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WESTERN DISTRICT OF WASHINGTON
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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON;
STATE OF CALIFORNIA, et al,
Plaintiffs

vs.

DONALD J. TRUMP,
President of the United States, et al,
Defendants

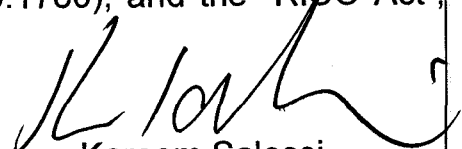
) **CASE NO. C17-0141JLR**
)
) **Motion For Reconsideration of Intervener**
) **Kareem Salessi (Dkt. # 166), pursuant to**
) **this court's Order of Denial (Dkt. # 174);**
) <https://www.courttrax.com/wp-content/uploads/2017/03/USDC-WA-W-2-17cv00141-Order-Denying-Motions-to-Intervene.pdf> **Partial Case Docket:**
) <https://dockets.justia.com/docket/washington/wawdce/2:2017cv00141/241761>

TO THE COURT, TO THE PARTIES, AND TO THE AMICI:

Pursuant to this honorable court construing my Request for Judicial Notice (Salessi-RJN), as a motion to intervene (Salessi mot. (Dkt. # 166)), and its subsequent denial (Dkt. # 174), I now file this timely Motion for Reconsideration of #166 pursuant to significant related new events, since the filing of #166.

Furthermore, standing is established pursuant to California, and federal Private Attorney General statutes, as set forth respectively, by the California Consumer Legal Remedies Act (Civil Code §§1750:1780), and the "RICO Act", Title 18 U.S.C. §§1961-1968.

Respectfully submitted.
Dated: 4/28/2017


Kareem Salessi

PRIMARY POINTS & AUTHORITIES:

In its denial order (Dkt. #174), this court cited *United States v. Alisal Water Corp.*, 370 F.3d 915, 919 (9th Cir. 2004): “The burden is on the proposed intervenor to demonstrate that the conditions for intervention are satisfied.”

Alisal, *supra*, under its section “C. Significantly Protectable Interest Relating to the Subject of the Action”, states as follows:

“The district court held that Silverwood did not assert a “significantly protectable interest relating to the property or transaction that is the subject of the action.” An applicant for intervention has a significantly protectable interest if the interest is protected by law and there is a relationship between the legally protected interest and the plaintiff’s claims. [citations]. The “interest” test is not a bright-line rule. *Id.* An applicant seeking to intervene need not show that “the interest he asserts is one that is protected by statute under which litigation is brought.” [citation] It is enough that the interest is protectable under any statute. *Id.*”

Therefore, pursuant to this court’s own guidance provided with the above Alisal decision, I can now intervene with this motion for reconsideration, pursuant to any underlying statutes. In the instant case, I resort to the Private Attorney General statutes of California, and United States, as set forth respectively by the applicable provisions of the California Consumer Legal Remedies Act (Civil Code §§1750:1780), and the “RICO Act”, Title 18 U.S.C. §§1961-1968, both of which afford any individual to raise any public policy claims on behalf of himself as well as on behalf of similarly situated California, and/or USA individuals who may be similarly affected by the claims raised.

According to Alisal, *supra*, and many other decisions, this court has the discretion to grant Salessi-RJN (Dkt. #166), by accommodating, and granting this motion. However, if the court sets out against the motion *ab initio*, then no amount of legal, and/or evidential reasoning would alter a final denial. Intervener here requests the court to reconsider the granting of Salessi-RJN with a human vision beyond the scope of the so called “Muslim Ban” which initiated this lawsuit,

1 and with a vision to prevent a likely nuclear World War Three (WW-3), as I had
2 written to California, and U.S. DOJ, in February of 2009, and linked herein below:

3 <https://kareemsalessi.files.wordpress.com/2011/03/e2809c2-20-2009-world-war-3-letter-to-california-governor-jerry-brown-us-doje2809d.pdf>

4 In the above letter, I documented “the 2008 American meltdown” as USA’s
5 foundation to spearhead World War Three (WWIII), in addition to having
6 documented in court papers, since 2004, that “the 2008 American meltdown” had
7 been engineered to initiate an American genocide with fraudulent foreclosures,
8 which has taken place just as I had diagnosed it:

9 https://groups.yahoo.com/neo/groups/the_iraqi/conversations/topics/12245

10 Around 15,000,000 homes (a quarter of USA homes) have been fraudulently
11 foreclosed, and stolen, in the past nine years, leading to the early deaths of at least ten
12 million Americans (10,000,000) ever since, yet not a single Major Stream Media (MSM)
13 has ever discussed this silent genocide because MSM have been an integrated part of
14 its concealments. In support of the above genocide, the new USA regime has even
15 appointed several king-pins of “The 2008 USA financial meltdown”, who are also king-
16 pins of “USA Foreclosure Genocide Industry”, as I had documented in my 9th Circuit
17 Opening Brief, in Case# 13-57063, linked in (Dkt. #166). American courts played active
18 roles in the fruition of the recent, and ongoing, “USA Foreclosure Genocide”.¹

19 Except for JFK, all USA presidents, since at least 1900, have exercised
20 total disregard for human life, both in USA and abroad. Nearly a century ago, this
21 had been well documented by General Smedley Butler, and accessible in
22 YOUTUBE: General Smedley Butler war is a racket

23 https://www.youtube.com/results?search_query=%22general+smedley+butler+war+is+a+racket%22

24
25 ¹ Judge Dale Chase (retired) in his recent book, page 96:

26 “Given these circumstances, it was absolutely necessary for them to involve the Judges in
27 their criminal conduct. Foreclosure Judges receive 10% of the original Promissory Note,
28 after they authorize the bank to steal and sell your assets in foreclosure.”

“THE GREAT AMERICAN ADVENTURE SECRETS OF AMERICA”

<http://www.stopthecrime.net/docs/THE-GREAT-AMERICAN-ADVENTURE.pdf>

1 In the past few decades, homeland USA genocides have been performed
2 with "Bio-Chemical Weapons of Mass-Destruction" ("Bio-Chem-WMD"),
3 including, but not limited to: poison vaccines; Chemtrails; GMOs; poisonous food
4 and water additives; poisonous prescription drugs, such as opioids; and
5 countless toxic compounds, some of which have been described in the 2017
6 book of attorney/victim Alan Bell: "Poisoned: How a Crime-busting Prosecutor
7 Turned His Medical Mystery Into a Crusade for Environmental Victims".

8 This American court now can sit back and watch WW-3 unfold, with the
9 new USA Regime as its conduit, or it can likely prevent it by granting this motion
10 and taking judicial notice of the facts presented (Dkt. #166), now supported with
11 new facts and events presented below, as a requisite of bringing a motion for
12 reconsideration. The unfolding of the facts, and/or events, requested of this court
13 to take judicial notice of in (Dkt. #166), either by judicial admission, or by waiver
14 of denial, and/or by failure to explain, will most likely redirect the new USA
15 Regime to unlocking "internal homeland USA terrorism", and deter it from its
16 current path to a nuclear WW-3, evidently beginning with Korea, despite having
17 already murdered over a million Koreans fifty years ago, and having murdered
18 several millions in South-East Asia, after America's Korean genocide.

19 **NEW FACTS:**

20 Since the filing of (Dkt. #166) many of its referenced web-based
21 documents have already been pulled from the web, and/or the contents of many
22 of the linked pages have been sanitized! For instance, most of the referenced
23 contents on VeteransToday pages, in addition to whole articles, which had been
24 archived for years have been deleted in the past month. Some referenced
25 YOUTUBE documentaries, such as the free-view Yugoslav space project,
26 secretly sold to the world as NASA-Apollo's, have been deleted! Meantime,
27 "Solving 9/11 Enigma", the exhibit to #166, was revised, and posted online, and
28 is best viewable in a Windows browser: <https://kareemsalessi.com/solving-911-enigma/>

1 Before the filing of #166, POTUS had been outspoken against USA foreign
2 interventions, and had been poised to the rebuilding of USA industrial
3 infrastructure as its top priority.²

4 POTUS flip-flopping of many of his foreign policies has made it clear that
5 POTUS has been acting against his own original will and intentions, and most
6 likely under the duress of the World's Shadow Government operated by the
7 European Royals and Elite, as described in (Dkt. #166) with references.

8 As just one of the instances of POTUS flip-flopping, until recently, POTUS
9 publicly stated that Syria's President Assad was a hero, as he was defending
10 Syrian people and Syria's sovereignty, as against destruction and genocide by
11 ISIS and its backers. However, in the past month, POTUS, having had access to
12 ample information (published and USA-intel), that the 2013, and the 2017, Syrian
13 poison gas attacks had been staged by NATO-made terrorists (ISIS), which had
14 been supplied with the chemicals from NATO countries, and through Turkey. The
15 NATO terrorists had actually filmed themselves firing their improvised poison gas
16 rockets and posted its videos on YOUTUBE: 2013 SYRIAN REBELS GAS
17 ATTACK, or follow link:

18 https://www.youtube.com/results?search_query=2013+SYRIAN+REBELS+GAS+ATTACK

19 The 2017 poison gas attack had evidently been coordinated among NATO
20 members (including USA), and executed by the UK-based terrorist group called
21 "White Helmets" which had been on the scene moving bodies, while themselves
22 going unscathed from the purported Sarin Gas, which is an impossibility,
23 according to, *inter alia*, Scott Ritter, former UN weapons inspector/expert to Iraq.

24 Several USA-terrorist-attacks, murdering over 1,000 victims, have
25 occurred since the filing of #166, in Yemen, Syria and Afghanistan, in the first 80
26 days of the new regime. By some accounts US-Military dropped a mini-nuclear

27
28 ² "POTUS" = President of The United States (President Trump), (i.e.: the new USA regime)

1 bomb, and/or chemical weapons on Afghanistan (VeteransToday). POTUS has
2 likely been acting under duress to sign off on all the recent USA-Terrorist-Attacks
3 as against his own will, and will likely be relieved by this court if this court helps
4 unlock the uncontested facts documented in (Dkt. #166), the most important of
5 which is probably to take judicial notice of the fact that USA governments have at
6 all times been under the control of, little known, genetically non-human creatures,
7 commonly described as "Shapeshifters", and/or "Shape-Shifting Reptilians",
8 some of which may have been documented by the recently released CNN
9 presidential inauguration photos taken by a CNN ultra-high definition camera,
10 "CNN GIGAPIXEL", the original of which is linked below:

11 <http://www.cnn.com/interactive/2017/01/politics/trump-inauguration-gigapixel/>

12 The following search, of the above photo, pinpoints at least three obvious
13 non-human creatures during shape-shifting:

14 YOUTUBE: CNN megapixel shapeshift

15 https://www.youtube.com/results?search_query=cnn+gigapixel+shapeshift

16 Two of the above shape-shifting men appear to be familiar TV personalities.

17 It is thus imperative that this honorable court liberally accept my
18 intervention as in the role of a Private Attorney General and thus move to
19 reconsider my standing, and based on the reconsideration motion standards as
20 set before the court below:

21 **MEMORANDUM OF POINTS AND AUTHORITIES**

22
23 Movant Kareem Salessi's instant motion for reconsideration, of his
24 (Dkt.#166) is herein brought based primarily pursuant to either 1) Federal Rule of
25 Civil Procedure 54(b), which allows a district court to revise an interlocutory order
26 "that adjudicates fewer than all the claims ... at any time before entry of a
27 judgment adjudicating all the claims," or 2) the district court's inherent common-
28 law authority to rescind or modify any interlocutory order so long as the court

1 retains jurisdiction over the matter. See: *Credit Suisse First Boston Corp. v.*
2 *Grunwald*, 400 F.3d 1119, 1124 (9th Cir.2005).

3 Reconsideration is an “extraordinary remedy, to be used sparingly in the
4 interests of finality and conservation of judicial resources.” *Kona Enters., Inc. v.*
5 *Estate of Bishop*, 229 F.3d 877, 890 (9th Cir.2000). Motions for reconsideration
6 brought under Rule 59(e) are typically not granted “unless the district court is
7 presented with newly discovered evidence, committed clear error, or if there is an
8 intervening change in the controlling law.” *389 Orange St. Partners v. Arnold*, 179
9 F.3d 656, 665 (9th Cir.1999).

10 However, Rule 54(b) does not address the standards a district court should
11 apply when reconsidering an interlocutory order, and this Washington District has
12 no local rule governing motions for reconsideration. Cf. W.D. Wash. CR 7(h)(1).
13 However, when reviewing motions for reconsideration of interlocutory orders,
14 district courts in the Ninth Circuit generally apply standards of review
15 substantially similar to those used under Rules 59(e) and 60(b). See, e.g., *Nike,*
16 *Inc. v. Dixon*, 163 Fed. Appx. 908 (Fed.Cir.2006); *Motorola, Inc. v. J.B. Rodgers*
17 *Mech. Contractors*, 215 F.R.D. 581, 583–86 (D.Ariz.2003) (surveying relevant
18 local rules for districts throughout the Ninth Circuit). Similarly, Washington State’s
19 federal courts have adopted the following conditions in determining whether a
20 motion for reconsideration may be granted:

21 1) There are material differences in fact or law from that presented to the
22 Court and, at the time of the Court’s decision, the party moving for
23 reconsideration could not have known of the factual or legal differences through
24 reasonable diligence;

25 2) There are new material facts that happened after the Court’s decision;

26 3) There has been a change in the law that was decided or enacted after
27 the Court’s decision; or

28

CERTIFICATE OF SERVICE BY MAIL

CASE NO. C17-0141JLR

I, Catherine Carlson, declare:

I, Catherine Carlson am NOT a party to this action.

My business address is:

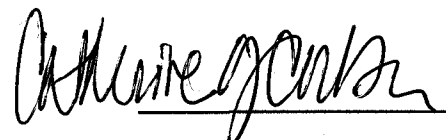
Barrett Reporting, Inc., 17332 Irvine Blvd #220, Tustin, CA 92780

On **5/1/17**, I deposited in the United States mail at **TUSTIN**, California, a copy (or original as the Code requires) of the following document(s): **Motion For Reconsideration of Intervener Kareem Salessi (Dkt. # 166)**, pursuant to this court's Order of Denial (Dkt. # 174);

Addressed to:

<p>CASE NO. C17-0141JLR UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 700 Stewart St., Seattle, WA 98101 Phone: (206) 370-8400</p>	<p>9th Circuit Case# 17-35105 NOEL FRANCISCO; Acting Solicitor General c/o: Civil Division, Room 7241 U.S. Dept. of Justice 950 Pennsylvania Ave., NW Washington, DC 20530</p>
<p>9th Circuit Case# 17-35105 ROBERT W. FERGUSON, WSBA 26004 Attorney General of Washington Office of the Attorney General 800 Fifth Avenue, Suite 2000 Seattle, WA 98104</p>	<p>SCOTT J. KAPLAN, Senior Assistant Attorney General Oregon Department of Justice 100 Market Street Portland, OR 97201 971-673-1880</p>
<p>Alexandra Robert Gordon Deputy Attorney General Office of the Attorney General 455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004 Telephone: (415) 703-5509</p>	<p>MEGHAN K. CASEY Assistant Attorney General Office of Maryland Attorney General 200 St. Paul Place, 20th Floor Baltimore, Maryland 21202 Telephone: (410) 576-6325</p>
<p>ELIZABETH N. DEWAR State Solicitor One Ashburton Place Boston, MA 02108 617-963-2204</p>	<p>LOURDES M. ROSADO Bureau Chief, Civil Rights Bureau New York State Attorney General 120 Broadway New York, New York 10271</p>

I declare under penalty of perjury that the foregoing is true and correct.
Executed on **5/1/17**, in Orange County, California.



CASE NO. C17-0141JLR
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
700 Stewart St., Seattle, WA 98101
Phone: (206) 370-8400

