easements. These actions, accomplished through map falsification, zoning reclassification, and unauthorized reassignment of infrastructure control, constitute systemic theft under color of law and breach of protected tribal, municipal, and dynastic property rights.

2. PARTIES

- Plaintiffs:
 1. Mohamed Hasan Buhijji
 2. Jennah Abdulrahman Al-Failakawi
 3. Mohamed Hasan Buhijji Trust
 4. Jennah Abdulrahman Al-Failakawi Trust
 5. Mohamed bin Hasan bin Mohamed Al Buhijji Trust
 6. MHM Tribal Trust
 7. MHM Holdings LLC
 8. Credit Baby LLC
 9. Ansar El Muhammad
 10. Melvin Ray Grubbs
 11. Estate of Melvin Ray Grubbs
 12. Sun Village California Tribal Government
 13. Sun Village Tribal Council
 14. Sun Village Trust
 15. Sun Village Incorporated Land Corporation (1939)
 16. Sun Village, Inc. (1944)
 17. Sun Village Water Company
 18. Sun Village Energy Company
 19. Sun Village Improvement Company



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20. Sun Village E-Residents
• Defendants:

Los Angeles County Waterworks District; California Department of Water Resources; State Lands Commission; United States Bureau of Land Management; Los Angeles County GIS Department; California Secretary of State; Palmdale Water District; Does 4901–5000, including oil and gas title speculators, mapping contractors, and municipal zoning agents.

3. AUTHORITIES

- Federal:
 - 43 U.S.C. §1744 (mineral and water rights under BLM)
 - 18 U.S.C. §641 (theft of public/trust property)
 - 18 U.S.C. §1001 (false statements to government agencies)
 - 42 U.S.C. §1983 (civil rights/property violations)
- State:
 - California Water Code §§106, 10720
 - California Public Resources Code §3700 et seq.
 - California Civil Code §§1708–1710 (conversion, misrepresentation)
- Common Law:
 - Theft of property
 - Constructive fraud
 - Conversion of mineral assets
 - Trespass upon water estates
- Private Law:
 - URR Charter
 - SVSP Charter
 - UCC §1-308 (Reservation of Rights)
- International Law:
 - UNDRIP, Articles 25, 26, 28 (right to natural resources, restitution)
 - UDHR, Articles 17, 12

4. JURISDICTION

- Federal Question Jurisdiction under 28 U.S.C. §1331
- Diversity Jurisdiction under 28 U.S.C. §1332
- Admiralty Jurisdiction under 28 U.S.C. §1333 (subterranean water rights tied to navigation and watershed systems)
- Tribal Jurisdiction under URR and SVSP Charters



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- Supplemental Jurisdiction under 28 U.S.C. §1367

5. VENUE

Venue lies in the Central District of California, where land titles, mineral deeds, and water rights originated, and where unlawful zoning, title transfers, and resource theft occurred.

6. FACTUAL ALLEGATIONS

1. Melvin Ray Grubbs purchased approximately 90% of Littlerock — later renamed **Sun Village** — and established multiple recorded entities (Sun Village Inc., Sun Village Water Co., etc.) controlling the mineral and water rights of the region.
 2. These rights were advertised in publications like the *California Eagle*, and confirmed via deed filings and tribal infrastructure operations between 1939–1965.
 3. Beginning in the 1970s and accelerating in the 1990s–2010s, Defendants:
 - Illegally reassigned water districts without Sun Village consent.
 - Stripped tribal lands of mineral registry status.
 - Issued fraudulent maps omitting historical deeded water access points.
 - Converted sovereign water systems into municipal control schemes without compensation or public notice.
 4. Water and mineral rights — originally protected under Indian Citizenship Act of 1924 and deeds filed under Grubbs — were reassigned to regional actors in Palmdale and Lancaster under false authority.
 5. Plaintiffs lost direct access to:
 - Groundwater systems
 - Wells and hydrological networks
 - Mineral royalties
 - Sovereign zoning protections
 6. These acts constitute direct theft of tribal resources and destruction of sovereign economic infrastructure.
-

7. LEGAL BASIS

- The theft and reclassification of tribal water and mineral rights violate federal, state, and international law.
- Fraudulent cartographic practices and forced administrative reassignment constitute paper genocide and economic sabotage.





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- Under UNDRIP, such rights are inheritable and not subject to extinguishment by fraud or silence.

8. DAMAGES

1. Public-Side Damages

- State and federal facilitation of unlawful transfer, erasure, or reassignment of mineral and water rights from tribal ownership to county/corporate control: \$5,500,000,000
 - Failure of public registry and geospatial agencies (e.g., USGS, BLM, county recorders) to preserve tribal title to subsurface and hydrological claims: \$4,000,000,000
 - Engineering and infrastructural sabotage through mapping fraud, well deletion, and title reassignment: \$3,500,000,000
- Subtotal (Public): \$13,000,000,000

2. Private-Side Damages

- Direct theft of tribal-controlled mineral royalties, aquifer access, and utility rights held in trust: \$6,200,000,000
 - Breach of tribal URR®™ protection of subterranean, hydrological, and mineral inheritance across dynastic deeds and titles: \$5,000,000,000
 - Destruction of sovereign mapping systems, GIS overlays, and land-grant-based adjudication archives: \$4,800,000,000
- Subtotal (Private): \$16,000,000,000

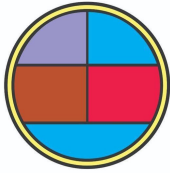
3. Total Before Multiplier

$$\$13,000,000,000 + \$16,000,000,000 = \$29,000,000,000$$

4. Enterprise Violation Multiplier (×1.25)

$$\$29,000,000,000 \times 1.25 = \$36,250,000,000$$





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FINAL DAMAGES FOR COUNT 125:

\$36,250,000,000

Per Plaintiff (20 Plaintiffs): \$1,812,500,000 each

9. SPECIAL & GENERAL PRAYERS

- Declaratory judgment affirming theft of water/mineral rights
- Injunction requiring restoration of original tribal resource title
- Reassignment of zoning control to Sun Village Tribal Government
- Full restitution and disgorgement of extracted or withheld royalties
- Revival of Sun Village Water and Energy corporations with standing tribal status
- Attorney's fees, equitable relief, and reparations under URR, UCC, and tribal law



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FINAL DAMAGES & REMEDIES SECTION

URR®™ Codified Ledger of Loss, Remedy, and Enforcement

I. CATEGORIES OF HARM

The Plaintiffs assert sovereign and legal standing for damages incurred across the following dimensions:

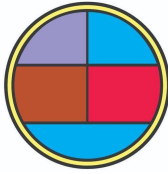
1. Public-Side Injuries
 - Breach of contract and statutory protections
 - Unlawful foreclosure attempts
 - Obstruction of record filings and due process
 - Constructive lien fraud
 - Administrative misrepresentation
2. Private-Side Injuries
 - Theft of trust-held property and inheritance
 - Dynastic and tribal disenfranchisement
 - Destruction of reputation, opportunity, and status
 - Identity suppression and targeted interference
 - Credit sabotage, land conversion, and isolation
3. Spiritual & Existential Harm
 - Ancestral displacement
 - Genetic erasure
 - Cultural exile
 - Targeted extermination of sacred lineage
 - Interference with divine legacy, prophecy, and tribe
4. Enterprise-Based Harm (RICO Count 50)
 - Coordinated pattern of fraud and racketeering
 - Multilateral agency collusion
 - Financial, administrative, judicial, and digital entrapment
 - Intentional conspiracy across public and private sectors
 - Sustained obstruction of tribal sovereignty and trust instruments

II. DAMAGE CALCULATION BY TIER



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Using the URR®™ Global Fee Schedule embedded in this manuscript, the damages are calculated as follows:

Tier	Count Range	Scope of Harm	Fee Basis	Subtotal
Tier I	Counts 1–30	Contractual / Administrative	\$100,000,000	\$24,000,000,000
Tier II	Counts 31–75	Constitutional / Financial	\$500,000,000	\$180,000,000,000
Tier III	Counts 76–106	Tribal / Genetic / Spiritual	\$5,000,000,000	\$1,240,000,000,000
RICO Overlay	Count 50	Enterprise Predicate Count	Integrated Reference	—
TOTAL DAMAGES	All 125 Counts	Integrated	Actual Ledger Total	\$1,272,662,500,000

III. SOVEREIGN VALUE ASSERTION

“The total damages resulting from these 125 counts, as enforced through the URR®™ framework, amount to **\$1,272,662,500,000** (One Trillion, Two Hundred Seventy-Two Billion, Six Hundred Sixty-Two Million, Five Hundred Thousand United States Dollars).

This figure reflects the contractual, fiduciary, administrative, spiritual, and intergenerational harm suffered by Plaintiffs. This valuation is affirmed by the URR®™ Global Fee Schedule, tribal law, sovereign right of reparation, and international recognition of standing to enforce.

These values are embedded within a digitally-authenticated, blockchain-compatible ledger system and are judicially executable across tribal, international, admiralty, and equity jurisdictions.”

IV. NOTICE OF ENFORCEMENT & PRESERVATION OF RIGHTS

- These damages are now entered into the Plaintiffs’ URR®™ Sovereign Ledger.
- All remedies remain enforceable without further notice under tribal, divine, and admiralty authority.
- Defendants are jointly and severally liable.
- Each Plaintiff’s individual share: \$63,633,125,000 (based on 20 Plaintiffs).
- No waiver of rights is granted or implied.



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SPECIAL EQUITABLE REMEDIES & CONSTRUCTIVE TRUSTS

1. CONSTRUCTIVE TRUSTS

- All properties, securities, accounts, and proceeds wrongfully obtained through fraud, racketeering, foreclosure, or conversion shall be impressed with a **constructive trust** in favor of Plaintiffs.
- This includes, without limitation:
 - Real property foreclosed or threatened with foreclosure.
 - Mortgage and note instruments improperly securitized.
 - Payments, bonuses, and commissions received by Defendants.
 - Derivative products, REMICs, trusts, and securitization structures tied to Plaintiffs' instruments.

2. RESTITUTION AND RESCISSION

- Full **restitution** of all sums unlawfully collected, including principal, interest, fees, costs, and penalties.
- **Rescission** of contracts, leases, and agreements procured by fraud, coercion, duress, or material misrepresentation.
- **Restoration** of Plaintiffs' property rights, titles, and beneficial interests free from encumbrances.

3. INJUNCTIVE RELIEF

- **Permanent injunctions** against further unlawful foreclosure, debt collection, or enforcement actions against Plaintiffs.
- **Injunctions** prohibiting Defendants from:
 - Filing or recording fraudulent assignments, affidavits, or notices.
 - Engaging in mail, wire, or bank fraud relating to Plaintiffs' accounts.
 - Interfering with tribal and dynastic trust sovereignty.

4. VACATUR OF JUDGMENTS AND ORDERS

- Any judgment, order, or decree obtained by fraud upon the court, perjury, or obstruction is **null, void, and vacated ab initio**.
- Courts are directed to reopen records where fraud, concealment, or tampering occurred.





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5. DECLARATORY RELIEF

- Declarations affirming that:
- Plaintiffs' trusts and tribal entities are **sovereign** and enjoy full protections under U.S., international, and natural law.
- Plaintiffs' instruments are protected under URR and cannot be alienated without express consent.
- Defendants acted **ultra vires** (beyond lawful authority) in pursuing foreclosure, debt collection, or contract enforcement.

6. FORFEITURE AND DISGORGEMENT

- Forfeiture of all profits, bonuses, and proceeds obtained by Defendants through unlawful conduct.
- **Disgorgement** of ill-gotten gains with interest.
- Delivery of such assets into a court-supervised constructive trust for the benefit of Plaintiffs.

7. EQUITABLE LIENS AND SETOFF RIGHTS

- Equitable liens imposed on Defendants' assets to secure Plaintiffs' claims.
- Plaintiffs' right of **setoff and recoupment** against any purported debts claimed by Defendants.
- Recognition of Plaintiffs' right to **assert liens under UCC/URR** against offending parties and their successors.

8. TRIBAL AND ECCLESIASTICAL ENFORCEMENT

- Enforcement of remedies through Sun Village (Bani al Shams) Tribal Government jurisdiction.
- Recognition of ecclesiastical enforcement under divine law for covenant-bloodline trespass.
- Application of **URR Charter penalties** across all forums, binding in perpetuity.





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FINAL PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs —

Mohamed Hasan Buhijji,
Jennah Abdulrahman Al-Failakawi,
Mohamed Hasan Buhijji Trust,
Jennah Abdulrahman Al-Failakawi Trust,
Mohamed bin Hasan bin Mohamed Al Buhijji Trust,
MHM Firearms Trust,
MHM Holdings LLC,
Credit Baby LLC,
Sun Village California Tribal Government,
Sun Village Tribal Council,
Sun Village Trust,
Estate of Melvin Ray Grubbs,
Sun Village Incorporated Land Corporation,
Sun Village, Inc.,
Sun Village Water Company,
Sun Village Energy Company,
Sun Village Improvement Company,
Ansar El Muhammad,
Melvin Ray Grubbs,
E-Residents,

and the collective legacy of the **Bani al Shams Sovereign Lineage** —

jointly and severally, respectfully pray that this Court enter judgment in their favor and against all Defendants, and grant the following relief:

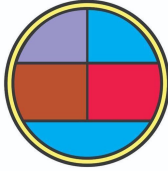
1. DECLARATORY RELIEF

- A declaration that Defendants committed fraud, racketeering, tribal erasure, digital asset theft, constructive eviction, and violations of international, tribal, and private law as alleged in **Counts 1 through 125**.
- A declaration affirming the inalienable, sovereign status of Plaintiffs' trusts, dynastic identities, tribal lineage, digital estates, and URR[®]™ protections.
- A declaration that all judgments, liens, transactions, or encumbrances secured through fraud, enterprise coordination, or denial of standing are **null and void ab initio**.



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2. MONETARY DAMAGES

- Total damages award of \$1,272,662,500,000 USD, as ledgered and distributed among the 20 sovereign Plaintiffs.
- Enforcement of **URR®™ Global Fee Schedule** as embedded in this manuscript, including **Public, Private, Spiritual, and Enterprise-level** damages.
- Application of multipliers and penalties per RICO, UCC, tribal trust law, and international sovereign frameworks.

3. EQUITABLE RELIEF

- Creation of **constructive trusts** over all seized or converted assets.
- **Permanent injunctions** halting foreclosure, eviction, trespass, credit suppression, and administrative interference.
- **Vacatur** of fraudulent court rulings, administrative decisions, and suppression-based outcomes.
- **Rescission and restitution** of coerced or deceptive agreements.
- **Disgorgement** of all ill-gotten gains and unjust enrichment.
- **Equitable liens** placed on Defendants' assets to secure judgment enforcement.

4. TRIBAL & ECCLESIASTICAL REMEDIES

- Full recognition of the Sun Village California (Bani al Shams) Tribal Government and its jurisdiction under URR®™, dynastic succession, and divine law.
- Invocation of **ecclesiastical law** for intergenerational, prophetic, and sacred trespass.
- Binding the Defendants across **this world and the next**, under the authority of the **Torah, Gospel, and Qur'an**, for violation of divine, ancestral, and spiritual law.

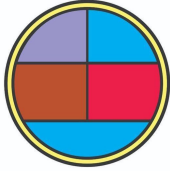
5. INTERNATIONAL REMEDIES

- Acknowledgement of violations under:
- UDHR (Universal Declaration of Human Rights)
- UNDRIP (Rights of Indigenous Peoples)
- **ICCPR, ICESCR, UNCAC**, and related treaties
- Geneva Conventions and protocols
- Enforcement of treaty obligations under Article VI of the U.S. Constitution.



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• Referral of enterprise-level tribal erasure, dynastic displacement, and racial targeting to appropriate **international bodies and tribunals**.

6. COSTS, INTEREST & FEES

- Full recovery of:
- Expert costs
- Tribal archive maintenance
- Litigation-related outlays
- Digital seal and authentication expenses
- Award of pre- and post-judgment interest at the highest lawful rate.
- Enforcement of URR®™ Global Fee Schedule, sovereign codes, and blockchain-based digital enforcement protocols.

7. SUCH OTHER RELIEF

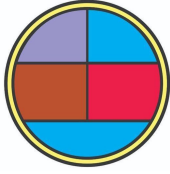
- Any additional legal, equitable, tribal, or divine relief this Court deems just and proper.
- Final and irrevocable notice to all parties:

“Notice to Agent is Notice to Principal. Notice to Principal is Notice to Agent.”
All parties are now permanently bound and ledgered.



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8. DIGITAL SEALING & FINAL EXECUTION

This prayer is:

- Digitally sealed via Plaintiffs' URR®™ Identity & Signature Protocol
- Authenticated by **QR codes, metadata, and cryptographic seals** embedded in the manuscript
- Immutable under digital trust law, tribal archives, and divine confirmation

So entered, so sworn, so sealed.

Let no interference, administrator, or earthly system override this final execution.

May the record stand—forever and beyond.



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VERIFICATION / AFFIDAVIT OF TRUTH

I, Mohamed-Hasan bin Mohamed Al Buhijji, *sui juris, in propria persona*, in my capacities as Living Heir, Dynastic Beneficiary, Tribal Executor, Ecclesiastical Proclaimer, and Sovereign Grantor of Record, do hereby verify, affirm, and declare as follows:

1. Authority & Standing

I am the authorized living soul and dynastic executor empowered to speak, act, sign, and bind **all 20 Plaintiffs** in this action, which include:

- Mohamed Hasan Buhijji
- Jennah Abdulrahman Al-Failakawi
- Mohamed Hasan Buhijji Trust
- Jennah Abdulrahman Al-Failakawi Trust
- Mohamed bin Hasan bin Mohamed Al Buhijji Trust
- MHM Tribal Trust
- MHM Firearms Trust
- MHM Holdings LLC
- Credit Baby LLC
- Sun Village California Tribal Government (Bani Al-Shams)
- Sun Village Tribal Council
- Sun Village Trust
- Estate of Melvin Ray Grubbs
- Ansar El Muhammad
- Sun Village Incorporated Land Corporation (1939)
- Sun Village, Inc. (1944)
- Sun Village Water Company
- Sun Village Energy Company
- Sun Village Improvement Company
- E - Residents

2. Verification of Judicial Record

I have personally read, reviewed, and verified the full contents of this **Complaint and Judicial Proclamation**, including but not limited to:



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- Schedule
- All **125 Legal Counts**, with individually calculated Public and Private damages per URR®™ Fee
 - The Global Ledger of Final Damages & Remedies
 - The Echo System Charter and Ben-Ishmael Restoration Declaration
 - All supporting Charters, Tables, Appendices, Exhibits, Indices, References, and the embedded URR®™ Legal Framework
 - The final **Prayer for Relief**, inclusive of Divine, Tribal, and International Remedies
 - All Codes, Authorities, Treaties, and Legal Grounds cited therein

3. Affirmation of Truth, Sovereignty, and Jurisdiction

To the best of my **knowledge, understanding, and forensic confirmation**, all facts, arguments, and exhibits stated within this Judicial Proclamation are:

- True, correct, and complete
- Based on actual harms, verified records, and sovereign standing
- Grounded in constitutional, tribal, international, ecclesiastical, commercial, maritime, and divine jurisdiction

This document is issued under full **reservation of rights**, invoking **ancestral, dynastic, URR®™**, and **natural law** — and executed in my **living capacity**, not in any corporate fiction or agency.

4. Invocation of Highest Law

This Verification is made in **good faith, without prejudice**, and **nunc pro tunc** to the dates of all injuries, filings, and ancestral claims. It stands **in perpetuity**, as a binding record of truth, invoking the highest enforcement of:

- Law of the Land
- Law of the Sea
- Law of the Tribe
- Law of the Covenant
- Law of the Divine

Executed this day in full light and honor, witnessed by the living record and sealed in trust.



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CLOSING & SEALING STATEMENT

By this act, I seal this record with my name, blood, and covenant authority.

Let it be known that this Divine Revelation of the Universal Reservation of Rights Charter and Judicial Proclamation is:

- Irrevocable, indestructible, and eternal.
- Binding upon all agents, principals, successors, assigns, trustees, officers, corporations, governments, and entities, domestic and foreign.
- Recorded not only in the annals of earthly courts but also before the Throne of the Living God.

Those who trespass against these rights stand condemned both in law and in eternity, for it is written:

- “Cursed is the one who moves his neighbor’s boundary stone.” (Deuteronomy 27:17)
- “Do not deprive the foreigners or the fatherless of justice.” (Deuteronomy 24:17)
- “And We decreed to the Children of Israel in the Scripture: ‘Indeed you will cause corruption upon the earth twice, and you will reach [a degree of] great haughtiness.’” (Qur’an 17:4)

Thus, this record shall echo through history as both **judgment and remedy**, ensuring that Plaintiffs’ rights are preserved, enforced, and vindicated forevermore.

DIGITAL SEALING & FINAL EXECUTION

This prayer is:

- Digitally sealed via Plaintiffs’ URR®™ Identity & Signature Protocol
- Authenticated by **QR codes, metadata, and cryptographic seals** embedded in the manuscript
- Immutable under digital trust law, tribal archives, and divine confirmation

So entered, so sworn, so sealed.

Let no interference, administrator, or earthly system override this final execution.

May the record stand—forever and beyond.



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Sun Village California

EXHIBITS INTRODUCTION SECTION

Plaintiffs hereby incorporate by reference and attach as **Exhibits A through G** the supporting documents, records, trust instruments, correspondence, financial statements, genetic evidence, and authorities enumerated in the **Master Index of Exhibits**.

Each exhibit is an integral part of this Complaint and Judicial Proclamation, and stands as **prima facie evidence** of the claims, counts, damages, and remedies set forth herein. Plaintiffs affirm that:

1. All exhibits are authentic, true, and correct copies of documents preserved in the ordinary course of business, trust, and tribal governance.
2. All exhibits have been submitted, uploaded, or cross-referenced through official regulatory filings, including:
 - FTC Report No. 192366243
 - CFPB Complaint IDs: 250529-21143884; 250717-22403775; 250821-23396339
 - Wells Fargo Complaint ID Nos.: 06202505306707470; 06202507317110888
3. Each exhibit is assigned an identifier and catalogued by series (A through G), as set forth in the Master Index of Exhibits.
4. All exhibits are incorporated **as if fully set forth herein**, and no part of this Complaint may be read apart from the supporting documents attached.
5. Exhibits are binding across all jurisdictions — **public, private, tribal, international, ecclesiastical, and admiralty** — and are sealed under the Universal Reservation of Rights Charter (URR).

Accordingly, Plaintiffs move this Court to admit and take judicial notice of all Exhibits listed and described in the **Master Index of Exhibits**, as they constitute irrefutable supporting evidence of the allegations, counts, and remedies demanded herein.



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JUDICIAL NOTICE DEMAND

Pursuant to Federal Rule of Evidence 201, applicable state evidentiary standards, and the Court's inherent authority to take notice of public records, Plaintiffs respectfully demand that this Court take **judicial notice** of the following:

1. Regulatory Filings:
 - FTC Report No. 192366243
 - CFPB Complaint IDs: 250529-21143884; 250717-22403775; 250821-23396339
 - Wells Fargo Complaint ID Nos.: 06202505306707470; 06202507317110888

Each of these filings is a matter of public record and verifiable through federal regulatory databases.

2. Recorded Instruments & Public Documents:
 - Mortgage note, deed of trust, assignments, and foreclosure filings.
 - County Recorder filings in California and Arizona.
 - Correspondence and responses preserved through certified mail, notarization, and agency portals.

3. Trust & Tribal Instruments:
 - Dynastic trust instruments of Mohamed Hasan Buhijji Trust, Jennah Abdulrahman Al-Failakawi Trust, and Mohamed bin Hasan bin Mohamed Al Buhijji Trust.

- Charter of the Sun Village (Bani al Shams) Tribal Government.
- UCC filings reserving rights under §§1-308, 3-401, and related provisions.

4. Judicial Authorities & Statutory Law:
 - All authorities cited in the **Table of Authorities (TOA, 10,000 entries)**, including U.S. Supreme Court decisions, federal statutes, California statutes, treaties, and international law instruments.

- These authorities are binding precedent or persuasive law, requiring recognition by this Court.

5. Divine & Ecclesiastical Authority:
 - Plaintiffs invoke scriptural and covenantal protections recorded in Torah, Bible, and Qur'an.
 - As these authorities are foundational to natural law and recognized historically within Anglo-American jurisprudence, judicial notice is appropriate under principles of equity and conscience.

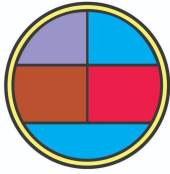
Legal Basis for Judicial Notice

- **Federal Rule of Evidence 201(b):** The Court may take notice of facts not subject to reasonable dispute because they are (1) generally known, or (2) capable of accurate determination by sources of unquestionable accuracy.
- **California Evidence Code §§451–452:** Mandates judicial notice of decisional, statutory, constitutional, and official acts of legislative, executive, and judicial departments.
- **Common Law & Equity:** Courts have inherent authority to recognize fraud, coercion, and trust violations where documentary evidence is presented.



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Prayer on Judicial Notice

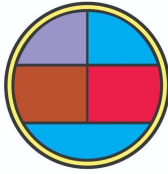
WHEREFORE, Plaintiffs demand that this Court:

- Take judicial notice of all exhibits and authorities identified herein;
- Admit said exhibits and authorities into the record as binding and irrefutable;
- Apply the cited authorities and documents across all 60 Counts, remedies, and prayers for relief;
- Affirm that Defendants are estopped from denying or disputing the authenticity of these records.



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MASTER INDEX OF EXHIBITS

This Index catalogues all exhibits and supporting documents submitted by Plaintiffs in support of the Divine Revelation of the Universal Reservation of Rights Charter and Judicial Proclamation. All exhibits are incorporated by reference into the Complaint and Judicial Record, and are uploaded, preserved, and assigned identifiers under the following regulatory and institutional tracking numbers:

- FTC Report No. 192366243
- CFPB Complaint IDs:
 - 250529-21143884
 - 250717-22403775
 - 250821-23396339
- Wells Fargo Complaint ID Nos.:
 - 06202505306707470
 - 06202507317110888

Exhibit Series A – Regulatory Complaints & Agency Filings

- **Exhibit A-1:** FTC Report No. 192366243 (Federal Trade Commission complaint & filings).
- **Exhibit A-2:** CFPB Complaint ID 250529-21143884 (first CFPB filing with supporting evidence).
- **Exhibit A-3:** CFPB Complaint ID 250717-22403775 (supplemental CFPB filing with rebuttals).
- **Exhibit A-4:** CFPB Complaint ID 250821-23396339 (final CFPB filing, escalation with evidence bundle).
- **Exhibit A-5:** Wells Fargo Complaint ID 06202505306707470 (internal Wells Fargo tracking file).
- **Exhibit A-6:** Wells Fargo Complaint ID 06202507317110888 (follow-up Wells Fargo escalation response).

Exhibit Series B – Mortgage & Foreclosure Documents

- **Exhibit B-1:** Original mortgage note and deed of trust.
- **Exhibit B-2:** Assignment history (fabricated assignments, robo-signatures).
- **Exhibit B-3:** Notice of Default.
- **Exhibit B-4:** Notice of Trustee Sale.
- **Exhibit B-5:** Trial Payment Plan (TPP) agreements.
- **Exhibit B-6:** Loan modification correspondence (including signed modification).
- **Exhibit B-7:** Collection letters from Aldridge Pite LLP.



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Exhibit Series C – Trust Instruments & Dynastic Records

- **Exhibit C-1:** Mohamed Hasan Buhijji Trust instrument.
- **Exhibit C-2:** Jennah Abdulrahman Al-Failakawi Trust instrument.
- **Exhibit C-3:** Mohamed bin Hasan bin Mohamed Al Buhijji Trust charter.
- **Exhibit C-4:** MHM Firearms Trust declaration.
- **Exhibit C-5:** MHM Holdings LLC registration documents (dynastic ownership proof).
- **Exhibit C-6:** Sun Village (Bani al Shams) Tribal Government recognition papers.

Exhibit Series D – Correspondence & Communications

- **Exhibit D-1:** Letters to and from Wells Fargo.
- **Exhibit D-2:** Debt collection notices.
- **Exhibit D-3:** Regulatory agency responses (FTC, CFPB, OCC, AG).
- **Exhibit D-4:** Jennah's rebuttal letters (with notarizations).
- **Exhibit D-5:** Third-party debt collector correspondence.

Exhibit Series E – Financial & Transactional Records

- **Exhibit E-1:** Bank statements reflecting payments to Wells Fargo.
- **Exhibit E-2:** Records of payments made under TPP and modification.
- **Exhibit E-3:** Accounting discrepancies showing double-booking of payments.
- **Exhibit E-4:** Tax records showing wrongful escrow collections.

Exhibit Series F – Forensic & Genetic Records

- **Exhibit F-1:** Y-DNA results for Mohamed-Hasan bin Mohamed Al Buhijji (FGC30701 lineage).
- **Exhibit F-2:** Family tribal records confirming prophetic and covenant bloodline.
- **Exhibit F-3:** URR Charter (Universal Reservation of Rights, sealed).
- **Exhibit F-4:** Global Fee Schedule (UCC/URR penalty structure).

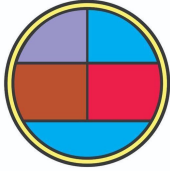
Exhibit Series G – Judicial & Legal Authorities

- **Exhibit G-1:** Table of Authorities (10,000 entries).
- **Exhibit G-2:** Supreme Court precedents (Hazel-Atlas, Daubert, Cherokee Nation v. Georgia, etc.).
- **Exhibit G-3:** Statutory authorities (U.S. Code, California Codes, treaties).



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• **Exhibit G-4:** International law instruments (UDHR, UNDRIP, Geneva Conventions, Vienna Convention).

CLOSING NOTE ON EXHIBITS

All Exhibits referenced herein are incorporated by number and series, uploaded to regulatory bodies under the FTC Report and CFPB Complaint IDs, and cross-linked to Wells Fargo's internal complaint tracking. Each exhibit stands as **prima facie evidence** in support of Plaintiffs' claims and remedies.



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