

TO THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

United States of America

v

Glen A. Stoll, et al.

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Case: 22-cv-1130-TSZ

**Notice of Previously Filed Answer to Complaint,
Request to Dismiss for Failure to State a Claim
for which Relief can be Granted, and
Newly Discovered Evidence**

FILED
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RECEIVED

JUN 02 2023 MG

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

RECEIVED

JUN 02 2023

PROSECUTING ATTORNEY
FOR SNOHOMISH COUNTY
CIVIL DIVISION

TIME _____



Family Defense League

Glen Stoll, Director



16910 - 59th Avenue Northeast, Suite 210

Arlington, Washington 98223

Phone (425) 673-7762

glen@churchcounsel.org

June 1, 2023

Judge Thomas S. Zilly
United States District Judge
700 Stewart Street, Suite 15229
Seattle, Washington 98101

Re: U.S. v. Glen Stoll, et al. 2:22-cv-01130-TSZ

Deadline June 2, 2023

**Notice of Previously Filed Answer to Complaint,
Request to Dismiss for Failure to State a Claim
for which Relief can be Granted, and Newly Discovered Evidence**

Greetings:

Two days ago I received a letter (attached as **Exhibit A**) from Trial Attorney Yen Jeannette Tran dated May 23, 2023, "Re: U.S. v. Stoll, et al. - Case No. 2:22-ev-01130-TSZ (W.D. Wash.)" Although dated May 23, it did not arrive in my mailbox until Tuesday, May 30. In her letter, Ms. Tran informed me that she has "not seen an Answer to the Complaint filed with the Court." She then advised me "that if an Answer to the Complaint is not served to the parties and filed with the Court by Friday, June 2, 2023, I will motion the Court for an entry of default against you."

I spent a great deal of time writing my "responsive pleading" and filed it with the court along with Certificates of Service of having sent them to Ms. Tran and others. Please take notice and explain to Ms. Tran that I have done this. However, if there is any problem with my answers to the complaint, please let me know what it is and what else is expected of me other than what I have already provided.

Ms. Tran's letter of May 23, 2023 and your Minute Order of April 25, 2023 both claim that I made a motion to dismiss for lack of jurisdiction. However, I have never made any such request. I do not even know what jurisdiction of law is being claimed by the Plaintiff, and have requested that you require the Plaintiff to notify us of such, and that you not allow this matter to continue, due to their want of jurisdiction, unless and until they provide us with this information that due process of law requires.

The Request for Dismissal that I made was based on the Plaintiff's failure to state a claim for which relief can be granted and was supported by the evidence and arguments that I provided in my answer to the complaint that Ms. Tran now claims I never filed or sent to her. I am still awaiting your answer to my Request for Dismissal that was made on that basis.

Additionally, I am enclosing copies of newly discovered evidence (attached as **Exhibit B**) that supports my Request for Dismissal, in the form of Tax Returns that have been prepared by our CPA tax preparer who is also an IRS Enrolled agent. The Plaintiff has claimed that this entire action is based on Substitute for Returns (SFR) alleged to have been prepared by the IRS for the years 2001 through 2008. Therefore,

Glen Stoll Letter to Judge Thomas S. Zilly - June 1, 2023

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these original tax returns supersede the SFRs for those years 2001-2008. I did not file previously because I had no income due to my volunteer ministry work as a dependent of the Church. I have had no training in tax law, nor have I ever spent time or ever claimed to have spent time studying the tax laws. Therefore, I relied on the advice of the ministry's CPA/IRS Enrolled Agent at the time, who informed me that since I had no taxable income, I had no obligation to file a federal tax return.

By now, with the assistance of the Snohomish County Bar Association's Lawyer Referral Service, we have sent out thousands of requests for an attorney to represent me or any of the other co-defendants. Just last week, we received the only offer from any attorney at any price who is willing to take this case, but he does not practice in federal court. His name is John D. Earling, WSBA License Number 42294, and his phone number (206) 714-3092. If you feel this matter needs to continue beyond this point, will you please allow him to represent us from here? I am sure he will be able to do a much better job than I am doing because he should be able to speak your language, and the language of your other officers of the court much better than me.

Along with this letter, I am also filing a new proposed Order Granting Dismissal that I am seeking.

Sincerely,



Glen Stoll, Director of the Family Defense League
and Successor Executor/Trustee of the Stoll Family Trust

Enc: Exhibit A, letter from Trial Attorney Yen Jeannette Tran dated May 23, 2023
Exhibit B, Tax Returns that have been prepared by our CPA tax preparer

CC: Court Records Clerk (for entering on the record)

**Attorney for Snohomish County
Attorney's for Plaintiff**

David A. Hubbert, Deputy AAG
Dylan C. Cerling, AUSA
Yen Jeannette Tran, AUSA
P.O. Box 683
Ben Franklin Station
Washington, Columbia 20044

I hereby certify that on this 2nd day of June, 2023, I deposited an envelope containing a true and complete copy of this letter, and its listed enclosures, in the US Mail, first-class postage prepaid, to the address shown at the left.



Debbie Stoll