

## In the United States Court of Federal Claims

Thomas G. Landreth

Plaintiff(s),

v.

THE UNITED STATES,

Defendant.

Case No. 18-476 C

Judge HONORABLE

PATRICIA CAMPBELL-SA

### MOTION TO SUBMIT AMICUS CURIAE BRIEF

#### SUPPORT FOR PLAINTIFF

THOMAS G. LANDRETH

BY: (PRINT YOUR NAME) PRICE M. CHENAULT, M.D.

#### Amicus Curiae

Latin for "friend of the court." Frequently, a person or group who is not a party to a lawsuit, but has a strong interest in the matter, will petition the court for permission to submit a brief in the action with the intent of influencing the court's decision. See, e.g. *American Airlines v. Wolens*, 513 US 219 (1995).

1.1. I own private property within the boundary of the Olympic National Park on the north shore of navigable Lake Quinault in the State of Washington.

1.2. I support the Plaintiff and the complaint submitted to the Federal Court of Claims by Thomas G. Landreth to have the legal standing of navigable Lake Quinault adjudicated to determine my rights to the use and access of Lake Quinault water and the shoreline between the ordinary high water mark and the ordinary low water mark abutting my private property on the north shore of Lake Quinault.

1.3. Mr. Landreth described my civil rights violated by the Quinault Indian Tribe/Nation in 2013 with the closure of navigable Lake Quinault to all non-Quinault people for all and any recreational activities within or abutting navigable Lake Quinault.

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1.4. The Quinault Indian Tribe/Nation did in fact maintain armed police patrols on navigable Lake Quinault to deter any non-Quinault people from have the full use and enjoyment of my land abutting navigable Lake Quinault.

1.5. The Quinault Indian Tribe/Nation did in fact demand the removal of all private property in navigable Lake Quinault or face a penalty or removal of the private property.

1.6. The Quinault Indian Tribe/Nation has for many decades claimed ownership and jurisdiction over the bed of navigable Lake Quinault and force the non-Quinault people to be compliant with their demands requiring application to the Quinault Indian Tribe for permission to access the lake from my private property abutting navigable Lake Quinault.

1.7. Mr. Landreth has kept me informed regarding the results of his extensive research over the past 5 years and has uncovered the facts regarding Lake Quinault.

### CONCLUSION

2.1 I have been denied and restricted to the full use and enjoyment of my private property abutting navigable Lake Quinault by the Quinault Indian Tribe/Nation.

2.2. The research concludes that my private property abutting navigable Lake Quinault gives me (A citizen and real property owner) the freedom of access with riparian rights to navigable Lake Quinault, regardless of ownership of the bed and shore land of the lake.

2.3. My rights given under the Constitution of the United States allows me the Civil Rights of free access and use of navigable Lake Quinault located within the State of Washington.

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