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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

FILED
AUG 24 2015
Phil Lombardi, Clerk
U.S. DISTRICT COURT

RUSSELL ALLEN PASSONS,

Plaintiff,

vs.

OSAGE NATION GOVERNMENT, et al.,

Defendants.

Case No. 14-CV-281-JHP-TLW

PLAINTIFF'S OBJECTION TO DEFENDANT'S
MOTION TO DISMISS

COMES now, pro-se lidigant, Russell Allen Passons, with this "Formal Objection" against defendants "Motion to Dismiss".

Russell Passons, here-in-after the plaintiff filed a civil action against defendants, as plaintiff is entitled under the United States Constitution and the Constitution of the Osaga Nation. Plaintiffs action is in regards with assests, property, quarterly payments, mineral rights and other assests controlled by the defendants (see Title 25, Chapter 9, Sec.331, "OSAGE INDIAN TRIBE OF OKLAHOMA)(see also "The Consitution Of The Osage Nation, ratified: March 11, 2006).

UNDISPUTED FACTS

1. Plaintiff Russell Passons is a registered Osage Indian and therefore entitled by blood and both Constitutions to rightfull shares or "headright" or "headright's" by law.

2. Defendant's "are in control" of property, assest's, mineral rights and other money's for which plaintiff is entitled to, by both Constitutions and law.

3. That plaintiff being a "direct decendant" of deceased Osage Indians, is entitled to several headrights of blood relatives and that defendant's refuse to provide information or documents so plaintiff can claims his blood right, being money, property, mineral rights, quarterly payments and other money's plaintiff is rightfully entitled to constitutionally.

4. That defendant's are guilty of obstruction of justice, by denying

PLAINTIFF'S OBJECTION-1

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plaintiff's request under the "Federal Freedom Of Information Act", by not filling plaintiffs legal requests.

5. Plaintiff having proved is a Osage Indian by blood, has been legally entitled to by law, a quarterly payment for which defendant's have denied him in violation of both Constitutions and Federal Law.

6. Defendants' are taking advantage of a pro-se Osage Indian who is incarcerated by not providing claim forms so plaintiff can claim what he is legally entitled to by blood right (probate cliam) in violation of federal and constitutional law.

7. Defendants are in possession of assest's of deceased blood relatives of plaintiff, pursuant to Federal Law Title 25, Chapter 9, Sec.331., OSAGE INDIAN TRIBE OF OKLAHOMA and denying plaintiff access to records, wills, allotments and other things of value in direct violation of Federal Law.

CONCLUSION

Plaintiff has shown this Honorable Court that there remains several material questions of fact and that the defendant's motion should be denied.

Plaintiff as a direct blood decendant of the Osage Indian Tribe and registered as such, shall not be deprived of property, assest's, quarterly payments, probate assest's, information or due process in violation of the United States and the Constitution of the Osage Nation.

Plaintiff request this case proceed to trial, mediation or any other just solution, so that plaintiff Russell Passons Constitutional Rights are not denied.

DATED this 20th day of August, 2015.



Russell Passons/Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of August, 2015, I served a true and correct copy of the forgoing "Objection To Defendants Motion To Dismiss" via the U.S. Mail system to the persons below:

Cathryn D. McClanahan, OBA No.14853
Assistant United States Attorney
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Osage Nation Counsel
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PAWBUKA OKLAHOMA



Russell Passons/Plaintiff

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Boise Idaho 83707

14-cv-281-JHP-TLW



Postmarked 8/21/15

RECEIVED

AUG 24 2015

Phil Lombardi, Clerk
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA
Clerk of the Court
333 WEST FOURTH STREET Room 4557
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