

**IN THE CIRCUIT COURT OF THE 12<sup>TH</sup> JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA**

BSFL Holdings, LLC  
and 72 Partners, LLC

Plaintiff

vs.

**Case No.: 2011 CA 004209 NC**

CECIL DAUGHTREY, JR., et. al.;  
and Joseph D. Gilberti P.E.

Defendants.

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**NOTICE OF FILING**

Plaintiff, Joseph D. Gilberti, P.E., pursuant to applicable Florida Rules of Civil Procedure, hereby provides Notice of Filing the attached correspondence dated January 13, 2019 to the United States District Court for District of Columbia via **Jane Doe 1, 2, 3 and John Doe 2 versus Donald Trump Shutdown case 1:19-cv-00051-RJL** regarding Federal Funds hiding Plaintiff Resource with Sarasota Department of Justice and Florida Leaders, Hospitals and Agencies that utilize Federal Revolving funds for Water Supply and Medicine production through University systems and Infrastructure needs tied to local Terrorism groups and Federal Elections.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via E-File system email this 13<sup>th</sup> day of January, 2019 to:

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JANE DOE 1, JANE DOE 2,  
JANE DOE 3, JOHN DOE 1,  
and JOHN DOE 2,

Plaintiffs,

v.

Civil Action No. 19-51

DONALD J. TRUMP,  
President of the United States  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

ELAINE L. CHAO,  
Secretary of Transportation  
U.S. Department of Transportation  
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Washington, DC 20590

MATTHEW G. WHITAKER,  
Acting Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

SONNY PERDUE,  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

KIRSTJEN M. NIELSEN,  
Secretary of Homeland Security  
U.S. Department of Homeland Security  
245 Murray Lane, SW  
Washington, DC 20528 and

THE UNITED STATES OF AMERICA

Defendants.

**MEMORANDUM SUPPORTING LANDTECH DESIGN GROUP, INC.**

## **MOTION TO INTERVENE AS DEFENDANT**

LANDTECH DESIGN GROUP, INC. (the “Engineer”), respectfully submits the following supporting memorandum of points and authorities in support of its motion for leave to intervene in this case.

### **Introduction**

The Engineer requests that the Court grant it leave to intervene as a Defendant as of right pursuant to Federal Rule of Civil Procedure 24(a)(2). The Engineer has a direct and tangible interest in this litigation that will necessarily be impaired if the Plaintiff prevails. The Engineer moves to intervene in this action filed by Plaintiffs Jane Doe 1, Jane Doe 2, Jane Doe 3, John Doe 1, and John Doe 2, by and through undersigned counsel,” (collectively Plaintiffs). Plaintiffs Jane Doe 1, Jane Doe 2, Jane Doe 3, John Doe 1, and John Doe 2, by and through undersigned counsel, bring this Complaint against President Donald J. Trump, in his official capacity; Secretary of the Department of Transportation Elaine L. Chao, in her official capacity; Acting Attorney General Matthew G. Whitaker, in his official capacity; Secretary of Agriculture Sonny Perdue, in his official capacity; Secretary of Homeland Security Kirstjen M. Nielsen, in her official capacity; the United States of America; their employees, agents, constituent agencies and components, and successors in office (“Defendants”).

Through this extraordinary suit, Intervener seeks to preempt the President from ending this Shutdown or paying Plaintiff who is depriving Defendant and THE PEOPLE of the United States of a Secret deep underground US Natural Resource in Medicine, Water Supply and Energy production that teaches Mankind and Humanity how to find thousands of more in Days. Access to a Global underground engine of Alkaline high mineral spring water from large meteor impacts has

been hidden by Plaintiff for decades to create Wars and now a huge Big Pharma complex that affected US and World Nations, elections and sustainability of Mankind. The defendants federal legislative and regulatory processes through which social, environmental, economic, and national security policies are established under our Constitution, that are hidden by these Federal Agencies are being done to damage the masses of People they are supposed to protect. The Agencies should remain SHUTDOWN and without Pay until the US Media (who is also hiding this collectively with the Rothschild Federal Reserve Bank) who use the both State and Federal agencies such as the FBI, Secret Service, State and Federal Judiciary, Department of Education, EPA and more to compel massive societal changes that the Intervener can prove their rules and policies are based on lies in regards to Earth water origins, via ICE COMET THEORY vs Oceans beneath the Earth Theory. This sites knowledge would eliminate most issues of climate change, its sea level rise assumptions, environmental rules taxing our Corporations and private industries, in which these agencies rely on for their tax base funding.

We have new CRITICAL evidence being hidden by Plaintiff and their constituents from the President and THE PEOPLE they are supposed to serve. The Plaintiff through multiple ongoing State and Federal cases involving US TERRORISM with Florida and US Federal contracted lawyers, consultants, local regulating agencies, Florida Elected officials, Judges, Developers in Florida and abroad, employees, Foreign interests, the Department of Justice in both State and Federal Courts, with FRAUD and Racketeering acts on a Unique and Global Natural Drinking Water and Energy production resource are working to destroy the economic drivers from critical natural resources for new medicine, energy production and sustainability.

The Engineer has access on his land to a hidden and never seen before on Earth unique natural resource that are far more efficient for healthcare and energy production that Mankind has

ever experienced. This US resource is under attack by Deep State Terrorist agency employees this Shutdown can eliminate. The President is being essentially attacked and is performing doing his Duty as a Leader and his Job by shutting down funding for these corrupt agencies being influenced by Foreign and State Representatives and/or local agencies or Defendant. The Plaintiff is using Federal Funds to install LOWER LEVEL OF SERVICE Natural Resources in Drinking Water (polluted RED TIDE Rivers and Arsenic Groundwater treated vs Alkaline mineral spring water) at a higher cost to serve, to sell Medicine, Deaths to our children at the Tap and bottles, unnecessary Wars from lack of Global resources that are actually available with this knowledge on how to find them, for both the Big Pharma and a Global New World Order Military complex driven by Rothschild World Bank and BRICS Bank.

Plaintiff is addressing payment and re-opening of Government from the President's shutdown without addressing their failure to protect the Public and are fully aware of this public record resource the Internet, Department of Justice in Florida and US Middle District Court, George 11<sup>th</sup> District Courts, Supreme Courts, are hiding, with Florida Leaders and US Congressional members, in which these crimes on record against the PEOPLE OF THE UNITED STATES the President is trying to protect with this Shutdown.

Additionally, Plaintiffs seek compensation through by this Court without any involvement or concern to expose this US and Global deep underground Ocean, its access points from Large Historical meteor impacts, that will serve and protect of millions of affected people throughout the United States and billions of other across Earth. These secret deep underground hidden resources would have protected Humanity and avoided wars from lack of food and resources for the past 40yrs since they have been hidden by the Defendant. These Agencies must remain shutdown until these resources and knowledge to find more is exposed to all Humanity; such as the EPA, FEMA,

Homeland Security have hidden this Resource and many more even during Hurricanes throughout the past few years and used media influence, School Boards, elected officials, Banks such as the Federal Reserve to suppress public records showing a barrage of timed Terrorism acts involving Wall Street corporations, State and Federal Judges, Police, Firemen, School Boards, Hospitals, large Developers, Funding programs that are wheeled down from Federal funding to the States to hide these resources and use poor Natural Resources to get millions sick at the Tap of Homes.

Finally, the Plaintiffs members are already subject to a multitude of federal regulations under the Clean Air Act (CAA) as Intervener has filed a Notice of Intent to sue the EPA under LandTech Design Group, on December 19, 2018, the day the Shutdown started, and has intervened in other cases, such as but not limited to the Florida Department of Administrative hearings for Peace River Manasota Water Supply, Southwest Florida Water Management district and multiple West Florida counties, Sarasota County, timed Terrorism cases in Hillsborough County where Judges and State attorneys with the DOJ attacked this US resource for Israel Mosaic Phosphate. The Plaintiff is hiding this secret US deep underground resource with Alkaline Mineral spring water readings never seen on Earth tied to a deeper underground Ocean to fill cancer center, use Universities to file for Federal Grants and test sick children to sell bad or inefficient medicine in a massive Cancer cluster created by bottled and Treated poor Raw Water Resources purposely by these Agencies of the Plaintiff who are hiding this unique Resource that teaches a whole new reality of World Water Origins in which they collectively lied about to create a Global Warming initiative and rules that make NO SENSE and waist tax payer monies to get them sick.

The Notice of Intent to sue the EPA and other lawsuits in Sarasota 2011 CA 004209 NC, 2015 CA 006544 NC, 2016 CA 000205 NC, and cases in Broward involving Parkland Shooting

timed with a Fake AR-15 cases on the Engineer by Pam Bondi and Hillsborough county to subdue intervener who has over \$400million in permit plans for a 300mile Transmission system from Tampa to Miami to lower water and power bills with Alkaline filtered spring water to the Tap vs treated arsenic ground water since 2012. The Plaintiff and this Florida group of Crooked Judges, Lawyers and Developers hiding this World Water with the Plaintiff have affected the election and THE PEOPLE by hiding this with almost all Florida Leaders, Media and the Department of Justice staff to sell this critical US hidden resource to groups like Mosaic Phosphate, owned by Israel and Saudi Arabian terrorist groups destroying local Aquifers for Bottling corps like Nestle', Coke, Pepsi and a massive list of west Florida terrorist Judges and lawyers who are helping them with the US Terrorist and the Plaintiff and its constituents. The Plaintiff must remain unpaid and SHUTDOWN for hiding this Secret US Resource under Interveners land, located in Sarasota Florida at 9438 Daughtrey Road, Sarasota, Florida 34266 via secret underground river in the rocks 2000ft below in an isolated area.

The Plaintiff is damaging Americans and regarding laws created by false Water Origin theory and hiding the proof its false affecting Worldwide critical and available water supply, free public healthcare to the taps of billions of World People and Americans, helping groups and bad leaders operate a massive Medicaid Fraud and Racketeering operations by folks such as but not limited to Senator Rick Scott, ex Presidents, Congress and more who some have a record of Medicaid Fraud issues, like Rick Scott. They are working with groups who know of this resource such as but not limited to, Moffit Cancer Centers, Shiners, Bay Care, Lee Memorial System, Universities like Harvard, Yale, Notre Dame, USF, and Mosaic Phosphate next to our land, including a number of record cases with ACOE and Sierra with Greenberg Traurig Law, Foley Lardner Law, Henderson Franklin, Gray Robinson, multiple Tampa, Sarasota, Manatee, Charlotte,

Lee, Collier, Broward, Palm Beach and Dade County law firms attacking the Engineer, the US Resource and helping these foreign terrorist corporations.

Mosaic Phosphate in particular is known for destroying drinking water supply and is located next to the Engineers property hiding more like this, has influenced local leaders and these Federal Agencies to hide this US Resource that shows America how to find many more in days from its geological indicators. The indicators from our professionals and ongoing cases in both State and Federal courts by our clients, Local Florida, Federal and State agencies, and the Engineer show the EPA, NASA, USGS, FEMA, Homeland Security, Tampa McDill AFB, Bush Family, Clinton, School Boards, Florida leaders, Candidates, Media and other Federal agencies tied to Rothschild Federal Reserve bank knew of this UNIQUE GLOBAL MEDICINE CHANGING UNLIMITED and ENDLESS Water supply resource and others but hid them with Defendants throughout the Country and Florida to sell bad Medicine, kill Americans with Cancer rates at the tap, created foreclosures in US Middle District Bankruptcy courts, ran up debts to over \$20trillion this would have satisfied in the fallout during the Bush, Clinton and Obama eras, in a massive Eugenics operation against the tax payers. For all of these reasons, it is critical that they have the opportunity to intervene.

In the alternative, the Engineer requests the Court grant permissive leave to intervene pursuant to Federal Rule of Civil Procedure 24(b)(1)(B), on the grounds that the Engineer has claims and defenses that share common questions of law and fact with the main action here. As a land holder with access to this secret Resource for the Defendant to inspect, hidden by the Plaintiff, with special interest in the administration of Federal funding for a large transmission that solves the Florida North South Water conflict and cancer rising from current water resources used by Plaintiff, the Engineer should be permitted to intervene as even Common Cause itself

has in prior litigation involving important legal issues. *See Kobach v. United States Election Assistance Comm'n*, 2013 U.S. Dist. LEXIS 173872 (D. Kan. Dec. 12, 2013) (in which Common Cause was granted permissive intervention). Indeed, the Engineer has previously been allowed to intervene as a Defendant- Intervenor, in similar cases that have not been denied and are awaiting hearing dates, such as but not limited to Department of Administrative hearings case 18-3276 with an EPA and FDEP agency in West Florida called Southwest Florida Water Management District and a corrupt Regional Peace River Manasota Water Supply agency owned by Sarasota, Charlotte, Desoto, Manatee Counties who are building huge ZIKA POND reservoirs subject to open to the Sky terrorism in the SWAMP that cannot be detected by Radar, right where 9-11 pilots practiced. Drones and pesticide planes can attack a 4-county regional system where Radar can't detect going against all Stafford Act 6.11 issues of being pro-active on Water Supply protection. This system and these Federal funded agencies have had this resource and permit with their corresponding local leaders, Police, Judges and hid this to attack Americans and sell it off to foreign corps and keep Cancer rising at the Tap. See EPA Health Advisories where Tap water treatment is based on Cancer Rates and FDEP 62-555(310) F.A.C which these agencies are ignoring to steal Medicaid monies with this racketeering operation. Our indicators show Flint Michigan has another access point and these Florida leader and Flint Michigan leaders knew and purposely hid this resource for Mosaic Phosphate and corrupt Congress leaders and Wall Street Big Pharma special interest.

Since the Engineer has been kidnapped by Hillsborough County where Mosaic controls huge Mining compact deals that are timed with Electoral votes and Elections, the Plaintiff with a huge mob and racketeering Medicaid fraud group, tied to US Terrorism acts, Senator Rick Scott, Congresswoman Nancy Pelosi, timed fake police reports with Obama and Pam Bondi, Tampa

State Attorneys, Lee County State Attorneys, to hide this secret underground endless Massive US resource in water supply, medicine and energy production. The Engineer is filing said issues but due to the massive group attacking THE PEOPLE, tax base and his family, with local Masked cops, Pedophile gangs of Elite hiding this Resource with Hospital foundation in Florida, tied to corrupt owners of Walt Disney, Seminole Tribe Casinos, NFL owners, bad FBI agents, Hollywood Producers and Actors, Fox, CNN, ABC, SNN, 60 Minutes and Wink News teams Fort Myers, has been delayed on other cases as permits are being processed by a ONE MAN shop since all the engineers in the region helped set this up with the local Federal agencies tied to the Plaintiff and the States funding through State Revolving funds, Federal Grants, Universities hiding this like Harvard, Yale, Notre Dame, UF, USF, FSU, SMU and many more on our list, etc.

If intervention is granted, the Engineer will participate in this case on the schedule that will be established for the existing parties; will avoid unnecessary delays or duplication of efforts in areas satisfactorily addressed and represented by the existing Defendants, to the extent possible; and will coordinate all future proceedings with the existing Defendants, to the extent possible.

The Federal Rules of Civil Procedure and the Local Rules of this Court do not require the Engineer to attempt to meet-and-confer with the other parties prior to the filing of this motion.

**I. The Court Should Grant Intervention as of Right.**

Upon filing of a timely motion, Federal Rule of Procedure 24(a)(2) requires that this Court “permit anyone to intervene who ‘claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant’s ability to protect its interest, unless existing parties

adequately represent that interest.’ As to adequacy of representation, the “‘requirement of the Rule is satisfied if the applicant shows that representation of his interest “may be” inadequate; and the burden of making that showing should be treated as minimal.’” *Lake Inv’rs Dev. Grp., Inc. v. Egidi Dev. Grp.*, 715 F.2d 1256, 1261 (7th Cir. 1983) (quoting *Trbovich v. United Mine Workers of America*, 404 U.S. 528, 538n.10 (1972)).

When seeking intervention as of right under Rule 24, an applicant must “(1) make timely application, (2) have an interest relating to the subject matter of the action, (3) be at risk that that interest will be impaired, ‘as a practical matter,’ by the action’s disposition and (4) lack adequate representation of the interest by the existing parties.” *Nissei Sangyo Am. v. United States*, 31 F.3d 435, 438 (7th Cir. 1994).

“A motion to intervene as a matter of right . . . should not be dismissed unless it appears to a certainty that the Intervenor is not entitled to relief under any set of facts which could be proved under the . . . complaint.” *Lake Inv’rs*, 715 F.2d at 1258. Here, the Foundation’s Motion satisfies each requirement of Rule 24(a).

**A. The Engineer’s Motion Is Timely.**

First, Rule 24 requires that a motion to intervene be timely filed. As interpreted by the Seventh Circuit, this requirement “essentially sets out a reasonableness standard: potential intervenors need to be reasonably diligent in learning of a suit that might affect their rights, and upon so learning they need to act reasonably promptly.” *Nissei Sangyo Am. v. United States*, 31 F.3d 435, 438 (7th Cir. 1994).

There has been exceptionally little time since the Foundation became aware of this case, and therefore of its interest in it. The Complaint was filed on October 27, 2017. To date, no other pleadings other than the initial Complaint have been filed. The docket shows that

summons have been issued, but does not show that the Defendants have been served with the Complaint, thus the deadline for the Defendants to file a responsive pleading is unknown. The Foundation submits that the time to file this Motion could hardly have been shorter. No scheduling order has been set, no discovery has been undertaken, no dispositive orders have been entered, not trial date has been set, and Defendants have not filed an answer. The Foundation is filing this motion as soon as possible following the filing of the Complaint. A motion to intervene filed less than 2 weeks after the case was initiated is timely.

**B. The Engineer Has a Strong Interest in the future Federal Funding by Plaintiff and Defendant to convey these hidden US Resources to THE PEOPLE, their Taps and New Medicine production.**

Second, Rule 24 requires that a movant “claim[] an interest relating to the property or transaction that is the subject of the action, and [be] so situated that disposing of the action may as a practical matter impair or impede the movant’s ability to protect its interest” Fed. R. Civ. P. 24(a)(2). Whether an Intervenor in a given case has a significant interest is a fact-specific inquiry, such that “comparison to other cases is of limited value.” *Sec. Ins. Co. of Hartford v. Schipporeit, Inc.*, 69 F.3d 1377, 1381 (7th Cir. 1995). Accordingly, the Intervenor must simply show “a direct, significant, and legally protectable interest” that is unique from the parties in the case. *Keith v. Daley*, 764 F.2d 1265, 1268 (7th Cir. 1985).

The Engineer has an interest in ensuring that the constitutional balance vesting state control over funding programs is preserved and that the democratic right to participate effectively and in state-prescribed issues of Federal funding is ensured for all citizens in Florida and other States where other secret Blue Gold veins of this Unique Medicine Water tied to Oceans exists (see Gilberti KT Hypothesis).

The Engineer is an Florida-based limited Liability Corporation that has as its mission the

advancement and protection of the integrity of American citizens and preserving the constitutional balance giving states control over their ability to get the best Natural resources, Medicine and drinking Water to their taps, that is healthier than any bottled water on the Planet and is FREE as this is THE PEOPLES WATER. The Engineer helps citizens defend the integrity of their right to Liberty and the pursuit to Happiness through healthier homes and Schools through water supply from these secret Blue Gold resources, by providing access from his lands, educating them on efforts to erode their right to know of this Global Change in Thermodynamic modeling for Energy and Water supply hidden by Plaintiff and leader for decades, taking action to ensure that voter registration and election processes and media are exposing this World knowledge and resource, and by helping states enforce their constitutionally laws to provide these US Resources to Mankind and THE PEOPLE of the UNITED STATES OF AMERICA as well as its Soldiers.

The Engineer has numerous unique interests in this case. The Plaintiff's lawsuit profoundly threatens the Public Safety and Welfare as well as US National Defense for the entire US Population and the Defendants ability to operate effectively. This US Resource cannot be moved or destroyed but is hidden! The Plaintiff's lawsuit seeks to impose payment without performing is fiduciary duty as an agency to protect America. The Plaintiff seeks to impose limits clearly beyond what was contemplated by Congress. Therefore, the Engineer has a vested interest in preserving the constitutional balance between the states and the federal government regarding the control of the electoral process for funding and the next election which this exposure would put President Trump in a focused team effort with the Plaintiff, our US military to build a massive new Alkaline Spring water infrastructure down Railroads, providing raises and new construction booms from God given hidden resources, to serve all

taps of America, new medicine and energy production as we are essentially viewing the Earths Water engine entirely different than what the Plaintiff has sold Humanity for over 40yrs. The metal for new railroads, pipelines, homes and it demand increases, computer parts, magnetic propulsion and efficiencies are increases and much more with this sites exposure. In the end will bring Job security to both parties and all America through God made underground resources hidden by Rothschild Federal Reserve who can restructure and now help Humanity and end all US Debt in days. This resource produces far more than printed money.

**C. The Engineer's Interests Will Be Impaired if Plaintiff Prevails in this Action.**

When the disposition of a case will “as a practical matter foreclose rights of [a] proposed Intervenor[] in a subsequent proceeding”, the proposed intervenor’s interest will be impaired. *Meridian Homes Corp. v. Nicholas W. Prassas & Co.*, 683 F.2d 201, 204 (7th Cir. 1982). Here, if Plaintiff prevails, it will have successfully blocked the state from using illegitimate programs building poor resources for water supply that are future terrorist attacks, lower Medicaid fraud issues by Florida leaders, and sell bottled medicine water where proceeds go back to Education, Social Security and Environmental needs to clean up Red Tide and pollutions. Water for cleaner energy starts with cleaner raw water resources not printed money from Rothschild Federal Reserve that is the cause of this Shutdown. If Plaintiff prevails it will upset the federalist balance struck by the Constitution and restrict America’s ability to maintain sustainability through more powerful Natural Resources for Water Supply, Healthcare risks, Medicine and Energy production. The Engineer would not be able to bring a subsequent action in order to restore that balance or to ensure that this list maintenance tool be used. Further, it will undo the progress Florida and other States has made in recent years in bringing its list-funding programs into compliance with its Defendants obligations to serve the Public its higher

level of service natural resources hidden for over 40yrs.

**D. Existing Parties Will Not Adequately Protect the Engineer's Interests.**

Absent the opportunity to intervene, the Engineer's interests almost certainly will not be adequately represented. Accordingly, the Engineer is able to meet its "minimal" burden of showing that its interests are not already represented in this litigation.

First, the Defendants' interests are different and distinct from the Engineer's interests. As such, the Defendants are not likely to press fully all defenses available in this case. Nor is the Defendant likely to press against the factual assertions contained in the Complaint as fully as they might. The Engineer is unrestrained by political concerns and can provide this Court with the full range of potential factual defects in the Complaint.

Most of all, the Engineer's arguments are different in that they explain how Plaintiff's have hidden critical US Resources from the Defendant since the Election. While the Defendants can demonstrate this US Resource with the Engineer within hours with a lab and pump report as nobody is moving this massive access to a secret underground ocean.

In addition, the Engineer's ultimate objectives are not necessarily aligned with that of Defendants either, even though they are on the same side of the litigation. *See Lake Inv'rs*, 715 F.2d at 1261 (7th Cir. 1983). The government's representation in this case will likely focus on preserving the *status quo* and maintaining the functioning of politics to affect the SHUTDOWN and their personal needs vs the reason the Shutdown was necessary outside, over and above the construction of a Wall along the Mexican border. The government is unlikely to fully reveal the extent of prior failures to conduct list maintenance and the reasonableness of legislative changes to correct that failure. The Engineer's interest and representation will also be focused on the broader jurisprudential implications of Plaintiff's

challenge and its ramifications on the federalism balance of power regarding future funding to the 50 States and their priorities. Thus, there will likely be differing points of view between the Engineer and the Defendants on the litigation as a whole.

Accordingly, Defendants will undoubtedly *not* make all of the Engineer's arguments. Nor are they capable and willing to make such arguments. In particular, the Engineer will argue that Plaintiff's challenge to defendants process to Federal funding, payments for their lack of work or potential acts of crimes against the United States using the Media to hide this Global Water Knowledge this resource shows mankind how to find through geological indicators, is flawed for several reasons unlikely to be echoed by the Defendants. Also, the Engineer will provide factual arguments regarding assertions in the Complaint which Defendants are unlikely to provide.

It is extremely unlikely that the Defendants will press arguments regarding the implications of Plaintiff's theories and interpretation of methods they use for funding to hide this US Resource that was discovered by the Engineer in 2012, and hidden through two full Presidential elections by the Plaintiff. As a result, the Engineer will offer a critically important position for the Court to consider that the other parties will not. This position is further enlightened by the Engineer's unique knowledge gained from litigation elsewhere involving the same issues and corruption. If Plaintiff seeks to payment for poor services and potential crimes to the public as a whole, the standard through this litigation, this Court will benefit from the Engineer's presence in this case.

## **II. In the Alternative, the Court Should Grant Permissive Intervention.**

If the Court nonetheless determines that the Engineer is not entitled to intervene as of right, it should grant permissive intervention. Fed. R. Civ. P. 24(b). Rule 24(b) authorizes the

Court to grant permissive intervention to anyone who “has a claim or defense that shares with the main action a common question of law or fact.” A district court has “broad discretion” to permit intervention. *Griffith v. Univ. Hosp., L.L.C.*, 249 F.3d 658, 662 (7th Cir. 2001). The Court must determine whether a proposed intervenor’s claims and the main action share a common question of fact or law and then whether the intervention will unduly delay the litigation or prejudice the original parties.

**A. Timeliness and Delay**

In considering the timeliness of the intervention, the Court should consider the totality of the circumstances, *NAACP v. New York*, 413 U.S. 345, 366 (1973), including the length of time since the movant knew of its interest in the case; prejudice to the existing parties caused by any delay in intervening (but not delay caused by the intervention itself); prejudice to the proposed Intervenor, and the existence of any unusual circumstances, *United Nuclear Corp. v. Cannon*, 696 F.2d 141, 143 (1st Cir. 1982).

As is stated above, the Engineer is filing this motion as soon as possible following the filing of the Complaint. The Engineer submits that any additional issues it intends to raise and litigate will cause no delay in this litigation.

**B. Common Question of Law or Fact**

The movant is not required to assert a separate or additional claim or defense in order to show commonality. Instead, permissive intervention is appropriate where the proposed intervenor’s “defense raises the same legal questions as the defense of the named defendants.” *Kobach v. U.S. Election Assistance Commission*, No. 13-CV-4095-EFM-DJW, 2013 WL 6511874, at \*10 (D. Kan. Dec. 12, 2013) (quoting *Miller v. Silbermann*, 832 F. Supp. 663, 673 (S.D.N.Y. 1993)). In another case, “organizations with a ‘special interest in the administration of

election laws' were granted leave to intervene permissively in an action wherein Florida sought preclearance of recent changes to its election laws, including voter registration restrictions." *Id.* (quoting *Florida v. United States*, [820 F. Supp. 2d 85, 86-87 (D.D.C. 2011).]) Similarly, the Engineer has a special interest in the elections for funding to the 50 States based on their coinciding regulations and laws. Overall, the questions of law and fact raised by the Engineer's defense are certainly the same as that of the existing action between the current parties. The Engineer's interests are different and distinct, but the legal issue is the same.

The Engineer's land located at 9438 Daughtrey Road, Sarasota, Florida 34266, that accesses this secret deep underground hidden Global Drinking Water and New Energy Resource, hidden by the Defendants and Florida Leaders and all major US Media networks attacking the Plaintiff involve protecting the constitutional arrangement whereby states are able to structure their own Federal Funding programs through the State Revolving funds, Grants for Universities, Water Supply Boards, county infrastructure improvements, Hurricane Disaster Recovery, FEMA, Homeland Security, and its timing for electoral voting, contributions from awarded Federal funded and State contracts that affect elections and Public Health and Jobs.

The Engineer's existing lands demonstrates that it denies the legal assertions made by the Plaintiff in its Complaint as its depriving President Trump and his members of Critical US Resources THE PEOPLE OF THE UNITED STATES OF AMERICA need, the Plaintiff tied to Terrorism acts in Florida and Boston are trying to sell off to Foreign Terrorist groups and Corporations like Rothschild World Bank, Isreal-Saudi Arabia owned Mosaic Phosphate in West Florida and Nestle' Bottling Corps. The Engineer possesses a unique land, access to a natural resource deep below from a Meteor impact, knowledge, perspective, and expertise regarding Agency funding and permitting matters, which has been recognized by other courts

that have accepted its appearance as a permit for a 300mile Transmission and connection to a massive 6-County infrastructure with one pipe in Sarasota Florida that can serve millions in just months and more in the next few years to almost half the residents of Florida.

The Engineer has filed in cases elsewhere courts are allowing but awaiting hearings or in abatement since the exposure within Florida and US Courts. Finally, the Engineers plans, permit petitions, presentations to commissioners from Sarasota to South Florida, Miami, Broward, School boards, health agencies, EPA and FDEP agencies and activities fundamentally deal with a special interest in the administration of voting and its funding approvals and essentially infrastructure needs in the States provided by the Plaintiff in State Revolving Funds by Federal programs. *See Florida*, 820 F. Supp. 2d at 86-87.

### **III. Conclusion**

For the foregoing reasons, the Court should grant the Engineer's Motion to Intervene as of right or, in the alternative, permissively.

### **CERTIFICATE OF SERVICE**

I certify that on January 13, 2019, I caused the foregoing to be filed with the United States District Court for the District of Columbia via the Court's CM/ECF system, and/or US Priority mail which will serve all registered users.

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