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To: 'CA07_pro_se_filings@ca7.uscourts.gov'
Subject: RESPONSE TO ORDER TO SHOW CAUSE AND NOTICE OF GOOD-FAITH CONSTITUTIONAL FILINGS
Importance: High

IN THE 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

RESPONSE TO ORDER TO SHOW CAUSE AND NOTICE OF GOOD-FAITH CONSTITUTIONAL FILINGS

Pursuant to this Court's Order dated April 16, 2025, Plaintiff-Appellant **Thomas E. Camarda**, proceeding pro se, respectfully submits this response to show cause why sanctions, fines, or a filing bar should not be imposed.

I. THE FILINGS WERE NECESSARY, CONSTITUTIONALLY PROTECTED, AND RESPONSIVE TO ESCALATING RETALIATION

At all times, Plaintiff-Appellant's filings were submitted in **good faith**, in response to:

- Retaliatory actions undertaken by state officials during the pendency of this appeal;
- Ongoing efforts by the State of Illinois to interfere with Plaintiff's protected First Amendment, due process, and commercial enforcement rights;
- Procedural developments that required clarification, notice, or urgent judicial attention (including criminal prosecution under a void warrant and retaliatory garnishment efforts).

None of these filings were duplicative for the sake of harassment. Rather, they were responsive, narrowly tailored, and **required by the evolving legal and factual landscape**.

II. FEDERAL LITIGANTS CANNOT BE PUNISHED FOR PROTECTING THEIR RIGHTS IN THE FACE OF ONGOING STATE RETALIATION

Plaintiff's filings included:

- Procedural clarifications;
- UCC enforcement documentation;
- Judicial notice of unconstitutional garnishments, FOIA denials, and due process violations;
- Motions to strike void state-level acts that arose **after** the filing of this case.

These filings were essential to:

- Preserve the appellate record;
- Prevent further irreparable harm;
- Satisfy the duty of candor and supplement the Court under **FRAP 28(j)** and related doctrines.

If Plaintiff had remained silent in the face of new retaliatory acts, his claims could have been deemed waived or forfeited.

III. PLAINTIFF-APPELLANT DID NOT RECEIVE ANY PRIOR DUE PROCESS HEARING ON FILING LIMITATIONS

Before sanctions or a filing bar may be imposed under **Mack, Support Systems Int'l, Inc. v. Mack**, 45 F.3d 185 (7th Cir. 1995), the Court must:

- Provide **notice and an opportunity to be heard**;
- Determine that the filings were **objectively frivolous or filed for harassment**;
- Consider **alternative remedies** short of an outright bar.

Here, Plaintiff was never granted an opportunity to respond to the Court's warnings prior to this Show Cause Order.

More importantly:

The filings were not frivolous. They were structured, legally grounded, and tethered to actual constitutional violations that the Court, to date, has not substantively addressed.

IV. VICTIM IMPACT AND LITIGANT CONTEXT — THIS IS NOT VEXATIOUS LITIGATION

Plaintiff-Appellant is a father who lost:

- Access to his children;
- Tens of thousands of dollars in unlawfully seized funds;
- Procedural due process protections under federal law.

Each filing was an act of **self-defense** against a weaponized child support enforcement system, conducted without oversight, against a prevailing federal litigant.

When litigants are stripped of basic protections and then penalized for documenting that abuse, **we no longer have a court of law — we have a court of silence.**

V. REQUEST FOR JUDICIAL RESTRAINT — PLEASE DO NOT IMPOSE SANCTIONS

Plaintiff respectfully requests that the Court:

- Decline to impose sanctions;
- Recognize the filings as procedurally necessary under **FRAP 28(j)**, **Rule 60(b)** supplementation, and UCC enforcement;
- Preserve Plaintiff's access to electronic filing and constitutional redress.

Should the Court require future filings to be consolidated or submitted under special rules, Plaintiff will comply without objection.

CONCLUSION

No frivolous, malicious, or intentionally excessive filings were made. Every submission was made:

- To preserve rights under federal law,
- In good faith,
- And in response to actual harm.

Sanctioning Plaintiff for lawful advocacy in a constitutional rights case would signal that prevailing litigants may not speak when retaliated against. That would set a dangerous precedent.

Respectfully submitted,

/s/ Thomas E. Camarda

Thomas E. Camarda

Plaintiff-Appellant, Pro Se

Seventh Circuit Case No. 24-3244

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Dated: April 17, 2025