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tcamarda@gmx.com

**From:** tcamarda@gmx.com  
**Sent:** Friday, April 18, 2025 1:13 AM  
**To:** 'CA07\_pro\_se\_filings@ca7.uscourts.gov'; 'civilrights.justice@usdoj.gov'; 'hhsoig@oig.hhs.gov'; 'oeig.general@illinois.gov'; 'information@iadc.org'; 'osc.whistleblower@osc.gov'; 'hfs.mru@illinois.gov'; 'hfs.dcsscaru@illinois.gov'; 'judicialconduct@uscourts.gov'; 'civilrights@usdoj.gov'; 'CRM.CivilRights@usdoj.gov'; 'oig.hotline@usdoj.gov'; 'jib@illinois.gov'; 'civilrights@atg.state.il.us'; 'FOIA@treasury.gov'; 'ethics@americanbar.org'; 'usalln.civilrights@usdoj.gov'; 'AO\_Ombudsman@ao.uscourts.gov'; 'usms.judicial.protection@usdoj.gov'; 'inspector.general@usdoj.gov'; 'tips@oig.hhs.gov'; 'crt.intake@usdoj.gov'; 'watchdog@pogo.org'  
**Cc:** 'CircuitClerk-MB'; 'statesattorney@mchenrycountyil.gov'; 'RLFreese@mchenrycountyil.gov'  
**Subject:** NOTICE OF FEDERAL SUPREMACY CONVERGENCE, MOTION FOR ENTRY OF FINAL JUDGMENT AND UNREBUTTED LEGAL POSITION ACROSS FOUR AXES OF LAW  
**Attachments:** 5 - MOTION TO ENTER FINAL JUDGMENT.pdf  
**Importance:** High

**UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT**

**Thomas E. Camarda**  
*Plaintiff-Appellant, Pro Se*

v.

**Elizabeth Whitehorn, et al.**  
*Defendants-Appellees*

**Case No. 24-3244****NOTICE OF FEDERAL SUPREMACY CONVERGENCE, MOTION FOR ENTRY OF FINAL JUDGMENT AND UNREBUTTED LEGAL POSITION ACROSS FOUR AXES OF LAW****TO THE HONORABLE PANEL AND CLERK OF COURT:**

**→→ SUMMARY JUDGMENT UNCHALLENGED — LEGAL CONVERGENCE: PERFECTED & SEALED UNDER ARTICLE VI ←←**

**FINAL NOTICE OF LEGAL CONVERGENCE AND REQUEST FOR ENTRY OF JUDGMENT**

Plaintiff-Appellant Thomas E. Camarda, appearing Pro Se and under reserved rights (UCC 1-308, 1-103.6), submits this Notice and Motion as a **final and binding clarification of legal posture**, to establish on the record that this case has reached full maturity across all operative dimensions of law: **constitutional, procedural, commercial, and administrative**. Not a single court, defendant, or agency has issued a valid rebuttal. The record stands **perfected**, the **claims unrebutted**, the **violations proven**, and **jurisdiction secured**. Any further resistance to judgment constitutes willful obstruction of justice and federal insubordination.

This Court is now in possession of a **procedurally sealed and lawfully dominant record**, matured through **uncontested filings** under:

- **Rule 56(a) – Summary Judgment by default,**
- **FRAP 31(c) – Appellee failure to appear,**
- **Article VI – Constitutional Supremacy Clause,**
- **UCC § 9-601–625 – Perfected commercial enforcement,**
- **5 U.S.C. § 552 – FOIA default and constructive admission.**

This is not a pending controversy — this is a finalized legal victory under the full authority of federal law. The only act remaining is **entry of judgment**.

### **I. PROCEDURAL MATURITY – FEDERAL RECORD PERFECTED**

As of April 2025, the following uncontested procedural facts are now firmly established:

- **Appellate Brief was timely filed on February 13, 2025.**
- **Defendants defaulted under FRAP 31(c), triggering judgment by silence.**
- **No Appellee Response, Reply Brief, or Cross-Appeal has been filed.**
- **The Court subsequently docketed over 140 supporting filings, including notices of record correction, enforcement, and unrebutted UCC and FOIA claims.**

### **II. CONSTITUTIONAL AXIS – UNCHALLENGED**

No Defendant has rebutted the following:

- **Supremacy Clause invocation (U.S. Const. art. VI, cl. 2)**
- **First Amendment retaliation (42 U.S.C. § 1983)**
- **Due Process violations in property seizure**
- **Violations of rights under color of law (18 U.S.C. § 242)**

### **III. PROCEDURAL AXIS – RULE 56(a) & FRAP 31(c) FINALITY**

- **No Appellee brief was filed under FRAP 31(c).**

- Plaintiff filed extensive verified record (DKT58, DKT113, DKT114).
- The procedural posture satisfies **Rule 56(a) Summary Judgment** standards.
- Over 100 docketed filings remain **unrebutted**.

#### IV. COMMERCIAL AXIS – PERFECTED UNDER UCC ARTICLE 9

- Plaintiff filed UCC-1 Financing Statement and supporting lien instruments.
- Enforcement rights under UCC § 9-601–625 now triggered.
- No rebuttal or objection was filed to these secured interests.

#### V. ADMINISTRATIVE AXIS – FOIA DEFAULT & LAWFUL AUTHORITY ABSENT

- FOIA requests (Oct 2024–Mar 2025) to state agencies and the Treasury received **no reply**.
- This constitutes a **constructive admission** of:
  - Absence of lawful bonding,
  - Absence of statutory enforcement basis,
  - Violation of 5 U.S.C. § 552.

#### VI. IMPLICATION – LEGAL POSITION UNCONTESTED, JUDGMENT MATURED

This case now presents a rare and decisive convergence — where **constitutional law, federal procedure, commercial enforcement, and administrative default** have merged into a single, unrebutted, and perfected legal outcome.

No agency, court, or opposing party has refuted:

- The constitutional violations raised under the First, Fifth, and Fourteenth Amendments,
- The procedural entitlements preserved under FRAP 31(c), Rule 56(a), and judicial notice,
- The perfected UCC Article 9 enforcement structure, secured and filed on record,

- The FOIA-based admissions of liability through silence and refusal to disclose authority.

This is not mere oversight — it is a **forfeiture of all defenses**. The Defendants have defaulted in law, in fact, and in duty.

**This is legal checkmate on four axes of law.**

There is no remaining jurisdictional shield, no procedural escape hatch, and no lawful rebuttal. The only path forward is formal enforcement of a matured federal judgment, as secured and perfected under the United States Constitution.

## **VII. LEGAL POSTURE – JUDGMENT IS NOT A REQUEST, IT IS A RIGHT**

Federal judgment is **not discretionary** where the Defendants:

- Fail to appear,
- Fail to respond,
- Fail to challenge the facts or legal basis of claims,
- And fail to rebut constitutional, commercial, and procedural notices.

This Court is now in possession of a closed record with no contest. Plaintiff-Appellant has exhausted all available relief mechanisms — legally, procedurally, and administratively.

## **VIII. IMPACT – FAILURE TO ENTER JUDGMENT INVITES COLLAPSE OF FEDERAL ORDER**

- ✓ **Record Closed:** No further filings necessary.
- ✓ **FRAP 31(c) Default Matured:** Appellees did not respond.
- ✓ **Rule 56(a) Judgment Perfected:** DKT113 stands uncontested.
- ✓ **No Appellee Brief, No Challenge:** Full silence on the merits.
- ✓ **1,900+ Pages Preserved:** Facts, exhibits, notices complete.
- ✓ **Federal Supremacy Controls — State Authority Dissolved**
- ✓ **Federal Agencies Notified:** DOJ, HHS-OIG, Treasury, CFPB.

✓ **No Procedural Objections Pending:** Nothing delays final entry.

✓ **Public Archive Published:** GitHub-hosted record accessible to public and court.

✓ **En Banc Petition and Writ Prepared:** Supremacy preserved at every level.

Failure to recognize the matured status of this record would result in:

- Ongoing state retaliation in violation of 42 U.S.C. § 1983,
- Suppression of constitutionally protected litigation,
- Obstruction of a perfected UCC and FOIA-based enforcement process,
- Violation of the Supremacy Clause, and
- Erosion of judicial integrity under FRAP, Rule 56, and U.S. Const. Art. VI.

## **IX. REQUEST FOR FINAL ENTRY OF JUDGMENT**

Plaintiff-Appellant respectfully **renews and formalizes the demand** for final resolution under the Constitution and governing procedural law. Having secured a matured judgment through un rebutted filings, perfected lien enforcement, and procedural default under FRAP 31(c), Plaintiff now moves this Court for the following relief:

- **Final entry of judgment in favor** of Plaintiff-Appellant, based on the uncontested record and matured claims;
- **Formal recognition and enforcement of federal supremacy**, pursuant to Article VI of the U.S. Constitution, including acknowledgment that the underlying federal claims cannot be nullified, retried, or obstructed by any state action;
- **Permanent preclusion and legal barring** of all state-level retaliation, criminalization of protected petitioning, and continued unlawful enforcement by actors operating under color of state law, now fully preempted by the federal ruling and binding precedent.
- **Affirm Plaintiff's prevailing party status** and preserved First Amendment protections.

This **is not** an optional order. It is the **only lawful remedy** following the Court's established docket history and the **Constitution's supremacy**.

—with the **power and might** of the **United States Constitution**, and under the **majesty and authority** of the **United States Court of Appeals for the Seventh Circuit**,

**Respectfully submitted,**

**Thomas E. Camarda**

*Plaintiff-Appellant, Pro Se*

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**Federal enforcement active – Summary judgment perfected – Supremacy invoked**

**Under the protection of the United States Constitution, Article VI**

***Filed not in supplication, but in affirmation: The record stands. Judgment must follow.***

**Dated:** April 18, 2025

**UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT**

**THOMAS E. CAMARDA,**

Plaintiff-Appellant, Pro Se

v.

**ELIZABETH WHITEHORN, et al.,**

Defendants-Appellees.

**Case No. 24-3244**

**MOTION TO ENTER FINAL JUDGMENT**

**BASED ON APPELLEE DEFAULT UNDER FRAP 31(c) AND PERFECTED  
SUMMARY JUDGMENT UNDER RULE 56(a)**

**Filed by:**

**Thomas E. Camarda**

Plaintiff-Appellant, Pro Se

tcamarda@gmx.com

(224) 279-8856

**Dated: April 15, 2025**

**UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT****THOMAS E. CAMARDA,**

Plaintiff-Appellant, Pro Se

v.

**ELIZABETH WHITEHORN, et al.,**

Defendants-Appellees.

Case No. 24-3244

**MOTION TO ENTER FINAL JUDGMENT****BASED ON APPELLEE DEFAULT UNDER FRAP 31(c) AND  
UNREBUTTED SUMMARY JUDGMENT UNDER RULE 56(a)**

NOW COMES Plaintiff-Appellant, **Thomas E. Camarda**, appearing pro se and as the prevailing party under **Rule 56(a)**, and respectfully moves this Honorable Court to **enter Final Judgment immediately** in the above-captioned matter. This request is based on:

- The Appellees' **complete and prolonged** failure to respond to Plaintiff-Appellant's Opening Brief within the required time under **Federal Rule of Appellate Procedure 31(c)**;
- The **matured and unrebutted federal evidentiary record** already perfected under **Rule 56(a)**;
- The invocation of the **binding nature of federal supremacy** under U.S. Const. art. VI, cl. 2;
- And the mounting harm and unlawful retaliation resulting from further delay, now occurring under color of state law despite perfected federal jurisdiction.

**I. THE DEFENDANTS-APPELLEES ARE IN PROCEDURAL DEFAULT  
UNDER FRAP 31(c)**

On **February 13, 2025**, Plaintiff-Appellant filed his Opening Brief pursuant to FRAP 28. As of the date of this motion:

- **No answering brief** has been filed;
- **No motion for extension** has been submitted;
- **No response of any kind** has been entered by any Appellee.
- **No appearance of any kind** has been entered by any Appellee.



Pursuant to **FRAP 31(c)**:

***“If an appellee fails to file a brief, the court may accept the appellant’s brief as unopposed and may summarily reverse, vacate, or enter judgment.”***

Thus, Plaintiff-Appellant’s brief and evidentiary record stand as **the only procedural basis** upon which judgment may be entered. **Defendants are procedurally foreclosed.**

This Court is fully empowered — and procedurally bound — to treat the Appellant’s brief and supporting record as dispositive and unopposed.

## **II. SUMMARY JUDGMENT IS PERFECTED UNDER RULE 56(a)**

Plaintiff-Appellant’s motion for summary judgment was formally docketed as **DKT113** and satisfies all requirements under **Rule 56(a)**. The record is:

- Complete;
- Supported by verified exhibits, enforcement orders, and documentary proof;
- Uncontested by Appellees, who remain silent despite federal service and judicial notice.

Federal law holds that:

***“If a party fails to properly support or address a fact... the court may grant summary judgment if the motion and supporting materials — including the facts considered undisputed — show that the movant is entitled to it.”***  
— *Fed. R. Civ. P. 56(e)*

This standard is now met in full. **Judgment must now be issued** as a matter of procedural law.

## **III. FEDERAL SUPREMACY REQUIRES ENTRY OF JUDGMENT**

This matter is no longer a dispute — it is a matter of enforcement. The Court has been repeatedly and properly noticed of:

- **Constitutional retaliation and violations** under 42 U.S.C. § 1983;
- **A void warrant** under 28 U.S.C. § 1691;
- **Procedural abuses and due process violations**;
- **UCC enforcement rights** recognized by this Court;
- **FOIA defaults**, confirming lack of state authority to enforce or collect;

- **Ongoing defiance** of a federal judgment now functionally entered under FRAP 31(c).
- And active violations of federal supremacy by state actors who remain on notice.

State retaliation now continues despite judicial notice of Plaintiff-Appellant's constitutional, procedural, and commercial enforcement rights.

This Court is duty-bound under **Article VI of the United States Constitution** to acknowledge that:

***"This Constitution... shall be the supreme Law of the Land... anything in the Constitution or laws of any State to the contrary notwithstanding."***

The record comprises over **1,900 pages** of filings, exhibits, statutory citations, judicially acknowledged liens, and federal notices. No further briefing or response is required.

#### **IV. RELIEF REQUESTED**

WHEREFORE, Plaintiff-Appellant respectfully requests that this Court:

1. **Immediately enter Final Judgment** in favor of Plaintiff-Appellant, granting full relief as outlined in the Opening Brief and supporting record (DKT113–137), based on procedural default under FRAP 31(c) and perfected summary judgment under Rule 56(a);
2. Declare all underlying state retaliation proceedings to be **jurisdictionally preempted** and constitutionally void under U.S. Const. art. VI;
3. Grant all **injunctive, declaratory, and equitable relief** necessary to bar further interference with Plaintiff-Appellant's rights, including enforcement of secured party authority under UCC §§ 9-601, 9-609, and 9-625;
4. And for such other relief as this Court deems just and proper to **preserve the integrity of federal appellate procedure**, constitutional supremacy, and the rule of law.

Respectfully submitted,

/s/ **Thomas E. Camarda**

**Thomas E. Camarda**

Plaintiff-Appellant, *Pro Se*

Seventh Circuit Case No. 24-3244

[tcamarda@gmx.com](mailto:tcamarda@gmx.com)

(224) 279-8856

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***Filed under authority of FRAP 31(c), Rule 56(a), and the United States Constitution.***

***This record is closed. Judgment is matured. No further delay is lawful.***

**Dated: April 15, 2025**

## SUPPLEMENTAL VICTIM IMPACT STATEMENT

*In Support of Final Judgment and Formal Federal Enforcement*

**Filed by:** Thomas E. Camarda, Plaintiff-Appellant, Pro Se

**Date:** April 18, 2025

**Case:** *Camarda v. Whitehorn*, 7th Cir. No. 24-3244

### I. THE COST OF UNCONSTITUTIONAL GOVERNMENT RETALIATION

This case is not theoretical. The harms inflicted upon me are not abstract. They are daily, tangible, and still ongoing. I did not ask to be placed in this fight. I was forced into it.

- **My bank accounts were emptied without lawful process.** No valid court order was ever issued. No opportunity was given to object, to defend, or to be heard. The seizures occurred **without notice**, violating every constitutional principle of due process, and left me financially paralyzed.
- **My wages were garnished in violation of due process.** The garnishment was executed in absence of any judicial determination or hearing. I was stripped of income essential to survival. I could not afford **food, fuel, or medicine**, and was left **penniless without recourse**.
- **My business was destroyed—not by failure, but by strangulation.** I did not lose my employment (or company) due to market conditions, performance, or mismanagement. It was destroyed because **government agents illegally deprived me of operating capital**, client acquisition ability, and transaction flow — leaving me unable to make the same income or recover.
- **I suffered at least \$24,000 in direct, documented, un rebutted financial harm.**

This includes:

- ✓ \$7,900 in illegal levy;
- ✓ \$500+ in immediate bank fees;
- ✓ \$16,000+ in indirect cash flow collapse and client loss;
- ✓ All traced to unconstitutional acts under color of law.

- **I lost a once-in-a-lifetime career path built by grit, talent, and sacrifice.** By April 2024, I had scaled my career to **\$187,000+ per year** and was on pace to reach **\$500,000/year** within 12–24 months. This was not speculative — it was supported by a record of client wins, measurable output, and verified capacity.
- My income model was **unlimited** — directly tied to my ability to travel, work extended hours, and operate independently. That freedom was **extinguished** by the Defendants' unlawful acts. They didn't just hurt my present — they **vaporized my future**.
- **This was a career of national scale and exceptional access.** My work brought me into contact with **CEOs, Presidents, and top American business owners**. I had earned the trust of the nation's highest producers and was thriving. That trajectory was dismantled for one reason only: **the state's greed for Title IV-D funds**.
- **I was never charged with a crime. I committed no wrongdoing.** There was no allegation of criminal conduct, fraud, or evasion. My only "offense" was asserting my **constitutional rights** under:
  - ✓ The First Amendment
  - ✓ The Due Process Clause
  - ✓ The Supremacy Clause
  - ✓ UCC Article 9 enforcement

And the Defendants responded with retaliation — not justice.

## II. THE DESTRUCTION OF FATHERHOOD

Perhaps no loss surpasses this:

I have not seen my children in nearly **three years, since June 5<sup>th</sup> 2022** — not because of any wrongdoing, but because the state of Illinois used its Title IV-D powers to turn **child support** into a **weapon of silencing**.

They took my livelihood, and they tried to take **my children's memory of me**. But I could not — and would not — let that be the legacy my kids inherited.

That their father didn't fight?

That he rolled over and let a corrupted system erase him?

**No.**

My children will know that their father fought back against injustice.

My children will know that their father did not bend — he prevailed.

And when they ask who stood up for them — **they will say: “Our dad did.”**

### **III. THE WEIGHT OF PRO SE FEDERAL LITIGATION UNDER DURESS**

Every single filing in this case — over **1,900 pages** of verified legal documents — was written under immense financial and emotional duress. And yet:

- I missed no deadline.
- I broke no rule.
- I disrespected no officer of the court.

I came into this court as a **man seeking justice** and endured **every procedural blockade**, every form of **state retaliation**, and every attempt to **derail my rights** — and yet, I am still here. Still upright. Still lawful. Still winning.

That is what this case truly is:

Not just a legal victory — but a **moral and constitutional one**.

### **IV. LOSS OF LIVELIHOOD — A CAREER DESTROYED BY RETALIATION**

As a direct result of the unconstitutional actions by the Defendants, I lost not just a job — I lost a career path I had spent years building. At the time of the illegal seizures and enforcement actions, I had achieved a professional income level exceeding **\$187,000 annually**, and was rapidly scaling beyond.

This was no ordinary job — it was a **performance-based, commission-driven career** in national business development where the income ceiling was virtually **unlimited**, bound only by how many miles I could drive and how many hours I was willing to work. I had already proven that I could scale above six figures consistently — and had clear momentum, discipline, and skill to reach **\$500,000+ per year** in annualized earnings within the foreseeable future.

But that trajectory was **deliberately destroyed** — not by market forces, not by poor performance — but by the **greed of Title IV-D enforcement officers**, who sought federal incentives over constitutional rights.

They didn't just seize funds.

They **seized freedom**.

They **killed opportunity**.

They **collapsed a thriving American career** that relied entirely on financial fluidity, independent scheduling, and the freedom to travel.

And worst of all, they did it to someone who was not evading support obligations — but was **actively supporting his family**, building toward **long-term stability**, and living the *American Dream* the right way.

I was in rooms with **CEOs, Presidents, and America's top business owners**.

And in an instant — that freedom was gone.

All because a bureaucratic system valued **federal reimbursement incentives** over **constitutional due process**.

## V. A FINAL MESSAGE TO THIS COURT

This Court now holds a rare and historic opportunity.

You are not reviewing a “domestic relations” complaint. You are not dealing with a “disgruntled parent.” You are reading the final chapter of a **battle against illegal seizures, civil rights violations, First Amendment retaliation, and procedural sabotage**.

I invoked the law.

The Defendants fled from it.

And now, the law must speak.

## VI. PRAYER FOR JUSTICE

Let my children — and this nation — see that the Constitution still means something. Allow us to stand witness that the Constitution is not a relic, but a living promise. And today, it was kept.

I respectfully renew my request for immediate final judgment under:

- **FRAP 31(c)**: Appellee procedural default
- **Rule 56(a)**: Uncontested summary judgment
- **Article VI**: Constitutional Supremacy
- **UCC § 9-601–625**: Commercial enforcement
- **42 U.S.C. § 1983**: Civil rights redress
- **18 U.S.C. § 242 & § 1512**: Color-of-law and retaliatory conduct

This Court has the authority.

This record has the weight.

The harm has been done.

**Now: Let justice enter.**

**Let final judgment speak.**

**Respectfully submitted,**

**/s/ Thomas E. Camarda**

**Plaintiff-Appellant, Pro Se**

**Seventh Circuit Case No. 24-3244**

**tcamarda@gmx.com**

**(224) 279-8856**

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**Dated: April 18, 2025**