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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF ARIZONA

10 United States of America,
11
12 Plaintiff,
13
14 v.
15 Janice Sue Taylor,
16
17 Defendant.

No. CR-10-0400-PHX-MHM
**GOVERNMENT’S RESPONSE TO
DEFENDANT’S MOTIONS TO
QUASH INDICTMENT AND
DISMISS FOR LACK OF
JURISDICTION**

16 The United States, through undersigned counsel, responds to Defendant’s motions to
17 quash the indictment (Doc. 214) and dismiss the case for lack of jurisdiction (Doc. 215).

18 This Court’s February 11, 2011, Order states that “Defendant is advised that motions in
19 limine are not substantive motions on the merits of the case. The deadline for such motions has
20 passed.” (Doc. 196 at 1-2.) The motions are therefore untimely.

21 In addition, the motions appear to be more of what another district judge called “legalistic
22 gibberish”:

23 Based on her papers, [Plaintiff Nonnie] Chrystal-who identifies herself as
24 “Ambassador nonnie: chrystal” of “satellite beach, Florida, Republic; near
25 [32937]”-has fallen in with the Sovereign Citizen/Tax Protestor movement. In
26 common with other so-called sovereign citizens, she appears to believe that ours
is a legal system, not of statutes and precedent, but of sorcery, with parties
prevailing as a result of their incantation of out-of-context passages from Black’s
Legal Dictionary.

27 *Chrystal v. Huntington Nat’l Bank*, No. 6:10-cv-668, 2010 WL 1965870, at *1 (M.D. Fla. May
28 17, 2010). Here, too, Defendant dresses up her motions with legal terms and citations to caselaw,

1 but the arguments are largely unintelligible and appear to recycle many of the same claims
2 already rejected by this Court and Judge Murguia.

3 As a result, the United States moves the Court to strike the motions as untimely, and will
4 not respond to the motions unless directed to do so by the Court.

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6 Respectfully submitted this 25th day of March, 2011.

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s/ James Knapp

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13 Certificate of Service

14 I hereby certify that on 3/25/2011, I electronically transmitted the attached document to the
15 Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic
Filing to the following CM/ECF registrants:

16 Susan Anderson

17 In addition, I mailed copies of the attached document to the following:

18 Janice Sue Taylor
3341 Arianna Ct.
19 Gilbert, AZ 85298

20 *s/ James Knapp*

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